

Q3

State of the Market Report for PJM
January through September

Monitoring Analytics, LLC

Independent
Market Monitor
for PJM

11.9.2017

2017

Preface

The PJM Market Monitoring Plan provides:

The Market Monitoring Unit shall prepare and submit contemporaneously to the Commission, the State Commissions, the PJM Board, PJM Management and to the PJM Members Committee, annual state-of-the-market reports on the state of competition within, and the efficiency of, the PJM Markets, and quarterly reports that update selected portions of the annual report and which may focus on certain topics of particular interest to the Market Monitoring Unit. The quarterly reports shall not be as extensive as the annual reports. In its annual, quarterly and other reports, the Market Monitoring Unit may make recommendations regarding any matter within its purview. The annual reports shall, and the quarterly reports may, address, among other things, the extent to which prices in the PJM Markets reflect competitive outcomes, the structural competitiveness of the PJM Markets, the effectiveness of bid mitigation rules, and the effectiveness of the PJM Markets in signaling infrastructure investment. These annual reports shall, and the quarterly reports may include recommendations as to whether changes to the Market Monitoring Unit or the Plan are required.¹

Accordingly, Monitoring Analytics, LLC, which serves as the Market Monitoring Unit (MMU) for PJM Interconnection, L.L.C. (PJM),² and is also known as the Independent Market Monitor for PJM (IMM), submits this *2017 Quarterly State of the Market Report for PJM: January through September*.³

¹ PJM Open Access Transmission Tariff (OATT) Attachment M (PJM Market Monitoring Plan) § VI.A. Capitalized terms used herein and not otherwise defined have the meaning provided in the OATT, PJM Operating Agreement, PJM Reliability Assurance Agreement or other tariff that PJM has on file with the Federal Energy Regulatory Commission (FERC or Commission).

² OATT Attachment M.

³ All references to this report should refer to the source as Monitoring Analytics, LLC, and should include the complete name of the report: *2017 Quarterly State of the Market Report for PJM: January through September*.

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Introduction

2017 Q3 in Review

The results of the energy market and the results of the capacity market were competitive in the first nine months of 2017. The goal of competition is to provide customers wholesale power at the lowest possible price, but no lower. The PJM markets work. The PJM markets bring customers the benefits of competition. But the PJM markets, and wholesale power markets in the U.S., face new challenges that potentially threaten the viability of competitive markets.

Particularly in times of stress on markets and when some flaws in markets are revealed, nonmarket solutions may appear attractive. Top down, integrated resource planning approaches are tempting because it is easy to think that experts know exactly the right mix and location of generation resources and the appropriate definition of resource diversity, reliability and resilience, and therefore which technologies should be favored through exceptions to market rules. The provision of subsidies to favored technologies, whether solar, wind, coal, batteries, demand side or nuclear, is tempting for those who would benefit, but subsidies are a form of integrated resource planning that is not consistent with markets. Subsidies to existing units are no different in concept than subsidies to planned units and are equally inconsistent with markets. Proposals for fuel diversity are generally proposals to subsidize an existing, uneconomic technology. Subsidies are tempting because they maintain existing resources and provide increased revenues to asset owners in uncertain markets. Cost of service regulation is tempting because cost of service regulation incorporates integrated resource planning and because guaranteed rates of return and fixed prices may look attractive to asset owners in uncertain markets. Changing LMP to increase revenues to preferred technologies is also tempting and no more consistent with markets than cost of service regulation.

It is essential that any approach to the PJM markets and the PJM Capacity Market incorporate a consistent view of how the preferred market design is expected to work to provide competitive results in a sustainable market design

over the long run. A sustainable market design means a market design that results in appropriate incentives to retire units and to invest in new units over time such that reliability is ensured as a result of the functioning of the market. There are at least two broad paradigms that could result in such an outcome. The market paradigm includes a full set of markets, most importantly the energy market and capacity market, which together ensure that there are adequate revenues to incent new generation when it is needed and to incent retirement of units when appropriate. This approach will result in long term reliability at the lowest possible cost.

The quasi-market paradigm includes an energy market based on LMP but addresses the need for investment incentives via the long term contract model or the cost of service model. In the quasi-market paradigm, competition to build capacity is limited and does not include the entire PJM footprint. In the quasi-market paradigm, customers absorb the risks associated with investment in and ownership of generation assets through guaranteed payments under either guaranteed long term contracts or the cost of service approach. In the quasi-market paradigm there is no market clearing pricing to incent investment in existing units or new units. In the quasi-market paradigm there is no incentive for entities without cost of service treatment to enter and thus competition is effectively eliminated.

The market paradigm and the quasi-market paradigm are mutually exclusive. Once the decision is made that market outcomes must be fundamentally modified, it will be virtually impossible to return to markets. While there are entities in the PJM markets that continue to operate under the quasi-market paradigm, those entities have made a long term decision on a regulatory model and the PJM rules generally limit any associated, potential negative impacts on markets. That consistent approach to the regulatory model is very different from current attempts to subsidize specific market assets that are uneconomic as a result of competition. Subsidies are an effort to reverse market outcomes with no commitment to a regulatory model and no attempt to mitigate negative impacts on competition. The subsidy model is inconsistent with the PJM market design and inconsistent with the market paradigm and constitutes a significant threat to both.

The issue of external subsidies continued to evolve in the first nine months of 2017, including the DOE Proposal in September. These subsidies are not directly part of the PJM market design but nonetheless threaten the foundations of the PJM capacity market and the PJM energy market as well as the competitiveness of PJM markets overall.

The Ohio subsidy proceedings and the Illinois ZEC subsidy proceeding all originated from the fact that competitive markets result in the exit of uneconomic and uncompetitive generating units. Regardless of the specific rationales offered by unit owners, the proposed solution for all such generating units has been to provide out of market subsidies in order to retain such units. These subsidies are not accurately characterized as state subsidies. These subsidies were all requested by the owners of specific uneconomic generating units in order to improve the profitability of those specific units. These subsidies were not requested to accomplish broader social goals. Broader social goals can all be met with market based mechanisms available to all market participants on a competitive basis and without discrimination.

The proponents of subsidies and of the concomitant significant alterations to the PJM capacity market and energy market designs have not demonstrated that there is a systematic problem rather than an uneconomic unit specific problem. Proponents have not demonstrated that the technologies in question actually need subsidies or higher revenues from market design changes. Over the last twelve months, fewer than a quarter of nuclear units in PJM did not recover avoidable costs from energy and capacity revenues. The average LMP increase of 5.3 percent between the 12 months ended September 30, 2017, and 2016, resulted in all nuclear plants recovering more than 90 percent of avoidable costs for the 12 months ended September 30, 2017. Assertions about the impact of negative prices are also not supported. Negative LMPs reduced nuclear plant net revenues by an average of 0.3 percent and a maximum of 2.6 percent in 2016.

But, there are some nuclear power plants in PJM that are not economic at recent levels of energy and capacity market clearing prices. The decisions on how to proceed belong to the owners of those plants. The fact that some plants

are uneconomic does not call into question the fundamentals of PJM markets. Many generating plants have retired in PJM since the introduction of markets and many generating plants have been built since the introduction of markets.

The proposed subsidy solutions in all cases ignore the opportunity cost of subsidizing uneconomic units, which is the displacement of resources and technologies that would otherwise be economic. A decision to subsidize uneconomic units that are a significant source of energy and capacity has direct and significant impacts on other sources of energy; the opportunity costs of subsidies are substantial. Such subsidies suppress energy and capacity market prices and therefore suppress incentives for investments in new, higher efficiency thermal plants but also suppress investment incentives for the next generation of energy supply technologies and energy efficiency technologies. These impacts are long lasting but difficult to quantify precisely.

Subsidies are contagious. Competition in the markets could be replaced by competition to receive subsidies. PJM markets have no protection against this emergent threat. Accurate signals for entry and exit are necessary for well functioning and competitive markets. Competitive investors rely on accurate signals to make decisions. Similar threats to competitive markets are being discussed by unit owners in other states and the potentially precedential nature of these actions enhances the urgency of creating an effective rule to maintain competitive markets by modifying market rules to address these subsidies. Fortunately, this can be accomplished quickly by expanding the coverage of an existing rule that already reflects stakeholder compromises.

The current proposals for subsidies demonstrate that the markets need protection against subsidized, noncompetitive offers from existing as well as new resources. The current minimum offer price rule (MOPR) only addresses subsidies for new entry. The MOPR should be expanded to address subsidies for existing units. An extended MOPR (MOPR-Ex) is the best means to defend the PJM markets from the threat posed by subsidies intended to forestall retirement of financially distressed assets. The role of subsidies to renewables should also be clearly defined and incorporated in this rule.

A MOPR-Ex is a simple and straightforward approach to ensuring that the impact of state subsidies on markets is limited and the impact on other states is limited and that there is a disincentive for such subsidies. MOPR-Ex, with exemptions for competitive entry, for self supply by cost of service utilities, for self supply by public power entities and for competitive RPS programs is a practical and narrowly targeted approach to protecting competitive wholesale power markets. An extended MOPR is a better way to maintain PJM markets than the PJM proposal to permit subsidized units to displace competitive units that could result in the capacity market becoming a residual market. The PJM capacity market and PJM markets overall cannot function as markets if the capacity market is a residual market. The current design requires all capacity resources to offer and all load to buy capacity, except those companies that elect the FRR option and keep load and generation out of the capacity market.

While an extended MOPR would protect markets in the short run, the underlying issues that have resulted in the pressure on markets should also be examined. Unit owners are seeking subsidies because gas prices are low resulting in low energy market margins and because flaws in the PJM capacity design have led to very substantial price suppression over the past 10 years.

Much of the reason that overall market outcomes are subject to legitimate criticism is that the capacity market has not been permitted to reveal the underlying supply and demand fundamentals in prices. Before market outcomes are rejected in favor of nonmarket choices, the capacity market should be permitted to work. It is more critical than ever to get capacity market prices correct. A number of capacity market design elements resulted in a substantial suppression of capacity market prices for multiple years.

These market design choices have and have had substantial impacts. Capacity prices that were suppressed substantially below the level consistent with supply and demand fundamentals affected some participants' long term decisions and led some market participants to seek subsidies. PJM has addressed the fundamental issues of the capacity market design in its Capacity Performance design, including price formation, product definition and performance incentives. But there are significant ongoing efforts to undo some of the

key elements of the Capacity Performance design including performance incentives and product definition.

The proponents of subsidies are also proposing changes to the PJM market design to increase revenues to specific technologies. Within the market paradigm, the temptation to modify other elements of the PJM energy and capacity market design in order to address asserted issues related to the level of prices or the shape of the supply curve is just another manifestation of the goal to change market outcomes and should also be resisted. The PJM supply curve is not flat. One of the lessons of the history of PJM capacity market design is that design changes based on short term, nonmarket considerations can have long term, significant, negative unintended consequences. The logic of LMP is fully consistent with efficient and competitive markets. The basic logic of LMP should not be modified in order to increase prices, or off peak prices or revenues. The shape of the supply curve does not affect the basic logic of LMP and LMP should not be arbitrarily modified in order to meet a goal not related to the logic of LMP. The capacity market design should not be modified in order to introduce elements of integrated resource planning to favor specific technologies. Improvements to the market design should be made when consistent with the basic market design logic, including better pricing when transmission constraints are violated and better and more locational scarcity pricing and improved incentives for flexible units by ending the practice of paying uplift to units based on inflexible operating parameters.

To the extent that there are shared broader goals related to PJM markets, they should also be addressed. If society determines that carbon is a pollutant with a negative value, a market approach to carbon is preferred to a technology or unit specific subsidy approach. Implementation of a carbon price is a market approach which would let market participants respond in efficient and innovative ways to the price signal rather than relying on planners to identify specific technologies or resources to be subsidized. If a shared goal is increased renewables in addition to their carbon attributes, a common approach to RECs would be a market based solution. Fuel diversity has also been mentioned as an issue. Current fuel diversity is higher than ever in PJM. If there is an

issue, the real issue is fuel security and not fuel diversity. Significant reliance on specific fuels, including nuclear, coal and gas means that markets are at risk from a significant disruption in any one fuel. As part of ensuring that a grid that relies on gas, coal and nuclear for very similar shares of energy, PJM should continue to evolve its approaches to evaluating reliability and extend those to the gas infrastructure, the coal infrastructure and the nuclear infrastructure. Risks associated with gas deliverability, with coal deliverability and availability to produce energy and with nuclear common mode issues could all be part of this evaluation.

Competitive markets were introduced as an alternative form of regulation to ensure that wholesale power is provided at the lowest possible price. The PJM market design does not incorporate a laissez faire approach. The PJM market remains regulated. The PJM market design incorporates a variety of rules designed to help ensure competitive outcomes. When basic elements of those rules are modified, e.g. the raising of the overall \$1,000 per MWh offer cap and the introduction of hourly offers in place of daily offers, it is essential that effective market power mitigation be maintained. While the three pivotal supplier test addresses local market power associated with transmission constrained markets, it does not address aggregate market power. Aggregate market power exists when generation owners have the ability to raise market prices above competitive levels in the absence of transmission constraints, for example when demand is high and market conditions are tight. The failure to maintain limits on aggregate market power will lead to the exercise of market power and the associated negative impacts on the competitiveness of PJM markets.

A primary market power mitigation rule in PJM is the three pivotal supplier (TPS) test. The TPS test is applied by PJM on an ongoing basis for local energy markets in order to determine whether offer capping is required for transmission constraints. The TPS test is a flexible, targeted real-time measure of market structure which replaced the prior approach of offer capping all units required to relieve a constraint. But there are some issues with the application of mitigation when market sellers fail the TPS test. There is no tariff or manual language that defines in detail the application of the TPS test

and mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market. In both the Day-Ahead and Real-Time Energy Markets, generators have the ability to avoid mitigation by using varying markups in their price-based offers, offering different operating parameters in their price-based and cost-based offers, and using different fuels in their price-based and cost-based offers. These issues with mitigation can and should be resolved by simple rule changes requiring that markup be constant across price and cost offers, that there be at least one cost-based offer using the same fuel as the available price-based offer, that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer, and requiring cost-based and price-based PLS offers to be at least as flexible as price-based non-PLS offers. The significance of implementing these rule changes is substantially increased with the introduction of hourly offers.

The price of energy must reflect supply and demand fundamentals. The inclusion of gas costs and other fuel costs in energy market offers must be based on market prices. The fuel cost policy for every unit documents the process by which a unit owner calculates the fuel cost component of its cost-based offers. Fuel cost policies must be algorithmic, verifiable and systematic to ensure that only market-based short run marginal costs are included in fuel costs, especially when markets are stressed. FERC's order on hourly offers means that generators have the ability to appropriately reflect gas cost changes in energy offers during the operating day in order to permit the energy market to reflect the current cost of gas. But offer changes should be based only on algorithmic and verifiable changes in gas cost and therefore not permit the exercise of market power.

The application of market power mitigation rules in the Day-Ahead Energy Market and the Real-Time Energy Market helps ensure competitive market outcomes even in the presence of structural market power. But the efficacy of market power mitigation rules depends on the definition of a competitive offer. A competitive offer is equal to short run marginal costs. The enforcement of market power mitigation rules is undermined if the definition of a competitive offer is not correct. The significance of competition metrics like markup is also undermined if the definition of a competitive offer is not correct. The

definition of a competitive offer, as currently interpreted by PJM, is not correct. Some unit owners include costs that are not short run marginal costs in offers, including long term maintenance costs. This issue can be resolved by simple changes to the PJM Market Rules to incorporate a clear and accurate definition of short run marginal costs. PJM Manual 15 should be replaced with a straightforward description of the components of cost offers based on short run marginal costs and the correct calculation of cost offers.

The overall energy market results in the first nine months of 2017 support the conclusion that energy prices in PJM are set, generally, by marginal units offering at, or close to, their short run marginal costs, although this is not always the case during high demand hours. This is evidence of generally competitive behavior, although the behavior of some participants during high demand periods raises concerns about economic withholding. The performance of the PJM markets under high load conditions has raised a number of concerns related to aggregate market power, or the ability to increase markups substantially in tight market conditions, related to the uncertainties about the pricing and availability of natural gas, and related to the role of demand response and interchange transactions.

One of the benefits of competitive power markets is that changes in input prices and changes in the balance of supply and demand are reflected immediately in energy prices. PJM real-time energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The load-weighted average real-time LMP was 3.5 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.36 per MWh versus \$29.32 per MWh. Energy prices were higher primarily as a result of higher fuel prices.

The markup conduct of individual owners and units has an identifiable impact on market prices. In the Real-Time Energy Market, the adjusted markup component of LMP increased from 8.1 percent of the real-time load-weighted average LMP in the first nine months of 2016 to 15.6 percent in the first nine months of 2017. Participant behavior was evaluated as competitive because marginal units generally made offers at, or close to, their short run

marginal costs. But the increased markup results and the markup results for high demand periods are a reminder that aggregate market power remains an issue when market conditions are tight and that market design choices must account for the potential to exercise aggregate market power. There are generation owners who routinely include high markups in price-based offers on some units. These markups do not affect prices under normal conditions but may affect prices during high demand conditions.

Net revenue is a key measure of overall market performance as well as a measure of the incentive to invest in new generation to serve PJM markets. Energy net revenues are significantly affected by energy prices and fuel prices. Energy prices and fuel prices were higher in the first nine months of 2017 than in the first nine months of 2016. Natural gas prices increased more than LMP and CTs and CCs ran fewer hours with lower margins as a result. Coal prices increased more than LMP but less than gas prices and CPs ran for more hours in the first nine months of 2017 than in the first nine months of 2016. In the first nine months of 2017, average energy market net revenues decreased by 51 percent for a new CT, 28 percent for a new CC, 17 percent for a new CP, 6 percent for a new DS, and 9 percent for a new solar installation compared to the first nine months of 2016. Average energy market net revenues increased by 6 percent for a new nuclear plant, and 15 percent for a new wind installation compared to the first nine months of 2016.

Load pays for the transmission system and contributes congestion revenues. For that reason, FTRs and later ARR were intended to return congestion revenues to load. The annual ARR allocation should be designed to ensure that load receives the rights to congestion revenues, without requiring contract path physical transmission rights that are impossible to define correctly and enforce in nodal, network LMP markets. The current ARR/FTR design does not serve as an efficient or effective way to ensure that load receives all the congestion revenues or that load receives the auction revenues associated with all the potential congestion revenues.

The goal of the design should be to assign the rights to 100 percent of the congestion revenues to load. But the actual results fall well short of that goal.

The current allocation of congestion revenue resulted in a total of \$1,714.8 million in unreturned congestion revenue to ARR holders, and a 73.9 percent congestion offset over the last seven planning periods.

On September 15, 2016, FERC issued an order that moved the market design substantially further from the goal of returning congestion revenues to load. The order shifted costs to load and shifted revenues to FTR holders. The order assigned the costs of balancing congestion to load, assigned excess auction revenues to FTR holders and assigned all day-ahead congestion revenues in excess of target allocations to FTR holders. If the new rules had been in place beginning with the 2011/12 planning period and the ARR/FTR allocations had remained the same, ARR holders would have received \$1,055.7 million less in congestion offsets for the 2011/2012 through the 2017/2018 planning periods. The total overpayment to FTR holders for the 2011/2012 through 2017/2018 planning period would have been \$962.9 million.

The FTR/ARR design should be significantly modified in order to return the design to its original purpose and function, which was to return congestion revenues to load.

The PJM markets and PJM market participants from all sectors face significant challenges. PJM and its market participants will need to continue to work constructively to address these challenges to ensure the continued effectiveness of PJM markets.

PJM Market Summary Statistics

Table 1-1 shows selected summary statistics describing PJM markets.

Table 1-1 PJM Market Summary Statistics: January 1 through September 30, 2016 and 2017¹

	Jan - Sep, 2016	Jan - Sep, 2017	Percent Change
Peak Load (MW)	152,177	145,636	(4.3%)
Installed Capacity at September 30 (MW)	182,447	182,459	0.0%
Load Weighted Average Real Time LMP (\$/MWh)	\$29.32	\$30.36	3.5%
Total Congestion Costs (\$ Million)	\$822.20	\$455.40	(44.6%)
Total Uplift Charges (\$ Million)	\$102.32	\$86.29	(15.7%)
Total PJM Billing (\$ Billion)	\$29.49	\$29.51	0.1%

PJM Market Background

The PJM Interconnection, L.L.C. (PJM) operates a centrally dispatched, competitive wholesale electric power market that, as of September 30, 2017, had installed generating capacity of 182,459 megawatts (MW) and 1,019 members including market buyers, sellers and traders of electricity in a region including more than 65 million people in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia (Figure 1-1).^{2 3 4}

As part of the market operator function, PJM coordinates and directs the operation of the transmission grid and plans transmission expansion improvements to maintain grid reliability in this region.

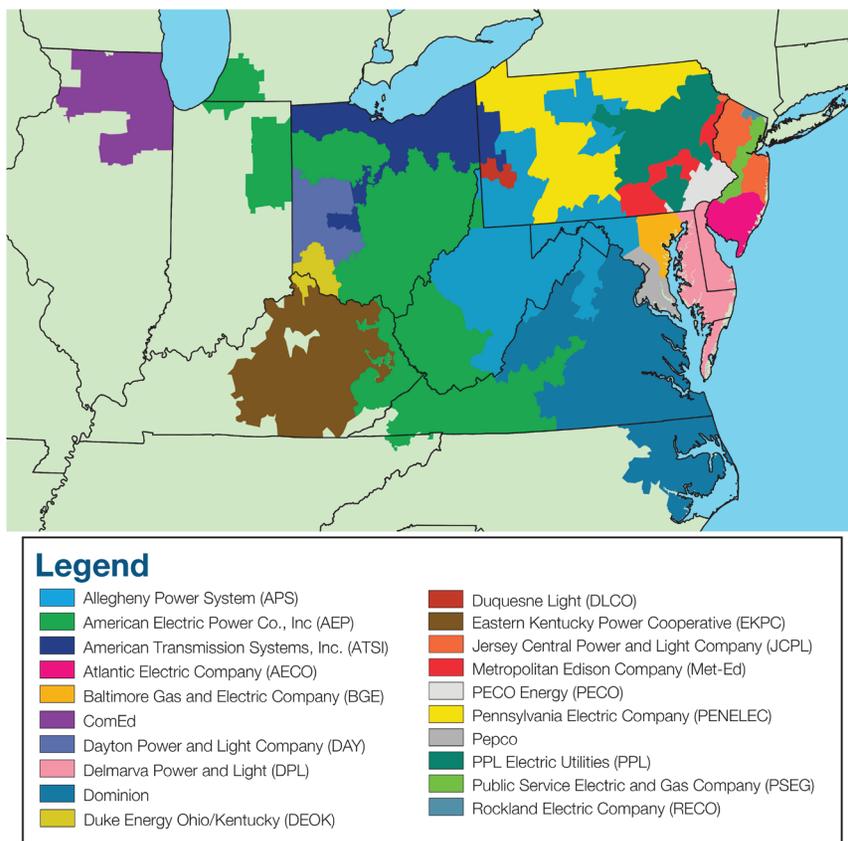
¹ The load reported in this table is the accounting load plus net withdrawals at generator buses. The average hourly accounting load is reported in Section 3, "Energy Market."

² See PJM. "Member List," which can be accessed at: <<http://pjm.com/about-pjm/member-services/member-list.aspx>>.

³ See PJM. "Who We Are," which can be accessed at: <<http://pjm.com/about-pjm/who-we-are.aspx>>.

⁴ See the 2016 State of the Market Report for PJM, Volume II, Appendix A: "PJM Geography" for maps showing the PJM footprint and its evolution prior to 2017.

Figure 1-1 PJM's footprint and its 20 control zones



In the first nine months of 2017, PJM had total billings of \$29.51 billion, an increase of 0.1 percent from \$29.49 billion in the first nine months of 2016.⁵

PJM operates the Day-Ahead Energy Market, the Real-Time Energy Market, the Reliability Pricing Model (RPM) Capacity Market, the Regulation Market, the Synchronized Reserve Market, the Day-Ahead Scheduling Reserve (DASR) Market and the Financial Transmission Rights (FTRs) Markets.

⁵ Monthly and year to date billing values are provided by PJM.

PJM introduced energy pricing with cost-based offers and market-clearing nodal prices on April 1, 1998, and market-clearing nodal prices with market-based offers on April 1, 1999. PJM introduced the Daily Capacity Market on January 1, 1999, and the Monthly and Multimonthly Capacity Markets for the January through May 1999 period. PJM implemented FTRs on May 1, 1999. PJM implemented the Day-Ahead Energy Market and the Regulation Market on June 1, 2000. PJM modified the Regulation Market design and added a market in Synchronized Reserve on December 1, 2002. PJM introduced an Auction Revenue Rights (ARR) allocation process and an associated Annual FTR Auction effective June 1, 2003. PJM introduced the RPM Capacity Market effective June 1, 2007. PJM implemented the DASR Market on June 1, 2008.^{6,7} PJM introduced the Capacity Performance capacity market design effective on August 10, 2015, with the Base Residual Auction for 2018/2019.

Conclusions

This report assesses the competitiveness of the markets managed by PJM in the first nine months of 2017, including market structure, participant behavior and market performance. This report was prepared by and represents the analysis of the Independent Market Monitor for PJM, also referred to as the Market Monitoring Unit or MMU.

For each PJM market, the market structure is evaluated as competitive or not competitive, and participant behavior is evaluated as competitive or not competitive. Most important, the outcome of each market, market performance, is evaluated as competitive or not competitive.

The MMU also evaluates the market design for each market. The market design serves as the vehicle for translating participant behavior within the market structure into market performance. This report evaluates the effectiveness

⁶ See also the *2016 State of the Market Report for PJM*, Volume 2, Appendix B: "PJM Market Milestones."

⁷ Analysis of 2017 market results requires comparison to prior years. During calendar years 2004 and 2005, PJM conducted the phased integration of five control zones: ComEd, American Electric Power (AEP), The Dayton Power & Light Company (DAY), Duquesne Light Company (DLCO) and Dominion. In June 2011, the American Transmission Systems, Inc. (ATSI) Control Zone joined PJM. In January 2012, the Duke Energy Ohio/Kentucky Control Zone joined PJM. In June 2013, the Eastern Kentucky Power Cooperative (EKPC) joined PJM. By convention, control zones bear the name of a large utility service provider working within their boundaries. The nomenclature applies to the geographic area, not to any single company. For additional information on the integrations, their timing and their impact on the footprint of the PJM service territory prior to 2017, see *2016 State of the Market Report for PJM*, Volume 2, Appendix A: "PJM Geography."

of the market design of each PJM market in providing market performance consistent with competitive results.

Market structure refers to the ownership structure of the market. The three pivotal supplier (TPS) test is the most relevant measure of market structure because it accounts for both the ownership of assets and the relationship between the pattern of ownership among multiple entities and the market demand using actual market conditions with both temporal and geographic granularity. Market shares and the related Herfindahl-Hirschman Index (HHI) are also measures of market structure.

Participant behavior refers to the actions of individual market participants, also sometimes referred to as participant conduct.

Market performance refers to the outcome of the market. Market performance reflects the behavior of market participants within a market structure, mediated by market design.

Market design means the rules under which the entire relevant market operates, including the software that implements the market rules. Market rules include the definition of the product, the definition of short run marginal cost, rules governing offer behavior, market power mitigation rules, and the definition of demand. Market design is characterized as effective, mixed or flawed. An effective market design provides incentives for competitive behavior and permits competitive outcomes. A mixed market design has significant issues that constrain the potential for competitive behavior to result in competitive market outcomes, and does not have adequate rules to mitigate market power or incent competitive behavior. A flawed market design produces inefficient outcomes which cannot be corrected by competitive behavior.

The MMU concludes for the first nine months of 2017:

Energy Market Conclusion

Table 1-2 The Energy Market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Aggregate Market	Competitive	
Market Structure: Local Market	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Effective

- The aggregate market structure was evaluated as competitive but the aggregate market power test based on pivotal suppliers indicates that the aggregate day-ahead market structure was not competitive on every day. The hourly HHI (Herfindahl-Hirschman Index) results indicate that by FERC standards, the PJM energy market in the first nine months of 2017 was unconcentrated. Average HHI was 929 with a minimum of 696 and a maximum of 1208 in the first nine months of 2017. The fact that the average HHI is in the unconcentrated range and the maximum hourly HHI is in the moderately concentrated range does not mean that the aggregate market was competitive in all hours. As demonstrated for the day-ahead market, it is possible to have pivotal suppliers in the aggregate market even when the HHI level is not in the highly concentrated range. It is possible to have an exercise of market power even when the HHI level is not in the highly concentrated range. The number of pivotal suppliers in the energy market is a more precise measure of structural market power than the HHI. The HHI is not a definitive measure of structural market power. The PJM energy market peaking segment of supply was highly concentrated.
- The local market structure was evaluated as not competitive due to the highly concentrated ownership of supply in local markets created by transmission constraints. The results of the three pivotal supplier (TPS) test, used to test local market structure, indicate the existence of market power in local markets created by transmission constraints. The local market performance is competitive as a result of the application of the TPS test. While transmission constraints create the potential for the exercise of local market power, PJM's application of the three pivotal

supplier test identified local market power and resulted in offer capping to force competitive offers, correcting for structural issues created by local transmission constraints. There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that need to be addressed because unit owners can exercise market power even when mitigated.

- Participant behavior was evaluated as competitive because the analysis of markup shows that marginal units generally make offers at, or close to, their marginal costs in both Day-Ahead and Real-Time Energy Markets, although the behavior of some participants both routinely and during periods of high demand is consistent with economic withholding.
- Market performance was evaluated as competitive because market results in the energy market reflect the outcome of a competitive market, as PJM prices are set, on average, by marginal units operating at, or close to, their marginal costs in both Day-Ahead and Real-Time Energy Markets, although high markups during periods of high demand did affect prices.
- Market design was evaluated as effective because the analysis shows that the PJM energy market resulted in competitive market outcomes. In general, PJM's energy market design provides incentives for competitive behavior and results in competitive outcomes. In local markets, where market power is an issue, the market design identifies market power and causes the market to provide competitive market outcomes in most cases although issues with the implementation of market power mitigation and development of cost-based offers remain. The role of UTCs in the Day-Ahead Energy Market continues to cause concerns.

PJM markets are designed to promote competitive outcomes derived from the interaction of supply and demand in each of the PJM markets. Market design itself is the primary means of achieving and promoting competitive outcomes in PJM markets. One of the MMU's primary goals is to identify actual or potential market design flaws.⁸ The approach to market power mitigation in PJM has focused on market designs that promote competition (a structural basis for competitive outcomes) and on limiting market power

mitigation to instances where the market structure is not competitive and thus where market design alone cannot mitigate market power. In the PJM energy market, this occurs primarily in the case of local market power. When a transmission constraint creates the potential for local market power, PJM applies a structural test to determine if the local market is competitive, applies a behavioral test to determine if generator offers exceed competitive levels and applies a market performance test to determine if such generator offers would affect the market price.⁹ There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that can result in the exercise of local market power even when market power mitigation rules are applied. These issues need to be addressed. There are issues related to the definition of gas costs includable in energy offers that need to be addressed. There are issues related to the level of variable operating and maintenance expense includable in energy offers that need to be addressed. There are currently no market power mitigation rules in place that limit the ability to exercise market power when aggregate market conditions are tight and there are pivotal suppliers in the aggregate market. Aggregate market power needs to be addressed. Now that generators will be allowed to modify offers hourly, market design must reflect appropriate incentives for competitive behavior, the application of local market power mitigation needs to be fixed, the definition of a competitive offer needs to be fixed, and aggregate market power mitigation rules need to be developed. The importance of these issues is amplified by the new rules permitting cost-based offers in excess of \$1,000 per MWh.

⁸ OATT Attachment M (PJM Market Monitoring Plan).

⁹ The market performance test means that offer capping is not applied if the offer does not exceed the competitive level and therefore market power would not affect market performance.

Capacity Market Conclusion

Table 1-3 The Capacity Market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Aggregate Market	Not Competitive	
Market Structure: Local Market	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Mixed

- The aggregate market structure was evaluated as not competitive. For almost all auctions held from 2007 to the present, the PJM region failed the three pivotal supplier test (TPS), which is conducted at the time of the auction.¹⁰
- The local market structure was evaluated as not competitive. For almost every auction held, all LDAs have failed the TPS test, which is conducted at the time of the auction.¹¹
- Participant behavior was evaluated as competitive. Market power mitigation measures were applied when the Capacity Market Seller failed the market power test for the auction, the submitted sell offer exceeded the defined offer cap, and the submitted sell offer, absent mitigation, would increase the market clearing price. Market power mitigation rules were also applied when the Capacity Market Seller submitted a sell offer for a new resource or uprate that was below the Minimum Offer Price Rule (MOPR) threshold.
- Market performance was evaluated as competitive. Although structural market power exists in the Capacity Market, a competitive outcome resulted from the application of market power mitigation rules.
- Market design was evaluated as mixed because while there are many positive features of the Reliability Pricing Model (RPM) design and the capacity performance modifications to RPM, there are several features of the RPM design which still threaten competitive outcomes. These include the definition of DR which permits inferior products to substitute

¹⁰ In the 2008/2009 RPM Third Incremental Auction, 18 participants in the RTO market passed the TPS test. In the 2018/2019 RPM Second Incremental Auction, 35 participants in the RTO market passed the test.

¹¹ In the 2012/2013 RPM Base Residual Auction, six participants included in the incremental supply of EMAAC passed the TPS test. In the 2014/2015 RPM Base Residual Auction, seven participants in the incremental supply in MAAC passed the TPS test.

for capacity, the replacement capacity issue, the definition of unit offer parameters and the inclusion of imports which are not substitutes for internal capacity resources.

Tier 2 Synchronized Reserve Market Conclusion

Table 1-4 The Tier 2 Synchronized Reserve Market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Regional Markets	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Mixed

- The Tier 2 Synchronized Reserve Market structure was evaluated as not competitive because of high levels of supplier concentration.
- Participant behavior was evaluated as competitive because the market rules require competitive, cost based offers.
- Market performance was evaluated as competitive because the interaction of participant behavior with the market design results in competitive prices.
- Market design was evaluated as mixed. Market power mitigation rules result in competitive outcomes despite high levels of supplier concentration. However, tier 1 reserves are inappropriately compensated when the nonsynchronized reserve market clears with a nonzero price.

Day-Ahead Scheduling Reserve Market Conclusion

Table 1-5 The Day-Ahead Scheduling Reserve Market results were competitive

Market Element	Evaluation	Market Design
Market Structure	Not Competitive	
Participant Behavior	Mixed	
Market Performance	Competitive	Mixed

- The Day-Ahead Scheduling Reserve Market structure was evaluated as not competitive because market participants failed the three pivotal supplier test in 18.9 percent of all cleared hours in the first nine months of 2017.

- Participant behavior was evaluated as mixed because while most offers were equal to marginal costs, a significant proportion of offers reflected economic withholding.
- Market performance was evaluated as competitive because there were adequate offers in every hour to satisfy the requirement and the clearing prices reflected those offers, although there is concern about offers above the competitive level affecting prices. Offers above \$0.00 set the clearing price in 2,057 hours (31.4 percent).
- Market design was evaluated as mixed because the DASR product does not include performance obligations, and the three pivotal supplier test and appropriate market power mitigation should be added to the market to ensure that market power cannot be exercised at times of system stress.

Regulation Market Conclusion

Table 1-6 The Regulation Market results were competitive

Market Element	Evaluation	Market Design
Market Structure	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Flawed

- The regulation market structure was evaluated as not competitive for the first nine months of 2017 because the PJM Regulation Market failed the three pivotal supplier (TPS) test in 89.9 percent of the hours in the first nine months of 2017.
- Participant behavior in the PJM Regulation Market was evaluated as competitive for the first nine months of 2017 because market power mitigation requires competitive offers when the three pivotal supplier test is failed and there was no evidence of generation owners engaging in noncompetitive behavior.
- Market performance was evaluated as competitive, despite significant issues with the market design.
- Market design was evaluated as flawed. The market design has failed to correctly incorporate a consistent implementation of the marginal

benefit factor in optimization, pricing and settlement. The market results continue to include the incorrect definition of opportunity cost. The result is significantly flawed market signals to existing and prospective suppliers of regulation.

FTR Auction Market Conclusion

Table 1-7 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 ARRs and voluntary participation. But it is not clear, in a competitive market, why the ownership structure of Long Term FTRs is so highly concentrated.
- Participant behavior was evaluated as competitive because there was no evidence of anticompetitive 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. But it is not clear, in a competitive market, why FTR purchases by financial entities remain persistently profitable.
- Market design was evaluated as flawed because there are significant flaws with the basic ARR/FTR design. The market design is not an efficient or effective way to ensure that all congestion revenues are returned to load.

Role of MMU

The FERC assigns three core functions to MMUs: reporting, monitoring and market design.¹² These functions are interrelated and overlap. The PJM Market Monitoring Plan establishes these functions, providing that the MMU is responsible for monitoring: compliance with the PJM Market Rules; actual or potential design flaws in the PJM Market Rules; structural problems in the PJM Markets that may inhibit a robust and competitive market; the actual or potential exercise of market power or violation of the market rules by a Market Participant; PJM's implementation of the PJM Market Rules or operation of the PJM Markets; and such matters as are necessary to prepare reports.¹³

Reporting

The MMU performs its reporting function primarily by issuing and filing annual and quarterly state of the market reports; regular reports on market issues; such as RPM auction reports; reports responding to requests from regulators and other authorities; and ad hoc reports on specific topics. The state of the market reports provide a comprehensive analysis of the structure, behavior and performance of PJM markets. State of the market reports and other reports are intended to inform PJM, the PJM Board, FERC, other regulators, other authorities, market participants, stakeholders and the general public about how well PJM markets achieve the competitive outcomes necessary to realize the goals of regulation through competition, and how the markets can be improved.

The MMU presents reports directly to PJM stakeholders, PJM staff, FERC staff, state commission staff, state commissions, other regulatory agencies and the general public. Report presentations provide an opportunity for interested parties to ask questions, discuss issues, and provide feedback to the MMU.

¹² 18 CFR § 35.28(g)(3)(ii); see also *Wholesale Competition in Regions with Organized Electric Markets*, Order No. 719, FERC Stats. & Regs. ¶31,281 (2008) ("Order No. 719"), *order on reh'g*, Order No. 719-A, FERC Stats. & Regs. ¶31,292 (2009), *reh'g denied*, Order No. 719-B, 129 FERC ¶ 61,252 (2009).

¹³ OATT Attachment M § IV; 18 CFR § 1c.2.

Monitoring

To perform its monitoring function, the MMU screens and monitors the conduct of Market Participants under the MMU's broad purview to monitor, investigate, evaluate and report on the PJM Markets.¹⁴ The MMU has direct, confidential access to the FERC.¹⁵ The MMU may also refer matters to the attention of state commissions.¹⁶

The MMU monitors market behavior for violations of FERC Market Rules and PJM Market Rules, including the actual or potential exercise of market power.¹⁷ The MMU will investigate and refer "Market Violations," which refers to any of "a tariff violation, violation of a Commission-approved order, rule or regulation, market manipulation, or inappropriate dispatch that creates substantial concerns regarding unnecessary market inefficiencies..."^{18 19 20} The MMU also monitors PJM for compliance with the rules, in addition to market participants.²¹

An important component of the monitoring function is the review of inputs to mitigation. The actual or potential exercise of market power is addressed in part through *ex ante* mitigation rules incorporated in PJM's market clearing software for the energy market, the capacity market and the regulation market. If a market participant fails the TPS test in any of these markets its offer is set

¹⁴ OATT Attachment M § IV.

¹⁵ OATT Attachment M § IV.K.3.

¹⁶ OATT Attachment M § IV.H.

¹⁷ OATT § I.1 ("FERC Market Rules" mean the market behavior rules and the prohibition against electric energy market manipulation codified by the Commission in its Rules and Regulations at 18 CFR §§ 1c.2 and 35.37, respectively; the Commission-approved PJM Market Rules and any related proscriptions or any successor rules that the Commission from time to time may issue, approve or otherwise establish... "PJM Market Rules" mean the rules, standards, procedures, and practices of the PJM Markets set forth in the PJM Tariff, the PJM Operating Agreement, the PJM Reliability Assurance Agreement, the PJM Consolidated Transmission Owners Agreement, the PJM Manuals, the PJM Regional Practices Document, the PJM-Midwest Independent Transmission System Operator Joint Operating Agreement or any other document setting forth market rules.")

¹⁸ The FERC defines manipulation as engaging "in any act, practice, or course of business that operates or would operate as a fraud or deceit upon any entity." 18 CFR § 1c.2(a)(3). Manipulation may involve behavior that is consistent with the letter of the rules, but violates their spirit. An example is market behavior that is economically meaningless, such as equal and opposite transactions, which may entitle the transacting party to a benefit associated with volume. Unlike market power or rule violations, manipulation must be intentional. The MMU must build its case, including an inference of intent, on the basis of market data.

¹⁹ OATT § I.1.

²⁰ The MMU has no prosecutorial or enforcement authority. The MMU notifies the FERC when it identifies a significant market problem or market violation. OATT Attachment M § IV.I.1. If the problem or violation involves a market participant, the MMU discusses the matter with the participant(s) involved and analyzes relevant market data. If that investigation produces sufficient credible evidence of a violation, the MMU prepares a formal referral and thereafter undertakes additional investigation of the specific matter only at the direction of FERC staff. *Id.* If the problem involves an existing or proposed law, rule or practice that exposes PJM markets to the risk that market power or market manipulation could compromise the integrity of the markets, the MMU explains the issue, as appropriate, to the FERC, state regulators, stakeholders or other authorities. The MMU may also participate as a party or provide information or testimony in regulatory or other proceedings.

²¹ OATT Attachment M § IV.C.

to the lower of its price-based or cost-based offer. This prevents the exercise of market power and ensures competitive pricing, provided that the cost-based offer accurately reflects short run marginal cost.

If the cost-based offer does not accurately reflect short run marginal cost, the market power mitigation process does not ensure competitive pricing in PJM markets. The MMU evaluates the fuel cost policy for every unit as well as the other inputs to cost-based offers. PJM Manual 15 does not clearly or accurately describe the short run marginal cost of generation. Manual 15 should be replaced with a straightforward description of the components of cost offers based on short run marginal costs and the correct calculation of cost offers. The MMU evaluates every offer in each capacity market (RPM) auction using data submitted to the MMU through web-based data input systems developed by the MMU.²²

The MMU also reviews operational parameter limits included with unit offers, evaluates compliance with the requirement to offer into the energy and capacity markets, evaluates the economic basis for unit retirement requests and evaluates and compares offers in the Day-Ahead and Real-Time Energy Markets.^{23 24 25 26}

The MMU reviews offers and inputs in order to evaluate whether those offers raise market power concerns. Market participants, not the MMU, determine and take responsibility for offers that they submit and the market conduct that those offers represent. If the MMU has a concern about an offer, the MMU may raise that concern with the FERC or other regulatory authorities. The FERC and other regulators have enforcement and regulatory authority that they may exercise with respect to offers submitted by market participants. PJM also reviews offers, but it does so in order to determine whether offers comply with the PJM tariff and manuals. PJM, in its role as the market operator, may reject an offer that fails to comply with the market rules. The respective reviews performed by the MMU and PJM are separate and non-sequential.

²² OATT Attachment M–Appendix § II.E.
²³ OATT Attachment M–Appendix § II.B.
²⁴ OATT Attachment M–Appendix § II.C.
²⁵ OATT Attachment M–Appendix § IV.
²⁶ OATT Attachment M–Appendix § VII.

The PJM Markets monitored by the MMU include market related procurement processes conducted by PJM, such as for Black Start resources included in the PJM system restoration plan.^{27 28}

The MMU also monitors transmission planning, interconnections and rules for vertical market power issues, and with the introduction of competitive transmission development policy in Order No. 1000, horizontal market power issues.²⁹

Market Design

In order to perform its role in PJM market design, the MMU evaluates existing and proposed PJM Market Rules and the design of the PJM Markets.³⁰ The MMU initiates and proposes changes to the design of such markets or the PJM Market Rules in stakeholder or regulatory proceedings.³¹ In support of this function, the MMU engages in discussions with stakeholders, State Commissions, PJM Management, and the PJM Board; participates in PJM stakeholder meetings or working groups regarding market design matters; publishes proposals, reports or studies on such market design issues; and makes filings with the Commission on market design issues.³² The MMU also recommends changes to the PJM Market Rules to the staff of the Commission’s Office of Energy Market Regulation, State Commissions, and the PJM Board.³³ The MMU may provide in its annual, quarterly and other reports “recommendations regarding any matter within its purview.”³⁴

New Recommendations

Consistent with its core function to “[e]valuate existing and proposed market rules, tariff provisions and market design elements and recommend proposed rule and tariff changes,”³⁵ the MMU recommends specific enhancements to existing market rules and implementation of new rules that are required for

²⁷ See OATT Attachment M–Appendix § II(p).

²⁸ See OATT Attachment M–Appendix § III.

²⁹ OA Schedule 6 § 1.5.

³⁰ OATT Attachment M § IV.D.

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ OATT Attachment M § VI.A.

³⁵ 18 CFR § 35.28(g)(3)(ii)(A); see also OATT Attachment M § IV.D.

competitive results in PJM markets and for continued improvements in the functioning of PJM markets.

In this *2017 Quarterly State of the Market Report for PJM: January through September*, the MMU includes four new recommendations.³⁶

New Recommendations from Section 5, Capacity Market

- The MMU recommends that PJM clear the capacity market based on nodal capacity resource locations and the characteristics of the transmission system consistent with the actual electrical facts of the grid. The current nested LDA structure used in the capacity market does not adequately represent all the capacity transfers that are feasible among LDAs. Absent a fully nodal capacity market clearing process, the MMU recommends that PJM use a nonnested model for all LDAs and specify a VRR curve for each LDA separately. Each LDA requirement should be met with the capacity resources located within the LDA and exchanges from neighboring LDAs up to the transmission limit. LDAs should price separate if that is the result of the LDA supply curves and the transmission constraints. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that the RPM market power mitigation rule be modified to apply offer caps in all cases when the three pivotal supplier test is failed and the sell offer is greater than the offer cap. This will ensure that market power does not result in an increase in make whole payments. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM develop a forward looking estimate for the expected number of Performance Assessment Hours (H) to use in calculating the Non-Performance Charge Rate. The MMU recommends that PJM develop a forward looking estimate for the Balancing Ratio (B) during Performance Assessment Hours to use in calculating the default offer cap. Both H and B parameters should be included in the annual review of planning parameters for the Base Residual Auction. (Priority: High. New recommendation. Status: Not adopted.)

³⁶ New or modified recommendations include all MMU recommendations that were reported for the first time, or substantially modified, in this *2017 Quarterly State of the Market Report for PJM: January through September*.

New Recommendation from Section 10, Ancillary Services

- The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the minimum tank suction level (MTSL) be allocated to black start service. The MMU further recommends that the PJM tariff be updated to clearly state how the MTSL will be calculated for black start units sharing oil tanks. (Priority: Medium. New recommendation. Status: Not adopted.)

Total Price of Wholesale Power

The total price of wholesale power is the total price per MWh of purchasing wholesale electricity from PJM markets. The total price is an average price and actual prices vary by location. The total price includes the price of energy, capacity, ancillary services, and transmission service, administrative fees, regulatory support fees and uplift charges billed through PJM systems. Table 1-8 shows the average price, by component, for the first nine months of 2016 and 2017.

Each of the components is defined in PJM's Open Access Transmission Tariff (OATT) and PJM Operating Agreement and each is collected through PJM's billing system.

Components of Total Price

- The Energy component is the real time load weighted average PJM locational marginal price (LMP).
- The Capacity component is the average price per MWh of Reliability Pricing Model (RPM) payments.
- The Transmission Service Charges component is the average price per MWh of network integration charges, and firm and nonfirm point to point transmission service.³⁷

³⁷ OATT §§ 13.7, 14.5, 27A & 34.

- The Energy Uplift (Operating Reserves) component is the average price per MWh of day-ahead and balancing operating reserves and synchronous condensing charges.³⁸
- The Reactive component is the average cost per MWh of reactive supply and voltage control from generation and other sources.³⁹
- The Regulation component is the average cost per MWh of regulation procured through the PJM Regulation Market.⁴⁰
- The PJM Administrative Fees component is the average cost per MWh of PJM's monthly expenses for a number of administrative services, including Advanced Control Center (AC²) and OATT Schedule 9 funding of FERC, OPSI, CAPS and the MMU.
- The Transmission Enhancement Cost Recovery component is the average cost per MWh of PJM billed (and not otherwise collected through utility rates) costs for transmission upgrades and projects, including annual recovery for the TrAIL and PATH projects.⁴¹
- The Capacity (FRR) component is the average cost per MWh under the Fixed Resource Requirement (FRR) Alternative for an eligible LSE to satisfy its Unforced Capacity obligation.⁴²
- The Emergency Load Response component is the average cost per MWh of the PJM Emergency Load Response Program.⁴³
- The Day-Ahead Scheduling Reserve component is the average cost per MWh of Day-Ahead scheduling reserves procured through the Day-Ahead Scheduling Reserve Market.⁴⁴
- The Transmission Owner (Schedule 1A) component is the average cost per MWh of transmission owner scheduling, system control and dispatch services charged to transmission customers.⁴⁵
- The Synchronized Reserve component is the average cost per MWh of synchronized reserve procured through the Synchronized Reserve Market.⁴⁶
- The Black Start component is the average cost per MWh of black start service.⁴⁷
- The RTO Startup and Expansion component is the average cost per MWh of charges to recover AEP, ComEd and DAY's integration expenses.⁴⁸
- The NERC/RFC component is the average cost per MWh of NERC and RFC charges, plus any reconciliation charges.⁴⁹
- The Economic Load Response component is the average cost per MWh of day ahead and real time economic load response program charges to LSEs.⁵⁰
- The Transmission Facility Charges component is the average cost per MWh of Ramapo Phase Angle Regulators charges allocated to PJM Mid-Atlantic transmission owners.⁵¹
- The nonsynchronized reserve component is the average cost per MWh of non-synchronized reserve procured through the Non-Synchronized Reserve Market.⁵²
- The Emergency Energy component is the average cost per MWh of emergency energy.⁵³

Table 1-8 shows that Energy, Capacity and Transmission Service Charges are the three largest components of the total price per MWh of wholesale power, comprising 97.2 percent of the total price per MWh in the first nine months of 2017.

38 OA Schedules 1 §§ 3.2.3 & 3.3.3.

39 OATT Schedule 2 and OA Schedule 1 § 3.2.3B. The line item in Table 1-8 includes all reactive services charges.

40 OA Schedules 1 §§ 3.2.2, 3.2.2A, 3.3.2, & 3.3.2A; OATT Schedule 3.

41 OATT Schedule 12.

42 RAA Schedule 8.1.

43 OATT PJM Emergency Load Response Program.

44 OA Schedules 1 §§ 3.2.3A.01 & OATT Schedule 6.

45 OATT Schedule 1A.

46 OA Schedule 1 § 3.2.3A.01; PJM OATT Schedule 6.

47 OATT Schedule 6A. The line item in Table 1-8 includes all Energy Uplift (Operating Reserves) charges for Black Start.

48 OATT Attachments H-13, H-14 and H-15 and Schedule 13.

49 OATT Schedule 10-NERC and OATT Schedule 10-RFC.

50 OA Schedule 1 § 3.6.

51 OA Schedule 1 § 5.3b.

52 OA Schedule 1 § 3.2.3A.001.

53 OA Schedule 1 § 3.2.6.

Table 1-8 Total price per MWh by category: January 1 through September 30, 2016 and 2017⁵⁴

Category	Jan-Sep 2016		Jan-Sep 2017		Percent Change Totals
	\$/MWh	Percent of Total	\$/MWh	Percent of Total	
Load Weighted Energy	\$29.32	58.7%	\$30.36	58.2%	3.5%
Capacity	\$11.05	22.1%	\$10.91	20.9%	(1.3%)
Capacity	\$11.05	22.1%	\$10.91	20.9%	(1.3%)
Capacity (FRR)	\$0.00	0.0%	\$0.00	0.0%	0.0%
Transmission	\$8.20	16.4%	\$9.44	18.1%	15.1%
Transmission Service Charges	\$7.59	15.2%	\$8.71	16.7%	14.7%
Transmission Enhancement Cost Recovery	\$0.52	1.0%	\$0.63	1.2%	22.6%
Transmission Owner (Schedule 1A)	\$0.09	0.2%	\$0.10	0.2%	4.3%
Transmission Facility Charges	\$0.00	0.0%	\$0.00	0.0%	(100.0%)
Ancillary	\$0.72	1.5%	\$0.78	1.5%	8.1%
Reactive	\$0.37	0.7%	\$0.44	0.8%	17.3%
Regulation	\$0.11	0.2%	\$0.13	0.2%	16.3%
Black Start	\$0.08	0.2%	\$0.09	0.2%	8.7%
Synchronized Reserves	\$0.05	0.1%	\$0.06	0.1%	11.6%
Non-Synchronized Reserves	\$0.01	0.0%	\$0.01	0.0%	(15.0%)
Day Ahead Scheduling Reserve (DASR)	\$0.10	0.2%	\$0.06	0.1%	(37.2%)
Administration	\$0.47	0.9%	\$0.53	1.0%	12.8%
PJM Administrative Fees	\$0.44	0.9%	\$0.50	1.0%	13.6%
NERC/RFC	\$0.03	0.1%	\$0.03	0.1%	1.1%
RTO Startup and Expansion	\$0.00	0.0%	\$0.00	0.0%	3.3%
Energy Uplift (Operating Reserves)	\$0.17	0.3%	\$0.13	0.2%	(25.9%)
Demand Response	\$0.01	0.0%	\$0.01	0.0%	(25.8%)
Load Response	\$0.01	0.0%	\$0.01	0.0%	(25.8%)
Emergency Load Response	\$0.00	0.0%	\$0.00	0.0%	0.0%
Emergency Energy	\$0.00	0.0%	\$0.00	0.0%	0.0%
Total Price	\$49.95	100.0%	\$52.15	100.0%	4.4%

Table 1-9 shows the inflation adjusted average price, by component, for the first nine months of 2016 and 2017. To obtain the inflation adjusted average prices, the individual components' prices are deflated using the US Consumer Price Index for all items, Urban Consumers (with a base period of January 1998), as published by *Bureau of Labor Statistics*.⁵⁵

54 Note: The totals in this table include after the fact billing adjustments and may not match totals presented in past reports.

55 US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by *Bureau of Labor Statistics*. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (July 14, 2017)

Table 1-9 Inflation adjusted total price per MWh by category: January 1 through September 30, 2016 and 2017⁵⁶

Category	Jan-Sep 2016 \$/MWh	Jan-Sep 2016 Percent of Total	Jan-Sep 2017 \$/MWh	Jan-Sep 2017 Percent of Total	Percent Change Totals
Load Weighted Energy	\$19.77	58.7%	\$20.05	58.2%	1.4%
Capacity	\$7.46	22.1%	\$7.21	20.9%	(3.4%)
Capacity	\$7.46	22.1%	\$7.21	20.9%	(3.4%)
Capacity (FRR)	\$0.00	0.0%	\$0.00	0.0%	0.0%
Transmission	\$5.53	16.4%	\$6.23	18.1%	12.7%
Transmission Service Charges	\$5.12	15.2%	\$5.75	16.7%	12.3%
Transmission Enhancement Cost Recovery	\$0.35	1.0%	\$0.42	1.2%	20.0%
Transmission Owner (Schedule 1A)	\$0.06	0.2%	\$0.06	0.2%	2.1%
Transmission Facility Charges	\$0.00	0.0%	\$0.00	0.0%	(100.0%)
Ancillary	\$0.49	1.4%	\$0.52	1.5%	5.9%
Reactive	\$0.25	0.7%	\$0.29	0.8%	14.9%
Regulation	\$0.08	0.2%	\$0.09	0.2%	13.7%
Black Start	\$0.06	0.2%	\$0.06	0.2%	6.7%
Synchronized Reserves	\$0.03	0.1%	\$0.04	0.1%	9.3%
Non-Synchronized Reserves	\$0.01	0.0%	\$0.01	0.0%	(16.4%)
Day Ahead Scheduling Reserve (DASR)	\$0.06	0.2%	\$0.04	0.1%	(38.5%)
Administration	\$0.32	0.9%	\$0.35	1.0%	10.5%
PJM Administrative Fees	\$0.30	0.9%	\$0.33	1.0%	11.3%
NERC/RFC	\$0.02	0.1%	\$0.02	0.1%	(1.0%)
RTO Startup and Expansion	\$0.00	0.0%	\$0.00	0.0%	0.0%
Energy Uplift (Operating Reserves)	\$0.11	0.3%	\$0.08	0.2%	(27.5%)
Demand Response	\$0.01	0.0%	\$0.00	0.0%	(28.6%)
Load Response	\$0.01	0.0%	\$0.00	0.0%	(28.6%)
Emergency Load Response	\$0.00	0.0%	\$0.00	0.0%	0.0%
Emergency Energy	\$0.00	0.0%	\$0.00	0.0%	0.0%
Total Price	\$33.69	100.0%	\$34.45	100.0%	2.2%

⁵⁶ Note: The totals in this table include after the fact billing adjustments and may not match totals presented in past reports.

Table 1-10 shows the average price, by component of the total wholesale power price per MWh, for calendar years 1999 through 2016.

Table 1-10 Total price per MWh by category: Calendar Years 1999 through 2016⁵⁷

Category	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	\$/MWh																	
Load Weighted Energy	\$34.07	\$30.72	\$36.65	\$31.60	\$41.23	\$44.34	\$63.46	\$53.35	\$61.66	\$71.13	\$39.05	\$48.35	\$45.94	\$35.23	\$38.66	\$53.14	\$36.16	\$29.23
Capacity	\$0.14	\$0.25	\$0.27	\$0.12	\$0.08	\$0.09	\$0.03	\$0.03	\$3.53	\$7.80	\$10.78	\$12.15	\$10.24	\$6.57	\$7.24	\$9.21	\$11.25	\$10.96
Capacity	\$0.14	\$0.25	\$0.27	\$0.12	\$0.08	\$0.09	\$0.03	\$0.03	\$3.53	\$7.80	\$10.78	\$12.15	\$9.71	\$6.05	\$7.13	\$9.01	\$11.12	\$10.96
Capacity (FRR)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.53	\$0.52	\$0.11	\$0.20	\$0.13	\$0.00
Transmission	\$3.49	\$4.13	\$3.56	\$3.46	\$3.64	\$3.38	\$2.80	\$3.27	\$3.55	\$3.83	\$4.22	\$4.33	\$4.86	\$5.32	\$5.65	\$6.46	\$7.69	\$8.42
Transmission Service Charges	\$3.41	\$4.03	\$3.48	\$3.39	\$3.57	\$3.28	\$2.71	\$3.18	\$3.45	\$3.68	\$4.03	\$4.04	\$4.49	\$4.90	\$5.21	\$5.96	\$7.09	\$7.81
Transmission Enhancement Cost Recovery	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.06	\$0.11	\$0.20	\$0.27	\$0.34	\$0.36	\$0.41	\$0.51	\$0.52
Transmission Owner (Schedule 1A)	\$0.07	\$0.09	\$0.08	\$0.07	\$0.07	\$0.10	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.09	\$0.08	\$0.08	\$0.09	\$0.09	\$0.09
Transmission Facility Charges	\$0.01	\$0.01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Ancillary	\$0.41	\$0.68	\$0.75	\$0.63	\$0.91	\$0.91	\$1.19	\$0.92	\$1.00	\$1.15	\$0.78	\$0.90	\$0.90	\$0.84	\$1.24	\$0.99	\$0.91	\$0.72
Reactive	\$0.26	\$0.29	\$0.22	\$0.20	\$0.24	\$0.26	\$0.26	\$0.29	\$0.29	\$0.34	\$0.36	\$0.45	\$0.41	\$0.46	\$0.76	\$0.40	\$0.37	\$0.38
Regulation	\$0.15	\$0.39	\$0.53	\$0.42	\$0.50	\$0.51	\$0.80	\$0.53	\$0.63	\$0.70	\$0.34	\$0.36	\$0.32	\$0.26	\$0.25	\$0.33	\$0.23	\$0.11
Black Start	\$0.00	\$0.00	\$0.00	\$0.00	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.04	\$0.14	\$0.08	\$0.08	\$0.09
Synchronized Reserves	\$0.00	\$0.00	\$0.00	\$0.01	\$0.15	\$0.13	\$0.11	\$0.08	\$0.06	\$0.08	\$0.05	\$0.07	\$0.09	\$0.04	\$0.04	\$0.12	\$0.11	\$0.05
Non-Synchronized Reserves	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.02	\$0.02	\$0.01
Day Ahead Scheduling Reserve (DASR)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.00	\$0.01	\$0.05	\$0.05	\$0.06	\$0.05	\$0.10	\$0.07
Administration	\$0.23	\$0.26	\$0.73	\$0.86	\$1.05	\$1.00	\$0.73	\$0.75	\$0.75	\$0.41	\$0.34	\$0.39	\$0.40	\$0.46	\$0.45	\$0.46	\$0.46	\$0.47
PJM Administrative Fees	\$0.23	\$0.26	\$0.71	\$0.86	\$1.05	\$0.93	\$0.72	\$0.74	\$0.72	\$0.39	\$0.31	\$0.36	\$0.37	\$0.42	\$0.41	\$0.43	\$0.43	\$0.44
NERC/RFC	\$0.00	-\$0.00	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	-\$0.00	\$0.01	\$0.01	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.03	\$0.03	\$0.03
RTO Startup and Expansion	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.06	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.00
Energy Uplift (Operating Reserves)	\$0.52	\$0.93	\$1.27	\$0.72	\$0.89	\$0.95	\$1.07	\$0.47	\$0.65	\$0.64	\$0.48	\$0.80	\$0.78	\$0.74	\$0.55	\$1.15	\$0.38	\$0.17
Demand Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.03	\$0.06	\$0.05	\$0.01	\$0.03	\$0.03	\$0.03	\$0.08	\$0.08	\$0.02	\$0.01
Load Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.03	\$0.06	\$0.05	\$0.01	\$0.01	\$0.01	\$0.02	\$0.01	\$0.03	\$0.02	\$0.01
Emergency Load Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.02	\$0.02	\$0.01	\$0.06	\$0.06	\$0.00	\$0.00
Emergency Energy	\$0.07	\$0.02	\$0.00	\$0.00	\$0.02	\$0.00	\$0.02	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.00	\$0.00
Total Price	\$38.92	\$36.98	\$43.22	\$37.39	\$47.83	\$50.66	\$69.30	\$58.82	\$71.20	\$85.01	\$55.66	\$66.95	\$63.16	\$49.20	\$53.87	\$71.49	\$56.87	\$49.99

⁵⁷ Note: The totals in this table include after the fact billing adjustments and may not match totals presented in past reports.

Table 1-11 shows the inflation adjusted average price, by component of the total wholesale power price per MWh, for calendar years 1999 through 2016.⁵⁸

Table 1-11 Inflation adjusted total price per MWh by category: Calendar Years 1999 through 2016⁵⁹

Category	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
	\$/MWh																	
Load Weighted Energy	\$33.04	\$28.80	\$33.45	\$28.35	\$36.24	\$37.91	\$52.37	\$42.73	\$48.06	\$53.27	\$29.46	\$35.83	\$33.01	\$24.80	\$26.82	\$36.37	\$24.69	\$19.68
Capacity	\$0.13	\$0.23	\$0.24	\$0.11	\$0.07	\$0.08	\$0.02	\$0.02	\$2.73	\$5.85	\$8.11	\$9.00	\$7.37	\$4.63	\$5.02	\$6.29	\$7.66	\$7.39
Capacity	\$0.13	\$0.23	\$0.24	\$0.11	\$0.07	\$0.08	\$0.02	\$0.02	\$2.73	\$5.85	\$8.11	\$9.00	\$6.99	\$4.26	\$4.94	\$6.15	\$7.58	\$7.39
Capacity (FRR)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.38	\$0.37	\$0.07	\$0.14	\$0.09	\$0.00
Transmission	\$3.38	\$3.88	\$3.25	\$3.10	\$3.20	\$2.88	\$2.32	\$2.62	\$2.76	\$2.87	\$3.18	\$3.21	\$3.49	\$3.74	\$3.92	\$4.41	\$5.24	\$5.67
Transmission Service Charges	\$3.31	\$3.79	\$3.17	\$3.04	\$3.13	\$2.80	\$2.24	\$2.55	\$2.69	\$2.76	\$3.04	\$2.99	\$3.23	\$3.45	\$3.61	\$4.07	\$4.84	\$5.26
Transmission Enhancement Cost Recovery	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.04	\$0.08	\$0.15	\$0.20	\$0.24	\$0.25	\$0.28	\$0.34	\$0.35
Transmission Owner (Schedule 1A)	\$0.07	\$0.08	\$0.07	\$0.06	\$0.06	\$0.08	\$0.07	\$0.07	\$0.07	\$0.07	\$0.06	\$0.07	\$0.06	\$0.06	\$0.06	\$0.06	\$0.06	\$0.06
Transmission Facility Charges	\$0.01	\$0.01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Ancillary	\$0.40	\$0.64	\$0.68	\$0.56	\$0.80	\$0.77	\$0.98	\$0.74	\$0.78	\$0.86	\$0.59	\$0.66	\$0.64	\$0.59	\$0.86	\$0.67	\$0.62	\$0.48
Reactive	\$0.25	\$0.27	\$0.20	\$0.18	\$0.21	\$0.22	\$0.21	\$0.23	\$0.23	\$0.25	\$0.27	\$0.33	\$0.29	\$0.32	\$0.53	\$0.27	\$0.25	\$0.26
Regulation	\$0.15	\$0.37	\$0.48	\$0.38	\$0.44	\$0.43	\$0.66	\$0.42	\$0.49	\$0.52	\$0.26	\$0.27	\$0.23	\$0.18	\$0.17	\$0.22	\$0.16	\$0.07
Black Start	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.01	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02	\$0.01	\$0.01	\$0.03	\$0.10	\$0.05	\$0.05	\$0.06
Synchronized Reserves	\$0.00	\$0.00	\$0.00	\$0.01	\$0.13	\$0.11	\$0.09	\$0.07	\$0.05	\$0.06	\$0.04	\$0.05	\$0.07	\$0.03	\$0.03	\$0.08	\$0.08	\$0.04
Non-Synchronized Reserves	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.01	\$0.01
Day Ahead Scheduling Reserve (DASR)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.00	\$0.01	\$0.04	\$0.03	\$0.04	\$0.03	\$0.07	\$0.05
Administration	\$0.22	\$0.24	\$0.66	\$0.77	\$0.93	\$0.85	\$0.61	\$0.60	\$0.58	\$0.31	\$0.25	\$0.29	\$0.29	\$0.32	\$0.31	\$0.32	\$0.32	\$0.32
PJM Administrative Fees	\$0.22	\$0.25	\$0.65	\$0.77	\$0.92	\$0.79	\$0.60	\$0.59	\$0.56	\$0.29	\$0.23	\$0.27	\$0.26	\$0.30	\$0.29	\$0.29	\$0.29	\$0.30
NERC/RFC	\$0.00	-\$0.00	\$0.01	\$0.01	\$0.01	\$0.01	\$0.00	-\$0.00	\$0.01	\$0.01	\$0.01	\$0.02	\$0.01	\$0.02	\$0.02	\$0.02	\$0.02	\$0.02
RTO Startup and Expansion	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.05	\$0.00	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.01	\$0.00
Energy Uplift (Operating Reserves)	\$0.50	\$0.87	\$1.15	\$0.65	\$0.78	\$0.81	\$0.88	\$0.38	\$0.51	\$0.48	\$0.36	\$0.59	\$0.56	\$0.52	\$0.38	\$0.79	\$0.26	\$0.12
Demand Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.02	\$0.05	\$0.03	\$0.00	\$0.02	\$0.02	\$0.02	\$0.05	\$0.05	\$0.01	\$0.01
Load Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.02	\$0.05	\$0.03	\$0.00	\$0.01	\$0.01	\$0.01	\$0.01	\$0.02	\$0.01	\$0.01
Emergency Load Response	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01	\$0.01	\$0.01	\$0.04	\$0.04	\$0.00	\$0.00
Emergency Energy	\$0.07	\$0.02	\$0.00	\$0.00	\$0.02	\$0.00	\$0.02	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Price	\$37.75	\$34.68	\$39.44	\$33.54	\$42.04	\$43.32	\$57.20	\$47.12	\$55.47	\$63.68	\$41.96	\$49.62	\$45.39	\$34.63	\$37.37	\$48.90	\$38.81	\$33.66

⁵⁸ US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by *Bureau of Labor Statistics*. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (July 14, 2017)

⁵⁹ Note: The totals in this table include after the fact billing adjustments and may not match totals presented in past reports.

Table 1-12 shows the percent of average price, by component of the wholesale power price per MWh, for calendar years 1999 through 2016.

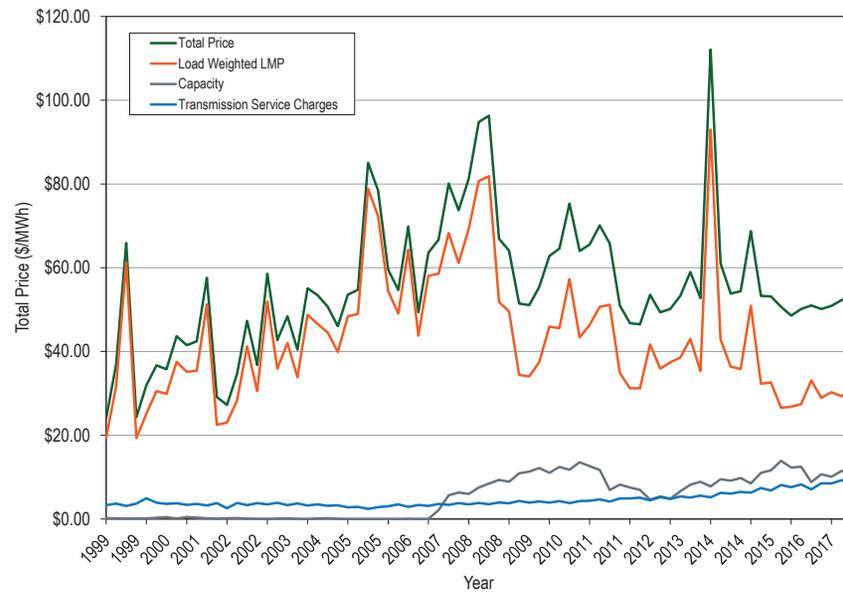
Table 1-12 Percent of total price per MWh by category: Calendar Years 1999 through 2016⁶⁰

Category	Percent of Total Charges 1999	Percent of Total Charges 2000	Percent of Total Charges 2001	Percent of Total Charges 2002	Percent of Total Charges 2003	Percent of Total Charges 2004	Percent of Total Charges 2005	Percent of Total Charges 2006	Percent of Total Charges 2007	Percent of Total Charges 2008	Percent of Total Charges 2009	Percent of Total Charges 2010	Percent of Total Charges 2011	Percent of Total Charges 2012	Percent of Total Charges 2013	Percent of Total Charges 2014	Percent of Total Charges 2015	Percent of Total Charges 2016
Load Weighted Energy	87.5%	83.1%	84.8%	84.5%	86.2%	87.5%	91.6%	90.7%	86.6%	83.7%	70.2%	72.2%	72.7%	71.6%	71.8%	74.3%	63.6%	58.5%
Capacity	0.4%	0.7%	0.6%	0.3%	0.2%	0.2%	0.0%	0.0%	5.0%	9.2%	19.4%	18.1%	16.2%	13.4%	13.4%	12.9%	19.8%	21.9%
Capacity	0.4%	0.7%	0.6%	0.3%	0.2%	0.2%	0.0%	0.0%	5.0%	9.2%	19.4%	18.1%	15.4%	12.3%	13.2%	12.6%	19.6%	21.9%
Capacity (FRR)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	1.1%	0.2%	0.3%	0.2%	0.0%
Transmission	9.0%	11.2%	8.2%	9.3%	7.6%	6.7%	4.0%	5.6%	5.0%	4.5%	7.6%	6.5%	7.7%	10.8%	10.5%	9.0%	13.5%	16.8%
Transmission Service Charges	8.8%	10.9%	8.0%	9.1%	7.5%	6.5%	3.9%	5.4%	4.8%	4.3%	7.2%	6.0%	7.1%	10.0%	9.7%	8.3%	12.5%	15.6%
Transmission Enhancement Cost Recovery	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%	0.3%	0.4%	0.7%	0.7%	0.6%	0.9%	1.0%
Transmission Owner (Schedule 1A)	0.2%	0.2%	0.2%	0.2%	0.1%	0.2%	0.1%	0.1%	0.1%	0.1%	0.2%	0.1%	0.1%	0.2%	0.2%	0.1%	0.2%	0.2%
Transmission Facility Charges	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Ancillary	1.1%	1.8%	1.7%	1.7%	1.9%	1.8%	1.7%	1.6%	1.4%	1.4%	1.4%	1.3%	1.4%	1.7%	2.3%	1.4%	1.6%	1.4%
Reactive	0.7%	0.8%	0.5%	0.5%	0.5%	0.5%	0.4%	0.5%	0.4%	0.4%	0.7%	0.7%	0.6%	0.9%	1.4%	0.6%	0.7%	0.8%
Regulation	0.4%	1.1%	1.2%	1.1%	1.1%	1.0%	1.1%	0.9%	0.9%	0.8%	0.6%	0.5%	0.5%	0.5%	0.5%	0.4%	0.5%	0.2%
Black Start	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.3%	0.1%	0.1%	0.2%
Synchronized Reserves	0.0%	0.0%	0.0%	0.0%	0.3%	0.3%	0.2%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.2%	0.1%
Non-Synchronized Reserves	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Day Ahead Scheduling Reserve (DASR)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.1%	0.2%	0.1%
Administration	0.6%	0.7%	1.7%	2.3%	2.2%	2.0%	1.1%	1.3%	1.1%	0.5%	0.6%	0.6%	0.6%	0.9%	0.8%	0.6%	0.8%	0.9%
PJM Administrative Fees	0.6%	0.7%	1.7%	2.3%	2.2%	1.8%	1.0%	1.3%	1.0%	0.5%	0.6%	0.5%	0.6%	0.9%	0.8%	0.6%	0.8%	0.9%
NERC/RFC	0.0%	-0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	-0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%	0.1%
RTO Startup and Expansion	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Energy Uplift (Operating Reserves)	1.3%	2.5%	2.9%	1.9%	1.9%	1.9%	1.5%	0.8%	0.9%	0.8%	0.9%	1.2%	1.2%	1.5%	1.0%	1.6%	0.7%	0.3%
Demand Response	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.0%	0.0%
Load Response	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Emergency Load Response	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%
Emergency Energy	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total Price	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

⁶⁰ Note: The totals in this table include after the fact billing adjustments and may not match totals presented in past reports.

Figure 1-2 shows the contributions of load-weighted energy, capacity and transmission service charges to the total price of wholesale power for each quarter since 1999.

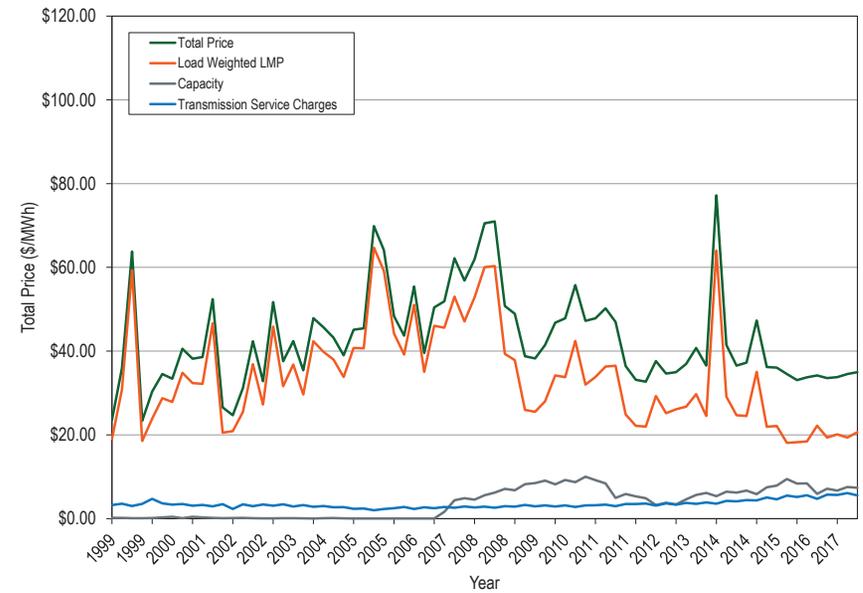
Figure 1-2 Top three components of quarterly total price (\$/MWh): January 1, 1999 through September 30, 2017⁶¹



61 Note: The totals presented in this figure include after the fact billing adjustments and may not match totals presented in past reports.

Figure 1-3 shows the inflation adjusted contributions of load-weighted energy, capacity and transmission service charges to the total price of wholesale power for each quarter since 1999.⁶²

Figure 1-3 Inflation adjusted top three components of quarterly total price (\$/MWh): January 1, 1999 through September 30, 2017⁶³

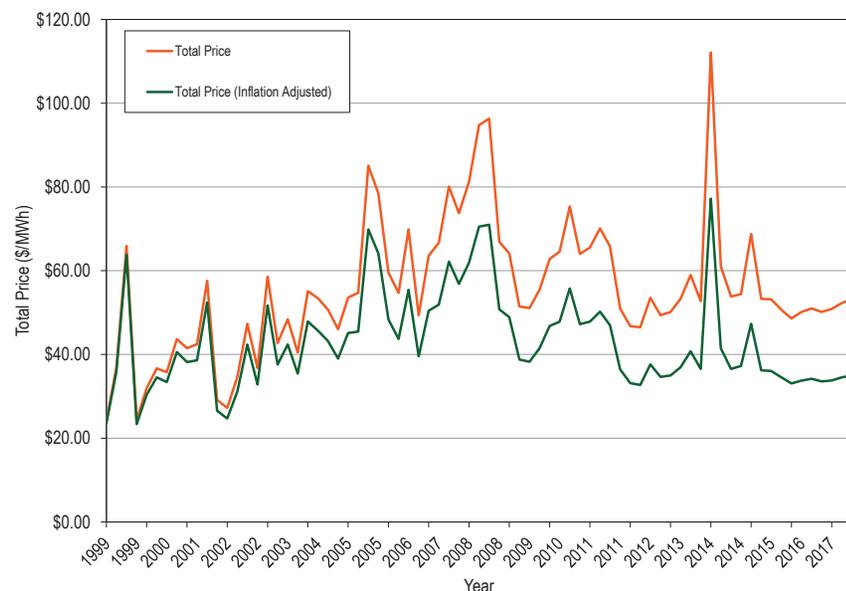


62 US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by Bureau of Labor Statistics. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (July 14, 2017)

63 Note: The totals presented in this figure include after the fact billing adjustments and may not match totals presented in past reports.

Figure 1-4 shows the total price of wholesale power and the inflation adjusted total price of wholesale power for each quarter since 1999.⁶⁴

Figure 1-4 Quarterly total price and quarterly inflation adjusted total price (\$/MWh): January 1, 1999 through September 30, 2017^{65 66}



⁶⁴ US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by Bureau of Labor Statistics. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (July 14, 2017)

⁶⁵ Note: The totals presented in this figure include after the fact billing adjustments and may not match totals presented in past reports.

⁶⁶ US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by Bureau of Labor Statistics. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (July 14, 2017)

Section Overviews

Overview: Section 3, Energy Market

Market Structure

- Supply.** Supply includes physical generation and imports and virtual transactions. The maximum of average offered real-time generation increased by 2,551 MW, or 1.5 percent, from 171,300 MW in the summer of 2016 to 173,851 MW in the summer of 2017. In the first nine months of 2017, 3,941.0 MW of new resources were added, 2,072.8 MW were retired. PJM average real-time cleared generation in the first nine months of 2017 decreased by 1,141 MW, or 1.2 percent, from the first nine months of 2016, from 92,799 MW to 91,658 MW. PJM average day-ahead cleared supply in the first nine months of 2017, including INCs and up to congestion transactions, increased by 0.2 percent from the first nine months of 2016, from 133,089 MW to 133,377 MW.
- Aggregate Pivotal Suppliers.** The PJM energy market at times requires generation from pivotal suppliers to meet the daily peak load, resulting in aggregate market power even when the HHI level indicates that the aggregate market is unconcentrated. Based on the HHI, the PJM energy market was unconcentrated overall with low concentration in the baseload segment, moderate concentration in the intermediate segment, and high concentration in the peaking segment.
- Generation Fuel Mix.** In the first nine months of 2017, coal units provided 32.2 percent, nuclear units 35.3 percent and natural gas units 26.8 percent of total generation. Compared to the first nine months of 2016, generation from coal units decreased 6.2 percent, generations from natural gas units decreased 2.8 percent and generation from nuclear units increased 2.5 percent.
- Fuel Diversity.** In the first nine months of 2017, the fuel diversity of energy generation, measured by the fuel diversity index for energy (FDI_e), increased 0.7 percent over the first nine months of 2016.

- **Marginal Resources.** In the PJM Real-Time Energy Market, in the first nine months of 2017, coal units were 32.5 percent of marginal resources and natural gas units were 52.9 percent of marginal resources. In the first nine months of 2016, coal units were 46.2 percent and natural gas units were 41.4 percent of the marginal resources.

In the PJM Day-Ahead Energy Market, in the first nine months of 2017, up to congestion transactions were 80.4 percent of marginal resources, INCs were 5.5 percent of marginal resources, DECs were 10.1 percent of marginal resources, and generation resources were 4.0 percent of marginal resources. In the first nine months of 2016, up to congestion transactions were 81.9 percent of marginal resources, INCs were 4.3 percent of marginal resources, DECs were 8.9 percent of marginal resources, and generation resources were 4.9 percent of marginal resources.

- **Demand.** Demand includes physical load and exports and virtual transactions. The PJM accounting peak load during the first nine months of 2017 was 145,636 MW in the HE 1700 on July 19, 2017, which was 6,541 MW, 4.3 percent, lower than the PJM peak load for the first nine months of 2016, which was 152,177 MW in the HE 1500 on August 11, 2016.

PJM average real-time load in the first nine months of 2017 decreased by 3.7 percent from 2016, from 90,599 MW to 87,243 MW. PJM average day-ahead demand in the first nine months of 2017, including DECs and up to congestion transactions, decreased by 0.5 percent in the first nine months of 2016, from 129,070 MW to 128,450 MW.

- **Supply and Demand: Load and Spot Market.** Companies that serve load in PJM can do so using a combination of self-supply, bilateral market purchases and spot market purchases. For the first nine months of 2017, 15.5 percent of real-time load was supplied by bilateral contracts, 28.5 percent by spot market purchases and 56.0 percent by self-supply. Compared with the first nine months of 2016, reliance on bilateral contracts increased by 2.6 percentage points, reliance on spot market purchases increased by 4.6 percentage points and reliance on self-supply decreased by 7.2 percentage points.

- **Supply and Demand: Scarcity.** Five minute shortage pricing was triggered on one day in the first nine months of 2017.

Market Behavior

- **Offer Capping for Local Market Power.** PJM offer caps units when the local market structure is noncompetitive. Offer capping is an effective means of addressing local market power when the rules are designed and implemented properly. Offer capping levels have historically been low in PJM. In the Day-Ahead Energy Market, for units committed to provide energy for local constraint relief, offer-capped unit hours decreased from 0.1 percent in the first nine months of 2016 to 0 percent in the first nine months of 2017. In the Real-Time Energy Market, for units committed to provide energy for local constraint relief, offer-capped unit hours decreased from 0.4 percent in the first nine months of 2016 to 0.3 percent in the first nine months of 2017.

In the first nine months of 2017, eleven control zones experienced congestion resulting from one or more constraints binding for 75 or more hours. The analysis of the application of the TPS test to local markets demonstrates that it is working successfully to identify pivotal owners when the market structure is noncompetitive and to ensure that owners are not subject to offer capping when the market structure is competitive. There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that can result in the exercise of local market power. These issues need to be addressed.

- **Offer Capping for Reliability.** PJM also offer caps units that are committed for reliability reasons, specifically for black start service and reactive service. In the Day-Ahead Energy Market, for units committed for reliability reasons, offer-capped unit hours increased from 0 percent in the first nine months of 2016 to 0.1 percent in the first nine months of 2017. In the Real-Time Energy Market, for units committed for reliability reasons, offer-capped unit hours increased from 0 percent in the first nine months of 2016 to 0.1 percent in the first nine months of 2017.

- **Markup Index.** The markup index is a summary measure of participant offer behavior for individual marginal units. In the first nine months of 2017, in the PJM Real-Time Energy Market, 93.0 percent of marginal units had offer prices less than \$50 per MWh. The average dollar markup of units with offer prices less than \$25 was positive when using unadjusted cost offers. The average dollar markup of units with offer prices between \$25 and \$50 was positive when using unadjusted cost offers. Negative markup means the unit is offering to run at a price less than its cost-based offer, demonstrating a revealed short run marginal cost that is less than the allowable cost-based offer under the PJM market rules. Some marginal units did have substantial markups. Using the unadjusted cost offers, the highest markup for any marginal unit in the first nine months of 2017 was \$755.09 while the highest markup in the first nine months of 2016 was \$258.16.

In the first nine months of 2017, in the PJM Day-Ahead Energy Market, 94.3 percent of marginal generating units had offer prices less than \$50 per MWh. The average dollar markup of units with offer prices less than \$25 was positive when using unadjusted cost offers. The average dollar markup of units with offer prices between \$25 and \$50 was positive when using unadjusted cost offers. Using the unadjusted cost offers, the highest markup for any marginal units in the first nine months of 2017 was \$47.74, while the highest markup in the first nine months of 2016 was \$170.99.

- **Markup.** The markup frequency distributions show that a significant proportion of units make price-based offers less than the cost-based offers permitted under the PJM market rules. This behavior means that competitive price-based offers reveal actual unit marginal costs and that PJM market rules permit the inclusion of costs in cost-based offers that are not short run marginal costs.

The markup behavior shown in the markup frequency distributions also shows that a substantial number of units were offered with high markups, consistent with the exercise of market power.

- **Frequently Mitigated Units (FMU) and Associated Units (AU).** A new FMU rule became effective November 1, 2014, limiting the availability of FMU adders to units with net revenues less than unit going forward costs. The number of units that were eligible for an FMU or AU adder declined from an average of 70 units during the first 11 months of 2014, to zero since December 2014.
- **Virtual Offers and Bids.** Any market participant in the PJM Day-Ahead Energy Market can use increment offers, decrement bids, up to congestion transactions, import transactions and export transactions as financial instruments that do not require physical generation or load. In the first nine months of 2017, the average hourly increment offers submitted MW increased by 21.4 percent from 7,017 MW in the first nine months of 2016 to 8,521 MW in the first nine months of 2017, and cleared MW increased by 6.5 percent from 4,577 MW in the first nine months of 2016 to 4,876 MW in the first nine months of 2017. In the first nine months of 2017, the average hourly decrement bids submitted MW increased by 20.7 percent from 6,918 MW in the first nine months of 2016 to 8,349 MW in the first nine months of 2017, and cleared MW increased by 7.6 percent from 4,087 MW in the first nine months of 2016 to 4,397 MW in the first nine months of 2017. In the first nine months of 2017, the average hourly up to congestion submitted MW increased by 1.1 percent from 143,885 MW in the first nine months of 2016 to 145,467 MW in the first nine months of 2017, and cleared MW increased by 6.6 percent from 34,204 MW in the first nine months of 2016 to 36,478 MW in the first nine months of 2017.
- **Generator Offers.** Generator offers are categorized as dispatchable and self scheduled. Units which are available for economic dispatch are dispatchable. Units which are self scheduled to generate fixed output are categorized as self scheduled. Units which are self scheduled at their economic minimum and are available for economic dispatch up to their economic maximum are categorized as self scheduled and dispatchable. Of all generator offers in the first nine months of 2017, 55.3 percent were offered as available for economic dispatch, 3.7 percent were offered as emergency dispatch, 20.0 percent were offered as self scheduled, and 20.9 percent were offered as self scheduled and dispatchable.

Market Performance

- **Prices.** PJM LMPs are a direct measure of market performance. Price level is a good, general indicator of market performance, although the number of factors influencing the overall level of prices means it must be analyzed carefully. Among other things, overall average prices reflect changes in supply and demand, generation fuel mix, the cost of fuel, emissions related expenses, markup and local price differences caused by congestion. PJM also may administratively set prices with the creation of closed loop interfaces related to demand side resources or reactive power, the application of transmission penalty factors, or the application of price setting logic.

PJM real-time energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The load-weighted average real-time LMP was 3.5 percent higher in the first nine months of 2017 than in first nine months of 2016, \$30.36 per MWh versus \$29.32 per MWh.

PJM day-ahead energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The load-weighted, average day-ahead LMP was 1.9 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.26 per MWh versus \$29.69 per MWh.

- **Components of LMP.** In the PJM Real-Time Energy Market, in the first nine months of 2017, 30.4 percent of the load-weighted LMP was the result of coal costs, 38.3 percent was the result of gas costs and 2.12 percent was the result of the cost of emission allowances.
In the PJM Day-Ahead Energy Market, in the first nine months of 2017, 21.2 percent of the load-weighted LMP was the result of the coal costs, 23.1 percent was the result of the DEC bid costs, 18.2 percent was the result of the gas costs, 23.2 percent was the result of the INC bid costs, and 3.0 percent was the result of the up to congestion transaction costs.
- **Markup.** The markup conduct of individual owners and units has an identifiable impact on market prices. Markup is a key indicator of the competitiveness of the energy market.

In the PJM Real-Time Energy Market in the first nine months of 2017, the adjusted markup component of LMP was \$4.74 per MWh or 15.6 percent of the PJM real-time, load-weighted, average LMP. May had the highest adjusted peak markup component, \$8.23 per MWh, or 21.72 percent of the real-time, peak hour load-weighted, average LMP. Using the unadjusted cost offers, the highest markup of a marginal unit in the first nine months of 2017 was \$755.09 per MWh. There were 37 hours in the first nine months of 2017 where the positive markup contribution to the PJM system wide, load-weighted, average LMP exceeded \$45.82 per MWh.

In the PJM Day-Ahead Energy Market, INCs, DECs and UTCs have zero markups. In the first nine months of 2017, the adjusted markup component of LMP resulting from generation resources was \$1.97 per MWh or 6.5 percent of the PJM day-ahead load-weighted average LMP. September had the highest adjusted markup component, \$2.98 per MWh or 9.4 percent of the day-ahead load-weighted average LMP. Using the unadjusted cost offers, the highest markup of a marginal unit in the first nine months of 2017 was \$47.74 per MWh.

Participant behavior was evaluated as competitive because the analysis of markup shows that marginal units generally make offers at, or close to, their marginal costs in both the Day-Ahead and Real-Time Energy Markets, although the behavior of some participants is consistent with economic withholding.

- **Price Convergence.** Hourly and daily price differences between the Day-Ahead and Real-Time Energy Markets fluctuate continuously and substantially from positive to negative. The difference between the average day-ahead and real-time prices was -\$0.11 per MWh in the first nine months of 2016 and -\$0.47 per MWh in the first nine months of 2017. The difference between average day-ahead and real-time prices, by itself, is not a measure of the competitiveness or effectiveness of the Day-Ahead Energy Market.

Scarcity

- PJM implemented five minute shortage pricing beginning May 11, 2017. Five minute shortage pricing was triggered for the first time on September 21, 2017. The shortage pricing was triggered for 21 intervals between 1400 and 1700 on that day.

Section 3 Recommendations

- The MMU recommends that the market rules should explicitly require that offers into the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. The short run marginal cost should reflect opportunity cost when and where appropriate. (Priority: Medium. First reported 2009. Status: Not adopted.)
- The MMU recommends that PJM require every market participant to make available at least one cost schedule with the same fuel type and parameters as that of their offered price schedule. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM require that the level of incremental costs includable in cost offers not exceed the unit's short run marginal cost. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM require that all fuel cost policies be algorithmic, verifiable, and systematic. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that Manual 15 be replaced with a straightforward description of the components of cost offers based on short run marginal costs and the correct calculation of cost offers. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends removal of all use of FERC System of Accounts in the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of all use of cyclic starting and peaking factors from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of all labor costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends changing the definition of the start heat input for combined cycles to include only the amount of fuel used from firing each combustion turbine in the combined cycle to the breaker close of each combustion turbine. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of nuclear fuel and nonfuel operations and maintenance costs that are not short run marginal costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends revising the pumped hydro fuel cost calculation to include day-ahead and real-time power purchases. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends revisions to the calculation of energy market opportunity costs to incorporate all time based offer parameters and all limitations that impact the opportunity cost of generating unit output. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends removing the catastrophic designation for force majeure fuel supply limitations in Schedule 2. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that the rules governing the application of the TPS test be clarified and documented. (Priority: High. First reported 2010. Status: Not adopted.)
- The MMU recommends, in order to ensure effective market power mitigation when the TPS test is failed, that markup be constant across the full MWh range of price and cost offers, that there be at least one cost-based offer using the same fuel as the available price-based offer. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that in order to ensure effective market power mitigation when the TPS test is failed, the operating parameters in the

cost-based offer and the price-based parameter limited schedule (PLS) offer be at least as flexible as the operating parameters in the available non-PLS price-based offer, and that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer. (Priority: High. First reported 2015. Status: Not adopted.)

- The MMU recommends that capacity performance resources and base capacity resources (during the June through September period) be held to the OEM operating parameters of the capacity market CONE reference resource for performance assessment and energy uplift payments and that this standard be applied to all technologies on a uniform basis. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that under the capacity performance construct, PJM recognize the difference between operational parameters that indicate to PJM dispatchers what a unit is capable of during the operating day and the parameters that are used for capacity performance assessment as well as uplift payments. The parameters which determine nonperformance charges and the amount of uplift payments to those generators should reflect the flexibility goals of the capacity performance construct. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM retain the \$1,000 per MWh offer cap in the PJM energy market except when cost-based offers exceed \$1,000 per MWh, and retain other existing rules that limit incentives to exercise market power. (Priority: High. First reported 1999. Status: Partially adopted, 1999.)
- The MMU recommends that PJM not allow nuclear generators which do not respond to prices or which only respond to manual instructions from the dispatcher to set the LMPs in the real-time market. (Priority: Low. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM document how LMPs are calculated when demand response is marginal. The LMPs in excess of \$1,800 per MWh on January 7, 2014, were potentially a result of the way in which PJM modeled zonal (not nodal) demand response as a marginal resource. (Priority: Low. First reported 2014. Status: Not Adopted.)
- The MMU recommends that PJM explicitly state its policy on the use of transmission penalty factors including: the level of the penalty factors; the triggers for the use of the penalty factors; the appropriate line ratings to trigger the use of penalty factors; the allowed duration of the violation; the use of constraint relaxation logic; and when the transmission penalty factors will be used to set the shadow price. (Priority: Medium. First reported 2015. Status: Not adopted. Stakeholder process.)
- The MMU recommends that the definition of maximum emergency status in the tariff apply at all times rather than just during maximum emergency events.⁶⁷ (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM update the outage impact studies, the reliability analyses used in RPM for capacity deliverability and the reliability analyses used in RTEP for transmission upgrades to be consistent with the more conservative emergency operations (post contingency load dump limit exceedance analysis) in the energy market that were implemented in June 2013. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that the roles of PJM and the transmission owners in the decision making process to control for local contingencies be clarified, that PJM's role be strengthened and that the process be made transparent. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM include in the appropriate manual an explanation of the initial creation of hubs, the process for modifying hub definitions and a description of how hub definitions have changed.⁶⁸ There is currently no PJM documentation in the tariff or manuals explaining how hubs are created and how their definitions are changed.⁶⁹ (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that during hours when a generation bus shows a net withdrawal, the energy withdrawal be treated as load, not negative generation, for purposes of calculating load and load-weighted LMP.

⁶⁷ OATT § 1 (Definitions – OATT Definitions - L-M-N) (June 1, 2017) at 76.

⁶⁸ According to minutes from the first meeting of the Energy Market Committee (EMC) on January 28, 1998, the EMC unanimously agreed to be responsible for approving additions, deletions and changes to the hub definitions to be published and modeled by PJM. Since the EMC has become the Market Implementation Committee (MIC), the MIC now appears to be responsible for such changes.

⁶⁹ The general definition of a hub can be found in the PJM.com Glossary <<http://www.pjm.com/Glossary.aspx>>.

The MMU recommends that during hours when a load bus shows a net injection, the energy injection be treated as generation, not negative load, for purposes of calculating generation and load-weighted LMP. (Priority: Low. First reported 2013. Status: Not adopted.)

- The MMU recommends that PJM remove nonspecific fuel types such as other or co-fire other from the list of fuel types available for market participants to identify the fuel type associated with their price and cost schedules. (Priority: Medium. First reported 2015. Status: Partially adopted.)
- The MMU recommends that PJM routinely review all transmission facility ratings and any changes to those ratings to ensure that the normal, emergency and load dump ratings used in modeling the transmission system are accurate and reflect standard ratings practice. (Priority: Low. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM identify and collect data on available behind the meter generation resources, including nodal location information and relevant operating parameters. (Priority: Low. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM continue to enhance its posting of market data to promote market efficiency. (Priority: Medium. First reported 2005. Status: Partially adopted.)
- The MMU recommends the elimination of FMU and AU adders. FMU and AU adders no longer serve the purpose for which they were created and interfere with the efficient operation of PJM markets. (Priority: Medium. First reported 2012. Status: Partially adopted, 2014.)
- The MMU recommends that PJM require all generating units to identify the fuel type associated with each of their offered schedules. (Priority: Low. First reported 2014. Status: Adopted in full, 2014.)

Section 3 Conclusion

The MMU analyzed key elements of PJM energy market structure, participant conduct and market performance in the first nine months of 2017, including

aggregate supply and demand, concentration ratios, aggregate pivotal supplier results, local three pivotal supplier test results, offer capping, participation in demand response programs, loads and prices.

PJM average real-time cleared generation decreased by 1,141 MW, 1.2 percent, and peak load decreased by 6,541 MW, 4.3 percent, in the first nine months of 2017 compared to the first nine months of 2016. The relationship between supply and demand, regardless of the specific market, balanced by market concentration and the extent of pivotal suppliers, is referred to as the supply-demand fundamentals or economic fundamentals. While the market structure does not guarantee competitive outcomes, overall the market structure of the PJM aggregate energy market remains reasonably competitive although aggregate market power does exist for a significant number of hours. Market concentration levels remained in the unconcentrated range on average although there is high concentration in the peaking segment of the supply curve which adds to concerns about market power when market conditions are tight. Low average aggregate concentration does not mean that market power cannot be exercised. It is possible that market power can be exercised at times when individual suppliers or small groups of suppliers are pivotal even when the HHI level does not indicate that the market is highly concentrated. High markups for some units demonstrate the potential to exercise market power during high demand conditions. As demonstrated for the day-ahead market, it is possible to have pivotal suppliers in the aggregate market even when the HHI level is not in the highly concentrated range. The number of pivotal suppliers in the energy market is a more precise measure of structural market power than the HHI. The HHI is not a definitive measure of structural market power.

Prices are a key outcome of markets. Prices vary across hours, days and years for multiple reasons. Price is an indicator of the level of competition in a market although individual prices are not always easy to interpret. In a competitive market, prices are directly related to the marginal cost of the most expensive unit required to serve load in each hour. The pattern of prices within days and across months and years illustrates how prices are directly related to supply and demand conditions and thus also illustrates the potential

significance of the impact of the price elasticity of demand on prices. Energy market results in the first nine months of 2017 generally reflected supply-demand fundamentals, although the behavior of some participants during high demand periods is consistent with economic withholding. Economic withholding is the ability to increase markups substantially in tight market conditions. There are additional issues in the energy market including the uncertainties about the pricing and availability of natural gas, the way that generation owners incorporate natural gas costs in offers, and the lack of adequate incentives for unit owners to take all necessary actions to acquire fuel and operate rather than take an outage.

The three pivotal supplier test is applied by PJM on an ongoing basis for local energy markets in order to determine whether offer capping is required for transmission constraints.⁷⁰ This is a flexible, targeted real-time measure of market structure which replaced the offer capping of all units required to relieve a constraint. A generation owner or group of generation owners is pivotal for a local market if the output of the owners' generation facilities is required in order to relieve a transmission constraint. When a generation owner or group of owners is pivotal, it has the ability to increase the market price above the competitive level. The three pivotal supplier test explicitly incorporates the impact of excess supply and implicitly accounts for the impact of the price elasticity of demand in the market power tests. The result of the introduction of the three pivotal supplier test was to limit offer capping to times when the local market structure was noncompetitive and specific owners had structural market power. The analysis of the application of the three pivotal supplier test demonstrates that it is working for most hours to exempt owners when the local market structure is competitive and to require offer capping of owners when the local market structure is noncompetitive.

However, there are some issues with the application of market power mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market when market sellers fail the TPS test. There is no tariff or manual language that defines in detail the application of the TPS test and offer capping in the Day-Ahead Energy Market and the Real-Time Energy Market. In both

the Day-Ahead and Real-Time Energy Markets, generators have the ability to avoid mitigation by using varying markups in their price-based offers, offering different operating parameters in their price-based and cost-based offers, and using different fuels in their price-based and cost-based offers. These issues can be resolved by simple rule changes requiring that markup be constant across price and cost offers, that there be at least one cost-based offer using the same fuel as the available price-based offer, that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer, and requiring cost-based and price-based PLS offers to be at least as flexible as price-based non-PLS offers.

Another issue with the application of market power mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market when market sellers fail the TPS test is related to the definition of a competitive offer. A competitive offer is equal to short run marginal costs. The enforcement of market power mitigation rules is undermined if the definition of a competitive offer is not correct. The significance of competition metrics like markup is also undermined if the definition of a competitive offer is not correct. The definition of a competitive offer, as interpreted by PJM, is not currently correct. Some unit owners include costs that are not short run marginal costs in offers, including maintenance costs. This issue can be resolved by simple changes to the PJM market rules to incorporate a clear and accurate definition of short run marginal costs.

PJM also offer caps units that are committed for reliability reasons in addition to units committed to provide constraint relief. Specifically, units that are committed to provide reactive support and black start service are offer capped in the energy market. These units are committed manually in both the Day-Ahead and Real-Time Energy Markets.

With or without a capacity market, energy market design must permit scarcity pricing when such pricing is consistent with market conditions and constrained by reasonable rules to ensure that market power is not exercised. Scarcity pricing can serve two functions in wholesale power markets: revenue adequacy and price signals. Scarcity pricing for revenue adequacy is not

⁷⁰ The MMU reviews PJM's application of the TPS test and brings issues to the attention of PJM.

required in PJM. Scarcity pricing for price signals that reflect market conditions during periods of scarcity is required in PJM. Scarcity pricing is also part of an appropriate incentive structure facing both load and generation owners in a working wholesale electric power market design. Scarcity pricing must be designed to ensure that market prices reflect actual market conditions, that scarcity pricing occurs with transparent triggers based on measured reserve levels and transparent prices and that there are strong incentives for competitive behavior and strong disincentives to exercise market power. Such administrative scarcity pricing is a key link between energy and capacity markets. The PJM Capacity Market is explicitly designed to provide revenue adequacy and the resultant reliability. Nonetheless, with a market design that includes a direct and explicit scarcity pricing net revenue true up mechanism, scarcity pricing can be a mechanism to appropriately increase reliance on the energy market as a source of revenues and incentives in a competitive market without reliance on the exercise of market power. PJM implemented scarcity pricing rules in 2012. There are significant issues with the scarcity pricing net revenue true up mechanism in the PJM scarcity pricing design, which will create issues when scarcity pricing occurs. PJM implemented five minute scarcity pricing on May 11, 2017, and implemented two step operating reserve demand curves on July 12, 2017. There are also significant issues with PJM's scarcity pricing rules, including the absence of a clear trigger based on measured reserve levels (the current triggers are based on estimated reserves) and the lack of adequate locational scarcity pricing options.

The overall energy market results support the conclusion that energy prices in PJM are set, generally, by marginal units operating at, or close to, their marginal costs, although this was not always the case in 2014, 2015 or 2016. This is evidence of generally competitive behavior and competitive market outcomes, although the behavior of some participants during the high demand periods is consistent with economic withholding. Given the structure of the energy market which can permit the exercise of aggregate market power at times of high demand, the tighter market conditions and the change in some participants' behavior are sources of concern in the energy market and provide a reason to use cost as the sole basis for hourly changes in offers or

offers greater than \$1,000 per MWh. The MMU concludes that the PJM energy market results were competitive in the first nine months of 2017.

Overview: Section 4, Energy Uplift

Energy Uplift Results

- **Energy Uplift Charges.** Total energy uplift charges decreased by \$16.0 million, or 15.7 percent, in the first nine months of 2017 compared to the first nine months of 2016, from \$102.3 million to \$86.3 million.
- **Energy Uplift Charges Categories.** The decrease of \$16.0 million in the first nine months of 2017 is comprised of a \$23.9 million decrease in day-ahead operating reserve charges, a \$5.4 million decrease in balancing operating reserve charges and a \$13.2 million increase in reactive services charges.
- **Average Effective Operating Reserve Rates in the Eastern Region.** Day-ahead load paid \$0.027 per MWh, real-time load paid \$0.029 per MWh, a DEC paid \$0.338 per MWh and an INC and any load, generation or interchange transaction deviation paid \$0.311 per MWh.
- **Average Effective Operating Reserve Rates in the Western Region.** Day-ahead load paid \$0.027 per MWh, real-time load paid \$0.025 per MWh, a DEC paid \$0.330 per MWh and an INC and any load, generation or interchange transaction deviation paid \$0.303 per MWh.
- **Reactive Services Rates.** The PENELEC, ComEd and BGE control zones had the three highest local voltage support rates: \$0.130, \$0.104 and \$0.073 per MWh.

Characteristics of Credits

- **Types of units.** Coal units received 88.5 percent of all day-ahead generator credits. Combustion turbines received 74.4 percent of all balancing generator credits. Combustion turbines and diesels received 66.1 percent of the lost opportunity cost credits.
- **Concentration of Energy Uplift Credits.** The top 10 units receiving energy uplift credits received 35.0 percent of all credits. The top 10

organizations received 79.8 percent of all credits. Concentration indexes for energy uplift categories classify them as highly concentrated. Day-ahead operating reserves HHI was 7434, balancing operating reserves HHI was 3356 and lost opportunity cost HHI was 5366.

- **Economic and Noneconomic Generation.** In the first nine months of 2017, 85.1 percent of the day-ahead generation eligible for operating reserve credits was economic and 79.0 percent of the real-time generation eligible for operating reserve credits was economic.
- **Day-Ahead Unit Commitment for Reliability.** In the first nine months of 2017, 1.2 percent of the total day-ahead generation MWh was scheduled as must run by PJM, of which 54.5 percent received energy uplift payments.

Geography of Charges and Credits

- In the first nine months of 2017, 89.0 percent of all uplift charges allocated regionally (day-ahead operating reserves and balancing operating reserves) were paid by transactions (at control zones or buses within a control zone), demand and generation, 4.4 percent by transactions at hubs and aggregates and 6.7 percent by interchange transactions at interfaces.
- Generators in the Eastern Region received 48.4 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.
- Generators in the Western Region received 49.0 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.
- External generators received 2.6 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.

Section 4 Recommendations

The MMU recognizes that many of the issues addressed in the recommendations are being discussed in PJM stakeholder processes. Until new rules are in place, the MMU's recommendations and the reported status of those recommendations are based on the existing market rules.

- The MMU recommends that PJM not use closed loop interface constraints to artificially override the nodal prices that are based on fundamental LMP logic in order to: accommodate rather than resolve the inadequacies of the demand side resource capacity product; address the inability of the power flow model to incorporate the need for reactive power; accommodate rather than resolve the flaws in PJM's approach to scarcity pricing; or for any other reason. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM not use price setting logic to artificially override the nodal prices that are based on fundamental LMP logic in order to reduce uplift. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that if PJM believes it appropriate to modify the LMP price setting logic, PJM initiate a stakeholder process to create transparent and consistent modifications to the rules and incorporate the modifications in the PJM tariff. (Priority: Medium. First Reported 2016. Status: Not adopted.)
- The MMU recommends that PJM initiate an analysis of the reasons why some combustion turbines and diesels scheduled in the Day-Ahead Energy Market are not called in real time when they are economic. (Priority: Medium. First Reported 2012. Status: Not adopted.)
- The MMU recommends the elimination of the day-ahead operating reserve category to ensure that units receive an energy uplift payment based on their real-time output and not their day-ahead scheduled output. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends reincorporating the use of net regulation revenues as an offset in the calculation of balancing operating reserve credits.

- (Priority: Medium. First reported 2009. Status: Not adopted. Stakeholder process.)
- The MMU recommends not compensating self scheduled units for their startup cost when the units are scheduled by PJM to start before the self scheduled hours. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)
 - The MMU recommends four additional modifications to the energy lost opportunity cost calculations:
 - The MMU recommends calculating LOC based on 24 hour daily periods or multi-hour segments of hours for combustion turbines and diesels scheduled in the Day-Ahead Energy Market, but not committed in real time. (Priority: Medium. First reported 2014. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time should be compensated for LOC based on their real-time desired and achievable output, not their scheduled day-ahead output. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time be compensated for LOC incurred within an hour. (Priority: Medium. First reported 2013. Status: Not adopted.)
 - The MMU recommends that only flexible fast start units (startup plus notification times of 30 minutes or less) and short minimum run times (one hour or less) be eligible by default for the LOC compensation to units scheduled in the Day-Ahead Energy Market and not committed in real time. Other units should be eligible for LOC compensation only if PJM explicitly cancels their day-ahead commitment. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that up to congestion transactions be required to pay energy uplift charges for both the injection and the withdrawal sides of the UTC. (Priority: High. First reported 2011. Status: Not adopted. Pending before FERC.)
 - The MMU recommends eliminating the use of internal bilateral transactions (IBTs) in the calculation of deviations used to allocate balancing operating reserve charges. (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)
 - The MMU recommends allocating the energy uplift payments to units scheduled as must run in the Day-Ahead Energy Market for reasons other than voltage/reactive or black start services as a reliability charge to real-time load, real-time exports and real-time wheels. (Priority: Medium. First reported 2014. Status: Not adopted. Stakeholder process.)
 - The MMU recommends reallocating the operating reserve credits paid to units supporting the Con Edison – PJM Transmission Service Agreements. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
 - The MMU recommends that the total cost of providing reactive support be categorized and allocated as reactive services. Reactive services credits should be calculated consistent with the operating reserve credits calculation. (Priority: Medium. First reported 2012. Status: Not adopted. Stakeholder process.)
 - The MMU recommends including real-time exports and real-time wheels in the allocation of the cost of providing reactive support to the 500 kV system or above, which is currently allocated solely to real-time RTO load. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)
 - The MMU recommends enhancing the current energy uplift allocation rules to reflect the elimination of day-ahead operating reserves, the timing of commitment decisions and the commitment reasons. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
 - The MMU recommends modifications to the calculation of lost opportunity costs credits paid to wind units. The lost opportunity costs credits paid to wind units should be based on the lesser of the desired output, the estimated output based on actual wind conditions and the capacity interconnection rights (CIRs). In addition, the MMU recommends that PJM allow and wind units submit CIRs that reflect the maximum

output wind units want to inject into the transmission system at any time. (Priority: Low. First reported 2012. Status: Not adopted.)

- The MMU recommends that PJM revise Manual 11 attachment C consistent with the tariff to limit compensation to offered costs. The Manual 11 attachment C procedure should describe the steps market participants must take to change the availability of cost-based energy offers that have been submitted day ahead. The MMU recommends that PJM eliminate the Manual 11 attachment C procedure with the implementation of hourly offers (ER16-372-000). (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM clearly identify and classify all reasons for incurring operating reserves in the Day-Ahead and the Real-Time Energy Markets and the associated operating reserve charges in order to make all market participants aware of the reasons for these costs and to help ensure a long term solution to the issue of how to allocate the costs of operating reserves. (Priority: Medium. First reported 2011. Status: Adopted 2015.)
- The MMU recommends that PJM revise the current operating reserve confidentiality rules in order to allow the disclosure of complete information about the level of operating reserve charges by unit and the detailed reasons for the level of operating reserve credits by unit in the PJM region. (Priority: High. First reported 2013. Status: Partially adopted.)
- The MMU recommends that the lost opportunity cost in the energy market be calculated using the schedule on which the unit was scheduled to run in the energy market. (Priority: High. First reported 2012. Status: Adopted 2015.)
- The MMU recommends including no load and startup costs as part of the total avoided costs in the calculation of lost opportunity cost credits paid to combustion turbines and diesels scheduled in the Day-Ahead Energy Market but not committed in real time. (Priority: Medium. First reported 2012. Status: Adopted 2015.)

- The MMU recommends using the entire offer curve and not a single point on the offer curve to calculate energy lost opportunity cost. (Priority: Medium. First reported 2012. Status: Adopted 2015.)

Section 4 Conclusion

Energy uplift is paid to market participants under specified conditions in order to ensure that resources are not required to operate for the PJM system at a loss incurred when LMP is greater than or equal to the incremental offer but does not cover start up and no load costs. Loss is defined to be receiving revenue less than the short run marginal costs incurred in order to generate energy. Referred to in PJM as day-ahead operating reserves, balancing operating reserves, energy lost opportunity cost credits, reactive services credits, synchronous condensing credits or black start services credits, these payments are intended to be one of the incentives to generation owners to offer their energy to the PJM energy market at short run marginal cost and to operate their units at the direction of PJM dispatchers. These credits are paid by PJM market participants as operating reserve charges, reactive services charges, synchronous condensing charges or black start charges.

Competitive market outcomes result from energy offers equal to short run marginal costs and that incorporate flexible operating parameters. But when PJM permits a unit to include inflexible operating parameters in its offer and pays uplift based on those inflexible parameters, there is an incentive for the unit to remain inflexible. The rules regarding operating parameters should be implemented in a way that creates incentives for flexible operations rather than inflexible operations. PJM has failed to hold coal, gas and oil steam turbines to the standard used for combined cycles, combustion turbines and diesels. The standard should be the maximum achievable flexibility, based on OEM standards. Applying a weaker standard to steam units effectively subsidizes inflexible units by paying them based on inflexible parameters that result from lack of investment and that could be made more flexible. The result both inflates uplift costs and suppresses energy prices.

In PJM, all energy payments to demand response resources are uplift payments. The energy payments to these resources are not part of the supply and demand balance, they are not paid by LMP revenues and therefore the energy payments to demand response resources have to be paid as out of market uplift. The energy payments to economic DR are funded by real-time load and real-time exports. The energy payments to emergency DR are funded by participants with net energy purchases in the Real-Time Energy Market.

From the perspective of those participants paying energy uplift charges, these costs are an unpredictable and unhedgeable component of participants' costs in PJM. While energy uplift charges are an appropriate part of the cost of energy, market efficiency would be improved by ensuring that the level and variability of these charges are as low as possible consistent with the reliable operation of the system and that the allocation of these charges reflects the reasons that the costs are incurred to the extent possible.

The goal should be to reflect the impact of physical constraints in market prices to the maximum extent possible and thus to reduce the necessity for out of market energy uplift payments. When units receive substantial revenues through energy uplift payments, these payments are not transparent to the market because of the current confidentiality rules. As a result, other market participants, including generation and transmission developers, do not have the opportunity to compete to displace them. As a result, substantial energy uplift payments to a concentrated group of units and organizations have persisted for more than 10 years.

One part of addressing the level and allocation of uplift payments is to eliminate all day-ahead operating reserve credits. It is illogical and unnecessary to pay units day-ahead operating reserve credits because units do not incur any costs to run and any revenue shortfalls are addressed by balancing operating reserve credits.

The level of energy uplift paid to specific units depends on the level of the unit's energy offer, the unit's operating parameters, the details of the rules which define payments and the decisions of PJM operators. Energy

uplift payments result in part from decisions by PJM operators, who follow reliability requirements and market rules, to start units or to keep units operating even when hourly LMP is less than the offer price including energy, no load and startup costs. Energy uplift payments also result from units' operational parameters that may require PJM to schedule or commit resources during noneconomic hours. The balance of these costs not covered by energy revenues are collected as energy uplift rather than reflected in price as a result of the rules governing the determination of LMP.

PJM's goal should be to minimize the total level of energy uplift paid and to ensure that the associated charges are paid by all those whose market actions result in the incurrence of such charges. For example, up to congestion transactions continue to pay no energy uplift charges, which means that all others who pay these charges are paying too much. In addition, the netting of transactions against internal bilateral transactions should be eliminated.⁷¹ Some uplift payments are the result of inflexible operating parameters included in offers by generating units. Operating parameters should reflect the flexibility of the benchmark new entrant unit in the PJM Capacity Market if the unit is to receive uplift payments from other market participants. The goal should be to minimize the total incurred energy uplift charges and to increase the transactions over which those charges are spread in order to reduce the impact of energy uplift charges on markets. The result would be to reduce the level of per MWh charges, to reduce the uncertainty associated with uplift charges and to reduce the impact of energy uplift charges on decisions about how and when to participate in PJM markets.

But it is also important that the reduction of uplift payments not be a goal to be achieved at the expense of the fundamental logic of an LMP system. For example, the use of closed loop interfaces to reduce uplift should be eliminated because it is not consistent with LMP fundamentals and constitutes a form of subjective price setting. The same is true of what PJM terms its price setting logic.

⁷¹ On October 17, 2017, PJM filed with FERC to begin charging uplift to UTC transactions and eliminating the netting of deviations with internal bilateral transactions. See FERC Docket No. ER18-86-000.

Overview: Section 5, Capacity Market

RPM Capacity Market

Market Design

The Reliability Pricing Model (RPM) Capacity Market is a forward-looking, annual, locational market, with a must offer requirement for Existing Generation Capacity Resources and mandatory participation by load, with performance incentives, that includes clear market power mitigation rules and that permits the direct participation of demand-side resources.⁷²

Under RPM, capacity obligations are annual. Base Residual Auctions (BRA) are held for Delivery Years that are three years in the future. Effective with the 2012/2013 Delivery Year, First, Second and Third Incremental Auctions (IA) are held for each Delivery Year.⁷³ Prior to the 2012/2013 Delivery Year, the Second Incremental Auction was conducted if PJM determined that an unforced capacity resource shortage exceeded 100 MW of unforced capacity due to a load forecast increase. Effective January 31, 2010, First, Second, and Third Incremental Auctions are conducted 20, 10, and three months prior to the Delivery Year.⁷⁴ Also effective for the 2012/2013 Delivery Year, a Conditional Incremental Auction may be held if there is a need to procure additional capacity resulting from a delay in a planned large transmission upgrade that was modeled in the BRA for the relevant Delivery Year.⁷⁵

The 2018/2019 RPM Second Incremental Auction and the 2019/2020 RPM First Incremental Auction were conducted in the third quarter of 2017.

On June 9, 2015, FERC accepted changes to the PJM capacity market rules proposed in PJM's Capacity Performance (CP) filing.⁷⁶ For a transition period during the 2018/2019 and 2019/2020 Delivery Years, PJM will procure two product types, Capacity Performance and Base Capacity. PJM also procured Capacity Performance resources in two transition auctions for the 2016/2017 and 2017/2018 Delivery Years. Effective with the 2020/2021 Delivery Year,

PJM will procure a single capacity product, Capacity Performance. CP Resources are expected to be available and capable of providing energy and reserves when needed at any time during the Delivery Year.⁷⁷ Effective for the 2018/2019 through the 2019/2020 Delivery Years, a Base Capacity Demand Resource Constraint and a Base Capacity Resource Constraint are established for each modeled LDA. These maximum quantities are set for reliability purpose to limit the quantity procured of the less available products, including Base Capacity Generation Resources, Base Capacity Demand Resources, and Base Capacity Energy Efficiency Resources. The Capacity Performance (CP) Transition Incremental Auctions (IAs) were held as part of a five year transition to a single capacity product type in the 2020/2021 Delivery Year. Participation in the CP Transition IAs was voluntary. If a resource cleared a CP Transition IA and had a prior commitment for the relevant Delivery Year, the existing commitment was converted to a CP commitment, which is subject to the CP performance requirements and nonperformance charges. The Transition IAs were not designed to minimize the cost of purchasing Capacity Performance resources for the two delivery years and were not designed to maximize economic welfare for the two delivery years.

RPM prices are locational and may vary depending on transmission constraints.⁷⁸ Existing generation capable of qualifying as a capacity resource must be offered into RPM auctions, except for resources owned by entities that elect the fixed resource requirement (FRR) option. Participation by LSEs is mandatory, except for those entities that elect the FRR option. There is an administratively determined demand curve that defines scarcity pricing levels and that, with the supply curve derived from capacity offers, determines market prices in each BRA. RPM rules provide performance incentives for generation, including the requirement to submit generator outage data and the linking of capacity payments to the level of unforced capacity, and the performance incentives have been strengthened significantly under the Capacity Performance modifications to RPM. Under RPM there are explicit market power mitigation rules that define the must offer requirement, that define structural market power based on the marginal cost of capacity, that

⁷² The terms *PJM Region*, *RTO Region* and *RTO* are synonymous in this report and include all capacity within the PJM footprint.

⁷³ See 126 FERC ¶ 61,275 (2009) at P 86.

⁷⁴ See Letter Order, FERC Docket No. ER10-366-000 (January 22, 2010).

⁷⁵ See 126 FERC ¶ 61,275 (2009) at P 88.

⁷⁶ See 151 FERC ¶ 61,208 (2015).

⁷⁷ See PJM, "Manual 18: PJM Capacity Market," Rev. 38 (July 27, 2017) at 9.

⁷⁸ Transmission constraints are local capacity import capability limitations (low capacity emergency transfer limit (CETL) margin over capacity emergency transfer objective (CETO)) caused by transmission facility limitations, voltage limitations or stability limitations.

define offer caps, that define the minimum offer price, and that have flexible criteria for competitive offers by new entrants. Demand Resources and Energy Efficiency Resources may be offered directly into RPM auctions and receive the clearing price without mitigation.

Market Structure

- **PJM Installed Capacity.** During the first nine months of 2017, PJM installed capacity increased 48.5 MW or 0.0 percent, from 182,410.7 MW on January 1 to 182,459.2 MW on September 30. Installed capacity includes net capacity imports and exports and can vary on a daily basis.
- **PJM Installed Capacity by Fuel Type.** Of the total installed capacity on September 30, 2017, 35.7 percent was coal; 36.4 percent was gas; 18.2 percent was nuclear; 3.7 percent was oil; 4.9 percent was hydroelectric; 0.6 percent was wind; 0.4 percent was solid waste; and 0.2 percent was solar.
- **Market Concentration.** In the 2018/2019 RPM Second Incremental Auction, 35 participants in the RTO passed the three pivotal supplier (TPS) test. In the 2019/2020 RPM First Incremental Auction all participants in the total PJM market as well as the LDA RPM markets failed the three pivotal supplier (TPS) test.⁷⁹ Offer caps were applied to all sell offers for resources which were subject to mitigation when the Capacity Market Seller did not pass the test, the submitted sell offer exceeded the defined offer cap, and the submitted sell offer, absent mitigation, increased the market clearing price.^{80 81 82}
- **Imports and Exports.** Of the 4,961.8 MW of imports in the 2020/2021 RPM Base Residual Auction, 3,997.2 MW cleared. Of the cleared imports, 1,671.2 MW (41.8 percent) were from MISO.

⁷⁹ There are 27 Locational Deliverability Areas (LDAs) identified to recognize locational constraints as defined in "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region", Schedule 10.1. PJM determines, in advance of each BRA, whether the defined LDAs will be modeled in the given delivery year using the rules defined in OATT Attachment DD § 5.10(a)(ii).

⁸⁰ See OATT Attachment DD § 6.5.

⁸¹ Prior to November 1, 2009, existing DR and EE resources were subject to market power mitigation in RPM Auctions. See 129 FERC ¶ 61,081 at P 30 (2009).

⁸² Effective January 31, 2011, the RPM rules related to market power mitigation were changed, including revising the definition for Planned Generation Capacity Resource and creating a new definition for Existing Generation Capacity Resource for purposes of the must-offer requirement and market power mitigation, and treating a proposed increase in the capability of a generation capacity resource the same in terms of mitigation as a Planned Generation Capacity Resource. See 134 FERC ¶ 61,065 (2011).

- **Demand-Side and Energy Efficiency Resources.** Capacity in the RPM load management programs was 10,117.8 MW for June 1, 2017, as a result of cleared capacity for Demand Resources and Energy Efficiency Resources in RPM Auctions for the 2017/2018 Delivery Year (13,793.0 MW) less replacement capacity from sources other than Demand Resources and Energy Efficiency (3,675.2 MW).

Market Conduct

- **2018/2019 RPM Second Incremental Auction.** Of the 68 generation resources that submitted Base Capacity offers, the MMU calculated offer caps for 23 generation resources (33.8 percent), of which 12 (17.6 percent) were based on the technology specific default (proxy) ACR values and 11 (16.2 percent) were unit-specific offer caps. Of the 344 generation resources that submitted Capacity Performance offers, the MMU calculated unit specific offer caps for five generation resources (1.5 percent).
- **2019/2020 RPM First Incremental Auction.** Of the 81 generation resources that submitted Base Capacity offers, the MMU calculated offer caps for 28 generation resources (34.6 percent), of which 17 (21.0 percent) were based on the technology specific default (proxy) ACR values and 11 (13.6 percent) were unit-specific offer caps. Of the 382 generation resources that submitted Capacity Performance offers, the MMU calculated unit specific offer caps for six generation resources (1.6 percent).

Market Performance

- The 2020/2021 RPM Base Residual Auction was conducted in the first nine months of 2017. The weighted average capacity price for the 2017/2018 Delivery Year is \$141.19 per MW-day, including all RPM Auctions for the 2017/2018 Delivery Year held through the first nine months of 2017. The weighted average capacity price for the 2018/2019 Delivery Year is \$175.58, including all RPM Auctions for the 2018/2019 Delivery Year held through the first nine months of 2017. The weighted average capacity price for the 2019/2020 Delivery Year is \$113.41, including all RPM Auctions for the 2019/2020 Delivery Year held through the first nine months of 2017.

- For the 2016/2017 Delivery Year, RPM annual charges to load are \$7.7 billion.
- The delivery year weighted average capacity price was \$121.84 per MW-day in 2016/2017 and \$141.19 per MW-day in 2017/2018.

Generator Performance

- **Forced Outage Rates.** The average PJM EFORd for the first nine months of 2017 was 6.9 percent, an increase from 6.6 percent for the first nine months of 2016.⁸³
- **Generator Performance Factors.** The PJM aggregate equivalent availability factor for the first nine months of 2017 was 85.6 percent, an increase from 84.6 percent for the first nine months of 2016.
- **Outages Deemed Outside Management Control (OMC).** In the first nine months of 2017, 2.6 percent of forced outages were classified as OMC outages.

Section 5 Recommendations⁸⁴

The MMU recognizes that PJM has implemented the Capacity Performance Construct to replace some of the existing core market rules and to address fundamental performance incentive issues. The MMU recognizes that the Capacity Performance Construct addresses many of the MMU's recommendations. The MMU's recommendations are based on the existing capacity market rules. The status is reported as adopted if the recommendation was included in FERC's order approving PJM's Capacity Performance filing.⁸⁵

Definition of Capacity

- The MMU recommends the enforcement of a consistent definition of capacity resource. The MMU recommends that the requirement to be a

⁸³ The generator performance analysis includes all PJM capacity resources for which there are data in the PJM generator availability data systems (GADS) database. This set of capacity resources may include generators in addition to those in the set of generators committed as capacity resources in RPM. Data was downloaded from the PJM GADS database on October 31, 2017. EFORd data presented in state of the market reports may be revised based on data submitted after the publication of the reports as generation owners may submit corrections at any time with permission from PJM GADS administrators.

⁸⁴ The MMU has identified serious market design issues with RPM and the MMU has made specific recommendations to address those issues. These recommendations have been made in public reports. See Table 52.

⁸⁵ 151 FERC ¶ 61,208 (June 9, 2015).

physical resource be enforced and enhanced. The requirement to be a physical resource should apply at the time of auctions and should also constitute a commitment to be physical in the relevant Delivery Year. The requirement to be a physical resource should be applied to all resource types, including planned generation, demand resources and imports.^{86 87} (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)

- The MMU recommends that the definition of demand side resources be modified to ensure that such resources be fully substitutable for other generation capacity resources. Both the Limited and the Extended Summer DR products should be eliminated in order to ensure that the DR product has the same unlimited obligation to provide capacity year round as generation capacity resources. (Priority: High. First reported 2012. Status: Adopted 2015.)

Market Design and Parameters

- The MMU recommends that the test for determining modeled Locational Deliverability Areas (LDAs) in RPM be redefined. A detailed reliability analysis of all at risk units should be included in the redefined model. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that the net revenue calculation used by PJM to calculate the net Cost of New Entry (CONE) VRR parameter reflect the actual flexibility of units in responding to price signals rather than using assumed fixed operating blocks that are not a result of actual unit limitations.^{88 89} The result of reflecting the actual flexibility is higher net revenues, which affect the parameters of the RPM demand curve and market outcomes. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that Energy Efficiency Resources (EE) not be included on the supply side of the capacity market, because PJM's load

⁸⁶ See also Comments of the Independent Market Monitor for PJM, Docket No. ER14-503-000 (December 20, 2013).

⁸⁷ See "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf> (December 27, 2016).

⁸⁸ See PJM Interconnection, LLC, Docket No. ER12-513-000 (December 1, 2011) ("Triennial Review").

⁸⁹ See the 2012 State of the Market Report for PJM, Volume 2, Section 6, Net Revenue.

forecasts now account for future EE, unlike the situation when EE was first added to the capacity market. However, the MMU recommends that the PJM load forecast method should be modified so that EE impacts immediately affect the forecast without the long lag times incorporated in the current forecast method. If EE is not included on the supply side, there is no reason to have an add back mechanism. If EE remains on the supply side, the implementation of the EE add back mechanism should be modified to ensure that market clearing prices are not affected. (Priority: Medium. First reported 2016. Status: Not adopted.)

- The MMU recommends that PJM reduce the number of incremental auctions to a single incremental auction held three months prior to the start of the delivery year and reevaluate the triggers for holding conditional incremental auctions. (Priority: Medium. First reported 2013. Modified Q1 2017. Status: Not adopted.)
- The MMU recommends that PJM offer to sell back capacity in incremental auctions only at the BRA clearing price for the relevant delivery year. (Priority: Medium. First reported Q1, 2017. Status: Not adopted.)
- The MMU recommends that the use of the 2.5 percent demand adjustment (Short Term Resource Procurement Target) be terminated immediately. The 2.5 percent should be added back to the overall market demand curve. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends changing the RPM solution method to explicitly incorporate the cost of make whole payments in the objective function. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM clear the capacity market based on nodal capacity resource locations and the characteristics of the transmission system consistent with the actual electrical facts of the grid. The current nested LDA structure used in the capacity market does not adequately represent all the capacity transfers that are feasible among LDAs. Absent a fully nodal capacity market clearing process, the MMU recommends that PJM use a nonnested model for all LDAs and specify a VRR curve for each LDA separately. Each LDA requirement should be met with the capacity resources located within the LDA and exchanges from neighboring LDAs

up to the transmission limit. LDAs should price separate if that is the result of the LDA supply curves and the transmission constraints. (Priority: Medium. New recommendation. Status: Not adopted.)

Offer Caps and Offer Floors

- The MMU recommends the extension of the minimum offer price rule (MOPR) to all existing and proposed units in order to protect competition in the capacity market from external subsidies. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that, as part of the MOPR unit specific standard of review, all projects be required to use the same basic modeling assumptions. That is the only way to ensure that projects compete on the basis of actual costs rather than on the basis of modeling assumptions.⁹⁰ (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that modifications to existing resources not be treated as new resources for purposes of market power related offer caps or MOPR offer floors. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the RPM market power mitigation rule be modified to apply offer caps in all cases when the three pivotal supplier test is failed and the sell offer is greater than the offer cap. This will ensure that market power does not result in an increase in make whole payments. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM develop a forward looking estimate for the expected number of Performance Assessment Hours (H) to use in calculating the Non-Performance Charge Rate. The MMU recommends that PJM develop a forward looking estimate for the Balancing Ratio (B) during Performance Assessment Hours to use in calculating the default offer cap. Both H and B parameters should be included in the annual

⁹⁰ See 143 FERC ¶ 61,090 (2013) ("We encourage PJM and its stakeholders to consider, for example, whether the unit-specific review process would be more effective if PJM requires the use of common modeling assumptions for establishing unit-specific offer floors while, at the same time, allowing sellers to provide support for objective, individual cost advantages. Moreover, we encourage PJM and its stakeholders to consider these modifications to the unit-specific review process together with possible enhancements to the calculation of Net CONE."); see also, Comments of the Independent Market Monitor for PJM, Docket No. ER13-535-001 (March 25, 2013); Complaint of the Independent Market Monitor for PJM v. Unnamed Participant, Docket No. EL12-63-000 (May 1, 2012); Motion for Clarification of the Independent Market Monitor for PJM, Docket No. ER11-2875-000, et al. (February 17, 2012); Protest of the Independent Market Monitor for PJM, Docket No. ER11-2875-002 (June 2, 2011); Comments of the Independent Market Monitor for PJM, Docket Nos. EL11-20 and ER11-2875 (March 4, 2011).

review of planning parameters for the Base Residual Auction. (Priority: High. New recommendation. Status: Not adopted.)

Performance Incentive Requirements of RPM

- The MMU recommends that a unit which is not capable of supplying energy consistent with its day-ahead offer reflect an appropriate outage. (Priority: Medium. First reported 2009. Status: Not adopted. Pending before FERC.)
- The MMU recommends that retroactive replacement capacity transactions not be permitted. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that Generation Capacity Resources be paid on the basis of whether they produce energy when called upon during any of the hours defined as critical. One hundred percent of capacity market revenue should be at risk rather than only fifty percent. (Priority: High. First reported 2012. Status: Adopted 2015.)
- The MMU recommends that PJM eliminate all OMC outages from the calculation of forced outage rates used for any purpose in the PJM Capacity Market. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that PJM eliminate the broad exception related to lack of gas during the winter period for single-fuel, natural gas-fired units.⁹¹ (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that there be an explicit requirement that capacity resource offers in the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. (Priority: Low. First reported 2013. Status: Not adopted.)

Capacity Imports and Exports

- The MMU recommends that all capacity imports be required to be pseudo tied prior to the relevant Delivery Year in order to ensure that imports

are as close to full substitutes for internal, physical capacity resources as possible. (Priority: High. First reported 2014. Status: Adopted 2015.)

- The MMU recommends that all capacity imports be required to be deliverable to PJM load prior to the relevant delivery year to ensure that they are as close to full substitutes for internal, physical capacity resources as possible. Pseudo ties alone are not adequate to ensure deliverability. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that all costs incurred as a result of a pseudo tied unit be borne by the unit itself and included as appropriate in unit offers in the capacity market. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that all capacity imports have firm transmission to the PJM border prior to offering in an RPM auction. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends that all resources importing capacity into PJM accept a must offer requirement. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends clear, explicit and detailed rules that define the conditions under which PJM will and will not recall energy from PJM capacity resources and prohibit new energy exports from PJM capacity resources. The MMU recommends that those rules define the conditions under which PJM will purchase emergency energy while at the same time not recalling energy exports from PJM capacity resources. PJM has modified these rules, but the rules need additional clarification and operational details. (Priority: Low. First reported 2010. Status: Partially adopted.)

Deactivations/Retirements

- The MMU recommends that the notification requirement for deactivations be extended from 90 days prior to the date of deactivation to 12 months prior to the date of deactivation and that PJM and the MMU be provided 60 days rather than 30 days to complete their reliability and market power analyses. (Priority: Low. First reported 2012. Status: Partially adopted.)

⁹¹ See OATT Attachment DD § 10(e). For more on this issue and related incentive issues, see the MMU's White Paper included in: Monitoring Analytics, LLC and PJM Interconnection, LLC, joint report, "Capacity in the PJM Market," (August 20, 2012). <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_And_PJM_Capacity_White_Papers_On_OPSI_Issues_20120820.pdf>

- The MMU recommends that RMR units recover all and only the incremental costs, including incremental investment costs, required by the RMR service that the unit owner would not have incurred if the unit owner had deactivated its unit as it proposed. Generation owners should bear all other costs. Customers should bear no responsibility for paying previously incurred costs, including a return on or of prior investments. (Priority: Low. First reported 2010. Status: Not adopted.)

Section 5 Conclusion

The analysis of PJM Capacity Markets begins with market structure, which provides the framework for the actual behavior or conduct of market participants. The analysis examines participant behavior within that market structure. In a competitive market structure, market participants are constrained to behave competitively. The analysis examines market performance, measured by price and the relationship between price and marginal cost, that results from the interaction of market structure and participant behavior.

The MMU found serious market structure issues, measured by the three pivotal supplier test results in the PJM Capacity Market in the first nine months of 2017. Explicit market power mitigation rules in the RPM construct offset the underlying market structure issues in the PJM Capacity Market under RPM. The exception was that some seasonal resources were paid additional make whole based on a failure of the market power rules to apply offer capping. The PJM capacity market results were competitive in the first nine months of 2017.

The MMU has identified serious market design issues with RPM and the MMU has made specific recommendations to address those issues.^{92 93 94 95}

⁹⁶ In 2016 and 2017, the MMU prepared a number of RPM-related reports

⁹² See "Analysis of the 2016/2017 RPM Base Residual Auction," <http://www.monitoringanalytics.com/reports/Reports/2014/IMM_Analysis_of_the_20162017_RPM_Base_Residual_Auction_20140418.pdf> (April 18, 2014).

⁹³ See "Analysis of the 2017/2018 RPM Base Residual Auction," <http://www.monitoringanalytics.com/reports/Reports/2014/IMM_Analysis_of_the_2017_2018_RPM_Base_Residual_Auction_20141006.pdf> (October 6, 2014).

⁹⁴ See "Analysis of the 2018/2019 RPM Base Residual Auction Revised," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20182019_RPM_Base_Residual_Auction_20160706.pdf> (July 6, 2016).

⁹⁵ See "Analysis of the 2019/2020 RPM Base Residual Auction Revised," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20192020_RPM_BRA_20160831-Revised.pdf> (August 31, 2016).

⁹⁶ See "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf>

and testimony, shown in Table 52. The capacity performance modifications to the RPM construct have significantly improved the capacity market and addressed many of the issues identified by the MMU. The MMU will publish more detailed reports on the CP Auctions which include more specific issues and suggestions for improvements.

The issue of external subsidies emerged more fully in 2017. The subsidies are not part of the PJM market design but nonetheless threaten the foundations of the PJM capacity market as well as the competitiveness of PJM markets overall.

The Ohio subsidy proceedings and the Illinois ZEC subsidy proceeding and the request in Pennsylvania to subsidize the TMI nuclear power plant and the DOE NOPR, all originate from the fact that competitive markets result in the exit of uneconomic and uncompetitive generating units. Regardless of the specific rationales offered by unit owners, the proposed solution for all such generating units has been to provide out of market subsidies in order to retain such units. The proposed solution in all cases ignores the opportunity cost of subsidizing uneconomic units, which is the displacement of new resources and technologies that would otherwise be economic. These subsidies are not accurately characterized as state subsidies. These subsidies were all requested by the owners of specific uneconomic generating units in order to improve the profitability of those specific units. These subsidies were not requested to accomplish broader social goals. Broader social goals can all be met with market-based mechanisms available to all market participants on a competitive basis and without discrimination.

Subsidies are contagious. Competition in the markets could be replaced by competition to receive subsidies. Similar threats to competitive markets are being discussed by unit owners in other states and the potentially precedential nature of these actions enhances the urgency of creating an effective rule to maintain competitive markets by modifying market rules to address these subsidies. Fortunately, this can be accomplished quickly by expanding the coverage of an existing rule that already reflects stakeholder compromises.

(December 27, 2016).

PJM markets have no protection against this emergent threat. Accurate signals for entry and exit are necessary for well functioning and competitive markets. Competitive investors rely on accurate signals to make decisions. The current MOPR only addresses subsidies for new entry. The current subsidies demonstrate that the markets need protection against subsidized, noncompetitive offers from existing as well as new resources. The MOPR should be expanded (MOPR-Ex) to address subsidies for existing units, and this should be done expeditiously. This issue will not become moot unless and until the MOPR is reformed. Action is needed to correct the MOPR immediately. An existing unit MOPR is the best means to defend the PJM markets from the threat posed by subsidies intended to forestall retirement of financially distressed assets. The role of subsidies to renewables should also be clearly defined and be incorporated in this rule.

While the existing unit MOPR would protect markets in the short run, the underlying issues that have resulted in the pressure on markets should also be examined. Unit owners are seeking subsidies because gas prices are low resulting in low energy market margins and because flaws in the PJM capacity design have led to very substantial price suppression over the past 10 years.

To the extent that there are shared broader goals related to PJM markets, they should also be addressed, but this can happen with a slightly longer lead time. If a shared goal is to reduce carbon output, a price on carbon is the market based solution. If a shared goal is increased renewables in addition to their carbon attributes, a common approach to RECs would be a market based solution. Fuel diversity has also been mentioned as an issue. Current fuel diversity is higher than ever in PJM. If there is an issue, the real issue is fuel security and not fuel diversity. Significant reliance on specific fuels, including nuclear, coal and gas means that markets are at risk from a significant disruption in any one fuel. If fuel security for gas is a concern, a number of issues should be considered including the reliability of the pipelines, the compatibility of the gas pipeline and the merchant generator business models, the degree to which electric generators have truly firm gas service and the need for a gas RTO to help ensure reliability.

As a result of the fact that demand side resources have contributed to price suppression in PJM capacity markets, the place of demand side in PJM should be reexamined. There are ways to ensure and enhance the vibrancy of demand side without negatively affecting markets for generation. There are other price formation issues in the capacity market that should also be examined and addressed.

Overview: Section 6, Demand Response

Overview

- **Demand Response Activity.** Demand response includes the economic program and the emergency program. The economic program includes the response to energy prices in the energy market. The emergency and pre-emergency programs are part of the capacity market program which includes both capacity payments and associated energy revenues when the capacity is called on to respond.⁹⁷ In the first nine months of 2017, the emergency program accounted for 98.6 percent of all revenue received by demand response providers, the economic program for 0.5 percent, synchronized reserve for 0.6 percent and the regulation market for 0.3 percent. Total emergency revenue decreased by \$166.0 million, 31.2 percent, from \$ 531.3 million in the first nine months of 2016 to \$365.4million in the first nine months of 2017. Capacity market revenue, which comprised 100.0 percent of the emergency demand response program in the first nine months of 2017, decreased by \$166.0 million, 31.2 percent, from \$531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017.⁹⁸

Economic program revenue decreased by \$1.3 million, 43.2 percent, from \$3.0 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017.⁹⁹ Synchronized reserve revenue decreased by \$0.5 million, 17.2 percent, from \$2.7 million in the first nine months of 2016 to \$2.3 million in the first nine months of 2017. Regulation revenue

⁹⁷ Throughout this document, emergency demand response refers to both emergency and pre-emergency demand response.

⁹⁸ The total credits and MWh numbers for demand resources were calculated as of October 16, 2017 and may change as a result of continued PJM billing updates.

⁹⁹ Economic credits are synonymous with revenue received for reductions under the economic load response program.

increased by \$0.5 million, 69.7 percent, from \$0.8 million in the first nine months of 2016 to \$1.3 million in the first nine months of 2017.

Total demand response revenue decreased by \$167.2 million, 31.1 percent, from \$537.8 million in the first nine months of 2016 to \$370.6 million in the first nine months of 2017. Not all DR activities in the first nine months of 2017 had been reported to PJM at the time of this report.

Emergency and Economic demand response energy payments are uplift. LMP does not cover demand response energy payments although emergency demand response can and does set LMP. Emergency demand response energy costs are paid by PJM market participants in proportion to their net purchases in the real-time market. Economic demand response energy costs are paid by real-time exports from the PJM Region and real-time loads in each zone for which the load-weighted average real-time LMP for the hour during which the reduction occurred is greater than the single system price determined under the net benefits test for that month.¹⁰⁰

- **Demand Response Market Concentration.** The ownership of economic demand response was highly concentrated in the first nine months of 2016 and 2017. The HHI for economic demand response reductions increased from 7658 in the first nine months of 2016 to 7883 in the first nine months of 2017. The ownership of emergency demand response was moderately concentrated in 2017. The HHI for emergency demand response registrations was 1433 for the 2017/2018 Delivery Year. In the 2017/2018 Delivery Year, the four largest companies contributed 69.6 percent of all registered emergency demand response resources.
- **Locational Dispatch of Demand Resources.** Beginning with the 2014/2015 Delivery Year, demand resources are dispatchable for mandatory reduction on a subzonal basis, defined by zip codes, but only if the subzone is defined at least one day before it is dispatched and only until PJM removes the definition of the subzone. More locational dispatch of demand resources in a nodal market improves market efficiency. The goal should be nodal dispatch of demand resources with no advance notice required, as is the case for generation resources.

¹⁰⁰ PJM. "Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) at 78.

Section 6 Recommendations

The MMU recognizes that PJM incorporated some of the recommendations related to Demand Response in the Capacity Performance filing. The status of each recommendation reflects the status at September 30, 2017.

- The MMU recommends, as a preferred alternative to having PJM demand side programs, that demand response be on the demand side of the markets and that customers be able to avoid capacity and energy charges by not using capacity and energy at their discretion and that customer payments be determined only by metered load. (Priority: High. First reported 2014. Status: Not adopted.)
- The MMU recommends that the option to specify a minimum dispatch price under the Emergency and Pre-Emergency Program Full option be eliminated and that participating resources receive the hourly real-time LMP less any generation component of their retail rate. (Priority: Medium. First reported 2010. Status: Not adopted.)
- The MMU recommends that the emergency load response program be treated as an economic resource, responding to economic price signals like other capacity resources and not an emergency program responding only after an emergency is called, and not triggering the definition of a PJM emergency and not triggering a Performance Assessment Hour under the new PJM Capacity Market rules. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that the Emergency Program Energy Only option be eliminated because the opportunity to receive the appropriate energy market incentive is already provided in the Economic Program. (Priority: Low. First reported 2010. Status: Not adopted.)
- The MMU recommends that a daily energy market must offer requirements apply to demand resources, comparable to the rule applicable to generation capacity resources.¹⁰¹ (Priority: High. First reported 2013. Status: Not adopted.)

¹⁰¹ See "Complaint and Motion to Consolidate of the Independent Market Monitor for PJM," Docket No. EL14-20-000 (January 27, 2014) at 1.

- The MMU recommends that demand resources be required to provide their nodal location, comparable to generation resources. (Priority: High. First reported 2011. Status: Not adopted.)
- The MMU recommends that PJM require nodal dispatch of demand resources with no advance notice required or, if nodal location is not required, subzonal dispatch of demand resources with no advance notice required. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM eliminate the measurement of compliance across zones within a compliance aggregation area (CAA). The multiple zone approach is less locational than the zonal and subzonal approach and creates larger mismatches between the locational need for the resources and the actual response. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that measurement and verification methods for demand resources be modified to reflect compliance more accurately. (Priority: Medium. First reported 2009. Status: Not adopted.)
- The MMU recommends that compliance rules be revised to include submittal of all necessary hourly load data, and that negative values be included when calculating event compliance across hours and registrations. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM adopt the ISO-NE five-minute metering requirements in order to ensure that dispatchers have the necessary information for reliability and that market payments to demand resources be calculated based on interval meter data at the site of the demand reductions.¹⁰² (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that demand response event compliance be calculated for each hour and the penalty structure reflect hourly compliance for the base and capacity performance products. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends that load management testing be initiated by PJM with limited warning to CSPs in order to more accurately represent the conditions of an emergency event. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that shutdown cost be defined as the cost to curtail load for a given period that does not vary with the measured reduction or, for behind the meter generators, be the start cost defined in Manual 15 for generators. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the Net Benefits Test be eliminated and that demand response resources be paid LMP less any generation component of the applicable retail rate. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that the tariff rules for demand response clarify that a resource and its CSP, if any, must notify PJM of material changes affecting the capability of the resource to perform as registered and to terminate registrations that are no longer capable of responding to PJM dispatch directives because load has been reduced or eliminated, such as in the case of bankrupt and/or out of service facilities. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not remove any defined subzone and maintain a public record of all created and removed subzones. (Priority: Low. First reported 2016. Status: Not adopted.)
- The MMU recommends that there be only one demand response product, with an obligation to respond when called for all hours of the year. (Priority: High. First reported 2011. Status: Partially adopted.¹⁰³)
- The MMU recommends that the lead times for demand resources be shortened to 30 minutes with an hour minimum dispatch for all resources. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends capping the baseline for measuring capacity compliance under winter compliance at the customers' PLC, similar

¹⁰² See ISO-NE Tariff, Section III, Market Rule 1, Appendix E1 and Appendix E2, "Demand Response," <http://www.iso-ne.com/regulatory/tariff/sect_3/mr1_append-e.pdf>. (Accessed October 17, 2017) ISO-NE requires that DR have an interval meter with five minute data reported to the ISO and each behind the meter generator is required to have a separate interval meter. After June 1, 2017, demand response resources in ISO-NE must also be registered at a single node.

¹⁰³ PJM's Capacity Performance proposal includes this change. See "Reforms to the Reliability Pricing Market ("RPM") and Related Rules in the PJM Open Access Transmission Tariff ("Tariff") and Reliability Assurance Agreement Among Load Serving Entities ("RAA)," Docket No. ER15-632-000 and "PJM Interconnection, L.L.C." Docket No. EL15-29-000.

to GLD, to avoid double counting. (Priority: High. First reported 2010. Status: Partially adopted.)

- The MMU recommends capping the baseline for measuring compliance under GLD, for the limited summer product, at the customers' PLC. (Priority: High. First reported 2010. Status: Adopted 2015.)
- The MMU recommends that demand resources whose technology type (load drop method) is designated as "Other" explicitly record the technology type. (Priority: Low. First reported 2013. Status: Adopted, 2014.)

Section 6 Conclusion

A fully functional demand side of the electricity market means that end use customers or their designated intermediaries will have the ability to see real-time energy price signals in real time, will have the ability to react to real-time prices in real time and will have the ability to receive the direct benefits or costs of changes in real-time energy use. In addition, customers or their designated intermediaries will have the ability to see current capacity prices, will have the ability to react to capacity prices and will have the ability to receive the direct benefits or costs of changes in the demand for capacity in the same year in which demand for capacity changes. A functional demand side of these markets means that customers will have the ability to make decisions about levels of power consumption based both on the value of the uses of the power and on the actual cost of that power.

In the energy market, if there is to be a demand side program, demand resources should be paid the value of energy, which is LMP less any generation component of the applicable retail rate. There is no reason to have the net benefits test. The necessity for the net benefits test is an illustration of the illogical approach to demand side compensation embodied in paying full LMP to demand resources. The benefit of demand side resources is not that they suppress market prices, but that customers can choose not to consume at the current price of power, that individual customers benefit from their choices and that the choices of all customers are reflected in market prices. If customers face the market price, customers should have the ability to not

purchase power and the market impact of that choice does not require a test for appropriateness.

If demand resources are to continue competing directly with generation capacity resources in the PJM Capacity Market, the product must be defined such that it can actually serve as a substitute for generation. This is a prerequisite to a functional market design.

In order to be a substitute for generation, demand resources should be defined in PJM rules as an economic resource, as generation is defined. Demand resources should be required to offer in the Day-Ahead Energy Market and should be called when the resources are required and prior to the declaration of an emergency. Demand resources should be available for every hour of the year and not be limited to a small number of hours.

In order to be a substitute for generation, demand resources should be subject to robust measurement and verification techniques to ensure that transitional DR programs incent the desired behavior. The methods used in PJM programs today are not adequate to determine and quantify deliberate actions taken to reduce consumption.

In order to be a substitute for generation, demand resources should provide a nodal location and should be dispatched nodally to enhance the effectiveness of demand resources and to permit the efficient functioning of the energy market. Both subzonal and multi-zone compliance should be eliminated because they are inconsistent with an efficient nodal market.

In order to be a substitute for generation, compliance by demand resources to PJM dispatch instructions should include both increases and decreases in load. The current method applied by PJM simply ignores increases in load and thus artificially overstates compliance.

In order to be a substitute for generation, reductions should be calculated hourly for dispatched DR. The current rules use the average reduction for the duration of an event. The average reduction across multiple hours does not provide an accurate metric for each hour of the event and is inconsistent

with the measurement of generation resources. Measuring compliance hourly would provide accurate information to the PJM system. Under the new CP rules, the performance of demand response during Performance Assessment Hours (PAH) will be measured on an hourly basis.

In order to be a substitute for generation, any demand resource and its Curtailment Service Provider (CSP), should be required to notify PJM of material changes affecting the capability of the resource to perform as registered and to terminate registrations that are no longer capable of responding to PJM dispatch directives, such as in the case of bankrupt and out of service facilities. Generation resources are required to inform PJM of any change in availability status, including outages and shutdown status.

As a preferred alternative, demand response should be on the demand side of the capacity market rather than on the supply side. Rather than complex demand response programs with their attendant complex and difficult to administer rules, customers would be able to avoid capacity and energy charges by not using capacity and energy at their discretion.

The long term appropriate end state for demand resources in the PJM markets should be comparable to the demand side of any market. Customers should use energy as they wish and that usage will determine the amount of capacity and energy for which each customer pays. There would be no counterfactual measurement and verification.

Under this approach, customers that wish to avoid capacity payments would reduce their load during expected high load hours. Capacity costs would be assigned to LSEs and by LSEs to customers, based on actual load on the system during these critical hours. Customers wishing to avoid high energy prices would reduce their load during high price hours. Customers would pay for what they actually use, as measured by meters, rather than relying on flawed measurement and verification methods. No M&V estimates are required. No promises of future reductions which can only be verified by M&V are required. To the extent that customers enter into contracts with CSPs or

LSEs to manage their payments, M&V can be negotiated as part of a bilateral commercial contract between a customer and its CSP or LSE.

This approach provides more flexibility to customers to limit usage at their discretion. There is no requirement to be available year round or every hour of every day. There is no 30 minute notice requirement. There is no requirement to offer energy into the day-ahead market. All decisions about interrupting are up to the customers only and they may enter into bilateral commercial arrangements with CSPs at their sole discretion. Customers would pay for capacity and energy depending solely on metered load.

A transition to this end state should be defined in order to ensure that appropriate levels of demand side response are incorporated in PJM's load forecasts and thus in the demand curve in the capacity market for the next three years. That transition should be defined by the PRD rules, modified as proposed by the MMU.

This approach would work under the current RPM design and this approach would work under the CP design. This approach is entirely consistent with the Supreme Court decision in *EPSA* as it does not depend on whether FERC has jurisdiction over the demand side. This approach will allow FERC to more fully realize its overriding policy objective to create competitive and efficient wholesale energy markets. The decision of the Supreme Court addressed jurisdictional issues and did not address the merits of FERC's approach. The Supreme Court's decision has removed the uncertainty surrounding the jurisdictional issues and created the opportunity for FERC to revisit its approach to demand side.

Overview: Section 7, Net Revenue

- Energy net revenues are significantly affected by energy prices and fuel prices. Energy prices and fuel prices were higher in the first nine months of 2017 than in the first nine months of 2016. Gas prices increased more than LMP and CTs and CCs ran fewer hours with lower margins as a result. Coal prices increased more than LMP but less than gas prices and

CPs ran for slightly more hours in the first nine months of 2017 than in the first nine months of 2016 and margins varied by zone.

- In the first nine months of 2017, average energy market net revenues decreased by 51 percent for a new CT, 28 percent for a new CC, 17 percent for a new CP, 6 percent for a new DS, and 9 percent for a new solar installation compared to the first nine months of 2016. Average energy market net revenues increased by 6 percent for a new nuclear plant, and 15 percent for a new wind installation compared to the first nine months of 2016.

Historical New Entrant CT and CC Revenue Adequacy

Total unit net revenues include energy and capacity revenues. Analysis of the total unit revenues of theoretical new entrant CTs and CCs for three representative locations shows that units that entered the PJM markets in 2007 have not covered their total costs, including the return on and of capital, on a cumulative basis through September 30, 2017. The analysis also shows that theoretical new entrant CTs and CCs that entered the PJM markets in 2012 have covered their total costs on a cumulative basis in the eastern PSEG and BGE zones but have not covered total costs in the western ComEd Zone. Energy market revenues were not sufficient to cover total costs in any scenario except the new entrant CC unit that went into operation in 2012 in BGE, which demonstrates the critical role of capacity market revenue in covering total costs.

Section 7 Conclusion

Wholesale electric power markets are affected by externally imposed reliability requirements. A regulatory authority external to the market makes a determination as to the acceptable level of reliability which is enforced through a requirement to maintain a target level of installed or unforced capacity. The requirement to maintain a target level of installed capacity can be enforced via a variety of mechanisms, including government construction of generation, full-requirement contracts with developers to construct and operate generation, state utility commission mandates to construct

capacity, or capacity markets of various types. Regardless of the enforcement mechanism, the exogenous requirement to construct capacity in excess of what is constructed in response to energy market signals has an impact on energy markets. The reliability requirement results in maintaining a level of capacity in excess of the level that would result from the operation of an energy market alone. The result of that additional capacity is to reduce the level and volatility of energy market prices and to reduce the duration of high energy market prices. This, in turn, reduces net revenue to generation owners which reduces the incentive to invest. The exact level of both aggregate and locational excess capacity is a function of the calculation methods used by RTOs and ISOs.

Unlike cost of service regulation, markets do not guarantee that units will cover their costs. New CT and CC units that began operation in 2007 have not covered their total costs from energy market and capacity market revenues through September 30, 2017 in the ComEd Zone, in the PSEG Zone and in the BGE Zone. New CT and CC units that began operation on June 1, 2012, have covered or more than covered their total costs in the PSEG Zone and the BGE Zone through September 30, 2017, and have not covered their total costs in the ComEd Zone through September 30, 2017.

Overview: Section 8, Environmental and Renewables Federal Environmental Regulation

- **EPA Mercury and Air Toxics Standards Rule.** The U.S. Environmental Protection Agency's (EPA) Mercury and Air Toxics Standards rule (MATS) applies the Clean Air Act (CAA) maximum achievable control technology (MACT) requirement to new or modified sources of emissions of mercury and arsenic, acid gas, nickel, selenium and cyanide.¹⁰⁴ The future of MATS is currently uncertain. The U.S. Supreme Court ruled in 2015 that the EPA acted "unreasonably when it deemed cost irrelevant to the decision to regulate power plants."¹⁰⁵ The EPA performed a cost review and made

¹⁰⁴ *National Emission Standards for Hazardous Air Pollutants From Coal and Oil-Fired Electric Utility Steam Generating Units and Standards of Performance for Fossil Fuel Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-Commercial-Institutional Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234, 77 Fed. Reg. 9304 (February 16, 2012).
¹⁰⁵ 135 S. Ct. 2699, 2712 (2015).

the required determination on cost in a supplemental finding.¹⁰⁶ In a case now pending before the U.S. Court of Appeals for the District of Columbia Circuit, the supplemental finding is under review.¹⁰⁷ On April 28, 2017, the Court granted the EPA's request to postpone scheduled oral argument "to allow the new Administration adequate time to review the Supplemental Finding to determine whether it will be reconsidered."¹⁰⁸

- **Air Quality Standards (NO_x and SO₂ Emissions).** The CAA requires each state to attain and maintain compliance with fine particulate matter (PM) and ozone national ambient air quality standards (NAAQS). The CAA also requires that each state prohibit emissions that significantly interfere with the ability of another state to meet NAAQS.¹⁰⁹ In January 2016, the EPA began the implementation of the Cross-State Air Pollution Rule (CSAPR) to address this issue through an interstate emissions trading regime.¹¹⁰ As of January 1, 2017, CSAPR's Phase 2 emissions budgets and assurance provisions apply.
- **National Emission Standards for Reciprocating Internal Combustion Engines.** On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit reversed the portion of the final rule exempting 100 hours of run time for certain stationary reciprocating internal combustion engines (RICE) participating in emergency demand response programs.¹¹¹ On May 3, 2016, the Court issued a mandate to implement its May 1, 2015, order. The provisions that allowed RICE participating in emergency demand response programs to operate for additional hours have been eliminated.¹¹² Zero hours are exempt.¹¹³ As a result, the national emissions standards uniformly apply to all RICE.¹¹⁴ All RICE are allowed to operate

during emergencies, including declared Energy Emergency Alert Level 2 or five percent voltage/frequency deviations.¹¹⁵

- **Greenhouse Gas Emissions Rule.** On August 3, 2015, the EPA issued a final rule for regulating CO₂ from certain existing power generation facilities titled Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units (the Clean Power Plan).¹¹⁶ The rule requires that individual state plans be submitted by September 6, 2016. However, on February 9, 2016, the U.S. Supreme Court issued a stay of the rule that will prevent its taking effect until judicial review is completed.¹¹⁷ On October 10, 2017, EPA proposed to repeal the Clean Power Plan based a determination that the Plan exceeds the EPA's authority under Section 111 of the EPA Act.¹¹⁸
- **Cooling Water Intakes.** An EPA rule implementing Section 316(b) of the Clean Water Act (CWA) requires that cooling water intake structures reflect the best technology available for minimizing adverse environmental impacts.¹¹⁹ The rule is implemented as National Pollutant Discharge Elimination System (NPDES) permits are issued, with exceptions in certain cases for permits expiring prior to July 14, 2018.

On June 17, 2017, the EPA issued a rulemaking to rescind the definition of "Waters of the United States" (WOTUS) proposed in the 2015 Clean Water Rule.¹²⁰ The rule would avoid the potential implementation of a broader definition of WOTUS included in the 2015 rule that was never implemented as the result of a stay issued by a reviewing Court.¹²¹ The rule would restore the pre 2015 version of the rule to the code, which remains in effect as a result of the stay.

¹⁰⁶ See *Supplemental Finding That It Is Appropriate and Necessary to Regulate Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234; see also *White Stallion Energy Center, LLC v EPA*, Slip Op. No. 12-1100 (D.C. Cir. 2015) (per curiam).

¹⁰⁷ See Case No. 16-1127, et al.

¹⁰⁸ Respondent EPA's Motion to Continue Oral Argument, Case No. 16-1127, et al. (April 18, 2017) at 1.

¹⁰⁹ CAA § 110(a)(2)(D)(i)(I).

¹¹⁰ Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals, Final Rule, Docket No. EPA-HQ-OAR-2009-0491, 76 Fed. Reg. 48208 (August 8, 2011) ("CSAPR").

¹¹¹ Delaware Department of Natural Resources and Environmental Control (DENREC) v. EPA, Slip Op. No. 13-1093; *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines*, Final Rule, EPA Docket No. EPA-HQ-OAR-2008-0708, 78 Fed. Reg. 9403 (January 30, 2013).

¹¹² EPA, Memorandum, Peter Tsirigotis Guidance on Vacatur of RICE NESHAP and NSPS Provisions for Emergency Engines (April 15, 2016).

¹¹³ *Id.*

¹¹⁴ *Id.*

¹¹⁵ See 40 CFR §§ 60.4211(f)(2)(ii)-(iii), 60.4243(d)(2)(ii)-(iii), and 63.6640(f)(2)(ii)-(iii) (Declared Energy Emergency Alert Level 2 or 5 percent voltage/frequency deviations); 0 CFR §§ 60.4211(f)(1), 60.4243(d)(1), and 63.6640(f)(1) ("There is no time limit on the use of emergency stationary ICE in emergency situations."); 40 CFR §§ 60.4211(f)(3), 60.4243(d)(3), 63.6640(f)(3)-(4).

¹¹⁶ *Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, EPA-HQ-OAR-2013-0602, Final Rule *mimeo* (August 3, 2015), also known as the "Clean Power Plan."

¹¹⁷ *North Dakota v. EPA*, et al., Order 15A793.

¹¹⁸ See *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, Proposed Rule, EPA Docket No. EPA-HQ-OAR-2017-0355, 82 Fed. Reg. 48035 (October 16, 2017).

¹¹⁹ See EPA, *National Pollutant Discharge Elimination System—Final Regulations to Establish Requirements for Cooling Water Intake Structures at Existing Facilities and Amend Requirements at Phase I Facilities*, EPA-HQ-OW-2008-0667, 79 Fed. Reg. 48300 (Aug. 15, 2014).

¹²⁰ 80 Fed. Reg. 37054 (June 29, 2015).

¹²¹ The stay was issued by the U.S. Court of Appeals for the Sixth Circuit on October 9, 2015.

- **Waste Disposal.** On December 19, 2014, the EPA issued its Coal Combustion Residuals rule (CCRR), effective October 19, 2015. The rule sets nonbinding criteria for coal ash disposal facilities.

State Environmental Regulation

- **NJ High Electric Demand Day (HEDD) Rule.** A New Jersey rule that imposes operational restrictions and emissions control requirements on units responsible for significant NO_x emissions on high electric demand days (HEDD).¹²² New Jersey's HEDD rule, which became effective May 19, 2009, applies to HEDD units, which include units that have a NO_x emissions rate on HEDD equal to or exceeding 0.15 lbs/MMBtu and lack identified emission control technologies.¹²³
- **Illinois Air Quality Standards (NO_x, SO₂ and Hg).** The State of Illinois has its own standards for NO_x, SO₂ and Hg (mercury) known as Multi-Pollutant Standards (MPS) and Combined Pollutants Standards (CPS) that are more stringent and take effect earlier than comparable Federal regulations, such as the EPA MATS rule.¹²⁴
- **Regional Greenhouse Gas Initiative (RGGI).** The Regional Greenhouse Gas Initiative (RGGI) is a CO₂ emissions cap and trade agreement among Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont that applies to power generation facilities. The auction price in the September 8, 2017, auction for the 2015–2017 compliance period was \$4.35 per ton. The clearing price is equivalent to a price of \$4.80 per metric tonne, the unit used in other carbon markets. The price increased by \$1.82 per ton, 71.9 percent, from \$2.53 per ton from June 7, 2017, to \$4.35 per ton for September 8, 2017.

¹²²N.J.A.C. § 7:27–19.

¹²³ CTs must have either water injection or selective catalytic reduction (SCR) controls; steam units must have either an SCR or selective noncatalytic reduction (SNCR).

¹²⁴ 35 Ill. Admin. Code §§ 225.233 (Multi-Pollutant Standard (MPS)), 224.295 (Combined Pollutant Standard: Emissions Standards for NO_x and SO₂ (CPS)).

State Renewable Portfolio Standards

Many states in PJM have enacted legislation to require that a defined percentage of retail suppliers' load be served by renewable resources, for which definitions vary. These are typically known as renewable portfolio standards, or RPS. As of September 30, 2017, Delaware, Illinois, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, and Washington, DC had renewable portfolio standards. Virginia and Indiana had voluntary renewable portfolio standards. Kentucky and Tennessee did not have renewable portfolio standards. West Virginia had a voluntary standard, but the state legislature repealed their renewable portfolio standard effective February 3, 2015.¹²⁵

Emissions Controls in PJM Markets

Environmental regulations affect decisions about emission control investments in existing units, investment in new units and decisions to retire units. As a result of environmental regulations and agreements to limit emissions, many PJM units burning fossil fuels have installed emission control technology. On September 30, 2017, 92.8 percent of coal steam MW had some type of flue-gas desulfurization (FGD) technology to reduce SO₂ emissions, while 99.5 percent of coal steam MW had some type of particulate control, and 93.6 percent of fossil fuel fired capacity in PJM had NO_x emission control technology.

Renewable Generation

Total wind and solar generation was 2.3 percent of total generation in PJM for the first nine months of 2017, total renewable generation was 4.5 percent of total generation in PJM and was 6.3 percent if coal and solid waste resources in the Tier II RECs programs are included.

Section 8 Recommendations

- The MMU recommends that renewable energy credit markets based on state renewable portfolio standards be brought into PJM markets as they are an increasingly important component of the wholesale energy market. (Priority: Medium. First reported 2010. Status: Not adopted.)

¹²⁵ See Enr. Com. Sub. For H. B. No. 2001.

Section 8 Conclusion

Environmental requirements and renewable energy mandates at both the federal and state levels have a significant impact on the cost of energy and capacity in PJM markets. The extension of the RPS concept to include nuclear power as a zero emissions source in order to provide subsidies to nuclear power will increase this impact. Renewable energy credit (REC) markets are markets related to the production and purchase of wholesale power, but FERC has determined that RECs are not regulated under the Federal Power Act unless the REC is sold as part of a transaction that also includes a wholesale sale of electric energy in a bundled transaction.¹²⁶

RECs, federal investment tax credits and federal production tax credits provide out of market payments to qualifying resources, primarily wind and solar, which create an incentive to generate MWh until the LMP is equal to the marginal cost of producing power minus the credit received for each MWh. The same is true for nuclear power credits, ZECs (zero emissions credits). The credits provide an incentive to make negative energy offers and more generally provide an incentive to operate whenever possible. These subsidies affect the offer behavior and the operational behavior of these resources in PJM markets and in some cases the existence of these resources and thus the market prices and the mix of clearing resources.

RECs clearly affect prices in the PJM wholesale power market. Some resources are not economic except for the ability to purchase or sell RECs. REC markets are not transparent. Data on REC prices, clearing quantities and markets are not publicly available for all PJM states. RECs do not need to be consumed during the year of production which creates multiple prices for a REC based on the year of origination. RECs markets are, as an economic fact, integrated with PJM markets including energy and capacity markets, but are not formally recognized as part of PJM markets. It would be preferable to have a single, transparent market for RECs operated by PJM that would meet the standards and requirements of all states in the PJM footprint including those

¹²⁶ See 139 FERC ¶ 61,061 at PP 18, 22 (2012) (“[W]e conclude that unbundled REC transactions fall outside of the Commission’s jurisdiction under sections 201, 205 and 206 of the FPA. We further conclude that bundled REC transactions fall within the Commission’s jurisdiction under sections 201, 205 and 206 of the FPA.... [A]lthough a transaction may not directly involve the transmission or sale of electric energy, the transaction could still fall under the Commission’s jurisdiction because it is “in connection with” or “affects” jurisdictional rates or charges.”)

with no RPS. This would provide better information for market participants about supply and demand and prices and contribute to a more efficient and competitive market and to better price formation. This could also facilitate entry by qualifying renewable resources by reducing the risks associated with lack of transparent market data. This would be a significant improvement even if some unusual or unique types of RECs remained outside this market.

PJM markets provide a flexible mechanism for incorporating the costs of environmental controls and meeting environmental requirements in a cost effective manner. Costs for environmental controls are part of bids for capacity resources in the PJM Capacity Market. The costs of emissions credits are included in energy offers. PJM markets also provide a flexible mechanism that incorporates renewable resources and the impacts of renewable energy credit markets, and ensure that renewable resources have access to a broad market. PJM markets provide efficient price signals that permit valuation of resources with very different characteristics when they provide the same product.

PJM markets could also provide a flexible mechanism for states to comply with the EPA’s Clean Power Plan, for example by incorporating a carbon price in unit offers which would be reflected in PJM’s economic dispatch. If there is a social decision to limit carbon output, a carbon price would be the most efficient way to implement that decision. It would also be an alternative to specific subsidies to individual nuclear power plants and instead provide a market signal to which any resource could respond. The imposition of specific and prescriptive environmental dispatch rules would, in contrast, pose a threat to economic dispatch and efficient markets and create very difficult market power monitoring and mitigation issues. The provision of subsidies to individual units creates a discriminatory regime that is not consistent with competition.

Overview: Section 9, Interchange Transactions

Interchange Transaction Activity

- **Aggregate Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, PJM was a monthly net exporter of energy in the Real-Time Energy Market in all months.¹²⁷ In the first nine months of 2017, the real-time net interchange of -17,891.2 GWh was lower than the net interchange of -3,112.0 GWh in the first nine months of 2016.
- **Aggregate Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, PJM was a monthly net exporter of energy in the Day-Ahead Energy Market in all months. In the first nine months of 2017, the total day-ahead net interchange of -14,655.8 GWh was lower than net interchange of -6,423.9 GWh in the first nine months of 2016.
- **Aggregate Imports and Exports in the Day-Ahead and the Real-Time Energy Market.** In the first nine months of 2017, gross imports in the Day-Ahead Energy Market were 177.8 percent of gross imports in the Real-Time Energy Market (127.4 percent in the first nine months of 2016). In the first nine months of 2017, gross exports in the Day-Ahead Energy Market were 122.2 percent of the gross exports in the Real-Time Energy Market (135.5 percent in the first nine months of 2016).
- **Interface Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, there were net scheduled exports at 10 of PJM's 20 interfaces in the Real-Time Energy Market.
- **Interface Pricing Point Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, there were net scheduled exports at 10 of PJM's 18 interface pricing points eligible for real-time transactions in the Real-Time Energy Market.¹²⁸
- **Interface Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, there were net scheduled exports at 11 of PJM's 20 interfaces in the Day-Ahead Energy Market.

¹²⁷ Calculated values shown in Section 9, "Interchange Transactions," are based on unrounded, underlying data and may differ from calculations based on the rounded values in the tables.

¹²⁸ There is one interface pricing point eligible for day-ahead transaction scheduling only (NIPSCO).

- **Interface Pricing Point Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, there were net scheduled exports at 12 of PJM's 19 interface pricing points eligible for day-ahead transactions in the Day-Ahead Energy Market.
- **Up to Congestion Interface Pricing Point Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, up to congestion transactions were net exports at four of PJM's 19 interface pricing points eligible for day-ahead transactions in the Day-Ahead Market.
- **Inadvertent Interchange.** In the first nine months of 2017, net scheduled interchange was -17,891 GWh and net actual interchange was -18,042 GWh, a difference of 151 GWh. In the first nine months of 2016, the difference was 1,003 GWh. This difference is inadvertent interchange.
- **Loop Flows.** In the first nine months of 2017, the Wisconsin Energy Corporation (WEC) interface had the largest loop flows of any interface with -1,766 GWh of net scheduled interchange and 6,380 GWh of net actual interchange, a difference of 8,146 GWh. In the first nine months of 2017, the SouthIMP interface pricing point had the largest loop flows of any interface pricing point with 6,888 GWh of net scheduled interchange and 17,532 GWh of net actual interchange, a difference of 10,644 GWh.

Interactions with Bordering Areas

PJM Interface Pricing with Organized Markets

- **PJM and MISO Interface Prices.** In the first nine months of 2017, the direction of the hourly flow was consistent with the real-time hourly price differences between the PJM/MISO Interface and the MISO/PJM Interface in 60.1 percent of the hours.
- **PJM and New York ISO Interface Prices.** In the first nine months of 2017, the direction of the hourly flow was consistent with the real-time hourly price differences between the PJM/NYIS Interface and the NYISO/PJM proxy bus in 52.0 percent of the hours.
- **Neptune Underwater Transmission Line to Long Island, New York.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was

consistent with the real-time hourly price differences between the PJM Neptune Interface and the NYISO Neptune bus in 57.1 percent of the hours.

- **Linden Variable Frequency Transformer (VFT) Facility.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was consistent with the real-time hourly price differences between the PJM Linden Interface and the NYISO Linden bus in 52.1 percent of the hours.
- **Hudson DC Line.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was consistent with the real-time hourly price differences between the PJM Hudson Interface and the NYISO Hudson bus in 0.1 percent of the hours.¹²⁹

Interchange Transaction Issues

- **PJM Transmission Loading Relief Procedures (TLRs).** PJM issued three TLRs of level 3a or higher in the first nine months of 2017, compared to eight such TLRs issued in the first nine months of 2016.
- **Up to congestion.** There was an increase in up to congestion volume starting in December 2015, coincident with the expiration of the fifteen month limit on the payment of prior uplift charges.¹³⁰ The average number of up to congestion bids submitted in the Day-Ahead Energy Market decreased by 0.4 percent, from 147,586 bids per day in the first nine months of 2016 to 146,930 bids per day in the first nine months of 2017. The average cleared volume of up to congestion bids submitted in the Day-Ahead Energy Market increased by 6.7 percent, from 820,224 MWh per day in the first nine months of 2016, to 875,065 MWh per day in the first nine months of 2017.
- **45 Minute Schedule Duration Rule.** Effective May 19, 2014, PJM removed the 45 minute scheduling duration rule in response to FERC Order No. 764.¹³¹ ¹³² PJM and the MMU issued a statement indicating ongoing concern about market participants' scheduling behavior, and a

¹²⁹ The Hudson line was out of service for all hours in the first nine months of 2017. In the first nine months of 2017, there were five hours with less than 1 MW of unscheduled flow across the Hudson line.

¹³⁰ 148 FERC ¶ 61,144 (2014). *Order Instituting Section 206 Proceeding and Establishing Procedures*. 16 U.S.C. § 824e.

¹³¹ *Integration of Variable Energy Resources*, Order No. 764, 139 FERC ¶ 61,246 (2012), *order on reh'g*, Order No. 764-A, 141 FERC ¶ 61,231 (2012).

¹³² See Letter Order, Docket No. ER14-381-000 (June 30, 2014).

commitment to address any scheduling behavior that raises operational or market manipulation concerns.¹³³

Section 9 Recommendations

- The MMU recommends that PJM implement rules to prevent sham scheduling. The MMU recommends that PJM apply after the fact market settlement adjustments to identified sham scheduling segments to ensure that market participants cannot benefit from sham scheduling. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would prohibit market participants from breaking transactions into smaller segments to defeat the interface pricing rule by concealing the true source or sink of the transaction. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would require market participants to submit transactions on paths that reflect the expected actual power flow in order to reduce unscheduled loop flows. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM end the practice of maintaining outdated definitions of interface pricing points, eliminate the NIPSCO, Southeast and Southwest interface pricing points from the Day-Ahead and Real-Time Energy Markets and, with VACAR, assign the transactions created under the reserve sharing agreement to the SouthIMP/EXP pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM eliminate the IMO interface pricing point, and assign the transactions that originate or sink in the IESO balancing authority to the MISO interface pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM monitor, and adjust as necessary, the weights applied to the components of the interfaces to ensure that the interface prices reflect ongoing changes in system conditions. The MMU

¹³³ See joint statement of PJM and the MMU re Interchange Scheduling issued July 29, 2014, at: <http://www.monitoringanalytics.com/reports/Market_Messages/Messages/PJM_IMM_Statement_on_Interchange_Scheduling_20140729.pdf>.

also recommends that PJM review the mappings of external balancing authorities to individual interface pricing points to reflect changes to the impact of the external power source on PJM tie lines as a result of system topology changes. The MMU recommends that this review occur at least annually. (Priority: Low. First reported 2009. Status: Not adopted.)

- The MMU requests that, in order to permit a complete analysis of loop flow, FERC and NERC ensure that the identified data are made available to market monitors as well as other industry entities determined appropriate by FERC. (Priority: Medium. First reported 2003. Status: Not adopted.)
- The MMU recommends that PJM explore an interchange optimization solution with its neighboring balancing authorities that would remove the need for market participants to schedule physical transactions across seams. Such a solution would include an optimized, but limited, joint dispatch approach that uses supply curves and treats seams between balancing authorities as constraints, similar to other constraints within an LMP market. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM permit unlimited spot market imports as well as unlimited nonfirm point-to-point willing to pay congestion imports and exports at all PJM interfaces in order to improve the efficiency of the market. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM immediately provide the required 12-month notice to Duke Energy Progress (DEP) to unilaterally terminate the Joint Operating Agreement. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJMSettlement Inc. immediately request a credit evaluation from all companies that engaged in up to congestion transactions between September 8, 2014, and December 31, 2015. If PJM has the authority, PJM should ensure that the potential exposure to uplift for that period be included as a contingency in the companies' calculations for credit levels and/or collateral requirements. If PJM does not have the authority to take such steps, PJM should request guidance from FERC. (Priority: High. First reported 2015. Status: Not adopted.)

- The MMU recommends that the emergency interchange cap be replaced with a market based solution. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that the submission deadline for real-time dispatchable transactions be modified from 1800 on the day prior, to three hours prior to the requested start time, and that the minimum duration be modified from one hour to 15 minutes. These changes would give PJM a more flexible product that could be used to meet load in the most economic manner. (Priority: Medium. First reported 2014. Status: Adopted partially, 2015.)
- The MMU recommends that PJM and MISO work together to align interface pricing definitions, using the same number of external buses and selecting buses in close proximity on either side of the border with comparable bus weights. (Priority: Medium. First reported 2012. Status: Adopted 2017.)

Section 9 Conclusion

Transactions between PJM and multiple balancing authorities in the Eastern Interconnection are part of a single energy market. While some of these balancing authorities are termed market areas and some are termed nonmarket areas, all electricity transactions are part of a single energy market. Nonetheless, there are significant differences between market and nonmarket areas. Market areas, like PJM, include essential features such as locational marginal pricing, financial congestion offsets (FTRs and ARRs in PJM) and transparent, least cost, security constrained economic dispatch for all available generation. Nonmarket areas do not include these features. The market areas are extremely transparent and the nonmarket areas are not transparent.

The MMU's recommendations related to transactions with external balancing authorities all share the goal of improving the economic efficiency of interchange transactions. The standard of comparison is an LMP market. In an LMP market, redispatch based on LMP and competitive generator offers results in an efficient dispatch and efficient prices. The goal of designing

interface transaction rules should be to match the outcomes that would exist in an LMP market.

Overview: Section 10, Ancillary Services

Primary Reserve

PJM's primary reserves are made up of resources, both synchronized and nonsynchronized, that can provide energy within 10 minutes. Primary reserve is PJM's implementation of the NERC 15-minute contingency reserve requirement.¹³⁴

Market Structure

- **Supply.** Primary reserve is satisfied by both synchronized reserve (generation or demand response currently synchronized to the grid and available within 10 minutes), and nonsynchronized reserve (generation currently off-line but available to start and provide energy within 10 minutes).
- **Demand.** The PJM primary reserve requirement is 150 percent of the largest contingency. From January 8, 2015, through May 10, 2017, the primary reserve requirement in the RTO Zone was 2,175 MW of which 1,700 MW was required to be available within the Mid-Atlantic Dominion (MAD) Subzone. As of May 10, 2017, the MAD requirement was raised to 2,175 MW. Temporary adjustments to the primary reserve requirement can occur when grid maintenance or outages change the largest contingency. Demand for primary reserve was redefined as 150 percent of the hourly largest contingency on July 12, 2017. In the third quarter of 2017 the average primary reserve requirement was 2,199.2 MW in the RTO Zone and 2,184.9 MW in the MAD Subzone.

Tier 1 Synchronized Reserve

Synchronized reserve is provided by generators or demand response resources synchronized to the grid and capable of increasing output or decreasing

load within 10 minutes. Synchronized reserve consists of tier 1 and tier 2 synchronized reserves.

Tier 1 synchronized reserve is part of primary reserve and is the capability of online resources following economic dispatch to ramp up in 10 minutes from their current output in response to a synchronized reserve event. There is no formal market for tier 1 synchronized reserve.

- **Supply.** No offers are made for tier 1 synchronized reserve. The market solution estimates tier 1 synchronized reserve as available 10-minute ramp from the energy dispatch. In the first nine months of 2017, there was an average hourly supply of 1,172.0 MW of tier 1 for the RTO Synchronized Reserve Zone, and an average hourly supply of 1,156.6 MW of tier 1 in the Mid-Atlantic Dominion Subzone.
- **Demand.** The synchronized reserve requirement is calculated hourly as the largest contingency within both the RTO Zone and the MAD Subzone. The requirement can be met with tier 1 or tier 2 synchronized reserves.
- **Tier 1 Synchronized Reserve Event Response.** Tier 1 synchronized reserve is paid when a synchronized reserve event occurs and it responds. When a synchronized reserve event is called, all tier 1 response is paid the average of five minute LMPs during the event, rather than hourly integrated LMP, plus \$50 per MW. This is the Synchronized Energy Premium Price. Of the Degree of Generator Performance (DGP) adjusted tier 1 synchronized reserve MW estimated at market clearing, 60.1 percent actually responded during the six synchronized reserve events with duration of 10 minutes or longer in the first nine months of 2017.
- **Issues.** The competitive offer for tier 1 synchronized reserves is zero, as there is no incremental cost associated with the ability to ramp up from the current economic dispatch point and the appropriate payment for responding to an event is the five-minute LMP plus \$50 per MWh. A tariff change included in the shortage pricing tariff changes (October 1, 2012) added the requirement to pay tier 1 synchronized reserve the tier 2 synchronized reserve market clearing price whenever the nonsynchronized reserve market clearing price rises above zero. This requirement was

¹³⁴ See PJM, "Manual 10: Pre-Scheduling Operations," Rev. 35 (January 1, 2017), p. 24.

unnecessary and inconsistent with efficient markets. The rationale for this change was and is unclear, but it has had a significant impact on the cost of tier 1 synchronized reserves, resulting in a windfall payment of \$89,719,045 to tier 1 resources in 2014, \$34,397,441 in 2015, \$4,948,084 in 2016, and \$1,995,133 in the first nine months of 2017.

Tier 2 Synchronized Reserve Market

Tier 2 synchronized reserve is part of primary reserve and is comprised of resources that are synchronized to the grid, that incur costs to be synchronized, that have an obligation to respond, that have penalties for failure to respond, and that must be dispatched in order to satisfy the synchronized reserve requirement.

When the synchronized reserve requirement cannot be met with tier 1 synchronized reserve, PJM uses a market to satisfy the balance of the requirement with tier 2 synchronized reserve. The Tier 2 Synchronized Reserve Market includes the PJM RTO Reserve Zone and a subzone, the Mid-Atlantic Dominion Reserve Subzone (MAD).

Market Structure

- **Supply.** In the first nine months of 2017, the supply of offered and eligible tier 2 synchronized reserve was 24,015.8 MW in the RTO Zone of which 6,726.4 MW (including 1,497.7 MW of DSR) was located in the MAD Subzone.
- **Demand.** The average hourly required synchronized reserve requirement was 1,522.8 MW in the RTO Reserve Zone and 1,514.8 MW for the Mid-Atlantic Dominion Reserve Subzone. The hourly average required tier 2 synchronized reserve was 455.1 MW in the MAD Subzone and 524.3 MW in the RTO.
- **Market Concentration.** Both the Mid-Atlantic Dominion Subzone Tier 2 Synchronized Reserve Market and the RTO Synchronized Reserve Zone Market were characterized by structural market power in the first nine months of 2017.

In the first nine months of 2017, the weighted average HHI for tier 2 synchronized reserve in the Mid-Atlantic Dominion Subzone was 5895, which is classified as highly concentrated. The MMU calculates that the three pivotal supplier test in the Mid-Atlantic Dominion Subzone would have been failed in 64.4 percent of hours.

In the first nine months of 2017, the weighted average HHI for cleared tier 2 synchronized reserve in the RTO Synchronized Reserve Zone was 6653, which is classified as highly concentrated. The MMU calculates that the three pivotal supplier test in the RTO Synchronized Reserve Zone would have been failed in 63.9 percent of hours.

Market Conduct

- **Offers.** There is a must offer requirement for tier 2 synchronized reserve. All nonemergency generation capacity resources are required to submit a daily offer for tier 2 synchronized reserve, unless the unit type is exempt. Tier 2 synchronized reserve offers from generating units are subject to an offer cap of marginal cost plus \$7.50 per MW, plus opportunity cost which is calculated by PJM. There has been less than complete compliance with the tier 2 synchronized reserve must offer requirement.

Market Performance

- **Price.** The weighted average price for tier 2 synchronized reserve for all cleared hours in the Mid-Atlantic Dominion (MAD) Subzone was \$3.34 per MW in the first nine months of 2017, a decrease of \$1.05 from the first nine months of 2016.

The weighted average price for tier 2 synchronized reserve for all cleared hours in the RTO Synchronized Reserve Zone was \$3.44 per MW in the first nine months of 2017, a decrease of \$0.91 from the first nine months of 2016.

Nonsynchronized Reserve Market

Nonsynchronized reserve is part of primary reserve and includes the RTO Reserve Zone and the Mid-Atlantic Dominion Reserve Subzone (MAD).

Nonsynchronized reserve is comprised of nonemergency energy resources not currently synchronized to the grid that can provide energy within 10 minutes. Nonsynchronized reserve is available to fill the primary reserve requirement above the synchronized reserve requirement. Generation owners do not submit supply offers. PJM defines the demand curve for nonsynchronized reserve and PJM defines the supply curve based on nonemergency generation resources that are available to provide energy and can start in 10 minutes or less (based on offer parameters), and on the resource opportunity costs calculated by PJM.

Market Structure

- **Supply.** In the first nine months of 2017, the average hourly supply of eligible nonsynchronized reserve was 2,382.6 MW in the RTO Zone and 2,035.0 MW in MAD Subzone.
- **Demand.** Demand for nonsynchronized reserve equals the primary reserve requirement minus the tier 1 synchronized reserve estimate and minus the scheduled tier 2 synchronized reserve.¹³⁵ In the RTO Zone, the market cleared an hourly average of 1,226.0 MW of nonsynchronized reserve in the first nine months of 2017. The MAD Subzone cleared an average of 863.0 MW in the first nine months of 2017.
- **Market Concentration.** In the first nine months of 2017, the weighted average HHI for cleared nonsynchronized reserve in the MAD Subzone was 3661 which is classified as highly concentrated. In the RTO Zone the weighted average HHI was 3657, which is also highly concentrated. The MMU calculates that the three pivotal supplier test would have been failed in 48.4 percent of hours in the MAD Subzone and zero hours in the RTO Zone.

Market Conduct

- **Offers.** Generation owners do not submit supply offers. Nonemergency generation resources that are available to provide energy and can start in 10 minutes or less are considered available for nonsynchronized reserves

¹³⁵ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017), p. 81. "Because Synchronized Reserve may be utilized to meet the Primary Reserve requirement, there is no explicit requirement for non-synchronized reserves."

by the market solution software. PJM calculates the associated offer prices based on PJM calculations of resource specific opportunity costs.

Market Performance

- **Price.** The nonsynchronized reserve price is determined by the opportunity cost of the marginal nonsynchronized reserve unit. The nonsynchronized reserve weighted average price for all hours in both the RTO Reserve Zone and MAD Subzone was \$0.17 per MW in the first nine months of 2017. The price cleared above \$0.00 only 2.1 percent of hours.

Secondary Reserve

There is no NERC standard for secondary reserve. PJM defines secondary reserve as reserves (online or offline available for dispatch) that can be converted to energy in 30 minutes. PJM defines a secondary reserve requirement but does not have a goal to maintain this reserve requirement in real time.

PJM maintains a day-ahead, offer based market for 30-minute day-ahead secondary reserve. The Day-Ahead Scheduling Reserve Market (DASR) has no performance obligations except that a unit which clears the DASR market may not be on an outage in real time.¹³⁶ If DASR units are on an outage in real time, the DASR payment is not made.

Market Structure

- **Supply.** The DASR Market is a must offer market. Any resources that do not make an offer have their offer set to \$0.00 per MW. DASR is calculated by the day-ahead market solution as the lesser of the thirty minute energy ramp rate or the economic maximum MW minus the day-ahead dispatch point for all online units. In the first nine months of 2017, the average available hourly DASR was 36,567.3 MW.
- **Demand.** The DASR requirement for 2017 is 5.52 percent of peak load forecast, down from 5.70 percent in 2016. The average DASR MW purchased was 5,756.4 MW per hour in the first nine months of 2017, compared to the 6,345.0 MW per hour in the same time period of 2016.

¹³⁶ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017), p. 172 §11.1.

- **Concentration.** In the first nine months of 2017, the MMU estimates that the DASR Market would have failed the three pivotal supplier test in 18.9 percent of hours.

Market Conduct

- **Withholding.** Economic withholding remains an issue in the DASR Market. The direct marginal cost of providing DASR is zero. PJM calculates the opportunity cost for each resource. All offers by resource owners greater than zero constitute economic withholding. In the first nine months of 2017, a daily average of 41.0 percent of units offered above \$0.00. A daily average of 11.7 percent of units offered above \$5.
- **DR.** Demand resources are eligible to participate in the DASR Market. Some demand resources have entered offers for DASR. No demand resources cleared the DASR market in the first nine months of 2017.

Market Performance

- **Price.** In the first nine months of 2017, the weighted average DASR price for all hours when the DASRMCP was above \$0.00 was \$3.10.

Regulation Market

The PJM Regulation Market is a real-time market. Regulation is provided by generation resources and demand response resources that qualify to follow one of two regulation signals, RegA or RegD. PJM jointly optimizes regulation with synchronized reserve and energy to provide all three products at least cost. The PJM regulation market design includes three clearing price components: capability; performance; and opportunity cost. The RegA signal is designed for energy unlimited resources with physically constrained ramp ability. The RegD signal is designed for energy limited resources with fast ramp rates. In the Regulation Market RegD MW are converted to effective MW using a marginal rate of substitution (MRTS), called a marginal benefit function (MBF). Correctly implemented, the MBF would be the marginal rate of technical substitution (MRTS) between RegA and RegD, holding the level of regulation service constant. The current market design is critically flawed as it has not properly implemented the MBF as an MRTS between RegA and

RegD resource MW and the MBF has not been consistently applied in the optimization, clearing and settlement of the Regulation Market.

Market Structure

- **Supply.** In the first nine months of 2017, the average hourly eligible supply of regulation for nonramp hours was 1,135.6 performance adjusted MW (858.9 effective MW).¹³⁷ This was a decrease of 79.4 performance adjusted MW (an increase of 9.4 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation for nonramp hours was 1,215.0 performance adjusted MW (849.6 effective MW). In the first nine months of 2017, the average hourly eligible supply of regulation for ramp hours was 1,423.0 performance adjusted MW (1,173.7 effective MW). This was an increase of 231.6 performance adjusted MW (225.5 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation was 1,191.4 performance adjusted MW (948.2 effective MW).
- **Demand.** Prior to January 9, 2017, the hourly regulation demand was set to 525.0 effective MW for nonramp hours and 700.0 effective MW for ramp hours. Starting January 9, 2017, the hourly regulation demand was set to 525.0 effective MW for nonramp hours and 800.0 effective MW for ramp hours.
- **Supply and Demand.** The nonramp regulation requirement of 525.0 effective MW was provided by a combination of RegA and RegD resources equal to 491.6 hourly average MW in the first nine months of 2017. This is a decrease of 26.6 MW from the first nine months of 2016, when the average hourly total regulation cleared MW for nonramp hours were 518.3 MW. The ramp regulation requirement of 700.0 effective MW prior to January 9, 2017, and 800.0 effective MW after January 9, 2017, was provided by a combination of RegA and RegD resources equal to 718.8 hourly average MW in the first nine months of 2017. This is an increase of 80.9 MW from the first nine months of 2016, where the average hourly regulation cleared MW for ramp hours were 637.9 MW.

¹³⁷ On peak and off peak hours are now designated as ramp and nonramp hours. The definitions change by season. See "Regulation requirement definition," <<http://www.pjm.com/~media/markets-ops/ancillary/regulation-requirement-definition.ashx>>.

The ratio of the average hourly eligible supply of regulation to average hourly regulation demand for ramp hours was 1.98 in the first nine months of 2017. This is an increase of 6.1 percent from the first nine months of 2016, when the ratio was 1.87. The ratio of the average hourly eligible supply of regulation to average hourly regulation demand required for nonramp hours was 2.31 in the first nine months of 2017. This is a decrease of 1.6 percent from the first nine months of 2016, when the ratio was 2.35.

- **Market Concentration.** In the first nine months of 2017, the three pivotal supplier test was failed in 89.9 percent of hours. In the first nine months of 2017, the weighted average HHI of RegA resources was 2730, which is highly concentrated and the weighted average HHI of RegD resources was 1595, which is also highly concentrated. The weighted average HHI of all resources was 1144, which is moderately concentrated.

Market Conduct

- **Offers.** Daily regulation offer prices are submitted for each unit by the unit owner. Owners are required to submit a cost-based offer and may submit a price-based offer. Offers include both a capability offer and a performance offer. Owners must specify which signal type the unit will be following, RegA or RegD.¹³⁸ In the first nine months of 2017, there were 215 resources following the RegA signal and 54 resources following the RegD signal.

Market Performance

- **Price and Cost.** The weighted average clearing price for regulation was \$15.70 per effective MW of regulation in the first nine months of 2017. This is a decrease of \$0.82 per MW, or 4.9 percent, from the weighted average clearing price of \$16.52 per MW in the first nine months of 2016. The weighted average cost of regulation in the first nine months of 2017 was \$21.68 per effective MW of regulation. This is an increase of \$2.69 per MW, or 14.2 percent, from the weighted average cost of \$18.99 per MW in the first nine months of 2016. The decrease in regulation price in the first nine months of 2017 resulted primarily from reductions in the

opportunity cost component of the regulation clearing prices due to low energy prices in the first nine months of 2017 compared to the first nine months of 2016.

- **Prices.** RegD resources continue to be incorrectly compensated relative to RegA resources due to an inconsistent application of the marginal benefit factor in the optimization, assignment and settlement processes. If the Regulation Market were functioning efficiently, RegD and RegA resources would be paid the same price per effective MW. RegA resources are paid on the basis of dollars per effective MW of RegA. RegD resources are not paid in terms of dollars per effective MW of RegA because the marginal benefit factor is not used in settlements. When the marginal benefit factor is above 1.0, RegD resources are generally (depending on the mileage ratio) underpaid on a per effective MW basis. When the MBF is less than one, RegD resources are generally overpaid on a per effective MW basis. Currently, the average MBF is less than 1.0, resulting in persistent overpayment of RegD resources that creates an artificial incentive for inefficient entry of RegD resources. The MBF averaged less than 1.0 in five of the first nine months of 2017, resulting in RegD resources being paid an average of \$14.1 million (385.3 percent) more than they should have in the first nine months of 2017. In each of the first nine months of 2016, the average MBF was less than 1.0, resulting in RegD resources being paid an average of \$11.02 million (1,855.6 percent) more than they should have been.
- **Marginal Benefit Factor Function.** The marginal benefit factor (MBF) is intended to measure the operational substitutability of RegD resources for RegA resources. The marginal benefit factor function is incorrectly defined and applied in the PJM market clearing. Correctly defined, the MBF function represents the Marginal Rate of Technical Substitution (MRTS) between RegA and RegD. Correctly implemented, the MBF would be consistently applied in the Regulation Market clearing and settlement. The current incorrect and inconsistent implementation of the MBF function has resulted in the PJM Regulation Market over procuring RegD relative to RegA in most hours and in a consistently inefficient market signal to participants regarding the value of RegD to the market

¹³⁸ See the 2016 State of the Market Report for PJM, Volume 2, Appendix F "Ancillary Services Markets."

in every hour. This over procurement began to degrade the ability of PJM to control ACE in some hours while at the same time increasing the cost of regulation.¹³⁹

- **Changes to the Regulation Market.** On December 14, 2015, PJM changed the MBF curve in an attempt to reduce the over procurement of RegD. The modification to the marginal benefit curve did not correct the identified issues. PJM made additional changes which went into effect on January 9, 2017. These include changing the definition of nonramp and ramp hours based on the season, increasing the effective MW requirement during ramp hours from 700 MW to 800 MW, adjusting the currently independent RegA and RegD signals to be interdependent, and changing the 15-minute neutrality requirement of the RegD signal to a 30-minute conditional neutrality requirement. The January 9 changes did not resolve the underlying issues. As a result of the changes implemented on January 9, 2017, the average daily payment per performance adjusted RegD MW increased by 57.2 percent, from \$10.01 between the January 1, 2016, through January 8, 2017, period (prior to the change in signal design), to \$15.74 between the January 9, 2017, through September 30, 2017, period (after the change in signal design). Effective July 31, 2017, PJM ended the use of excursion hours (hours ending 7:00, 8:00, 18:00-21:00), in which PJM had decided that more RegA was needed and PJM did not clear any RegD with an MBF less than 1.0.

Black Start Service

Black start service is required for the reliable restoration of the grid following a blackout. Black start service is the ability of a generating unit to start without an outside electrical supply, or is the demonstrated ability of a generating unit to automatically remain operating at reduced levels when disconnected from the grid (automatic load rejection or ALR).¹⁴⁰

In the first nine months of 2017, total black start charges were \$46.9 million, including \$46.8 million in revenue requirement charges and \$0.182 million in

¹³⁹ The issues associated with over procurement were brought before the PJM Operating Committee in May of 2015. Regulation Performance Impacts, PJM Operating Committee, (May 26, 2015), which can be accessed at: <<http://www.pjm.com/committees-and-groups/committees/oc.aspx>>.

¹⁴⁰ OATT Schedule 1 § 1.3BB.

operating reserve charges. Black start revenue requirements consist of fixed black start service costs, variable black start service costs, training costs, fuel storage costs, and an incentive factor. Black start operating reserve charges are paid to units scheduled in the Day-Ahead Energy Market or committed in real time to provide black start service under the ALR option or for black start testing. Black start zonal charges for the first nine months of 2017 ranged from \$0.05 per MW-day in the DLCO Zone (total charges were \$33,750) to \$4.27 per MW-day in the PENELEC Zone (total charges were \$3,016,578).

Reactive

Reactive service, reactive supply and voltage control are provided by generation and other sources of reactive power (measured in MVAR). Reactive power helps maintain appropriate voltages on the transmission system and is essential to the flow of real power (measured in MW).

Reactive capability revenue requirements are based on FERC approved filings.¹⁴¹ Reactive service charges are paid to units that operate in real time outside of their normal range at the direction of PJM for the purpose of providing reactive service. Reactive service charges are paid for scheduling in the Day-Ahead Energy Market and committing units in real time that provide reactive service. In the first nine months of 2017, total reactive charges were \$249.5 million, a 12.6 percent increase from \$221.6 million in the first nine months of 2016. Reactive capability revenue requirement charges increased from \$220.8 million in the first nine months of 2016 to \$235.4 million in the first nine months of 2017 and reactive service charges increased from \$0.8 million in the first nine months of 2016 to \$14.0 million in the first nine months of 2017. Total reactive service charges in the first nine months of 2017 ranged from \$1,239 in the RECO Zone to \$31.9 million in the ComEd Zone.

Section 10 Recommendations

- The MMU recommends that the Regulation Market be modified to incorporate a consistent application of the marginal benefit factor (MBF) throughout the optimization, assignment and settlement process. The

¹⁴¹ OATT Schedule 2.

MBF should be defined as the Marginal Rate of Technical Substitution (MRTS) between RegA and RegD. (Priority: High. First reported 2012. Status: Not adopted.)

- The MMU recommends that the lost opportunity cost in the ancillary services markets be calculated using the schedule on which the unit was scheduled to run in the energy market. (Priority: High. First reported 2010. Status: Not adopted.)
- The MMU recommends that all data necessary to perform the Regulation Market three pivotal supplier test be saved so that the test can be replicated. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that, to prevent gaming, there be a penalty enforced in the Regulation Market as a reduction in performance score and/or a forfeiture of revenues when resource owners elect to deassign assigned regulation resources within the hour. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends market design changes to improve the performance of the Regulation Market, including use of a single five minute clearing price based on actual LMP and actual LOC, modifications to the LOC calculation, a software change to save some data elements necessary for verifying market outcomes, and further documentation of the implementation of the market design. (Priority: Medium. First reported 2010. Status: Partially adopted in 2012.)
- The MMU recommends that the rule requiring that tier 1 synchronized reserve resources are paid the tier 2 price when the nonsynchronized reserve price is above zero be eliminated immediately and that, under the current rule, tier 1 synchronized reserve resources not be paid the tier 2 price when they do not respond. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that the tier 2 synchronized reserve must offer requirement be enforced. The MMU recommends that PJM define a set of acceptable reasons why a unit can be made unavailable daily or hourly and require unit owners to select a reason in Markets Gateway whenever making a unit unavailable either daily or hourly or setting the offer MW to 0 MW. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM be more explicit and transparent about why tier 1 biasing is used in defining demand in the Tier 2 Synchronized Reserve Market. The MMU recommends that PJM define rules for estimating tier 1 MW, define rules for the use and amount of tier 1 biasing and identify the rule based reasons for each instance of biasing. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that the single clearing price for synchronized reserves be determined based on the actual five minute LMP and actual LOC and not the forecast LMP. (Priority: Low. First reported 2010. Status: Adopted, 2016.)
- The MMU recommends that no payments be made to tier 1 resources if they are deselected in the PJM market solution. The MMU also recommends that documentation of the Tier 1 synchronized reserve deselection process be published. (Priority: High. First reported 2014. Status: Adopted, 2014.)
- The MMU recommends that a reason code be attached to every hour in which PJM market operations adds additional DASR MW. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM modify the DASR Market to ensure that all resources cleared incur a real-time performance obligation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that the three pivotal supplier test and market power mitigation be incorporated in the DASR Market. (Priority: Low. First reported 2009. Status: Not adopted.)
- The MMU recommends that separate payments for reactive capability be eliminated and the cost of reactive capability be recovered in the capacity market. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the minimum tank suction level (MTSL) be allocated to black start service. The MMU further recommends that the PJM tariff be updated to clearly state how the

MTSL will be calculated for black start units sharing oil tanks. (Priority: Medium. New recommendation. Status: Not adopted.)

Section 10 Conclusion

The current PJM Regulation Market design that incorporates two signals using two resource types was a result of Commission Order No. 755 and subsequent orders that required a flawed design.¹⁴²

The current design of the PJM Regulation Market is significantly flawed. The market design has failed to correctly incorporate the marginal rate of technical substitution (MRTS) in market clearing and settlement. The market design uses the marginal benefit factor (MBF) to incorrectly represent the MRTS and uses a mileage ratio instead of the MBF in settlement. This failure to correctly and consistently incorporate the MRTS into the regulation market design has resulted in both underpayment and overpayment of RegD resources and in the over procurement of RegD resources in all hours. The market results continue to include the incorrect definition of opportunity cost. These issues have led to the MMU's conclusion that the regulation market design is flawed.

To address these flaws, the MMU and PJM developed a joint proposal which was approved by the PJM Members Committee on July 27, 2017. The PJM/MMU joint proposal addresses issues with the inconsistent application of the marginal benefit factor throughout the optimization and settlement process in the PJM Regulation Market.

The structure of the Tier 2 Synchronized Reserve Market has been evaluated and the MMU has concluded that these markets are not structurally competitive as they are characterized by high levels of supplier concentration and inelastic demand. As a result, these markets are operated with market clearing prices and with offers based on the marginal cost of producing the product plus a margin. As a result of these requirements, the conduct of market participants within these market structures has been consistent with competition, and the market performance results have been competitive. However, compliance with

calls to respond to actual synchronized reserve events remains less than 100 percent. For the six spinning events 10 minutes or longer in all of 2016, the average tier 2 synchronized reserve response was 85.5 percent of all scheduled MW. For the six spinning events 10 minutes or longer in the first nine months of 2017, the response was 87.6 percent of scheduled tier 2 MW.

The rule that requires payment of the tier 2 synchronized reserve price to tier 1 synchronized reserve resources when the nonsynchronized reserve price is greater than zero, is inefficient and results in a substantial windfall payment to the holders of tier 1 synchronized reserve resources. Tier 1 resources have no obligation to perform and pay no penalties if they do not perform, and tier 1 resources do not incur any costs when they are part of the tier 1 estimate in the market solution. Tier 1 resources are already paid for their response if they do respond. Tier 1 resources require no additional payment. If tier 1 resources wish to be paid as tier 2 resources, the rules provide the opportunity to make competitive offers in the tier 2 market and take on the associated obligations. Overpayment of tier 1 resources based on this rule added \$89.7 million to the cost of primary reserve in 2014, \$34.1 million in 2015, \$4.9 million in 2016, and \$2.0 million in the first nine months of 2017.

The benefits of markets are realized under these approaches to ancillary service markets. Even in the presence of structurally noncompetitive markets, there can be transparent, market clearing prices based on competitive offers that account explicitly and accurately for opportunity cost. This is consistent with the market design goal of ensuring competitive outcomes that provide appropriate incentives without reliance on the exercise of market power and with explicit mechanisms to prevent the exercise of market power.

The MMU concludes that the regulation market results were competitive, although the market design is flawed. The MMU concludes that the synchronized reserve market results were competitive. The MMU concludes that the DASR market results were competitive, although offers above the competitive level continue to affect prices.

¹⁴² Frequency Regulation Compensation in the Organized Wholesale Power Markets, Order No. 755, 137 FERC ¶ 61,064 at PP 197–200 (2011).

Overview: Section 11, Congestion and Marginal Losses

Congestion Cost

- **Total Congestion.** Total congestion costs decreased by \$366.8 million or 44.6 percent, from \$822.2 million in the first nine months of 2016 to \$455.4 million in the first nine months of 2017.
- **Day-Ahead Congestion.** Day-ahead congestion costs decreased by \$395.2 million or 45.0 percent, from \$877.8 million in the first nine months of 2016 to \$482.5 million in the first nine months of 2017.
- **Balancing Congestion.** Balancing congestion costs increased by \$28.4 million or 51.2 percent, from -\$55.5 million in the first nine months of 2016 to -\$27.1 million in the first nine months of 2017.
- **Real-Time Congestion.** Real-time congestion costs decreased by \$344.7 million or 39.2 percent, from \$878.5 million in the first nine months of 2016 to \$533.8 million in the first nine months of 2017.
- **Monthly Congestion.** Monthly total congestion costs in the first nine months of 2017 ranged from \$30.1 million in August to \$98.5 million in September.
- **Geographic Differences in CLMP.** Differences in CLMP among eastern, southern and western control zones in PJM were primarily a result of congestion on the Conastone - Peach Bottom Line, the Braidwood - East Frankfort Line, the Emilie - Falls Line, the Graceton - Safe Harbor Line and the Westwood Flowgate.
- **Congestion Frequency.** Congestion frequency continued to be significantly higher in the Day-Ahead Energy Market than in the Real-Time Energy Market in the first nine months of 2017. The number of congestion event hours in the Day-Ahead Energy Market was about 13 times the number of congestion event hours in the Real-Time Energy Market.
Day-ahead congestion frequency increased by 7.1 percent from 209,600 congestion event hours in the first nine months of 2016 to 224,543 congestion event hours in the first nine months of 2017.

Real-time congestion frequency decreased by 19.2 percent from 20,396 congestion event hours in the first nine months of 2016 to 16,474 congestion event hours in the first nine months of 2017.

- **Congested Facilities.** Day-ahead, congestion-event hours increased on flowgates and transformers and decreased on interfaces and lines. Real-time, congestion-event hours increased on flowgates and interfaces and decreased on lines and transformers.

The Conastone - Peach Bottom Line was the largest contributor to congestion costs in the first nine months of 2017. With \$33.6 million in total congestion costs, it accounted for 7.4 percent of the total PJM congestion costs in the first nine months of 2017.

- **Zonal Congestion.** ComEd had the largest total congestion costs among all control zones in the first nine months of 2017. ComEd had \$140.0 million in total congestion costs, comprised of -\$119.0 million in total load congestion payments, -\$263.0 million in total generation congestion credits and -\$4.0 million in explicit congestion costs. The Alpine - Belvidere Flowgate, the Cherry Valley Transformer, the Braidwood - East Frankfort Line, the Westwood Flowgate and the Havana E - Havana S Flowgate contributed \$66.6 million, or 47.6 percent of the total ComEd control zone congestion costs.
- **Ownership.** In the first nine months of 2017, financial entities were net receivers and physical entities were net payers of congestion charges. In the first nine months of 2017, financial entities were paid \$16.1 million in congestion credits compared to \$16.9 million received in congestion credits in the first nine months of 2016. In the first nine months of 2017, physical entities paid \$471.5 million in congestion charges, a decrease of \$367.6 million or 43.8 percent compared to the first nine months of 2016.

Marginal Loss Cost

- **Total Marginal Loss Costs.** Total marginal loss costs decreased by \$40.9 million or 7.5 percent, from \$541.9 million in the first nine months of 2016 to \$501.0 million in the first nine months of 2017. The loss MWh in PJM decreased by 571.1 GWh or 4.9 percent, from 11,607.8 GWh in

the first nine months of 2016 to 11,036.7 GWh in the first nine months of 2017. The loss component of real-time LMP in the first nine months of 2017 was \$0.015, compared to \$0.014 in the first nine months of 2016.

- **Monthly Total Marginal Loss Costs.** Monthly total marginal loss costs in the first nine months of 2017 ranged from \$44.2 million in April to \$71.6 million in July.
- **Day-Ahead Marginal Loss Costs.** Day-ahead marginal loss costs decreased by \$29.3 million or 4.9 percent, from \$595.4 million in the first nine months of 2016 to \$566.0 million in the first nine months of 2017.
- **Balancing Marginal Loss Costs.** Balancing marginal loss costs decreased by \$11.6 million or 21.7 percent, from -\$53.4 million in the first nine months of 2016 to -\$65.0 million in the first nine months of 2017.
- **Total Marginal Loss Surplus.** The total marginal loss surplus decreased in the first nine months of 2017 by \$24.5 million or 13.5 percent, from \$181.0 million in the first nine months of 2016, to \$156.5 million in the first nine months of 2017.

Energy Cost

- **Total Energy Costs.** Total energy costs increased by \$14.3 million or 4.2 percent, from -\$358.3 million in the first nine months of 2016 to -\$344.0 million in the first nine months of 2017.
- **Day-Ahead Energy Costs.** Day-ahead energy costs decreased by \$0.9 million or 0.2 percent, from -\$483.5 million in the first nine months of 2016 to -\$484.4 million in the first nine months of 2017.
- **Balancing Energy Costs.** Balancing energy costs increased by \$7.8 million or 6.1 percent, from \$128.1 million in the first nine months of 2016 to \$135.9 million in the first nine months of 2017.
- **Monthly Total Energy Costs.** Monthly total energy costs in the first nine months of 2017 ranged from -\$48.2 million in January to -\$31.0 million in April.

Section 11 Conclusion

Congestion is defined to be the total congestion payments by load in excess of the total congestion credits received by generation. The level and distribution of congestion reflects the underlying characteristics of the power system, including the nature and capability of transmission facilities, the offers and geographic distribution of generation facilities, the level and geographic distribution of incremental bids and offers and the geographic and temporal distribution of load.

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, 86.5 and 98.1 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014/2015, 2015/2016 and 2016/2017 planning periods. For the first four months of the 2017/2018 planning period ARRs and self scheduled FTRs offset 79.7 percent of total congestion costs

Overview: Section 12, Planning

Planned Generation and Retirements

- **Planned Generation.** As of September 30, 2017, 95,508.9 MW of capacity were in generation request queues for construction through 2024, compared to an average installed capacity of 201,573.5 MW as of September 30, 2017. Of the capacity in queues, 8,900.7 MW, or 9.3 percent, are uprates and the rest are new generation. Wind projects account for 15,580.9 MW of nameplate capacity or 16.3 percent of the capacity in the queues. Natural gas fired projects account for 59,943.8 MW of capacity or 62.8 percent of the capacity in the queues.
- **Generation Retirements.** As shown in Table 1-25, 32,150.7 MW have been, or are planned to be, retired between 2011 and 2020. Of that, 6,427.3 MW are planned to retire after September 30, 2017. In the first nine months of 2017, 2,072.8 MW were retired. Of the 6,427.3 MW pending retirement, 4,125.0 MW (64.2 percent) are coal units. The coal unit retirements were a

result of low gas prices, low capacity prices and the investments required for compliance with the EPA's Mercury and Air Toxics Standards (MATS) for some units.

- **Generation Mix.** A significant shift in the distribution of unit types within the PJM footprint continues as natural gas fired units enter the queue and coal fired steam units retire. There are 199.0 MW of coal fired steam capacity and 59,943.8 MW of gas fired capacity in the queue. The replacement of coal fired steam units by units burning natural gas will significantly affect future congestion, the role of firm and interruptible gas supply, and natural gas supply infrastructure.

Generation and Transmission Interconnection Planning Process

- Any entity that requests interconnection of a new generating facility, including increases to the capacity of an existing generating unit, or that requests interconnection of a merchant transmission facility, must follow the process defined in the PJM tariff to obtain interconnection service.¹⁴³ PJM's process is designed to ensure that new generation is added in a reliable and systematic manner. The process is complex and time consuming at least in part as a result of the required analyses. The cost, time and uncertainty associated with interconnecting to the grid may create barriers to entry for potential entrants.
- The queue contains a substantial number of projects that are not likely to be built. The queue process results in a substantial number of projects that drop out. Excluding currently active projects and projects currently under construction, 3,590 projects, representing 465,477.1 MW, have entered the queue process since its inception. Of those, 734 projects, representing 49,788.4 MW, went into service. Of the projects that entered the queue process, 56.9 percent of the MW withdrew prior to completion. Such projects may create barriers to entry for projects that would otherwise be completed by taking up queue positions, increasing interconnection costs and creating uncertainty.

- Feasibility, impact and facilities studies may be delayed for reasons including disputes with developers, circuit and network issues and retooling as a result of projects being withdrawn. The Earlier Queue Submittal Task Force (EQSTF) was established in August 2015 to address delays associated with the submittal of large numbers of requests at the end of the queue window, which resulted in revisions to the PJM Open Access Transmission Tariff, effective October 31, 2016.¹⁴⁴ ¹⁴⁵ On December 15, 2016, the Commission issued a notice of proposed rulemaking proposing additional queue reforms intended to improve certainty, promote more informed interconnection, and enhance interconnection processes.¹⁴⁶
- A transmission owner (TO) is an "entity that owns, leases or otherwise has a possessory interest in facilities used for the transmission of electric energy in interstate commerce under the tariff."¹⁴⁷ Where the transmission owner is a vertically integrated company that also owns generation, there is a potential conflict of interest when the transmission owner evaluates the interconnection requirements of new generation which is a competitor to the generation of the parent company and when the transmission owner evaluates the interconnection requirements of new generation which is part of the same company as the transmission owner. There is also a potential conflict of interest when the transmission owner evaluates the interconnection requirements of a merchant transmission developer which is a competitor of the transmission owner.

Regional Transmission Expansion Plan (RTEP)

- Artificial Island is an area in southern New Jersey that includes nuclear units at Salem and at Hope Creek in the PSEG Zone. On April 29, 2013, PJM issued a request for proposal (RFP), seeking technical solutions to improve stability issues and operational performance under a range of anticipated system conditions, and the elimination of potential planning criteria violations in this area. On July 30, 2015, the PJM Board of Managers accepted PJM's recommendation to assign the project to LS Power, a merchant developer, PSEG, and PHI with a total cost estimate

¹⁴⁴ See Earlier Queue Submittal Task Force at <<http://www.pjm.com/committees-and-groups/closed-groups/eqstf.aspx>>

¹⁴⁵ See Letter Order, ER16-2518-000 (Oct. 7, 2016).

¹⁴⁶ 157 FERC ¶ 61,212 (2016).

¹⁴⁷ See OATT § 1 (Transmission Owner).

¹⁴³ See OATT Parts IV & VI.

between \$263M and \$283M.^{148 149} On August 5, 2016, PJM announced that the Artificial Island project was to be suspended immediately due to unanticipated project complexities and significant cost overruns. On March 3, 2017, PJM held a special Transmission Expansion Advisory Committee (TEAC) meeting to discuss their updated analysis of the Artificial Island project. PJM staff presented updated assumptions that went into the new project analysis. In consultation with project developers and stakeholders, PJM made several major revisions to the project. These included switching the interconnection point from the Salem Substation to the Hope Creek Substation, removal of the New Freedom switched vertical circuit (SVC) from the project scope, and removal of the optical ground wire (OPGW) from the project scope. These revisions led to a revised total project cost estimate of \$280 million, \$140 million less than the previous \$420 million project cost estimate released in February 2016. On April 6, 2017, the PJM Board lifted a suspension of the project. It is expected to be in service by June 2020.

- On October 25, 2012, Schedule 12 of the tariff and Schedule 6 of the OA were changed to address FERC Order No. 1000 reforms to the cost allocation requirements for local and regional transmission planning projects that were formerly defined in Order No. 890. The new approach was applied for the first time to the 2013 RTEP. The allocation process has been upheld by FERC despite repeated challenges.¹⁵⁰
- The TEAC regularly reviews internal and external proposals to improve transmission reliability throughout PJM. On July 26, 2017, the PJM Board of Managers authorized more than \$417 million in electric transmission projects for reliability. The approved projects include a large substation that serves critical infrastructure customers in Newark, N.J., a \$275 million PSEG Newark Switch substation project to replace aging equipment, and additional equipment upgrades and improvements in areas served by:

American Electric Power; Dominion; Atlantic City Electric Company; PECO Energy Company; Pennsylvania Electric Company; American Transmission Systems, Inc.; East Kentucky Power Cooperative, Inc. and Dayton Power & Light. Most of the individual projects cost less than \$5 million.¹⁵¹

Backbone Facilities

- PJM baseline transmission projects are implemented to resolve reliability criteria violations. PJM backbone transmission projects are a subset of significant baseline projects, which are intended to resolve multiple reliability criteria violations and congestion issues and which may have substantial impacts on energy and capacity markets. There are currently three backbone projects under development, Surry Skiffes Creek 500kV, and the conversion of the Marion-Bayonne and Bayway-Linden lines from 138 kV to 345 kV.¹⁵²

Transmission Facility Outages

- PJM maintains a list of reportable transmission facilities. When the reportable transmission facilities need to be taken out of service, PJM transmission owners are required to report planned transmission facility outages as early as possible. PJM processes the transmission facility outage requests according to rules in PJM's Manual 3 to decide if the outage is on time or late and whether or not they will allow the outage.¹⁵³
- There were 10,186 transmission outage requests submitted in the 2017/2018 planning period. Of the requested outages, 69.4 percent were planned for five days or shorter and 9.5 percent were planned for longer than 30 days. Of the requested outages, 38.3 percent were late according to the rules in PJM's Manual 3.

Section 12 Recommendations

The MMU recommends improvements to the planning process.

148 See "Artificial Island Recommendations," presented at the TEAC meeting on April 28, 2015 at <<http://www.pjm.com/~media/committees-groups/committees/teac/20150428-aj/20150428-artificial-island-recommendations.aspx>>.

149 See letter from Terry Boston concerning the Artificial Island Project at <<http://www.pjm.com/~media/library/reports-notices/special-reports/board-statement-on-artificial-island-project.aspx?la=en>>.

150 See 155 FERC ¶ 61,090 (2016); 155 FERC ¶ 61,089 (2016); 155 FERC ¶ 61,088 (2016); see also Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom.* 762 F.3d 41, 412 (D.C. Cir. 2014); 142 FERC ¶ 61,074 (2013) (accepting the proposed PJM cost allocation method, effective February 1, 2013, subject to the outcome of PJM's Order No. 1000 regional compliance filing proceeding); 142 FERC ¶ 61,214 (2013), *order on reh'g and compliance*, 147 FERC ¶ 61,128 (2014), *order on reh'g and compliance*, 150 FERC ¶ 61,038 (2015), *order on reh'g and compliance*, 151 FERC ¶ 61,250 (2015).

151 See PJM. "PJM Board approves \$417 million investment in transmission improvements," <<http://www.pjm.com/~media/about-pjm/newsroom/2017-releases/20170726-pjm-board-approves-417-million-investment-in-transmission-improvements.aspx>> (July 26, 2017).

152 See "2017 RTEP Process Scope and Input Assumptions White Paper," P 25. <<http://www.pjm.com/~media/library/reports-notices/2017-rtep/20170731-rtep-input-assumptions-and-scope-whitepaper.aspx?la=en>> Accessed October 5, 2017.

153 PJM. "Manual 03: Transmission Operations," Revision 51 (June 1, 2017), Section 4.

- The MMU recommends that PJM continue to incorporate the principle that the goal of transmission planning should be the incorporation of transmission investment decisions into market driven processes as much as possible. (Priority: Low. First reported 2001. Status: Not adopted.)
- The MMU recommends the creation of a mechanism to permit a direct comparison, or competition, between transmission and generation alternatives, including which alternative is less costly and who bears the risks associated with each alternative. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that rules be implemented to permit competition to provide financing for transmission projects. This competition could reduce the cost of capital for transmission projects and significantly reduce total costs to customers. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that rules be implemented to require that project cost caps on new transmission projects be part of the evaluation of competing projects. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that barriers to entry be addressed in a timely manner in order to help ensure that the capacity market will result in the entry of new capacity to meet the needs of PJM market participants and reflect the uncertainty and resultant risks in the cost of new entry used to establish the capacity market demand curve in RPM. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the question of whether Capacity Injection Rights (CIRs) should persist after the retirement of a unit be addressed. Even if the treatment of CIRs remains unchanged, the rules need to ensure that incumbents cannot exploit control of CIRs to block or postpone entry of competitors.¹⁵⁴ (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends outsourcing interconnection studies to an independent party to avoid potential conflicts of interest. Currently, these studies are performed by incumbent transmission owners under PJM's direction. This creates potential conflicts of interest, particularly when transmission owners are vertically integrated and the owner of transmission also owns generation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM establish fair terms of access to rights of way and property, such as at substations, in order to remove any barriers to entry and permit competition between incumbent transmission providers and merchant transmission providers in the RTEP. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM enhance the transparency and queue management process for merchant transmission investment. Issues related to data access and complete explanations of cost impacts should be addressed. The goal should be to remove barriers to competition from merchant transmission. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends consideration of changing the minimum distribution factor in the allocation from 0.01 to 0.00 and adding a threshold minimum usage impact on the line. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM reevaluate all transmission outage tickets as on time or late as if they were new requests when an outage is rescheduled and apply the standard rules for late submissions to any such outages. (Priority: Low. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM draft a clear definition of the congestion analysis required for transmission outage requests to include in Manual 3 after appropriate review. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM modify the rules to reduce or eliminate the approval of late outage requests submitted or rescheduled after the FTR auction bidding opening date. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not permit transmission owners to divide long duration outages into smaller segments to avoid complying with

¹⁵⁴ See "Comments of the Independent Market Monitor for PJM," Docket No. ER12-1177-000 <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_Comments_ER12-1177-000_20120312.pdf>.

the requirements for long duration outages. (Priority: Low. First reported 2015. Status: Not adopted.)

- The MMU recommends improvements in queue management including that PJM establish a review process to ensure that projects are removed from the queue if they are not viable, as well as a process to allow commercially viable projects to advance in the queue ahead of projects which have failed to make progress, subject to rules to prevent gaming. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends an analysis of the study phase of PJM's transmission planning to reduce the need for postponements of study results, to decrease study completion times, and to improve the likelihood that a project at a given phase in the study process will successfully go into service. (Priority: Medium. First reported 2014. Status: Partially adopted.)

Section 12 Conclusion

The goal of PJM market design should be to enhance competition and to ensure that competition is the driver for all the key elements of PJM markets. But transmission investments have not been fully incorporated into competitive markets. The construction of new transmission facilities has significant impacts on the energy and capacity markets. But when generating units retire or load increases, there is no market mechanism in place that would require direct competition between transmission and generation to meet loads in the affected area. In addition, despite FERC Order No. 1000, there is not yet a transparent, robust and clearly defined mechanism to permit competition to build transmission projects, to ensure that competitors provide a total project cost cap, or to obtain least cost financing through the capital markets.

The addition of a planned transmission project changes the parameters of the capacity auction for the area, changes the amount of capacity needed in the area, changes the capacity market supply and demand fundamentals in the area and may effectively forestall the ability of generation to compete. But there is no mechanism to permit a direct comparison, let alone competition, between transmission and generation alternatives. There is no mechanism

to evaluate whether the generation or transmission alternative is less costly, whether there is more risk associated with the generation or transmission alternatives, or who bears the risks associated with each alternative. Creating such a mechanism should be an explicit goal of PJM market design.

Managing the generation queues is a highly complex process. The PJM queue evaluation process has been substantially improved in recent years and it is more efficient and effective as a result. The PJM queue evaluation process should continue to be improved to help ensure that barriers to competition for new generation investments are not created. Issues that need to be addressed include the ownership rights to CIRs, whether transmission owners should perform interconnection studies, and improvements in queue management to ensure that projects are removed from the queue if they are not viable, as well as a process to allow commercially viable projects to advance in the queue ahead of projects which have failed to make progress.

The PJM rules for competitive transmission development through the RTEP should build upon FERC Order No. 1000 to create real competition between incumbent transmission providers and merchant transmission providers. PJM should enhance the transparency and queue management process for merchant transmission investment. Issues related to data access and complete explanations of cost impacts should be addressed. The goal should be to remove barriers to competition from merchant transmission. Another element of opening competition would be to consider transmission owners' ownership of property and rights of way at or around transmission substations. In many cases, the land acquired included property intended to support future expansion of the grid. Incumbents have included the costs of the property in their rate base. Because PJM now has the responsibility for planning the development of the grid under its RTEP process, property bought to facilitate future expansion should be a part of the RTEP process and be made available to all providers on equal terms.

There are currently no market incentives for transmission owners to submit and complete transmission outages in a timely and efficient manner. Requiring transmission owners to pay does not create an effective incentive when those

payments are passed through to transmission customers. The process for the submission of planned transmission outages needs to be carefully reviewed and redesigned to limit the ability of transmission owners to submit transmission outages that are late for FTR auction bid submission dates and are late for the Day-Ahead Energy Market. The submission of late transmission outages can inappropriately affect market outcomes when market participants do not have the ability to modify market bids and offers.

Overview: Section 13, FTRs and ARR

Auction Revenue Rights

Market Structure

- **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. Residual ARRs with negative target allocations are not allocated to participants. Instead they are removed and the model is rerun until a minimum of negative target allocation residual ARRs are found.

In the first four months of the 2017/2018 planning period, PJM allocated a total of 27,657.9 MW of residual ARRs, down from 29,478.9 MW in the first four months of the 2016/2017 planning period, with a total target allocation of \$4.8 million for the first four months of the 2017/2018 planning period, down from \$5.7 million for the first four months of the 2016/2017 planning period.

- **ARR Reassignment for Retail Load Switching.** There were 22,714 MW of ARRs associated with \$6139,300 of revenue that were reassigned in the first four months of the 2017/2018 planning period. There were 33,567 MW of ARRs associated with \$172,300 of revenue that were reassigned for the first four months of the 2016/2017 planning period.

Market Performance

- **Revenue Adequacy.** For the first four months of the 2017/2018 planning period, the ARR target allocations, which are based on the nodal price differences from the Annual FTR Auction, were \$550.4 million, while PJM collected \$558.4 million from the combined Long Term, Annual and Monthly Balance of Planning Period FTR Auctions, making ARRs revenue adequate. For the 2016/2017 planning period, the ARR target allocations were \$914.2 million while PJM collected \$941.5 million from the combined Long Term, Annual and Monthly Balance of Planning Period FTR Auctions. The year over year decrease in ARR target allocations and auction revenue is a result of decreased prices from the previous planning period resulting from continued reduced allocation of Stage 1B and Stage 2 ARRs. ARR revenue adequacy is also affected by PJM's clearing of additional counter flow FTRs to alleviate infeasibilities from Stage 1A.
- **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, which include congestion in the Day-Ahead Energy Market and the balancing energy market, for the 2014/2015 planning period. In the first four months of the 2017/2018 planning period, which reallocated balancing congestion and M2M payments to load, total ARR and self scheduled FTR revenues offset 79.7 percent of total congestion costs. The goal of the design should be to return 100 percent of the congestion revenues to the load.

Financial Transmission Rights

Market Structure

- **Supply.** Market participants can sell FTRs. In the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period, total participant FTR sell offers were 2,084,830 MW, up from 2,078,673 MW for the same period during the 2016/2017 planning period.
- **Demand.** The total FTR buy bids from the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning

period decreased 15.2 percent from 10,167,079 MW for the same time period of the prior planning period, to 8,621,736 MW.

- **Patterns of Ownership.** For the Monthly Balance of Planning Period Auctions, financial entities purchased 72.6 percent of prevailing flow and 81.9 percent of counter flow FTRs January through September of 2017. Financial entities owned 58.8 percent of all prevailing and counter flow FTRs, including 49.2 percent of all prevailing flow FTRs and 71.5 percent of all counter flow FTRs during the period from January through September 2017.

Market Behavior

- **FTR Forfeitures.** FTR forfeitures were not billed after January 19, 2017, pending retroactive implementation of a new FTR forfeiture rule. As of the September bill, PJM has begun retroactive billing under the new FTR forfeiture rule.
- **Credit Issues.** There were two collateral defaults in the first nine months of 2017 for a total of \$318,746. Both defaults were cured reasonable promptly.

Market Performance

- **Volume.** In the first four months of the 2017/2018 planning period Monthly Balance of Planning Period FTR Auctions cleared 1,232,334 MW (14.3 percent) of FTR buy bids and 478,581 MW (23.0 percent) of FTR sell offers cleared.
- **Price.** The weighted average buy bid cleared FTR price in the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period was \$0.10, down from \$0.13 per MW for the same period in the 2016/2017 planning period.
- **Revenue.** The Monthly Balance of Planning Period FTR Auctions generated \$16.2 million in net revenue for all FTRs for the first four months of the 2017/2018 planning period, down from \$17.3 million for the same time period in the 2016/2017 planning period.

- **Revenue Adequacy.** FTRs were paid at 100 percent of the target allocation level for the first four months of the 2017/2018 planning period. This high level of revenue adequacy was at least partially a result of FERC redefining the FTR congestion calculation to exclude balancing congestion and M2M payments.
- **Profitability.** FTR profitability is the difference between the revenue received for an FTR and the cost of the FTR. In the first four months of the 2017/2018 planning period, physical entities made \$69.9 million in profits, largely due to self scheduled FTRs, and financial entities made \$46.4 million. Revenues from self scheduled FTRs are more accurately described as a return of congestion rather than profits.

Section 13 Recommendations

- The MMU recommends that the ARR/FTR design be modified to ensure that the rights to all congestion revenues are assigned to load. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that all FTR auction revenue be distributed to ARR holders. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that FTR auction revenues not be used to buy counter flow FTRs for the purpose of improving FTR payout ratios.¹⁵⁵ (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that all historical generation to load paths be eliminated as a basis for allocating ARRs. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that counter flow FTRs be eliminated. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM eliminate portfolio netting to eliminate cross subsidies among FTR market participants. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM eliminate subsidies to counter flow FTRs by applying the payout ratio to counter flow FTRs in the same way

¹⁵⁵ See PJM. "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55.

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 implement a seasonal ARR and FTR allocation system to better represent outages. (Priority: Medium. 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: Adopted.)
- 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.)
- The MMU recommends that PJM improve transmission outage modeling in the FTR auction models. (Priority: Low. First reported 2013. Status: Not adopted.)
- 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, 2014/2015 planning period.)
- 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: Adopted 2016.)
- The MMU recommends that Long Term FTRs be modified to include only a one year ahead FTR. (Priority: High. First reported 2017. Status: Not adopted.)

Section 13 Conclusion

The annual ARR allocation should be designed to ensure that the rights to all congestion revenues are assigned to firm transmission service customers, without requiring contract path physical transmission rights that are 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 the benefits of firm low cost generation delivered using the transmission system in the form of revenues which offset congestion. 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 and loads pay congestion. 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 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 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 the rights to all the congestion revenues and 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, 86.5 and 98.1 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014/2015, 2015/2016 and 2016/2017 planning periods.

As of the 2017/2018 planning period, balancing congestion and M2M payments are assigned to load, rather than to FTR holders. Under the new allocation of balancing congestion and M2M payments, for the first four months of the 2017/2018 planning period, ARRs and self scheduled FTRs offset 79.7 percent of total congestion costs.

Load should never be required to subsidize payments to FTR Holders, regardless of the reason. Such subsidies have been suggested repeatedly.¹⁵⁶ The FERC order of September 15, 2016, introduced a subsidy to FTR Holders at the expense of ARR holders.¹⁵⁷ The order requires PJM to ignore balancing congestion when calculating total congestion dollars available to fund FTRs. This approach ignores 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. Eliminating balancing congestion from the FTR revenue calculation requires load to pay twice for congestion. Load will have to continue paying for the physical transmission system, will have to continue paying in excess of generator revenues and load will 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 will 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.

The Commission's order will shift substantial revenue from load to the holders of FTRs and reduce the ability of load to offset congestion. Under the old allocation rule ARR holders would have had an effective offset of 98.4 percent of congestion in the first four months of the 2017/2018 planning period rather

¹⁵⁶ See FERC Docket Nos. EL13-47-000, EL12-19-000.

¹⁵⁷ See 156 FERC ¶ 61,180.

than the 79.7 percent effective offset that resulted from the new rule, a loss of \$21.4 million.

If these new allocation rules had been in place beginning with the 2011/2012 planning period, ARR holders would have received \$1,034.2 million less in congestion offsets from the 2011/2012 through the 2016/2017 planning period. The total overpayment to FTR Holders for the 2011/2012 through 2016/2017 planning period would have been \$944.4 million. The underpayment to load and the overpayment to FTR Holders is a result of several factors in the new rules all of which mean the transfer of revenues to FTR Holders and the shifting of costs to load. Load is now required to pay for balancing congestion, which significantly increases costs to load and significantly increases revenues paid to FTR Holders. PJM will continue to clear counter flow FTRs using excess auction revenues in order to make it possible to sell more prevailing flow FTRs. FTR Holders will receive excess day-ahead congestion revenues in excess of target allocations. FTR Holders will receive excess auction revenue, which is what FTR Holders were willing to pay for FTRs in excess of what is provided to ARR 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 balancing 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.

PJM used a more conservative approach to modeling the transmission capability for the 2014/2015 through 2016/2017 planning periods compared to the 2013/2014 planning period. PJM simply used 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 bid prices, increased clearing prices and reduced clearing quantities. For the 2017/2018 planning period PJM assigned all balancing congestion and M2M payments to load and exports. As a result, PJM also reversed course and increased the availability of Stage 1B and Stage 2 FTRs. The market response to the increased supply of FTRs was lower bid prices and clearing prices.

Clearing prices fell and cleared quantities increased from the 2010/2011 planning period through the 2013/2014 planning period. The market response to lower revenue adequacy was to reduce bid prices and to increase bid volumes and offer volumes. In the 2014/2015, 2015/2016 and 2016/2017 planning periods, due to reduced ARR allocations, FTR volume decreased relative to the 2013/2014 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 2013/2014 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 2013/2014 planning period from the reported 72.8 percent to 91.0 percent. For the 2014/2015, 2015/2016 and 2016/2017 planning periods 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 ARR 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 are 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. There is a reason that transmission is not built to address the Stage 1A overallocation issue. PJM's transmission planning process (RTEP) does not identify a need for new transmission because there is, in fact, no need for new transmission associated with Stage 1A ARRs. The Stage 1A overallocation issue is a fiction based on the use of outdated and irrelevant generation to load paths to assign Stage 1A rights that have nothing to do with actual power flows.

The result of removing portfolio netting, applying a payout ratio to counter flow FTRs and eliminating Stage 1A ARR overallocation in the 2013/2014 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 different line ratings, 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; the payment of congestion revenues to UTCs; 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.

It is not clear, in a competitive market, why FTR purchases by financial entities remain persistently profitable. In a competitive market, it would be expected that profits would be competed away. It is also not clear, in a competitive market, why the ownership structure of long term FTRs is so highly concentrated. The apparent lack of competition to purchase Long Term FTRs (three year product), results in low prices when compared to the resale prices in Annual FTR Auctions. In a competitive market the price of Long

Term FTRs (three year product) would be expected to converge with the prices of Annual FTRs, but there has been a persistent, wide divergence that has made the purchase of Long Term FTRs very profitable.

For the 2014/2015, 2015/2016 and 2016/2017 planning periods FTRs have been revenue adequate. This is not because the underlying market design 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.

Load is significantly worse off as a result of the changes made to the FTR/ARR process by PJM based on the FERC order of September 15, 2016. ARR revenues were significantly reduced for the 2017/2018 FTR Auction, the first auction under the new rules. In addition, the certainty of the ARR offset to congestion, whatever the level, was eliminated by the assignment of 100 percent of balancing congestion to load. ARR holders will be worse off as a result of paying balancing congestion but will not know exactly how much worse off until the end of the planning year.

It has become increasingly clear that the Long Term FTR Auction should be limited to one year ahead. Ownership of the three year product is extremely highly concentrated. The buyers of the product resell the annual segments of the product for multiples of the purchase price. The prices in the Long Term FTR Auction are much lower than those in the Annual FTR Auction. The difference in revenue over the previous four planning periods is \$337.2 million. PJM cannot model transmission upgrades past the one year ahead product. There is no reason for the very small number of purchasers to continue to be subsidized.

Recommendations

In order to perform its role in PJM market design, the MMU evaluates existing and proposed PJM Market Rules and the design of the PJM Markets.¹ The MMU initiates and proposes changes to the design of the markets and the PJM Market Rules in stakeholder and regulatory proceedings.² In support of this function, the MMU engages in discussions with stakeholders, State Commissions, PJM management, and the PJM Board; participates in PJM stakeholder meetings and working groups regarding market design matters; publishes proposals, reports and studies on market design issues; and makes filings with the Commission on market design issues.³ The MMU also recommends changes to the PJM Market Rules to the staff of the Commission's Office of Energy Market Regulation, State Commissions, and the PJM Board.⁴ The MMU may provide in its annual, quarterly and other reports "recommendations regarding any matter within its purview."⁵

Priority rankings are relative. The creation of rankings recognizes that there are limited resources available to address market issues and that problems must be ranked in order to determine the order in which to address them. It does not mean that all the problems should not be addressed. Priority rankings are dynamic and as new issues are identified, priority rankings will change. The rankings reflect a number of factors including the significance of the issue for efficient markets, the difficulty of completion and the degree to which items are already in progress. A low ranking does not necessarily mean that an issue is not important, but could mean that the issue would be easy to resolve.

There are three priority rankings: High, Medium and Low. High priority indicates that the recommendation requires action because it addresses a market design issue that creates significant market inefficiencies and/or long lasting negative market effects. Medium priority indicates that the recommendation addresses a market design issue that creates intermediate

market inefficiencies and/or near term negative market effects. Low priority indicates that the recommendation addresses a market design issue that creates smaller market inefficiencies and/or more limited market effects or that it could be easily resolved.

The MMU is also tracking PJM's progress in addressing these recommendations. The MMU recognizes that part of the process of addressing recommendations may include discussions in the stakeholder process, FERC decisions and court decisions and those elements are included in the tracking. Each recommendation includes a status. The status categories are:

- **Adopted:** PJM has implemented the recommendation made by the MMU.
- **Partially adopted:** PJM has implemented part of the recommendation made by the MMU.
- **Not adopted:** PJM does not plan to implement the recommendation made by the MMU, or has not yet implemented any part of the recommendation made by the MMU. Where the subject of the recommendation is pending stakeholder or FERC action, that status is noted.

New Recommendations

Consistent with its core function to "[e]valuate existing and proposed market rules, tariff provisions and market design elements and recommend proposed rule and tariff changes," the MMU recommends specific enhancements to existing market rules and implementation of new rules that are required for competitive results in PJM markets and for continued improvements in the functioning of PJM markets.⁶

In this *2017 Quarterly State of the Market Report for PJM: January through September*, the MMU includes four new recommendations.⁷

¹ OATT Attachment M § IV.D.

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ OATT Attachment M § VI.A.

⁶ 18 CFR § 35.28(g)(3)(ii)(A); see also OATT Attachment M § IV.D.

⁷ New or modified recommendations include all MMU recommendations that were reported for the first time, or substantially modified, in this *2017 Quarterly State of the Market Report for PJM: January through September*.

New Recommendations from Section 5, Capacity Market

- The MMU recommends that PJM clear the capacity market based on nodal capacity resource locations and the characteristics of the transmission system consistent with the actual electrical facts of the grid. The current nested LDA structure used in the capacity market does not adequately represent all the capacity transfers that are feasible among LDAs. Absent a fully nodal capacity market clearing process, the MMU recommends that PJM use a nonnested model for all LDAs and specify a VRR curve for each LDA separately. Each LDA requirement should be met with the capacity resources located within the LDA and exchanges from neighboring LDAs up to the transmission limit. LDAs should price separate if that is the result of the LDA supply curves and the transmission constraints. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that the RPM market power mitigation rule be modified to apply offer caps in all cases when the three pivotal supplier test is failed and the sell offer is greater than the offer cap. This will ensure that market power does not result in an increase in make whole payments. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM develop a forward looking estimate for the expected number of Performance Assessment Hours (H) to use in calculating the Non-Performance Charge Rate. The MMU recommends that PJM develop a forward looking estimate for the Balancing Ratio (B) during Performance Assessment Hours to use in calculating the default offer cap. Both H and B parameters should be included in the annual review of planning parameters for the Base Residual Auction. (Priority: High. New recommendation. Status: Not adopted.)

New Recommendation from Section 10, Ancillary Services

- The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the minimum tank suction level (MTSL) be allocated to black start service. The MMU further recommends that the PJM tariff be updated to clearly state how the MTSL will be calculated for black start units sharing oil tanks. (Priority: Medium. New recommendation. Status: Not adopted.)

Complete List of Current MMU Recommendations

The following recommendations are explained in greater detail in each section of the report.

Section 3, Energy Market

- The MMU recommends that the market rules should explicitly require that offers into the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. The short run marginal cost should reflect opportunity cost when and where appropriate. (Priority: Medium. First reported 2009. Status: Not adopted.)
- The MMU recommends that PJM require every market participant to make available at least one cost schedule with the same fuel type and parameters as that of their offered price schedule. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM require that the level of incremental costs includable in cost offers not exceed the unit's short run marginal cost. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM require that all fuel cost policies be algorithmic, verifiable, and systematic. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that Manual 15 be replaced with a straightforward description of the components of cost offers based on short run marginal

- costs and the correct calculation of cost offers. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends removal of all use of FERC System of Accounts in the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends the removal of all use of cyclic starting and peaking factors from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends the removal of all labor costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends changing the definition of the start heat input for combined cycles to include only the amount of fuel used from firing each combustion turbine in the combined cycle to the breaker close of each combustion turbine. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends the removal of nuclear fuel and nonfuel operations and maintenance costs that are not short run marginal costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends revising the pumped hydro fuel cost calculation to include day-ahead and real-time power purchases. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends revisions to the calculation of energy market opportunity costs to incorporate all time based offer parameters and all limitations that impact the opportunity cost of generating unit output. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends removing the catastrophic designation for force majeure fuel supply limitations in Schedule 2. (Priority: Medium. First reported 2016. Status: Not adopted.)
 - The MMU recommends that the rules governing the application of the TPS test be clarified and documented. (Priority: High. First reported 2010. Status: Not adopted.)
 - The MMU recommends, in order to ensure effective market power mitigation when the TPS test is failed, that markup be constant across the full MWh range of price and cost offers, that there be at least one cost-based offer using the same fuel as the available price-based offer. (Priority: High. First reported 2015. Status: Not adopted.)
 - The MMU recommends that in order to ensure effective market power mitigation when the TPS test is failed, the operating parameters in the cost-based offer and the price-based parameter limited schedule (PLS) offer be at least as flexible as the operating parameters in the available non-PLS price-based offer, and that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer. (Priority: High. First reported 2015. Status: Not adopted.)
 - The MMU recommends that capacity performance resources and base capacity resources (during the June through September period) be held to the OEM operating parameters of the capacity market CONE reference resource for performance assessment and energy uplift payments and that this standard be applied to all technologies on a uniform basis. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that under the capacity performance construct, PJM recognize the difference between operational parameters that indicate to PJM dispatchers what a unit is capable of during the operating day and the parameters that are used for capacity performance assessment as well as uplift payments. The parameters which determine nonperformance charges and the amount of uplift payments to those generators should reflect the flexibility goals of the capacity performance construct. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that PJM retain the \$1,000 per MWh offer cap in the PJM energy market except when cost-based offers exceed \$1,000 per MWh, and retain other existing rules that limit incentives to exercise

- market power. (Priority: High. First reported 1999. Status: Partially adopted, 1999.)
- The MMU recommends that PJM not allow nuclear generators which do not respond to prices or which only respond to manual instructions from the dispatcher to set the LMPs in the real-time market. (Priority: Low. First reported 2016. Status: Not adopted.)
 - The MMU recommends that PJM document how LMPs are calculated when demand response is marginal. The LMPs in excess of \$1,800 per MWh on January 7, 2014, were potentially a result of the way in which PJM modeled zonal (not nodal) demand response as a marginal resource. (Priority: Low. First reported 2014. Status: Not Adopted.)
 - The MMU recommends that PJM explicitly state its policy on the use of transmission penalty factors including: the level of the penalty factors; the triggers for the use of the penalty factors; the appropriate line ratings to trigger the use of penalty factors; the allowed duration of the violation; the use of constraint relaxation logic; and when the transmission penalty factors will be used to set the shadow price. (Priority: Medium. First reported 2015. Status: Not adopted. Stakeholder process.)
 - The MMU recommends that the definition of maximum emergency status in the tariff apply at all times rather than just during maximum emergency events.⁹ (Priority: Medium. First reported 2012. Status: Not adopted.)
 - The MMU recommends that PJM update the outage impact studies, the reliability analyses used in RPM for capacity deliverability and the reliability analyses used in RTEP for transmission upgrades to be consistent with the more conservative emergency operations (post contingency load dump limit exceedance analysis) in the energy market that were implemented in June 2013. (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that the roles of PJM and the transmission owners in the decision making process to control for local contingencies be clarified, that PJM's role be strengthened and that the process be made transparent. (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that PJM include in the appropriate manual an explanation of the initial creation of hubs, the process for modifying hub definitions and a description of how hub definitions have changed.⁹ There is currently no PJM documentation in the tariff or manuals explaining how hubs are created and how their definitions are changed.¹⁰ (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that during hours when a generation bus shows a net withdrawal, the energy withdrawal be treated as load, not negative generation, for purposes of calculating load and load-weighted LMP. The MMU recommends that during hours when a load bus shows a net injection, the energy injection be treated as generation, not negative load, for purposes of calculating generation and load-weighted LMP. (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that PJM remove nonspecific fuel types such as other or co-fire other from the list of fuel types available for market participants to identify the fuel type associated with their price and cost schedules. (Priority: Medium. First reported 2015. Status: Partially adopted.)
 - The MMU recommends that PJM routinely review all transmission facility ratings and any changes to those ratings to ensure that the normal, emergency and load dump ratings used in modeling the transmission system are accurate and reflect standard ratings practice. (Priority: Low. First reported 2013. Status: Partially adopted.)
 - The MMU recommends that PJM identify and collect data on available behind the meter generation resources, including nodal location information and relevant operating parameters. (Priority: Low. First reported 2013. Status: Partially adopted.)
 - The MMU recommends that PJM continue to enhance its posting of market data to promote market efficiency. (Priority: Medium. First reported 2005. Status: Partially adopted.)

8 OATT S 1 (Definitions – OATT Definitions – L-M-N) (June 1, 2017) at 76.

9 According to minutes from the first meeting of the Energy Market Committee (EMC) on January 28, 1998, the EMC unanimously agreed to be responsible for approving additions, deletions and changes to the hub definitions to be published and modeled by PJM. Since the EMC has become the Market Implementation Committee (MIC), the MIC now appears to be responsible for such changes.

10 The general definition of a hub can be found in the PJM.com Glossary <<http://www.pjm.com/Glossary.aspx>>.

- The MMU recommends the elimination of FMU and AU adders. FMU and AU adders no longer serve the purpose for which they were created and interfere with the efficient operation of PJM markets. (Priority: Medium. First reported 2012. Status: Partially adopted, 2014.)
- The MMU recommends that PJM require all generating units to identify the fuel type associated with each of their offered schedules. (Priority: Low. First reported 2014. Status: Adopted in full, 2014.)

Section 4, Energy Uplift

The MMU recognizes that many of the issues addressed in the recommendations are being discussed in PJM stakeholder processes. Until new rules are in place, the MMU's recommendations and the reported status of those recommendations are based on the existing market rules.

- The MMU recommends that PJM not use closed loop interface constraints to artificially override the nodal prices that are based on fundamental LMP logic in order to: accommodate rather than resolve the inadequacies of the demand side resource capacity product; address the inability of the power flow model to incorporate the need for reactive power; accommodate rather than resolve the flaws in PJM's approach to scarcity pricing; or for any other reason. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM not use price setting logic to artificially override the nodal prices that are based on fundamental LMP logic in order to reduce uplift. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that if PJM believes it appropriate to modify the LMP price setting logic, PJM initiate a stakeholder process to create transparent and consistent modifications to the rules and incorporate the modifications in the PJM tariff. (Priority: Medium. First Reported 2016. Status: Not adopted.)
- The MMU recommends that PJM initiate an analysis of the reasons why some combustion turbines and diesels scheduled in the Day-Ahead Energy Market are not called in real time when they are economic. (Priority: Medium. First Reported 2012. Status: Not adopted.)
- The MMU recommends the elimination of the day-ahead operating reserve category to ensure that units receive an energy uplift payment based on their real-time output and not their day-ahead scheduled output. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends reincorporating the use of net regulation revenues as an offset in the calculation of balancing operating reserve credits. (Priority: Medium. First reported 2009. Status: Not adopted. Stakeholder process.)
- The MMU recommends not compensating self scheduled units for their startup cost when the units are scheduled by PJM to start before the self scheduled hours. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends four additional modifications to the energy lost opportunity cost calculations:
 - The MMU recommends calculating LOC based on 24 hour daily periods or multi-hour segments of hours for combustion turbines and diesels scheduled in the Day-Ahead Energy Market, but not committed in real time. (Priority: Medium. First reported 2014. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time should be compensated for LOC based on their real-time desired and achievable output, not their scheduled day-ahead output. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time be compensated for LOC incurred within an hour. (Priority: Medium. First reported 2013. Status: Not adopted.)
 - The MMU recommends that only flexible fast start units (startup plus notification times of 30 minutes or less) and short minimum run times (one hour or less) be eligible by default for the LOC compensation to

units scheduled in the Day-Ahead Energy Market and not committed in real time. Other units should be eligible for LOC compensation only if PJM explicitly cancels their day-ahead commitment. (Priority: Medium. First reported 2015. Status: Not adopted.)

- The MMU recommends that up to congestion transactions be required to pay energy uplift charges for both the injection and the withdrawal sides of the UTC. (Priority: High. First reported 2011. Status: Not adopted. Pending before FERC.)
- The MMU recommends eliminating the use of internal bilateral transactions (IBTs) in the calculation of deviations used to allocate balancing operating reserve charges. (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)
- The MMU recommends allocating the energy uplift payments to units scheduled as must run in the Day-Ahead Energy Market for reasons other than voltage/reactive or black start services as a reliability charge to real-time load, real-time exports and real-time wheels. (Priority: Medium. First reported 2014. Status: Not adopted. Stakeholder process.)
- The MMU recommends reallocating the operating reserve credits paid to units supporting the Con Edison – PJM Transmission Service Agreements. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends that the total cost of providing reactive support be categorized and allocated as reactive services. Reactive services credits should be calculated consistent with the operating reserve credits calculation. (Priority: Medium. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends including real-time exports and real-time wheels in the allocation of the cost of providing reactive support to the 500 kV system or above, which is currently allocated solely to real-time RTO load. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends enhancing the current energy uplift allocation rules to reflect the elimination of day-ahead operating reserves, the timing of commitment decisions and the commitment reasons. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends modifications to the calculation of lost opportunity costs credits paid to wind units. The lost opportunity costs credits paid to wind units should be based on the lesser of the desired output, the estimated output based on actual wind conditions and the capacity interconnection rights (CIRs). In addition, the MMU recommends that PJM allow and wind units submit CIRs that reflect the maximum output wind units want to inject into the transmission system at any time. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM revise Manual 11 attachment C consistent with the tariff to limit compensation to offered costs. The Manual 11 attachment C procedure should describe the steps market participants must take to change the availability of cost-based energy offers that have been submitted day ahead. The MMU recommends that PJM eliminate the Manual 11 attachment C procedure with the implementation of hourly offers (ER16-372-000). (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM clearly identify and classify all reasons for incurring operating reserves in the Day-Ahead and the Real-Time Energy Markets and the associated operating reserve charges in order to make all market participants aware of the reasons for these costs and to help ensure a long term solution to the issue of how to allocate the costs of operating reserves. (Priority: Medium. First reported 2011. Status: Adopted 2015.)
- The MMU recommends that PJM revise the current operating reserve confidentiality rules in order to allow the disclosure of complete information about the level of operating reserve charges by unit and the detailed reasons for the level of operating reserve credits by unit in the PJM region. (Priority: High. First reported 2013. Status: Partially adopted.)
- The MMU recommends that the lost opportunity cost in the energy market be calculated using the schedule on which the unit was scheduled to run

in the energy market. (Priority: High. First reported 2012. Status: Adopted 2015.)

- The MMU recommends including no load and startup costs as part of the total avoided costs in the calculation of lost opportunity cost credits paid to combustion turbines and diesels scheduled in the Day-Ahead Energy Market but not committed in real time. (Priority: Medium. First reported 2012. Status: Adopted 2015.)
- The MMU recommends using the entire offer curve and not a single point on the offer curve to calculate energy lost opportunity cost. (Priority: Medium. First reported 2012. Status: Adopted 2015.)

Section 5, Capacity¹¹

The MMU recognizes that PJM has implemented the Capacity Performance Construct to replace some of the existing core market rules and to address fundamental performance incentive issues. The MMU recognizes that the Capacity Performance Construct addresses many of the MMU's recommendations. The MMU's recommendations are based on the existing capacity market rules. The status is reported as adopted if the recommendation was included in FERC's order approving PJM's Capacity Performance filing.¹²

- The MMU recommends the enforcement of a consistent definition of capacity resource. The MMU recommends that the requirement to be a physical resource be enforced and enhanced. The requirement to be a physical resource should apply at the time of auctions and should also constitute a commitment to be physical in the relevant Delivery Year. The requirement to be a physical resource should be applied to all resource types, including planned generation, demand resources and imports.^{13 14} (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)

¹¹ The MMU has identified serious market design issues with RPM and the MMU has made specific recommendations to address those issues. These recommendations have been made in public reports.

¹² 151 FERC ¶ 61,208 (June 9, 2015).

¹³ See also Comments of the Independent Market Monitor for PJM, Docket No. ER14-503-000 (December 20, 2013).

¹⁴ See "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf> (December 27, 2016).

- The MMU recommends that the definition of demand side resources be modified to ensure that such resources be fully substitutable for other generation capacity resources. Both the Limited and the Extended Summer DR products should be eliminated in order to ensure that the DR product has the same unlimited obligation to provide capacity year round as generation capacity resources. (Priority: High. First reported 2012. Status: Adopted 2015.)
- The MMU recommends that the test for determining modeled Locational Deliverability Areas (LDAs) in RPM be redefined. A detailed reliability analysis of all at risk units should be included in the redefined model. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that the net revenue calculation used by PJM to calculate the net Cost of New Entry (CONE) VRR parameter reflect the actual flexibility of units in responding to price signals rather than using assumed fixed operating blocks that are not a result of actual unit limitations.^{15 16} The result of reflecting the actual flexibility is higher net revenues, which affect the parameters of the RPM demand curve and market outcomes. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that Energy Efficiency Resources (EE) not be included on the supply side of the capacity market, because PJM's load forecasts now account for future EE, unlike the situation when EE was first added to the capacity market. However, the MMU recommends that the PJM load forecast method should be modified so that EE impacts immediately affect the forecast without the long lag times incorporated in the current forecast method. If EE is not included on the supply side, there is no reason to have an add back mechanism. If EE remains on the supply side, the implementation of the EE add back mechanism should be modified to ensure that market clearing prices are not affected. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM reduce the number of incremental auctions to a single incremental auction held three months prior to

¹⁵ See PJM Interconnection, LLC, Docket No. ER12-513-000 (December 1, 2011) ("Triennial Review").

¹⁶ See the 2012 State of the Market Report for PJM, Volume 2, Section 6, Net Revenue.

the start of the delivery year and reevaluate the triggers for holding conditional incremental auctions. (Priority: Medium. First reported 2013. Modified Q1 2017. Status: Not adopted.)

- The MMU recommends that PJM offer to sell back capacity in incremental auctions only at the BRA clearing price for the relevant delivery year. (Priority: Medium. First reported Q1, 2017. Status: Not adopted.)
- The MMU recommends that the use of the 2.5 percent demand adjustment (Short Term Resource Procurement Target) be terminated immediately. The 2.5 percent should be added back to the overall market demand curve. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends changing the RPM solution method to explicitly incorporate the cost of make whole payments in the objective function. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM clear the capacity market based on nodal capacity resource locations and the characteristics of the transmission system consistent with the actual electrical facts of the grid. The current nested LDA structure used in the capacity market does not adequately represent all the capacity transfers that are feasible among LDAs. Absent a fully nodal capacity market clearing process, the MMU recommends that PJM use a nonnested model for all LDAs and specify a VRR curve for each LDA separately. Each LDA requirement should be met with the capacity resources located within the LDA and exchanges from neighboring LDAs up to the transmission limit. LDAs should price separate if that is the result of the LDA supply curves and the transmission constraints. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends the extension of the minimum offer price rule (MOPR) to all existing and proposed units in order to protect competition in the capacity market from external subsidies. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that, as part of the MOPR unit specific standard of review, all projects be required to use the same basic modeling assumptions. That is the only way to ensure that projects compete on the

basis of actual costs rather than on the basis of modeling assumptions.¹⁷ (Priority: High. First reported 2013. Status: Not adopted.)

- The MMU recommends that modifications to existing resources not be treated as new resources for purposes of market power related offer caps or MOPR offer floors. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the RPM market power mitigation rule be modified to apply offer caps in all cases when the three pivotal supplier test is failed and the sell offer is greater than the offer cap. This will ensure that market power does not result in an increase in make whole payments. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM develop a forward looking estimate for the expected number of Performance Assessment Hours (H) to use in calculating the Non-Performance Charge Rate. The MMU recommends that PJM develop a forward looking estimate for the Balancing Ratio (B) during Performance Assessment Hours to use in calculating the default offer cap. Both H and B parameters should be included in the annual review of planning parameters for the Base Residual Auction. (Priority: High. New recommendation. Status: Not adopted.)
- The MMU recommends that a unit which is not capable of supplying energy consistent with its day-ahead offer reflect an appropriate outage. (Priority: Medium. First reported 2009. Status: Not adopted. Pending before FERC.)
- The MMU recommends that retroactive replacement capacity transactions not be permitted. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that Generation Capacity Resources be paid on the basis of whether they produce energy when called upon during any

¹⁷ See 143 FERC ¶ 61,090 (2013) ("We encourage PJM and its stakeholders to consider, for example, whether the unit-specific review process would be more effective if PJM requires the use of common modeling assumptions for establishing unit-specific offer floors while, at the same time, allowing sellers to provide support for objective, individual cost advantages. Moreover, we encourage PJM and its stakeholders to consider these modifications to the unit-specific review process together with possible enhancements to the calculation of Net CONE."); see also, Comments of the Independent Market Monitor for PJM, Docket No. ER13-535-001 (March 25, 2013); Complaint of the Independent Market Monitor for PJM v. Unnamed Participant, Docket No. EL12-63-000 (May 1, 2012); Motion for Clarification of the Independent Market Monitor for PJM, Docket No. ER11-2875-000, et al. (February 17, 2012); Protest of the Independent Market Monitor for PJM, Docket No. ER11-2875-002 (June 2, 2011); Comments of the Independent Market Monitor for PJM, Docket Nos. EL11-20 and ER11-2875 (March 4, 2011).

of the hours defined as critical. One hundred percent of capacity market revenue should be at risk rather than only fifty percent. (Priority: High. First reported 2012. Status: Adopted 2015.)

- The MMU recommends that PJM eliminate all OMC outages from the calculation of forced outage rates used for any purpose in the PJM Capacity Market. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that PJM eliminate the broad exception related to lack of gas during the winter period for single-fuel, natural gas-fired units.¹⁸ (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that there be an explicit requirement that capacity resource offers in the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that all capacity imports be required to be pseudo tied prior to the relevant Delivery Year in order to ensure that imports are as close to full substitutes for internal, physical capacity resources as possible. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends that all capacity imports be required to be deliverable to PJM load prior to the relevant delivery year to ensure that they are as close to full substitutes for internal, physical capacity resources as possible. Pseudo ties alone are not adequate to ensure deliverability. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that all costs incurred as a result of a pseudo tied unit be borne by the unit itself and included as appropriate in unit offers in the capacity market. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that all capacity imports have firm transmission to the PJM border prior to offering in an RPM auction. (Priority: High. First reported 2014. Status: Adopted 2015.)

¹⁸ See OATT Attachment DD § 10(e). For more on this issue and related incentive issues, see the MMU's White Paper included in: Monitoring Analytics, LLC and PJM Interconnection, LLC, joint report, "Capacity in the PJM Market," (August 20, 2012). <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_And_PJM_Capacity_White_Papers_On_OPSI_Issues_20120820.pdf>.

- The MMU recommends that all resources importing capacity into PJM accept a must offer requirement. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends clear, explicit and detailed rules that define the conditions under which PJM will and will not recall energy from PJM capacity resources and prohibit new energy exports from PJM capacity resources. The MMU recommends that those rules define the conditions under which PJM will purchase emergency energy while at the same time not recalling energy exports from PJM capacity resources. PJM has modified these rules, but the rules need additional clarification and operational details. (Priority: Low. First reported 2010. Status: Partially adopted.)
- The MMU recommends that the notification requirement for deactivations be extended from 90 days prior to the date of deactivation to 12 months prior to the date of deactivation and that PJM and the MMU be provided 60 days rather than 30 days to complete their reliability and market power analyses. (Priority: Low. First reported 2012. Status: Partially adopted.)
- The MMU recommends that RMR units recover all and only the incremental costs, including incremental investment costs, required by the RMR service that the unit owner would not have incurred if the unit owner had deactivated its unit as it proposed. Generation owners should bear all other costs. Customers should bear no responsibility for paying previously incurred costs, including a return on or of prior investments. (Priority: Low. First reported 2010. Status: Not adopted.)

Section 6, Demand Response

The MMU recognizes that PJM incorporated some of the recommendations related to Demand Response in the Capacity Performance filing. The status of each recommendation reflects the status at September 30, 2017.

- The MMU recommends, as a preferred alternative to having PJM demand side programs, that demand response be on the demand side of the markets and that customers be able to avoid capacity and energy charges by not using capacity and energy at their discretion and that customer payments

- be determined only by metered load. (Priority: High. First reported 2014. Status: Not adopted.)
- The MMU recommends that the option to specify a minimum dispatch price under the Emergency and Pre-Emergency Program Full option be eliminated and that participating resources receive the hourly real-time LMP less any generation component of their retail rate. (Priority: Medium. First reported 2010. Status: Not adopted.)
 - The MMU recommends that the emergency load response program be treated as an economic resource, responding to economic price signals like other capacity resources and not an emergency program responding only after an emergency is called, and not triggering the definition of a PJM emergency and not triggering a Performance Assessment Hour under the new PJM Capacity Market rules. (Priority: High. First reported 2012. Status: Not adopted.)
 - The MMU recommends that the Emergency Program Energy Only option be eliminated because the opportunity to receive the appropriate energy market incentive is already provided in the Economic Program. (Priority: Low. First reported 2010. Status: Not adopted.)
 - The MMU recommends that a daily energy market must offer requirement apply to demand resources, comparable to the rule applicable to generation capacity resources.¹⁹ (Priority: High. First reported 2013. Status: Not adopted.)
 - The MMU recommends that demand resources be required to provide their nodal location, comparable to generation resources. (Priority: High. First reported 2011. Status: Not adopted.)
 - The MMU recommends that PJM require nodal dispatch of demand resources with no advance notice required or, if nodal location is not required, subzonal dispatch of demand resources with no advance notice required. (Priority: High. First reported 2015. Status: Not adopted.)
 - The MMU recommends that PJM eliminate the measurement of compliance across zones within a compliance aggregation area (CAA). The multiple zone approach is less locational than the zonal and subzonal approach and creates larger mismatches between the locational need for the resources and the actual response. (Priority: High. First reported 2015. Status: Not adopted.)
 - The MMU recommends that measurement and verification methods for demand resources be modified to reflect compliance more accurately. (Priority: Medium. First reported 2009. Status: Not adopted.)
 - The MMU recommends that compliance rules be revised to include submittal of all necessary hourly load data, and that negative values be included when calculating event compliance across hours and registrations. (Priority: Medium. First reported 2012. Status: Not adopted.)
 - The MMU recommends that PJM adopt the ISO-NE five-minute metering requirements in order to ensure that dispatchers have the necessary information for reliability and that market payments to demand resources be calculated based on interval meter data at the site of the demand reductions.²⁰ (Priority: Medium. First reported 2013. Status: Not adopted.)
 - The MMU recommends that demand response event compliance be calculated for each hour and the penalty structure reflect hourly compliance for the base and capacity performance products. (Priority: Medium. First reported 2013. Status: Partially adopted.)
 - The MMU recommends that load management testing be initiated by PJM with limited warning to CSPs in order to more accurately represent the conditions of an emergency event. (Priority: Low. First reported 2012. Status: Not adopted.)
 - The MMU recommends that shutdown cost be defined as the cost to curtail load for a given period that does not vary with the measured reduction or, for behind the meter generators, be the start cost defined in Manual 15 for generators. (Priority: Low. First reported 2012. Status: Not adopted.)
 - The MMU recommends that the Net Benefits Test be eliminated and that demand response resources be paid LMP less any generation component

¹⁹ See "Complaint and Motion to Consolidate of the Independent Market Monitor for PJM," Docket No. EL14-20-000 (January 27, 2014) at 1.

²⁰ See ISO-NE Tariff, Section III, Market Rule 1, Appendix E1 and Appendix E2, "Demand Response," <http://www.iso-ne.com/regulatory/tariff/sect_3/mr1_append-e.pdf>. (Accessed October 17, 2017) ISO-NE requires that DR have an interval meter with five minute data reported to the ISO and each behind the meter generator is required to have a separate interval meter. After June 1, 2017, demand response resources in ISO-NE must also be registered at a single node.

of the applicable retail rate. (Priority: Low. First reported 2015. Status: Not adopted.)

- The MMU recommends that the tariff rules for demand response clarify that a resource and its CSP, if any, must notify PJM of material changes affecting the capability of the resource to perform as registered and to terminate registrations that are no longer capable of responding to PJM dispatch directives because load has been reduced or eliminated, such as in the case of bankrupt and/or out of service facilities. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not remove any defined subzone and maintain a public record of all created and removed subzones. (Priority: Low. First reported 2016. Status: Not adopted.)
- The MMU recommends that there be only one demand response product, with an obligation to respond when called for all hours of the year. (Priority: High. First reported 2011. Status: Partially adopted.²¹)
- The MMU recommends that the lead times for demand resources be shortened to 30 minutes with an hour minimum dispatch for all resources. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends capping the baseline for measuring capacity compliance under winter compliance at the customers' PLC, similar to GLD, to avoid double counting. (Priority: High. First reported 2010. Status: Partially adopted.)
- The MMU recommends capping the baseline for measuring compliance under GLD, for the limited summer product, at the customers' PLC. (Priority: High. First reported 2010. Status: Adopted 2015.)
- The MMU recommends that demand resources whose technology type (load drop method) is designated as "Other" explicitly record the technology type. (Priority: Low. First reported 2013. Status: Adopted, 2014.)

²¹ PJM's Capacity Performance proposal includes this change. See "Reforms to the Reliability Pricing Market ("RPM") and Related Rules in the PJM Open Access Transmission Tariff ("Tariff") and Reliability Assurance Agreement Among Load Serving Entities ("RAA")," Docket No. ER15-632-000 and "PJM Interconnection, L.L.C." Docket No. EL15-29-000.

Section 7, Net Revenue

There are no recommendations in this section.

Section 8, Environmental

- The MMU recommends that renewable energy credit markets based on state renewable portfolio standards be brought into PJM markets as they are an increasingly important component of the wholesale energy market. (Priority: Medium. First reported 2010. Status: Not adopted.)

Section 9, Interchange Transactions

- The MMU recommends that PJM implement rules to prevent sham scheduling. The MMU recommends that PJM apply after the fact market settlement adjustments to identified sham scheduling segments to ensure that market participants cannot benefit from sham scheduling. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would prohibit market participants from breaking transactions into smaller segments to defeat the interface pricing rule by concealing the true source or sink of the transaction. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would require market participants to submit transactions on paths that reflect the expected actual power flow in order to reduce unscheduled loop flows. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM end the practice of maintaining outdated definitions of interface pricing points, eliminate the NIPSCO, Southeast and Southwest interface pricing points from the Day-Ahead and Real-Time Energy Markets and, with VACAR, assign the transactions created under the reserve sharing agreement to the SouthIMP/EXP pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM eliminate the IMO interface pricing point, and assign the transactions that originate or sink in the IESO balancing

authority to the MISO interface pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)

- The MMU recommends that PJM monitor, and adjust as necessary, the weights applied to the components of the interfaces to ensure that the interface prices reflect ongoing changes in system conditions. The MMU also recommends that PJM review the mappings of external balancing authorities to individual interface pricing points to reflect changes to the impact of the external power source on PJM tie lines as a result of system topology changes. The MMU recommends that this review occur at least annually. (Priority: Low. First reported 2009. Status: Not adopted.)
- The MMU requests that, in order to permit a complete analysis of loop flow, FERC and NERC ensure that the identified data are made available to market monitors as well as other industry entities determined appropriate by FERC. (Priority: Medium. First reported 2003. Status: Not adopted.)
- The MMU recommends that PJM explore an interchange optimization solution with its neighboring balancing authorities that would remove the need for market participants to schedule physical transactions across seams. Such a solution would include an optimized, but limited, joint dispatch approach that uses supply curves and treats seams between balancing authorities as constraints, similar to other constraints within an LMP market. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM permit unlimited spot market imports as well as unlimited nonfirm point-to-point willing to pay congestion imports and exports at all PJM interfaces in order to improve the efficiency of the market. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM immediately provide the required 12-month notice to Duke Energy Progress (DEP) to unilaterally terminate the Joint Operating Agreement. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJMSettlement Inc. immediately request a credit evaluation from all companies that engaged in up to congestion transactions between September 8, 2014, and December 31, 2015. If

PJM has the authority, PJM should ensure that the potential exposure to uplift for that period be included as a contingency in the companies' calculations for credit levels and/or collateral requirements. If PJM does not have the authority to take such steps, PJM should request guidance from FERC. (Priority: High. First reported 2015. Status: Not adopted.)

- The MMU recommends that the emergency interchange cap be replaced with a market based solution. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that the submission deadline for real-time dispatchable transactions be modified from 1800 on the day prior, to three hours prior to the requested start time, and that the minimum duration be modified from one hour to 15 minutes. These changes would give PJM a more flexible product that could be used to meet load in the most economic manner. (Priority: Medium. First reported 2014. Status: Adopted partially, 2015.)
- The MMU recommends that PJM and MISO work together to align interface pricing definitions, using the same number of external buses and selecting buses in close proximity on either side of the border with comparable bus weights. (Priority: Medium. First reported 2012. Status: Adopted 2017.)

Section 10, Ancillary Services

- The MMU recommends that the Regulation Market be modified to incorporate a consistent application of the marginal benefit factor (MBF) throughout the optimization, assignment and settlement process. The MBF should be defined as the Marginal Rate of Technical Substitution (MRTS) between RegA and RegD. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that the lost opportunity cost in the ancillary services markets be calculated using the schedule on which the unit was scheduled to run in the energy market. (Priority: High. First reported 2010. Status: Not adopted.)

- The MMU recommends that all data necessary to perform the Regulation Market three pivotal supplier test be saved so that the test can be replicated. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that, to prevent gaming, there be a penalty enforced in the Regulation Market as a reduction in performance score and/or a forfeiture of revenues when resource owners elect to deassign assigned regulation resources within the hour. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends market design changes to improve the performance of the Regulation Market, including use of a single five minute clearing price based on actual LMP and actual LOC, modifications to the LOC calculation, a software change to save some data elements necessary for verifying market outcomes, and further documentation of the implementation of the market design. (Priority: Medium. First reported 2010. Status: Partially adopted in 2012.)
- The MMU recommends that the rule requiring that tier 1 synchronized reserve resources are paid the tier 2 price when the nonsynchronized reserve price is above zero be eliminated immediately and that, under the current rule, tier 1 synchronized reserve resources not be paid the tier 2 price when they do not respond. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that the tier 2 synchronized reserve must offer requirement be enforced. The MMU recommends that PJM define a set of acceptable reasons why a unit can be made unavailable daily or hourly and require unit owners to select a reason in Markets Gateway whenever making a unit unavailable either daily or hourly or setting the offer MW to 0 MW. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM be more explicit and transparent about why tier 1 biasing is used in defining demand in the Tier 2 Synchronized Reserve Market. The MMU recommends that PJM define rules for estimating tier 1 MW, define rules for the use and amount of tier 1 biasing and identify the rule based reasons for each instance of biasing. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that the single clearing price for synchronized reserves be determined based on the actual five minute LMP and actual LOC and not the forecast LMP. (Priority: Low. First reported 2010. Status: Adopted, 2016.)
- The MMU recommends that no payments be made to tier 1 resources if they are deselected in the PJM market solution. The MMU also recommends that documentation of the Tier 1 synchronized reserve deselection process be published. (Priority: High. First reported 2014. Status: Adopted, 2014.)
- The MMU recommends that a reason code be attached to every hour in which PJM market operations adds additional DASR MW. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM modify the DASR Market to ensure that all resources cleared incur a real-time performance obligation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that the three pivotal supplier test and market power mitigation be incorporated in the DASR Market. (Priority: Low. First reported 2009. Status: Not adopted.)
- The MMU recommends that separate payments for reactive capability be eliminated and the cost of reactive capability be recovered in the capacity market. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the minimum tank suction level (MTSL) be allocated to black start service. The MMU further recommends that the PJM tariff be updated to clearly state how the MTSL will be calculated for black start units sharing oil tanks. (Priority: Medium. New recommendation. Status: Not adopted.)

Section 11, Congestion and Marginal Losses

There are no recommendations in this section.

Section 12, Planning

- The MMU recommends that PJM continue to incorporate the principle that the goal of transmission planning should be the incorporation of transmission investment decisions into market driven processes as much as possible. (Priority: Low. First reported 2001. Status: Not adopted.)
- The MMU recommends the creation of a mechanism to permit a direct comparison, or competition, between transmission and generation alternatives, including which alternative is less costly and who bears the risks associated with each alternative. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that rules be implemented to permit competition to provide financing for transmission projects. This competition could reduce the cost of capital for transmission projects and significantly reduce total costs to customers. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that rules be implemented to require that project cost caps on new transmission projects be part of the evaluation of competing projects. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that barriers to entry be addressed in a timely manner in order to help ensure that the capacity market will result in the entry of new capacity to meet the needs of PJM market participants and reflect the uncertainty and resultant risks in the cost of new entry used to establish the capacity market demand curve in RPM. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the question of whether Capacity Injection Rights (CIRs) should persist after the retirement of a unit be addressed. Even if the treatment of CIRs remains unchanged, the rules need to ensure that incumbents cannot exploit control of CIRs to block or postpone entry of competitors.²² (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends outsourcing interconnection studies to an independent party to avoid potential conflicts of interest. Currently, these studies are performed by incumbent transmission owners under PJM's direction. This creates potential conflicts of interest, particularly when transmission owners are vertically integrated and the owner of transmission also owns generation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM establish fair terms of access to rights of way and property, such as at substations, in order to remove any barriers to entry and permit competition between incumbent transmission providers and merchant transmission providers in the RTEP. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM enhance the transparency and queue management process for merchant transmission investment. Issues related to data access and complete explanations of cost impacts should be addressed. The goal should be to remove barriers to competition from merchant transmission. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends consideration of changing the minimum distribution factor in the allocation from 0.01 to 0.00 and adding a threshold minimum usage impact on the line. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM reevaluate all transmission outage tickets as on time or late as if they were new requests when an outage is rescheduled and apply the standard rules for late submissions to any such outages. (Priority: Low. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM draft a clear definition of the congestion analysis required for transmission outage requests to include in Manual 3 after appropriate review. (Priority: Low. First reported 2015. Status: Not adopted.)

²² See "Comments of the Independent Market Monitor for PJM," Docket No. ER12-1177-000 <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_Comments_ER12-1177-000_20120312.pdf>.

- The MMU recommends that PJM modify the rules to reduce or eliminate the approval of late outage requests submitted or rescheduled after the FTR auction bidding opening date. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not permit transmission owners to divide long duration outages into smaller segments to avoid complying with the requirements for long duration outages. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends improvements in queue management including that PJM establish a review process to ensure that projects are removed from the queue if they are not viable, as well as a process to allow commercially viable projects to advance in the queue ahead of projects which have failed to make progress, subject to rules to prevent gaming. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends an analysis of the study phase of PJM's transmission planning to reduce the need for postponements of study results, to decrease study completion times, and to improve the likelihood that a project at a given phase in the study process will successfully go into service. (Priority: Medium. First reported 2014. Status: Partially adopted.)
- The MMU recommends that all historical generation to load paths be eliminated as a basis for allocating ARRs. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that counter flow FTRs be eliminated. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM eliminate portfolio netting to eliminate cross subsidies among FTR market participants. (Priority: High. First reported 2012. Status: Not adopted.)
- 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 implement a seasonal ARR and FTR allocation system to better represent outages. (Priority: Medium. 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: Adopted.)

Section 13, FTRs and ARRs

- The MMU recommends that the ARR/FTR design be modified to ensure that the rights to all congestion revenues are assigned to load. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that all FTR auction revenue be distributed to ARR holders. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that FTR auction revenues not be used to buy counter flow FTRs for the purpose of improving FTR payout ratios.²³ (Priority: High. First reported 2015. Status: Not adopted.)
- 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.)
- The MMU recommends that PJM improve transmission outage modeling in the FTR auction models. (Priority: Low. First reported 2013. Status: Not adopted.)
- 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, 2014/2015 planning period.)

²³ See PJM "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55.

- 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: Adopted 2016.)
- The MMU recommends that Long Term FTRs be modified to include only a one year ahead FTR. (Priority: High. First reported 2017. Status: Not adopted.)

Energy Market

The PJM energy market comprises all types of energy transactions, including the sale or purchase of energy in PJM's Day-Ahead and Real-Time Energy Markets, bilateral and forward markets and self-supply. Energy transactions analyzed in this report include those in the PJM Day-Ahead and Real-Time Energy Markets. These markets provide key benchmarks against which market participants may measure results of transactions in other markets.

The Market Monitoring Unit (MMU) analyzed measures of market structure, participant conduct and market performance in the first nine months of 2017, including market size, concentration, residual supply index, and price.¹ The MMU concludes that the PJM energy market results were competitive in the first nine months of 2017.

Table 3-1 The energy market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Aggregate Market	Competitive	
Market Structure: Local Market	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Effective

- The aggregate market structure was evaluated as competitive but the aggregate market power test based on pivotal suppliers indicates that the aggregate day-ahead market structure was not competitive on every day. The hourly HHI (Herfindahl-Hirschman Index) results indicate that by FERC standards, the PJM energy market in the first nine months of 2017 was unconcentrated. Average HHI was 929 with a minimum of 696 and a maximum of 1208 in the first nine months of 2017. The fact that the average HHI is in the unconcentrated range and the maximum hourly HHI is in the moderately concentrated range does not mean that the aggregate market was competitive in all hours. As demonstrated for the day-ahead

¹ Analysis of 2017 market results requires comparison to prior years. In 2004 and 2005, PJM conducted the phased integration of five control zones: ComEd, American Electric Power (AEP), The Dayton Power & Light Company (DAY), Duquesne Light Company (DLCO) and Dominion. In June 2011, PJM integrated the American Transmission Systems, Inc. (ATSI) Control Zone. In January 2012, PJM integrated the Duke Energy Ohio/Kentucky (DEOK) Control Zone. In June 2013, PJM integrated the Eastern Kentucky Power Cooperative (EKPC). By convention, control zones bear the name of a large utility service provider working within their boundaries. The nomenclature applies to the geographic area, not to any single company. For additional information on the control zones, the integrations, their timing and their impact on the footprint of the PJM service territory, see the *2015 State of the Market Report for PJM*, Appendix A, "PJM Geography."

market, it is possible to have pivotal suppliers in the aggregate market even when the HHI level is not in the highly concentrated range. It is possible to have an exercise of market power even when the HHI level is not in the highly concentrated range. The number of pivotal suppliers in the energy market is a more precise measure of structural market power than the HHI. The HHI is not a definitive measure of structural market power. The PJM energy market peaking segment of supply was highly concentrated.

- The local market structure was evaluated as not competitive due to the highly concentrated ownership of supply in local markets created by transmission constraints. The results of the three pivotal supplier (TPS) test, used to test local market structure, indicate the existence of market power in local markets created by transmission constraints. The local market performance is competitive as a result of the application of the TPS test. While transmission constraints create the potential for the exercise of local market power, PJM's application of the three pivotal supplier test identified local market power and resulted in offer capping to force competitive offers, correcting for structural issues created by local transmission constraints. There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that need to be addressed because unit owners can exercise market power even when mitigated.
- Participant behavior was evaluated as competitive because the analysis of markup shows that marginal units generally make offers at, or close to, their marginal costs in both Day-Ahead and Real-Time Energy Markets, although the behavior of some participants both routinely and during periods of high demand is consistent with economic withholding.
- Market performance was evaluated as competitive because market results in the energy market reflect the outcome of a competitive market, as PJM prices are set, on average, by marginal units operating at, or close to, their marginal costs in both Day-Ahead and Real-Time Energy Markets, although high markups during periods of high demand did affect prices.

- Market design was evaluated as effective because the analysis shows that the PJM energy market resulted in competitive market outcomes. In general, PJM's energy market design provides incentives for competitive behavior and results in competitive outcomes. In local markets, where market power is an issue, the market design identifies market power and causes the market to provide competitive market outcomes in most cases although issues with the implementation of market power mitigation and development of cost-based offers remain. The role of UTCs in the Day-Ahead Energy Market continues to cause concerns.

PJM markets are designed to promote competitive outcomes derived from the interaction of supply and demand in each of the PJM markets. Market design itself is the primary means of achieving and promoting competitive outcomes in PJM markets. One of the MMU's primary goals is to identify actual or potential market design flaws.² The approach to market power mitigation in PJM has focused on market designs that promote competition (a structural basis for competitive outcomes) and on limiting market power mitigation to instances where the market structure is not competitive and thus where market design alone cannot mitigate market power. In the PJM energy market, this occurs primarily in the case of local market power. When a transmission constraint creates the potential for local market power, PJM applies a structural test to determine if the local market is competitive, applies a behavioral test to determine if generator offers exceed competitive levels and applies a market performance test to determine if such generator offers would affect the market price.³ There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that can result in the exercise of local market power even when market power mitigation rules are applied. These issues need to be addressed. There are issues related to the definition of gas costs includable in energy offers that need to be addressed. There are issues related to the level of variable operating and maintenance expense includable in energy offers that need to be addressed. There are currently no market power mitigation rules in place that limit the ability to exercise market power when aggregate market

² OATT Attachment M (PJM Market Monitoring Plan).

³ The market performance test means that offer capping is not applied if the offer does not exceed the competitive level and therefore market power would not affect market performance.

conditions are tight and there are pivotal suppliers in the aggregate market. Aggregate market power needs to be addressed. Now that generators will be allowed to modify offers hourly, market design must reflect appropriate incentives for competitive behavior, the application of local market power mitigation needs to be fixed, the definition of a competitive offer needs to be fixed, and aggregate market power mitigation rules need to be developed. The importance of these issues is amplified by the new rules permitting cost-based offers in excess of \$1,000 per MWh.

Overview

Market Structure

- **Supply.** Supply includes physical generation and imports and virtual transactions. The maximum of average offered real-time generation increased by 2,551 MW, or 1.5 percent, from 171,300 MW in the summer of 2016 to 173,851 MW in the summer of 2017. In the first nine months of 2017, 3,941.0 MW of new resources were added, 2,072.8 MW were retired. PJM average real-time cleared generation in the first nine months of 2017 decreased by 1,141 MW, or 1.2 percent, from the first nine months of 2016, from 92,799 MW to 91,658 MW. PJM average day-ahead cleared supply in the first nine months of 2017, including INCs and up to congestion transactions, increased by 0.2 percent from the first nine months of 2016, from 133,089 MW to 133,377 MW.
- **Aggregate Pivotal Suppliers.** The PJM energy market at times requires generation from pivotal suppliers to meet the daily peak load, resulting in aggregate market power even when the HHI level indicates that the aggregate market is unconcentrated. Based on the HHI, the PJM energy market was unconcentrated overall with low concentration in the baseload segment, moderate concentration in the intermediate segment, and high concentration in the peaking segment.
- **Generation Fuel Mix.** In the first nine months of 2017, coal units provided 32.2 percent, nuclear units 35.3 percent and natural gas units 26.8 percent of total generation. Compared to the first nine months of 2016, generation from coal units decreased 6.2 percent, generations from

natural gas units decreased 2.8 percent and generation from nuclear units increased 2.5 percent.

- **Fuel Diversity.** In the first nine months of 2017, the fuel diversity of energy generation, measured by the fuel diversity index for energy (FDI_e), increased 0.7 percent over the first nine months of 2016.
- **Marginal Resources.** In the PJM Real-Time Energy Market, in the first nine months of 2017, coal units were 32.5 percent of marginal resources and natural gas units were 52.9 percent of marginal resources. In the first nine months of 2016, coal units were 46.2 percent and natural gas units were 41.4 percent of the marginal resources.

In the PJM Day-Ahead Energy Market, in the first nine months of 2017, up to congestion transactions were 80.4 percent of marginal resources, INCs were 5.5 percent of marginal resources, DECs were 10.1 percent of marginal resources, and generation resources were 4.0 percent of marginal resources. In the first nine months of 2016, up to congestion transactions were 81.9 percent of marginal resources, INCs were 4.3 percent of marginal resources, DECs were 8.9 percent of marginal resources, and generation resources were 4.9 percent of marginal resources.

- **Demand.** Demand includes physical load and exports and virtual transactions. The PJM accounting peak load during the first nine months of 2017 was 145,636 MW in the HE 1700 on July 19, 2017, which was 6,541 MW, 4.3 percent, lower than the PJM peak load for the first nine months of 2016, which was 152,177 MW in the HE 1500 on August 11, 2016.

PJM average real-time load in the first nine months of 2017 decreased by 3.7 percent from 2016, from 90,599 MW to 87,243 MW. PJM average day-ahead demand in the first nine months of 2017, including DECs and up to congestion transactions, decreased by 0.5 percent in the first nine months of 2016, from 129,070 MW to 128,450 MW.

- **Supply and Demand: Load and Spot Market.** Companies that serve load in PJM can do so using a combination of self-supply, bilateral market purchases and spot market purchases. For the first nine months of 2017, 15.5 percent of real-time load was supplied by bilateral contracts, 28.5

percent by spot market purchases and 56.0 percent by self-supply. Compared with the first nine months of 2016, reliance on bilateral contracts increased by 2.6 percentage points, reliance on spot market purchases increased by 4.6 percentage points and reliance on self-supply decreased by 7.2 percentage points.

- **Supply and Demand: Scarcity.** Five minute shortage pricing was triggered on one day in the first nine months of 2017.

Market Behavior

- **Offer Capping for Local Market Power.** PJM offer caps units when the local market structure is noncompetitive. Offer capping is an effective means of addressing local market power when the rules are designed and implemented properly. Offer capping levels have historically been low in PJM. In the Day-Ahead Energy Market, for units committed to provide energy for local constraint relief, offer-capped unit hours decreased from 0.1 percent in the first nine months of 2016 to 0 percent in the first nine months of 2017. In the Real-Time Energy Market, for units committed to provide energy for local constraint relief, offer-capped unit hours decreased from 0.4 percent in the first nine months of 2016 to 0.3 percent in the first nine months of 2017.

In the first nine months of 2017, eleven control zones experienced congestion resulting from one or more constraints binding for 75 or more hours. The analysis of the application of the TPS test to local markets demonstrates that it is working successfully to identify pivotal owners when the market structure is noncompetitive and to ensure that owners are not subject to offer capping when the market structure is competitive. There are, however, identified issues with the application of market power mitigation to resources whose owners fail the TPS test that can result in the exercise of local market power. These issues need to be addressed.

- **Offer Capping for Reliability.** PJM also offer caps units that are committed for reliability reasons, specifically for black start service and reactive service. In the Day-Ahead Energy Market, for units committed for reliability reasons, offer-capped unit hours increased from 0 percent in the first nine months of 2016 to 0.1 percent in the first nine months of

2017. In the Real-Time Energy Market, for units committed for reliability reasons, offer-capped unit hours increased from 0 percent in the first nine months of 2016 to 0.1 percent in the first nine months of 2017.

- **Markup Index.** The markup index is a summary measure of participant offer behavior for individual marginal units. In the first nine months of 2017, in the PJM Real-Time Energy Market, 93.0 percent of marginal units had offer prices less than \$50 per MWh. The average dollar markup of units with offer prices less than \$25 was positive when using unadjusted cost offers. The average dollar markup of units with offer prices between \$25 and \$50 was positive when using unadjusted cost offers. Negative markup means the unit is offering to run at a price less than its cost-based offer, demonstrating a revealed short run marginal cost that is less than the allowable cost-based offer under the PJM market rules. Some marginal units did have substantial markups. Using the unadjusted cost offers, the highest markup for any marginal unit in the first nine months of 2017 was \$755.09 while the highest markup in the first nine months of 2016 was \$258.16.

In the first nine months of 2017, in the PJM Day-Ahead Energy Market, 94.3 percent of marginal generating units had offer prices less than \$50 per MWh. The average dollar markup of units with offer prices less than \$25 was positive when using unadjusted cost offers. The average dollar markup of units with offer prices between \$25 and \$50 was positive when using unadjusted cost offers. Using the unadjusted cost offers, the highest markup for any marginal units in the first nine months of 2017 was \$47.74, while the highest markup in the first nine months of 2016 was \$170.99.

- **Markup.** The markup frequency distributions show that a significant proportion of units make price-based offers less than the cost-based offers permitted under the PJM market rules. This behavior means that competitive price-based offers reveal actual unit marginal costs and that PJM market rules permit the inclusion of costs in cost-based offers that are not short run marginal costs.

The markup behavior shown in the markup frequency distributions also shows that a substantial number of units were offered with high markups, consistent with the exercise of market power.

- **Frequently Mitigated Units (FMU) and Associated Units (AU).** A new FMU rule became effective November 1, 2014, limiting the availability of FMU adders to units with net revenues less than unit going forward costs. The number of units that were eligible for an FMU or AU adder declined from an average of 70 units during the first 11 months of 2014, to zero since December 2014.
- **Virtual Offers and Bids.** Any market participant in the PJM Day-Ahead Energy Market can use increment offers, decrement bids, up to congestion transactions, import transactions and export transactions as financial instruments that do not require physical generation or load. In the first nine months of 2017, the average hourly increment offers submitted MW increased by 21.4 percent from 7,017 MW in the first nine months of 2016 to 8,521 MW in the first nine months of 2017, and cleared MW increased by 6.5 percent from 4,577 MW in the first nine months of 2016 to 4,876 MW in the first nine months of 2017. In the first nine months of 2017, the average hourly decrement bids submitted MW increased by 20.7 percent from 6,918 MW in the first nine months of 2016 to 8,349 MW in the first nine months of 2017, and cleared MW increased by 7.6 percent from 4,087 MW in the first nine months of 2016 to 4,397 MW in the first nine months of 2017. In the first nine months of 2017, the average hourly up to congestion submitted MW increased by 1.1 percent from 143,885 MW in the first nine months of 2016 to 145,467 MW in the first nine months of 2017, and cleared MW increased by 6.6 percent from 34,204 MW in the first nine months of 2016 to 36,478 MW in the first nine months of 2017.
- **Generator Offers.** Generator offers are categorized as dispatchable and self scheduled. Units which are available for economic dispatch are dispatchable. Units which are self scheduled to generate fixed output are categorized as self scheduled. Units which are self scheduled at their economic minimum and are available for economic dispatch up to their economic maximum are categorized as self scheduled and dispatchable. Of all generator offers in the first nine months of 2017, 55.3 percent were

offered as available for economic dispatch, 3.7 percent were offered as emergency dispatch, 20.0 percent were offered as self scheduled, and 20.9 percent were offered as self scheduled and dispatchable.

Market Performance

- **Prices.** PJM LMPs are a direct measure of market performance. Price level is a good, general indicator of market performance, although the number of factors influencing the overall level of prices means it must be analyzed carefully. Among other things, overall average prices reflect changes in supply and demand, generation fuel mix, the cost of fuel, emissions related expenses, markup and local price differences caused by congestion. PJM also may administratively set prices with the creation of closed loop interfaces related to demand side resources or reactive power, the application of transmission penalty factors, or the application of price setting logic.

PJM real-time energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The load-weighted average real-time LMP was 3.5 percent higher in the first nine months of 2017 than in first nine months of 2016, \$30.36 per MWh versus \$29.32 per MWh.

PJM day-ahead energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The load-weighted, average day-ahead LMP was 1.9 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.26 per MWh versus \$29.69 per MWh.

- **Components of LMP.** In the PJM Real-Time Energy Market, in the first nine months of 2017, 30.4 percent of the load-weighted LMP was the result of coal costs, 38.3 percent was the result of gas costs and 2.12 percent was the result of the cost of emission allowances.

In the PJM Day-Ahead Energy Market, in the first nine months of 2017, 21.2 percent of the load-weighted LMP was the result of the coal costs, 23.1 percent was the result of the DEC bid costs, 18.2 percent was the

result of the gas costs, 23.2 percent was the result of the INC bid costs, and 3.0 percent was the result of the up to congestion transaction costs.

- **Markup.** The markup conduct of individual owners and units has an identifiable impact on market prices. Markup is a key indicator of the competitiveness of the energy market.

In the PJM Real-Time Energy Market in the first nine months of 2017, the adjusted markup component of LMP was \$4.74 per MWh or 15.6 percent of the PJM real-time, load-weighted, average LMP. May had the highest adjusted peak markup component, \$8.23 per MWh, or 21.72 percent of the real-time, peak hour load-weighted, average LMP. Using the unadjusted cost offers, the highest markup of a marginal unit in the first nine months of 2017 was \$755.09 per MWh. There were 37 hours in the first nine months of 2017 where the positive markup contribution to the PJM system wide, load-weighted, average LMP exceeded \$45.82 per MWh.

In the PJM Day-Ahead Energy Market, INCs, DECs and UTCs have zero markups. In the first nine months of 2017, the adjusted markup component of LMP resulting from generation resources was \$1.97 per MWh or 6.5 percent of the PJM day-ahead load-weighted average LMP. September had the highest adjusted markup component, \$2.98 per MWh or 9.4 percent of the day-ahead load-weighted average LMP. Using the unadjusted cost offers, the highest markup of a marginal unit in the first nine months of 2017 was \$47.74 per MWh.

Participant behavior was evaluated as competitive because the analysis of markup shows that marginal units generally make offers at, or close to, their marginal costs in both the Day-Ahead and Real-Time Energy Markets, although the behavior of some participants is consistent with economic withholding.

- **Price Convergence.** Hourly and daily price differences between the Day-Ahead and Real-Time Energy Markets fluctuate continuously and substantially from positive to negative. The difference between the average day-ahead and real-time prices was $-\$0.11$ per MWh in the first nine months of 2016 and $-\$0.47$ per MWh in the first nine months of

2017. The difference between average day-ahead and real-time prices, by itself, is not a measure of the competitiveness or effectiveness of the Day-Ahead Energy Market.

Scarcity

- PJM implemented five minute shortage pricing beginning May 11, 2017. Five minute shortage pricing was triggered for the first time on September 21, 2017. The shortage pricing was triggered for 21 intervals between 1400 and 1700 on that day.

Recommendations

- The MMU recommends that the market rules should explicitly require that offers into the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. The short run marginal cost should reflect opportunity cost when and where appropriate. (Priority: Medium. First reported 2009. Status: Not adopted.)
- The MMU recommends that PJM require every market participant to make available at least one cost schedule with the same fuel type and parameters as that of their offered price schedule. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM require that the level of incremental costs includable in cost offers not exceed the unit's short run marginal cost. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM require that all fuel cost policies be algorithmic, verifiable, and systematic. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that Manual 15 be replaced with a straightforward description of the components of cost offers based on short run marginal costs and the correct calculation of cost offers. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends removal of all use of FERC System of Accounts in the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of all use of cyclic starting and peaking factors from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of all labor costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends changing the definition of the start heat input for combined cycles to include only the amount of fuel used from firing each combustion turbine in the combined cycle to the breaker close of each combustion turbine. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends the removal of nuclear fuel and nonfuel operations and maintenance costs that are not short run marginal costs from the Cost Development Guidelines. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends revising the pumped hydro fuel cost calculation to include day-ahead and real-time power purchases. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends revisions to the calculation of energy market opportunity costs to incorporate all time based offer parameters and all limitations that impact the opportunity cost of generating unit output. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends removing the catastrophic designation for force majeure fuel supply limitations in Schedule 2. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that the rules governing the application of the TPS test be clarified and documented. (Priority: High. First reported 2010. Status: Not adopted.)
- The MMU recommends, in order to ensure effective market power mitigation when the TPS test is failed, that markup be constant across the full MWh range of price and cost offers, that there be at least one

- cost-based offer using the same fuel as the available price-based offer. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that in order to ensure effective market power mitigation when the TPS test is failed, the operating parameters in the cost-based offer and the price-based parameter limited schedule (PLS) offer be at least as flexible as the operating parameters in the available non-PLS price-based offer, and that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer. (Priority: High. First reported 2015. Status: Not adopted.)
 - The MMU recommends that capacity performance resources and base capacity resources (during the June through September period) be held to the OEM operating parameters of the capacity market CONE reference resource for performance assessment and energy uplift payments and that this standard be applied to all technologies on a uniform basis. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that under the capacity performance construct, PJM recognize the difference between operational parameters that indicate to PJM dispatchers what a unit is capable of during the operating day and the parameters that are used for capacity performance assessment as well as uplift payments. The parameters which determine nonperformance charges and the amount of uplift payments to those generators should reflect the flexibility goals of the capacity performance construct. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that PJM retain the \$1,000 per MWh offer cap in the PJM energy market except when cost-based offers exceed \$1,000 per MWh, and retain other existing rules that limit incentives to exercise market power. (Priority: High. First reported 1999. Status: Partially adopted, 1999.)
 - The MMU recommends that PJM not allow nuclear generators which do not respond to prices or which only respond to manual instructions from the dispatcher to set the LMPs in the real-time market. (Priority: Low. First reported 2016. Status: Not adopted.)
 - The MMU recommends that PJM document how LMPs are calculated when demand response is marginal. The LMPs in excess of \$1,800 per MWh on January 7, 2014, were potentially a result of the way in which PJM modeled zonal (not nodal) demand response as a marginal resource. (Priority: Low. First reported 2014. Status: Not Adopted.)
 - The MMU recommends that PJM explicitly state its policy on the use of transmission penalty factors including: the level of the penalty factors; the triggers for the use of the penalty factors; the appropriate line ratings to trigger the use of penalty factors; the allowed duration of the violation; the use of constraint relaxation logic; and when the transmission penalty factors will be used to set the shadow price. (Priority: Medium. First reported 2015. Status: Not adopted. Stakeholder process.)
 - The MMU recommends that the definition of maximum emergency status in the tariff apply at all times rather than just during maximum emergency events.⁴ (Priority: Medium. First reported 2012. Status: Not adopted.)
 - The MMU recommends that PJM update the outage impact studies, the reliability analyses used in RPM for capacity deliverability and the reliability analyses used in RTEP for transmission upgrades to be consistent with the more conservative emergency operations (post contingency load dump limit exceedance analysis) in the energy market that were implemented in June 2013. (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that the roles of PJM and the transmission owners in the decision making process to control for local contingencies be clarified, that PJM's role be strengthened and that the process be made transparent. (Priority: Low. First reported 2013. Status: Not adopted.)
 - The MMU recommends that PJM include in the appropriate manual an explanation of the initial creation of hubs, the process for modifying hub definitions and a description of how hub definitions have changed.⁵ There is currently no PJM documentation in the tariff or manuals explaining

⁴ OATT § 1 (Definitions – OATT Definitions - L-M-N) (June 1, 2017) at 76.

⁵ According to minutes from the first meeting of the Energy Market Committee (EMC) on January 28, 1998, the EMC unanimously agreed to be responsible for approving additions, deletions and changes to the hub definitions to be published and modeled by PJM. Since the EMC has become the Market Implementation Committee (MIC), the MIC now appears to be responsible for such changes.

how hubs are created and how their definitions are changed.⁶ (Priority: Low. First reported 2013. Status: Not adopted.)

- The MMU recommends that during hours when a generation bus shows a net withdrawal, the energy withdrawal be treated as load, not negative generation, for purposes of calculating load and load-weighted LMP. The MMU recommends that during hours when a load bus shows a net injection, the energy injection be treated as generation, not negative load, for purposes of calculating generation and load-weighted LMP. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM remove nonspecific fuel types such as other or co-fire other from the list of fuel types available for market participants to identify the fuel type associated with their price and cost schedules. (Priority: Medium. First reported 2015. Status: Partially adopted.)
- The MMU recommends that PJM routinely review all transmission facility ratings and any changes to those ratings to ensure that the normal, emergency and load dump ratings used in modeling the transmission system are accurate and reflect standard ratings practice. (Priority: Low. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM identify and collect data on available behind the meter generation resources, including nodal location information and relevant operating parameters. (Priority: Low. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM continue to enhance its posting of market data to promote market efficiency. (Priority: Medium. First reported 2005. Status: Partially adopted.)
- The MMU recommends the elimination of FMU and AU adders. FMU and AU adders no longer serve the purpose for which they were created and interfere with the efficient operation of PJM markets. (Priority: Medium. First reported 2012. Status: Partially adopted, 2014.)

- The MMU recommends that PJM require all generating units to identify the fuel type associated with each of their offered schedules. (Priority: Low. First reported 2014. Status: Adopted in full, 2014.)

Conclusion

The MMU analyzed key elements of PJM energy market structure, participant conduct and market performance in the first nine months of 2017, including aggregate supply and demand, concentration ratios, aggregate pivotal supplier results, local three pivotal supplier test results, offer capping, participation in demand response programs, loads and prices.

PJM average real-time cleared generation decreased by 1,141 MW, 1.2 percent, and peak load decreased by 6,541 MW, 4.3 percent, in the first nine months of 2017 compared to the first nine months of 2016. The relationship between supply and demand, regardless of the specific market, balanced by market concentration and the extent of pivotal suppliers, is referred to as the supply-demand fundamentals or economic fundamentals. While the market structure does not guarantee competitive outcomes, overall the market structure of the PJM aggregate energy market remains reasonably competitive although aggregate market power does exist for a significant number of hours. Market concentration levels remained in the unconcentrated range on average although there is high concentration in the peaking segment of the supply curve which adds to concerns about market power when market conditions are tight. Low average aggregate concentration does not mean that market power cannot be exercised. It is possible that market power can be exercised at times when individual suppliers or small groups of suppliers are pivotal even when the HHI level does not indicate that the market is highly concentrated. High markups for some units demonstrate the potential to exercise market power during high demand conditions. As demonstrated for the day-ahead market, it is possible to have pivotal suppliers in the aggregate market even when the HHI level is not in the highly concentrated range. The number of pivotal suppliers in the energy market is a more precise measure of structural market power than the HHI. The HHI is not a definitive measure of structural market power.

⁶ The general definition of a hub can be found in the PJM.com Glossary <<http://www.pjm.com/Glossary.aspx>>.

Prices are a key outcome of markets. Prices vary across hours, days and years for multiple reasons. Price is an indicator of the level of competition in a market although individual prices are not always easy to interpret. In a competitive market, prices are directly related to the marginal cost of the most expensive unit required to serve load in each hour. The pattern of prices within days and across months and years illustrates how prices are directly related to supply and demand conditions and thus also illustrates the potential significance of the impact of the price elasticity of demand on prices. Energy market results in the first nine months of 2017 generally reflected supply-demand fundamentals, although the behavior of some participants during high demand periods is consistent with economic withholding. Economic withholding is the ability to increase markups substantially in tight market conditions. There are additional issues in the energy market including the uncertainties about the pricing and availability of natural gas, the way that generation owners incorporate natural gas costs in offers, and the lack of adequate incentives for unit owners to take all necessary actions to acquire fuel and operate rather than take an outage.

The three pivotal supplier test is applied by PJM on an ongoing basis for local energy markets in order to determine whether offer capping is required for transmission constraints.⁷ This is a flexible, targeted real-time measure of market structure which replaced the offer capping of all units required to relieve a constraint. A generation owner or group of generation owners is pivotal for a local market if the output of the owners' generation facilities is required in order to relieve a transmission constraint. When a generation owner or group of owners is pivotal, it has the ability to increase the market price above the competitive level. The three pivotal supplier test explicitly incorporates the impact of excess supply and implicitly accounts for the impact of the price elasticity of demand in the market power tests. The result of the introduction of the three pivotal supplier test was to limit offer capping to times when the local market structure was noncompetitive and specific owners had structural market power. The analysis of the application of the three pivotal supplier test demonstrates that it is working for most hours to

exempt owners when the local market structure is competitive and to require offer capping of owners when the local market structure is noncompetitive.

However, there are some issues with the application of market power mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market when market sellers fail the TPS test. There is no tariff or manual language that defines in detail the application of the TPS test and offer capping in the Day-Ahead Energy Market and the Real-Time Energy Market. In both the Day-Ahead and Real-Time Energy Markets, generators have the ability to avoid mitigation by using varying markups in their price-based offers, offering different operating parameters in their price-based and cost-based offers, and using different fuels in their price-based and cost-based offers. These issues can be resolved by simple rule changes requiring that markup be constant across price and cost offers, that there be at least one cost-based offer using the same fuel as the available price-based offer, that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer, and requiring cost-based and price-based PLS offers to be at least as flexible as price-based non-PLS offers.

Another issue with the application of market power mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market when market sellers fail the TPS test is related to the definition of a competitive offer. A competitive offer is equal to short run marginal costs. The enforcement of market power mitigation rules is undermined if the definition of a competitive offer is not correct. The significance of competition metrics like markup is also undermined if the definition of a competitive offer is not correct. The definition of a competitive offer, as interpreted by PJM, is not currently correct. Some unit owners include costs that are not short run marginal costs in offers, including maintenance costs. This issue can be resolved by simple changes to the PJM market rules to incorporate a clear and accurate definition of short run marginal costs.

PJM also offer caps units that are committed for reliability reasons in addition to units committed to provide constraint relief. Specifically, units that are committed to provide reactive support and black start service are offer capped

⁷ The MMU reviews PJM's application of the TPS test and brings issues to the attention of PJM.

in the energy market. These units are committed manually in both the Day-Ahead and Real-Time Energy Markets.

With or without a capacity market, energy market design must permit scarcity pricing when such pricing is consistent with market conditions and constrained by reasonable rules to ensure that market power is not exercised. Scarcity pricing can serve two functions in wholesale power markets: revenue adequacy and price signals. Scarcity pricing for revenue adequacy is not required in PJM. Scarcity pricing for price signals that reflect market conditions during periods of scarcity is required in PJM. Scarcity pricing is also part of an appropriate incentive structure facing both load and generation owners in a working wholesale electric power market design. Scarcity pricing must be designed to ensure that market prices reflect actual market conditions, that scarcity pricing occurs with transparent triggers based on measured reserve levels and transparent prices and that there are strong incentives for competitive behavior and strong disincentives to exercise market power. Such administrative scarcity pricing is a key link between energy and capacity markets. The PJM Capacity Market is explicitly designed to provide revenue adequacy and the resultant reliability. Nonetheless, with a market design that includes a direct and explicit scarcity pricing net revenue true up mechanism, scarcity pricing can be a mechanism to appropriately increase reliance on the energy market as a source of revenues and incentives in a competitive market without reliance on the exercise of market power. PJM implemented scarcity pricing rules in 2012. There are significant issues with the scarcity pricing net revenue true up mechanism in the PJM scarcity pricing design, which will create issues when scarcity pricing occurs. PJM implemented five minute scarcity pricing on May 11, 2017, and implemented two step operating reserve demand curves on July 12, 2017. There are also significant issues with PJM's scarcity pricing rules, including the absence of a clear trigger based on measured reserve levels (the current triggers are based on estimated reserves) and the lack of adequate locational scarcity pricing options.

The overall energy market results support the conclusion that energy prices in PJM are set, generally, by marginal units operating at, or close to, their marginal costs, although this was not always the case in 2014, 2015 or 2016.

This is evidence of generally competitive behavior and competitive market outcomes, although the behavior of some participants during the high demand periods is consistent with economic withholding. Given the structure of the energy market which can permit the exercise of aggregate market power at times of high demand, the tighter market conditions and the change in some participants' behavior are sources of concern in the energy market and provide a reason to use cost as the sole basis for hourly changes in offers or offers greater than \$1,000 per MWh. The MMU concludes that the PJM energy market results were competitive in the first nine months of 2017.

Market Structure

Market Concentration

Analysis of supply curve segments of the PJM energy market in the first nine months of 2017 indicates low concentration in the base load segment and moderate concentration in the intermediate segment, but high concentration in the peaking segment.⁸ High concentration levels, particularly in the peaking segment, increase the probability that a generation owner will be pivotal in the aggregate market during high demand periods. The fact that the average HHI is in the unconcentrated range and the maximum hourly HHI is in the moderately concentrated range does not mean that the aggregate market was competitive in all hours. It is possible to have pivotal suppliers in the aggregate market even when the HHI level does not indicate highly concentrated. It is possible to have an exercise of market power even when the HHI level does not indicate highly concentrated.

When transmission constraints exist, local markets are created with ownership that is typically significantly more concentrated than the overall energy market. PJM offer capping rules that limit the exercise of local market power were generally effective in preventing the exercise of market power in the first nine months of 2017, although there are issues with the application of market power mitigation for resources whose owners fail the TPS test that permit local market power to be exercised even when mitigation rules are applied. These issues include the lack of a method for consistently determining the

⁸ A unit is classified as base load if it runs for more than 50 percent of hours, as intermediate if it runs for less than 50 percent but greater than 10 percent of hours, and as peak if it runs for less than 10 percent of hours.

cheaper of the cost and price schedules, and the lack of rules requiring that cost based offers equal to short run marginal costs.

The concentration ratio used here is the Herfindahl-Hirschman Index (HHI), calculated by summing the squares of the market shares of all firms in a market. Hourly PJM energy market HHIs were calculated based on the real-time energy output of generators, adjusted for hourly net imports by owner (Table 3-2).

The HHI may not accurately capture market power issues in situations where, for example, there is moderate concentration in all on line resources but there is a high level of concentration in resources needed to meet increases in load. The HHIs for supply curve segments is an indication of such issues with the ownership of incremental resources. An aggregate pivotal supplier test is required to accurately measure the ability of incremental resources to exercise market power when load is high, for example.

Hourly HHIs were also calculated for baseload, intermediate and peaking segments of generation supply. Hourly energy market HHIs by supply curve segment were calculated based on hourly energy market shares, unadjusted for imports.

The “Merger Policy Statement” of FERC states that a market can be broadly characterized as:

- **Unconcentrated.** Market HHI below 1000, equivalent to 10 firms with equal market shares;
- **Moderately Concentrated.** Market HHI between 1000 and 1800; and
- **Highly Concentrated.** Market HHI greater than 1800, equivalent to between five and six firms with equal market shares.⁹

⁹ See “Inquiry Concerning the Commission’s Merger Policy under the Federal Power Act: Policy Statement, 77 FERC ¶ 61,263 mimeo at 80 (1996).

PJM HHI Results

Calculations for hourly HHI indicate that by FERC standards, the PJM energy market during the first nine months of 2017 was unconcentrated (Table 3-2).

Table 3-2 PJM hourly energy market HHI: January 1 through September 30, 2016 and 2017¹⁰

	Hourly Market HHI (Jan - Sep, 2016)	Hourly Market HHI (Jan - Sep, 2017)
Average	1023	929
Minimum	786	696
Maximum	1356	1208
Highest market share (One hour)	28%	27%
Average of the highest hourly market share	20%	18%
# Hours	6,575	6,551
# Hours HHI > 1800	0	0
% Hours HHI > 1800	0%	0%

Table 3-3 includes HHI values by supply curve segment, including base, intermediate and peaking plants for the first nine months of 2016 and 2017. The PJM energy market was moderately concentrated overall with low concentration in the baseload, moderate concentration in the intermediate segment, and high concentration in the peaking segment.

Table 3-3 PJM hourly energy market HHI (By supply segment): January 1 through September 30, 2016 and 2017

	Jan - Sep, 2016			Jan - Sep, 2017		
	Minimum	Average	Maximum	Minimum	Average	Maximum
Base	974	1117	1443	831	982	1254
Intermediate	533	1700	8102	779	1740	9894
Peak	647	6052	10000	705	5967	10000

Figure 3-1 shows the total installed capacity (ICAP) MW of units in the baseload, intermediate and peaking segments by fuel source in the first nine months of 2017.

¹⁰ This analysis includes all hours in the first nine months of 2016 and 2017, regardless of congestion.

Figure 3-1 Fuel source distribution in unit segments: January 1 through September 30, 2017¹¹

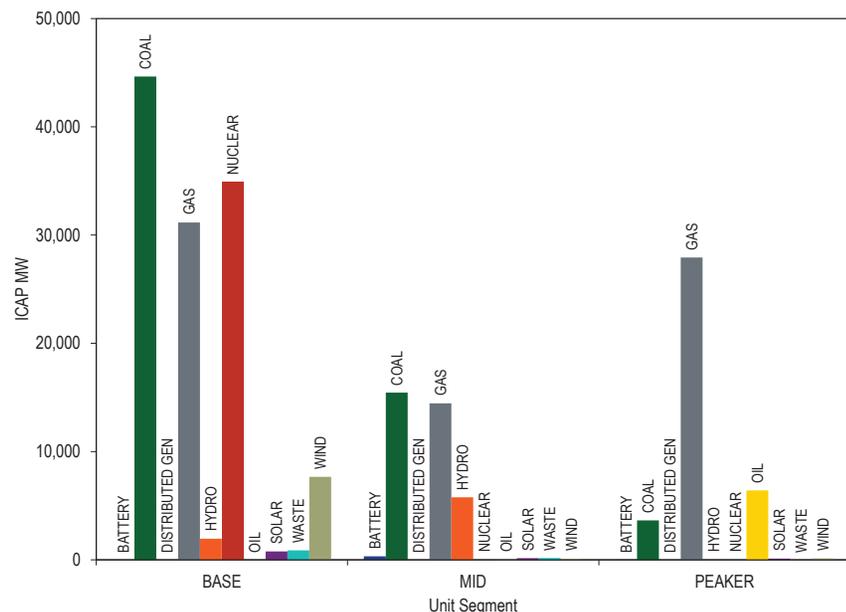
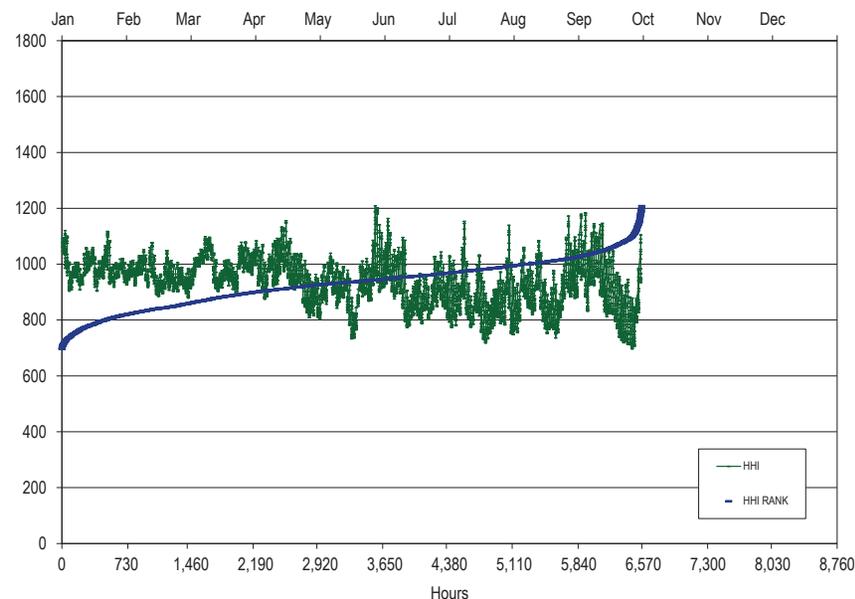


Figure 3-2 presents the hourly HHI values in chronological order and an HHI duration curve for the first nine months of 2017.

Figure 3-2 PJM hourly energy market HHI: January 1 through September 30, 2017



Aggregate Market Pivotal Supplier Results

Notwithstanding the HHI level, a supplier may have the incentive and ability to raise energy market prices. If reliably meeting the PJM system load requires energy from a single supplier, that supplier is pivotal and has monopoly power in the aggregate energy market. If a small number of suppliers are jointly required to meet load, those suppliers are jointly pivotal and have oligopoly power. The number of pivotal suppliers in the energy market is a more precise measure of structural market power than the HHI. The HHI is not a definitive measure of structural market power.

¹¹ The units classified as Distributed Gen are buses within Electric Distribution Companies (EDCs) that are modeled as generation buses to accurately reflect net energy injections from distribution level load buses. The modeling change was the outcome of the Net Energy Metering Task Force stakeholder group in July, 2012. See PJM. "Net Energy Metering Senior Task Force (NEMSTF) Action on Proposed Manual 28 Rev.," (July 26, 2012) <<http://www.pjm.com/~media/committees-groups/committees/mrc/20120726/20120726-item-04-nemstf-report-and-proposed-manual-revisions.ashx>>.

In the PJM Day-Ahead Energy Market, two suppliers were jointly pivotal on 20 percent of days in the first nine months of 2017. Three suppliers were jointly pivotal on 73 percent of days. The frequency of pivotal suppliers increased in the summer months and on high demand days in September.

Day-Ahead Energy Market Aggregate Pivotal Suppliers

To assess the number of pivotal suppliers in the Day-Ahead Energy Market, the MMU determined, for each supplier, the MW available for economic commitment that were already running or were available to start between the close of the Day-Ahead Energy Market and the peak load hour of the operating day. The available supply is defined as MW offered at a price less than 150 percent of the applicable LMP because supply available at higher prices is not competing to meet the demand for energy.¹² Generating units, import transactions, economic demand response, and INCs, are included for each supplier. Demand is the total MW required by PJM to meet physical load, cleared load bids, export transactions, and DECs. A supplier is pivotal if PJM would require some portion of the supplier's available economic capacity in the peak hour of the operating day in order to meet demand. Suppliers are jointly pivotal if PJM would require some portion of the joint suppliers' available economic capacity in the peak hour of the operating day in order to meet demand.

Figure 3-3 shows the number of days in the first nine months of 2017 with one pivotal supplier, two jointly pivotal suppliers, and three jointly pivotal suppliers for the Day-Ahead Energy Market along with the number of suppliers meeting each criterion. No supplier was singly pivotal for any day in the first nine months of 2017. Two suppliers were jointly pivotal on 52 days, while HHI levels did not exceed 702. When there were two jointly pivotal suppliers, one specific supplier was jointly pivotal with one to ten other suppliers, as shown in Figure 3-3. Three suppliers were jointly pivotal on 161 days, despite persistently unconcentrated average HHI levels.

¹² Each LMP is scaled by 150 percent to determine the relevant supply, resulting in a different price threshold for each LMP value. The analysis does not solve a redispatch of the PJM market.

Figure 3-3 Days with pivotal suppliers and numbers of pivotal suppliers in the PJM Day-Ahead Energy Market: January through September, 2017

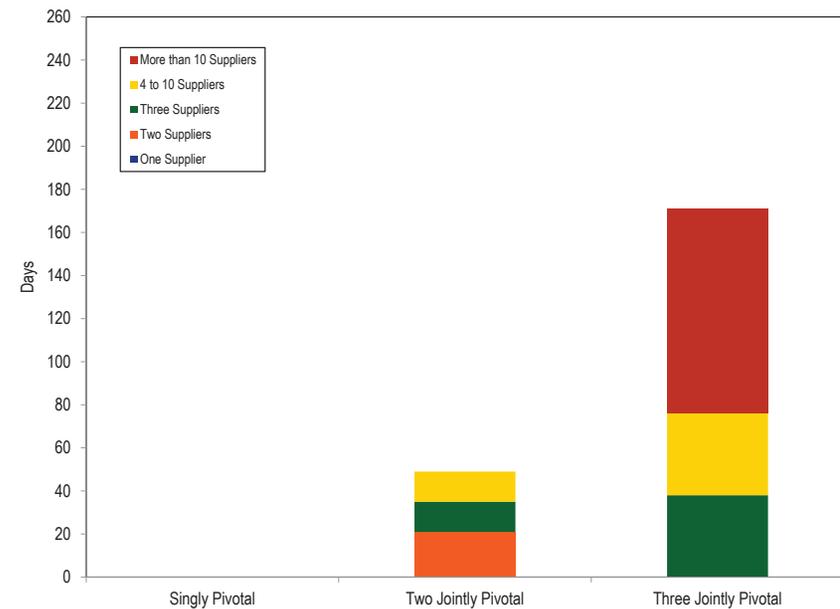


Table 3-4 provides the frequency with which each of the ten largest suppliers was singly or jointly pivotal for the Day-Ahead Energy Market in the first nine months of 2017. The two largest suppliers were pivotal on 52 and 51 days, 19 percent of days in the first nine months of 2017. All of the top 10 suppliers were one of three pivotal suppliers on at least 32 percent of days, and the largest two suppliers were one of three pivotal suppliers on 73 percent of days.

Table 3-4 Frequency of days as a pivotal supplier for the 10 largest suppliers: January 1 through September 30, 2017

Pivotal Supplier Rank	Days Singly Pivotal	Percent of Days	Days Jointly Pivotal with One Other Supplier		Days Jointly Pivotal with Two Other Suppliers	
			Days	Percent of Days	Days	Percent of Days
1	0	0%	52	19%	199	73%
2	0	0%	51	19%	198	73%
3	0	0%	29	11%	185	68%
4	0	0%	17	6%	161	59%
5	0	0%	10	4%	147	54%
6	0	0%	5	2%	112	41%
7	0	0%	2	1%	127	47%
8	0	0%	2	1%	114	42%
9	0	0%	1	0%	103	38%
10	0	0%	1	0%	87	32%

The current market power mitigation rules for the PJM energy market rely on the assumption that the aggregate market includes sufficient competing sellers to ensure competitive market outcomes. With sufficient competition, any attempt to economically or physically withhold generation would not result in higher market prices, because another supplier would replace the generation at a similar price. This assumption requires that the total demand for energy can be met without the supply from any individual supplier or without the supply from a small group of suppliers. This assumption is not correct, as demonstrated by these results. There are pivotal suppliers in the aggregate energy market.

The existing market power mitigation measures do not address aggregate market power.¹³ The MMU is developing an aggregate market power test for the day-ahead and real-time energy markets based on pivotal suppliers and will propose appropriate market power mitigation rules to address aggregate market power.

¹³ One supplier, Exelon, is partially mitigated for aggregate market power through its merger agreement. The agreement is not part of the PJM market rules. See Monitoring Analytics, LLC, Letter attaching Settlement Terms and Conditions, FERC Docket No. EC11-83-000 and Maryland PSC Case No. 9271 (October 11, 2011).

Ownership of Marginal Resources

Table 3-5 shows the contribution to real-time, load-weighted LMP by individual marginal resource owner.¹⁴ The contribution of each marginal resource to price at each load bus is calculated for each five-minute interval of 2017, and summed by the parent company that offers the marginal resource into the Real-Time Energy Market. In the first nine months of 2017, the offers of one company resulted in 13.8 percent of the real-time, load-weighted PJM system LMP and that the offers of the top four companies resulted in 50.0 percent of the real-time, load-weighted, average PJM system LMP. During the first nine months of 2016, the offers of one company resulted in 24.2 percent of the real-time, load-weighted PJM system LMP and offers of the top four companies resulted in 61.2 percent of the real-time, load-weighted, average PJM system LMP. In the first nine months of 2017, the offers of one company resulted in 13.2 percent of the peak hour real-time, load weighted PJM system LMP. In the first nine months of 2016, the offers of one company resulted in 24.4 percent of the peak hour, real-time, load weighted PJM system LMP.

¹⁴ See the *MMU Technical Reference for PJM Markets*, at "Calculation and Use of Generator Sensitivity/Unit Participation Factors."

Table 3-5 Marginal unit contribution to PJM real-time, load-weighted LMP (By parent company): January 1 through September 30, 2016 and 2017

Company	2016 (Jan-Sep)						2017 (Jan - Sep)					
	All Hours			Peak Hours			All Hours			Peak Hours		
	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company
1	24.2%	24.2%	1	24.4%	24.4%	1	13.8%	13.8%	1	13.2%	13.2%	
2	14.8%	39.0%	2	15.4%	39.8%	2	13.6%	27.4%	2	12.6%	25.7%	
3	12.9%	51.9%	3	10.9%	50.7%	3	12.1%	39.5%	3	10.9%	36.6%	
4	9.3%	61.2%	4	9.5%	60.2%	4	10.5%	50.0%	4	10.0%	46.7%	
5	8.1%	69.3%	5	7.0%	67.2%	5	9.8%	59.8%	5	9.1%	55.8%	
6	5.4%	74.8%	6	4.9%	72.1%	6	4.4%	64.2%	6	5.8%	61.6%	
7	2.2%	77.0%	7	3.0%	75.1%	7	3.8%	68.0%	7	5.1%	66.7%	
8	2.1%	79.1%	8	2.5%	77.6%	8	3.5%	71.5%	8	3.5%	70.3%	
9	2.0%	81.1%	9	2.5%	80.1%	9	3.5%	75.0%	9	3.3%	73.6%	
Other (68 companies)	18.9%	100.0%	Other (60 companies)	19.9%	100.0%	Other (73 companies)	25.0%	100.0%	Other (67 companies)	26.4%	100.0%	

Table 3-6 Marginal resource contribution to PJM day-ahead, load-weighted LMP (By parent company): January 1 through September 30, 2016 and 2017

Company	2016 (Jan - Sep)						2017 (Jan - Sep)					
	All Hours			Peak Hours			All Hours			Peak Hours		
	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company	Percent of Price	Cumulative Percent	Company
1	14.4%	14.4%	1	12.8%	12.8%	1	9.6%	9.6%	1	12.0%	12.0%	
2	9.2%	23.6%	2	12.0%	12.0%	2	8.1%	17.7%	2	6.9%	18.9%	
3	7.4%	31.0%	3	9.1%	9.1%	3	6.7%	24.4%	3	5.3%	24.1%	
4	7.0%	38.0%	4	8.9%	8.9%	4	6.0%	30.4%	4	5.1%	29.3%	
5	6.8%	44.8%	5	6.5%	6.5%	5	5.5%	35.9%	5	4.9%	34.2%	
6	5.5%	50.3%	6	6.5%	6.5%	6	5.3%	41.2%	6	4.7%	38.9%	
7	4.5%	54.8%	7	5.2%	5.2%	7	4.9%	46.1%	7	4.6%	43.5%	
8	4.3%	59.2%	8	3.5%	3.5%	8	4.4%	50.5%	8	4.5%	48.1%	
9	3.2%	62.4%	9	3.2%	3.2%	9	3.8%	54.4%	9	4.3%	52.4%	
Other (164 companies)	37.6%	100.0%	Other (157 companies)	32.2%	32.2%	Other (152 companies)	45.6%	100.0%	Other (147 companies)	47.6%	100.0%	

Table 3-6 shows the contribution to day-ahead, load-weighted LMP by individual marginal resource owners.¹⁵ The contribution of each marginal resource to price at each load bus is calculated hourly, and summed by the parent company that offers the marginal resource into the Day-Ahead Energy Market. The results show that in the first nine months of 2017, the offers of

¹⁵ See the *MMU Technical Reference for PJM Markets*, at "Calculation and Use of Generator Sensitivity/Unit Participation Factors."

one company contributed 9.6 percent of the day-ahead, load-weighted, PJM system LMP and that the offers of the top four companies contributed 30.4 percent of the day-ahead, load-weighted, average PJM system LMP. In the first nine months of 2016, the offers of one company contributed 14.4 percent of the day-ahead, load-weighted PJM system LMP and offers of the top four companies contributed 38.0 percent of the day-ahead, load-weighted, average PJM system LMP.

Type of Marginal Resources

LMPs result from the operation of a market based on security-constrained, least-cost dispatch in which marginal resources determine system LMPs, based on their offers. Marginal resource designation is not limited to physical resources in the Day-Ahead Energy Market. INC offers, DEC bids and up to congestion transactions are dispatchable injections and withdrawals in the Day-Ahead Energy Market that can set price via their offers and bids.

Table 3-7 shows the type of fuel used by marginal resources in the Real-Time Energy Market. There can be more than one marginal resource in

any given interval as a result of transmission constraints. In the first nine months of 2017, coal units were 32.5 percent and natural gas units were 52.9 percent of marginal resources. In the first nine months of 2016, coal units were 46.2 percent and natural gas units were 41.4 percent of the total marginal resources. In the first nine months of 2017, 74.1 percent of the wind marginal units had negative offer prices, 18.9 percent had zero offer prices and 6.9 percent had positive offer prices.

The results reflect the dynamics of an LMP market. When there is a single constraint, there are two marginal units. For example, a significant west to east constraint could be binding with a gas unit marginal in the east and a coal unit marginal in the west. As a result, although the dispatch of natural gas units has increased and gas units set price for more hours as marginal resources in the Real-Time Energy Market, this does not necessarily reduce the proportion of hours in which coal units are marginal.¹⁶

The proportion of marginal nuclear units increased from 0.03 percent in the first nine months of 2015 to 0.92 percent in the first nine months of 2016 and to 1.25 percent in the first nine months of 2017. The increase was primarily due to a small number of nuclear units offering with a dispatchable range. Most nuclear units are offered as fixed generation in the PJM market. The dispatchable nuclear units do not always respond to dispatch instructions.

Table 3-7 Type of fuel used (By real-time marginal units): January 1 through September 30, 2013 through 2017

Type/Fuel	Jan-Sep				
	2013	2014	2015	2016	2017
Gas	34.13%	42.48%	34.88%	41.41%	52.92%
Coal	57.56%	49.71%	54.46%	46.21%	32.53%
Wind	4.75%	3.86%	2.74%	2.67%	8.44%
Oil	3.22%	3.44%	7.39%	8.55%	4.45%
Uranium	0.02%	0.06%	0.03%	0.92%	1.25%
Other	0.21%	0.35%	0.43%	0.15%	0.32%
Municipal Waste	0.08%	0.04%	0.06%	0.10%	0.08%
Emergency DR	0.03%	0.05%	0.00%	0.00%	0.00%

¹⁶ Prior to April 1, 2015, for the generation units that are capable of using multiple fuel types, PJM did not require the participants to disclose the fuel type associated with their offer schedule. For these units, the cleared offer schedules on a given day were compared to the cost associated with each fuel to determine the fuel type most likely to have been the basis for the cleared schedule.

Figure 3-4 shows the type of fuel used by marginal resources in the Real-Time Energy Market since 2004. The role of coal as a marginal resource has declined while the role of gas as a marginal resource has increased.

Figure 3-4 Type of fuel used (By real-time marginal units): January 1 through September 30, 2004 through 2017

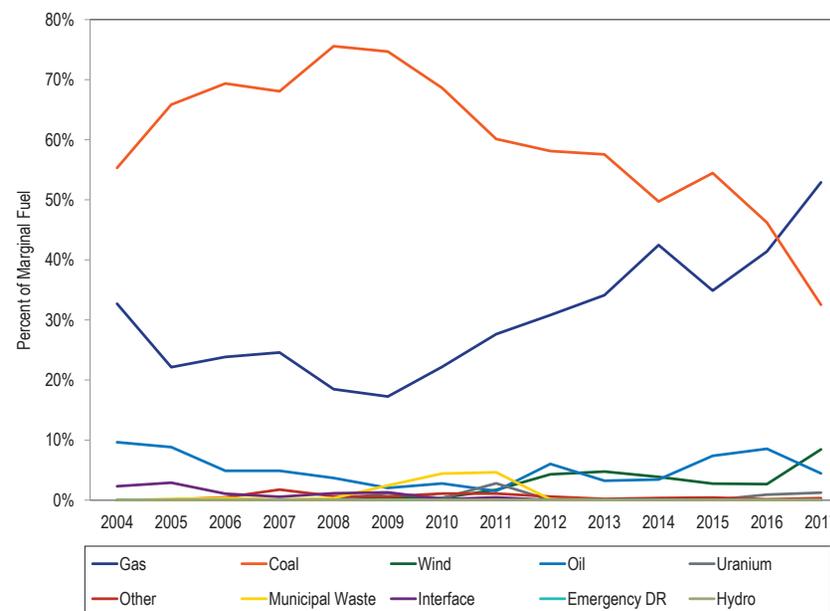


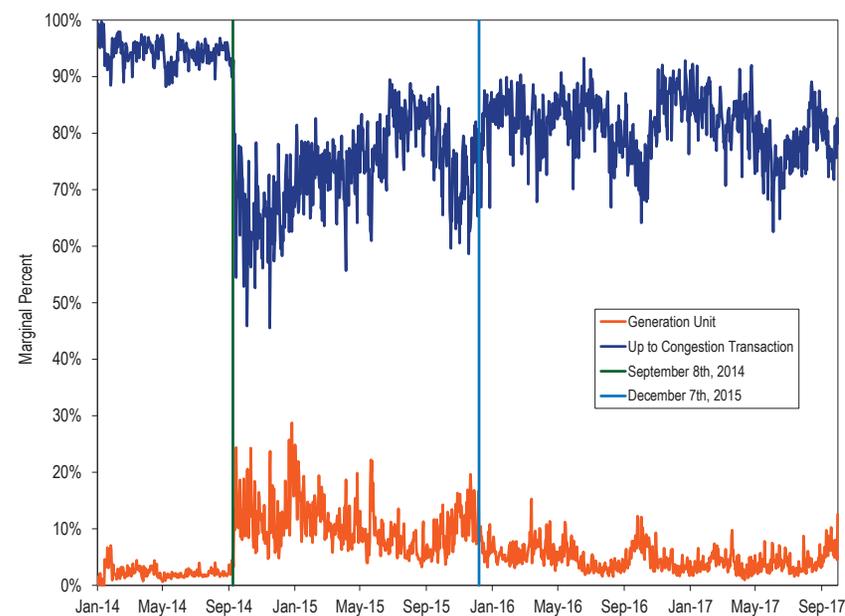
Table 3-8 shows the type and fuel type where relevant, of marginal resources in the Day-Ahead Energy Market. In the first nine months of 2017, up to congestion transactions were 80.37 percent of marginal resources. Up to congestion transactions were 81.88 percent of marginal resources in the first nine months of 2016.

Table 3-8 Day-ahead marginal resources by type/fuel: January 1 through September 30, 2011 through 2017

Type/Fuel	(Jan - Sep)						
	2011	2012	2013	2014	2015	2016	2017
Up to Congestion Transaction	69.42%	86.73%	96.23%	93.69%	76.47%	81.88%	80.37%
DEC	14.40%	5.15%	1.24%	2.19%	8.58%	8.89%	10.09%
INC	8.44%	4.36%	1.01%	1.59%	4.94%	4.25%	5.53%
Coal	5.36%	2.46%	0.97%	1.44%	6.08%	2.24%	1.71%
Gas	1.78%	1.12%	0.44%	0.95%	3.20%	2.02%	1.83%
Oil	0.00%	0.00%	0.00%	0.02%	0.21%	0.52%	0.19%
Uranium	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.06%
Dispatchable Transaction	0.24%	0.07%	0.06%	0.08%	0.31%	0.05%	0.03%
Wind	0.07%	0.04%	0.04%	0.03%	0.14%	0.04%	0.17%
Other	0.00%	0.00%	0.00%	0.00%	0.02%	0.01%	0.00%
Price Sensitive Demand	0.28%	0.05%	0.01%	0.01%	0.03%	0.00%	0.00%
Municipal Waste	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%
Water	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Figure 3-5 shows, for the Day-Ahead Energy Market from January 1, 2014, through September 30, 2017, the daily proportion of marginal resources that were up to congestion transaction and/or generation units. The percent of marginal up to congestion transactions decreased significantly and that of generation units increased beginning on September 8, 2014, as a result of FERC's UTC uplift refund notice which became effective on that date.¹⁷ That trend has reversed as a result of the expiration of the fifteen month uplift refund period for UTC transactions.

Figure 3-5 Day-ahead marginal up to congestion transaction and generation units: January 1, 2014 through September 30, 2017



¹⁷ See 18 CFR § 385.213 (2014).

Supply

Supply includes physical generation and imports and virtual transactions.

Figure 3-6 shows the average PJM aggregate real-time generation supply curves by offer price for the entire range of offers, peak load and average load for the summer of 2016 and 2017. The maximum of average offered real-time generation increased by 2,551 MW, or 1.5 percent, from 171,300 MW in the summer of 2016 to 173,851 MW in the summer of 2017.

Figure 3-6 Average PJM aggregate real-time generation supply curves by offer price: summer of 2016 and 2017

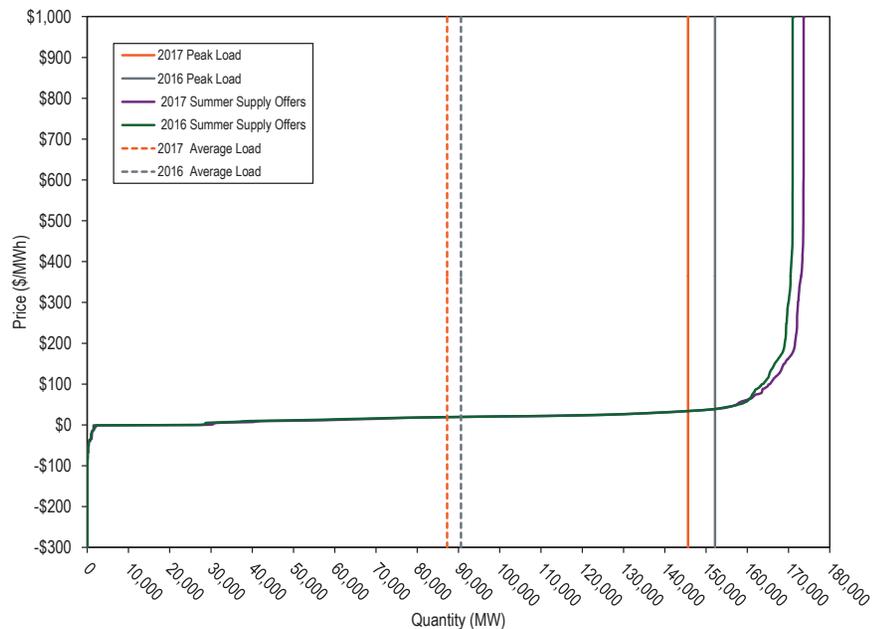
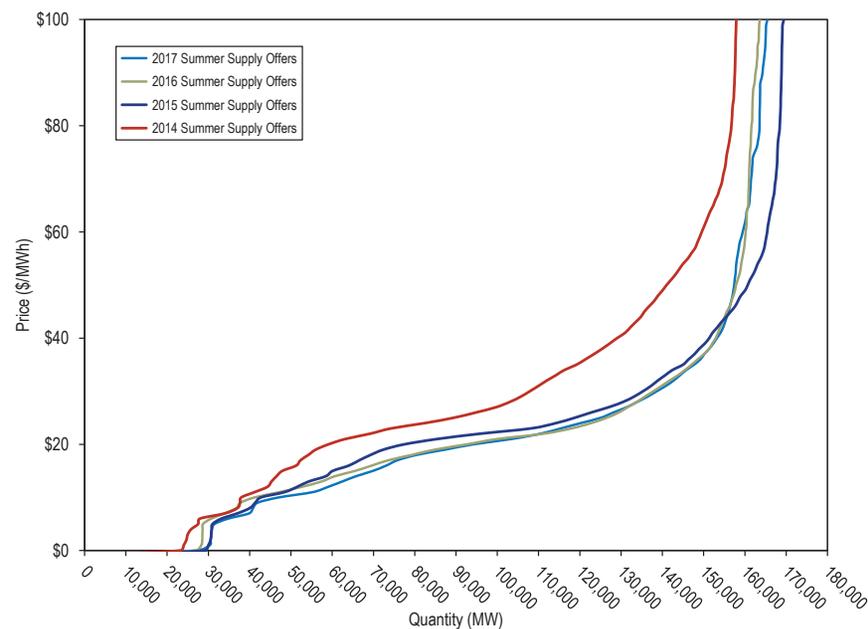


Figure 3-7 shows the average PJM aggregate real-time generation supply curves by offer price, for the typical dispatch range and for the summer of 2014 through 2017. Figure 3-7 shows that the supply curve is not flat in the typical dispatch range and that the supply curve has not become flatter over this period.

Figure 3-7 Average PJM aggregate real-time generation supply curves by offer price: summer of 2014 through 2017



Energy Production by Fuel Source

Table 3-9 shows PJM generation by fuel source in GWh for the first nine months of 2016 and 2017. In the first nine months of 2017, generation from coal units decreased 6.2 percent and generation from natural gas units increased 2.8 percent compared to the first nine months of 2016.¹⁸

Table 3-9 PJM generation (By fuel source (GWh)): January 1 through September 30, 2016 and 2017^{19 20}

Jan - Sep	2016		2017		Change in Output
	GWh	Percent	GWh	Percent	
Coal	209,032.7	33.8%	195,979.8	32.2%	(6.24%)
Bituminous	183,859.0	29.7%	169,203.3	27.8%	(7.97%)
Sub Bituminous	21,119.7	3.4%	20,884.1	3.4%	(1.12%)
Other Coal	4,054.0	0.7%	5,892.4	1.0%	45.35%
Nuclear	209,893.3	33.9%	215,089.3	35.3%	2.48%
Gas	169,493.9	27.4%	165,018.5	27.1%	(2.64%)
Natural Gas	167,890.0	27.1%	163,207.1	26.8%	(2.79%)
Landfill Gas	1,603.6	0.3%	1,797.0	0.3%	12.06%
Other Gas	0.3	0.0%	14.3	0.0%	4,100.00%
Hydroelectric	10,930.0	1.8%	11,929.1	2.0%	9.14%
Pumped Storage	3,862.2	0.6%	3,989.2	0.7%	3.29%
Run of River	5,782.2	0.9%	6,633.4	1.1%	14.72%
Other Hydro	1,285.6	0.2%	1,306.5	0.2%	1.62%
Wind	11,963.2	1.9%	14,268.3	2.3%	19.27%
Waste	3,089.0	0.5%	2,764.2	0.5%	(10.51%)
Solid Waste	3,089.0	0.5%	2,764.2	0.5%	(10.51%)
Miscellaneous	0.0	0.0%	0.0	0.0%	NA
Oil	1,752.6	0.3%	1,667.7	0.3%	(4.85%)
Heavy Oil	256.1	0.0%	154.5	0.0%	(39.65%)
Light Oil	298.3	0.0%	195.7	0.0%	(34.39%)
Diesel	50.1	0.0%	24.8	0.0%	(50.59%)
Gasoline	0.0	0.0%	0.0	0.0%	NA
Kerosene	68.4	0.0%	1.2	0.0%	(98.28%)
Jet Oil	0.0	0.0%	0.0	0.0%	NA
Other Oil	1,079.7	0.2%	1,291.5	0.2%	19.62%
Solar, Net Energy Metering	799.2	0.1%	1,156.6	0.2%	44.71%
Energy Storage	12.0	0.0%	20.5	0.0%	70.75%
Battery	12.0	0.0%	20.5	0.0%	70.75%
Compressed Air	0.0	0.0%	0.0	0.0%	NA
Biofuel	1,414.3	0.2%	1,342.7	0.2%	(5.07%)
Geothermal	0.0	0.0%	0.0	0.0%	NA
Other Fuel Type	0.0	0.0%	48.2	0.0%	NA
Total	618,380.2	100.0%	609,284.8	100.0%	(1.5%)

¹⁸ Generation data are the sum of MWh for each fuel by source at every generation bus in PJM with positive output and reflect gross generation without offset for station use of any kind.

¹⁹ All generation is total gross generation output and does not net out the MWh withdrawn at a generation bus to provide auxiliary/parasitic power or station power, power to synchronous condenser motors, or power to run pumped storage pumps.

²⁰ Net Energy Metering is combined with Solar due to data confidentiality reasons.

Table 3-10 Monthly PJM generation (By fuel source (GWh)): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Coal	25,111.3	19,246.2	21,910.6	17,843.2	19,836.7	22,512.3	26,748.3	23,892.6	18,878.6	195,979.8
Bituminous	21,142.1	16,596.5	18,996.6	15,674.8	17,627.2	19,757.0	22,750.8	20,480.3	16,178.0	169,203.3
Sub Bituminous	3,189.9	1,945.5	2,192.2	1,733.6	1,697.4	2,177.7	3,264.8	2,652.3	2,030.7	20,884.1
Other Coal	779.3	704.2	721.8	434.9	512.1	577.6	732.7	760.0	669.9	5,892.4
Nuclear	26,016.6	22,140.8	23,047.7	23,076.4	22,564.3	24,441.8	25,419.2	25,180.0	23,202.6	215,089.3
Gas	16,071.3	15,213.3	17,834.3	13,438.8	15,290.3	20,016.6	24,184.6	22,139.1	20,830.3	165,018.5
Natural Gas	15,884.4	15,017.6	17,625.2	13,234.8	15,096.3	19,822.6	23,975.8	21,923.2	20,627.3	163,207.1
Landfill Gas	186.9	195.7	208.6	201.2	193.9	192.6	208.3	212.4	197.5	1,797.0
Other Gas	0.0	0.1	0.6	2.8	0.1	1.4	0.5	3.4	5.5	14.3
Hydroelectric	1,266.9	1,083.6	1,215.3	1,432.4	1,620.7	1,552.8	1,536.4	1,305.7	915.3	11,929.1
Pumped Storage	337.1	253.0	308.4	320.8	431.6	542.8	656.1	637.7	501.6	3,989.2
Run of River	826.8	753.2	809.9	1,008.9	1,034.7	817.5	638.8	468.1	275.5	6,633.4
Other Hydro	103.0	77.4	97.0	102.6	154.4	192.5	241.5	199.9	138.2	1,306.5
Wind	2,017.5	2,178.6	2,299.9	2,072.0	1,825.5	1,457.9	811.9	693.5	911.5	14,268.3
Waste	364.9	281.5	302.3	264.4	303.6	301.5	320.9	318.8	306.4	2,764.2
Solid Waste	364.9	281.5	302.3	264.4	303.6	301.5	320.9	318.8	306.4	2,764.2
Miscellaneous	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Oil	210.9	152.6	112.9	142.8	214.7	226.0	200.4	201.3	206.1	1,667.7
Heavy Oil	0.5	3.1	0.0	0.0	34.7	58.2	25.9	28.9	3.2	154.5
Light Oil	59.7	21.8	5.8	4.9	21.6	19.8	11.4	8.1	42.5	195.7
Diesel	6.0	0.1	1.1	1.2	5.6	2.6	1.9	2.3	4.0	24.8
Gasoline	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Kerosene	0.8	0.0	0.1	0.0	0.0	0.0	0.2	0.1	0.0	1.2
Jet Oil	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other Oil	144.0	127.6	105.9	136.6	152.9	145.3	161.0	161.8	156.4	1,291.5
Solar, Net Energy Metering	52.6	93.1	121.0	134.8	141.2	161.2	160.1	150.9	141.5	1,156.6
Energy Storage	2.6	3.2	3.4	2.6	2.3	1.8	1.7	1.5	1.4	20.5
Battery	2.6	3.2	3.4	2.6	2.3	1.8	1.7	1.5	1.4	20.5
Compressed Air	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Biofuel	152.7	158.3	175.8	141.6	109.7	167.3	174.8	181.8	80.9	1,342.7
Geothermal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other Fuel Type	48.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.2
Total	71,315.5	60,551.1	67,023.0	58,549.0	61,908.9	70,839.1	79,558.4	74,065.1	65,474.7	609,284.8

Generator Offers

Generator offers are categorized as dispatchable (Table 3-11) or self scheduled (Table 3-12).²¹ Units which are available for economic dispatch are dispatchable. Units which are self scheduled to generate fixed output are self scheduled and must run. Units which are self scheduled at their economic minimum and are available for economic dispatch up to their economic maximum are self scheduled and dispatchable. Table 3-11 and Table 3-12 do not include units that did not indicate their offer status and units that were offered as available to run only during emergency events. Units that do not indicate their offer status are unavailable for dispatch by PJM. The MW offered beyond the economic range of a unit are categorized as emergency MW. Emergency MW are included in both tables.

Table 3-11 shows the proportion of MW offers by dispatchable units, by unit type and by offer price range, in the first nine months of 2017. For example, 79.8 percent of CC offers were dispatchable and in the \$0 to \$200 per MWh offer price range. The total column is the proportion of all MW offers by unit type that were dispatchable. For example, 86.0 percent of all CC MW offers were dispatchable, including the 5.7 percent of emergency MW offered by CC units. The all dispatchable offers row is the proportion of MW that were offered as available for economic dispatch within a given range by all unit types. For example, 51.1 percent of all dispatchable offers were in the \$0 to \$200 per MWh price range. The total column in the all dispatchable offers row is the proportion of all MW offers that were offered as available for economic dispatch, including emergency MW. Among all the generator offers in the first nine months of 2017, 55.3 percent were offered as available for economic dispatch, excluding emergency MW (59.1 percent less 3.7 percent).

²¹ Each range in the tables is greater than or equal to the lower value and less than the higher value. The unit type battery is not included in these tables because batteries do not make energy offers. The unit type fuel cell is not included in these tables because of the small number of owners and the small number of units.

Table 3-11 Distribution of MW for dispatchable unit offer prices: January 1 through September 30, 2017

Unit Type	Dispatchable (Range)						Emergency	Total
	(\$200 - \$0)	\$0 - \$200	\$200 - \$400	\$400 - \$600	\$600 - \$800	\$800 - \$1,000		
CC	0.1%	79.8%	0.2%	0.1%	0.0%	0.0%	5.7%	86.0%
CT	0.0%	84.2%	5.2%	1.0%	0.0%	0.1%	8.6%	99.0%
Diesel	0.1%	39.5%	18.8%	2.3%	0.1%	0.0%	15.1%	76.0%
Fuel Cell	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Nuclear	0.0%	6.4%	0.0%	0.0%	0.0%	0.0%	0.0%	6.4%
Pumped Storage	66.9%	1.5%	0.0%	0.0%	0.0%	0.0%	1.4%	69.8%
Run of River	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
Solar	53.8%	2.6%	0.0%	0.0%	0.0%	0.0%	0.0%	56.4%
Steam	0.1%	50.4%	0.1%	0.0%	0.0%	0.4%	2.5%	53.5%
Transaction	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wind	55.4%	9.5%	0.0%	0.0%	0.0%	0.0%	0.5%	65.3%
All Dispatchable Offers	2.8%	51.1%	1.1%	0.2%	0.0%	0.1%	3.7%	59.1%

Table 3-12 shows the proportion of MW offers by unit type that were self scheduled to generate fixed output and by unit type and price range for self scheduled and dispatchable units, for the first nine months of 2017. For example, 10.6 percent of CC offers were self scheduled and dispatchable and in the \$0 to \$200 offer price range. The total column is the proportion of all MW offers by unit type that were self scheduled to generate fixed output or are self scheduled and dispatchable. For example, 14.0 percent of all CC MW offers were either self scheduled to generate at fixed output or self scheduled to generate at economic minimum and dispatchable up to economic maximum, including the 1.6 percent of emergency MW offered by CC units. The all self scheduled offers row is the proportion of MW that were offered as either self scheduled to generate at fixed output or self scheduled to generate at economic minimum and dispatchable up to economic maximum within a given range by all unit types. For example, units that were self scheduled to generate at fixed output accounted for 18.8 percent of all offers and self scheduled and dispatchable units accounted for 19.7 percent of all offers. The total column in the all self scheduled offers row is the proportion of all MW offers that were either self scheduled to generate at fixed output or self scheduled to generate at economic minimum and dispatchable up to economic maximum, including emergency MW. Among all the generator offers in the

first nine months of 2017, 20.0 percent were offered as self scheduled and 20.9 percent were offered as self scheduled and dispatchable.

Table 3-12 Distribution of MW for self scheduled and dispatchable unit offer prices: January 1 through September 30, 2017

Unit Type	Self Scheduled		Self Scheduled and Dispatchable (Range)							Total
	Must Run	Emergency	(\$200) - \$0	\$0 - \$200	\$200 - \$400	\$400 - \$600	\$600 - \$800	\$800 - \$1,000	Emergency	
CC	1.6%	0.3%	0.2%	10.6%	0.0%	0.0%	0.0%	0.0%	1.3%	14.0%
CT	0.2%	0.1%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.1%	1.0%
Diesel	20.2%	1.1%	2.5%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	24.0%
Fuel Cell	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
Nuclear	79.4%	1.1%	9.2%	3.7%	0.0%	0.0%	0.0%	0.0%	0.1%	93.6%
Pumped Storage	14.8%	9.9%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%	30.2%
Run of River	61.9%	16.3%	0.4%	18.5%	0.0%	0.0%	0.0%	0.0%	2.6%	99.8%
Solar	28.6%	10.6%	4.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	43.6%
Steam	3.9%	1.2%	0.2%	39.2%	0.0%	0.0%	0.0%	0.0%	1.9%	46.5%
Transaction	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Wind	3.2%	2.5%	23.1%	2.7%	0.0%	0.0%	0.0%	0.0%	3.2%	34.7%
All Self-Scheduled Offers	18.8%	1.3%	2.4%	17.3%	0.0%	0.0%	0.0%	0.0%	1.2%	40.9%

Fuel Diversity

Figure 3-8 shows the fuel diversity index (FDI_c) for PJM energy generation.²² The FDI_c is defined as $1 - \sum_{i=1}^N s_i^2$, where s_i is the share of fuel type i . The minimum possible value for the FDI_c is zero, corresponding to all generation from a single fuel type. The maximum possible value for the FDI_c is achieved when each fuel type has an equal share of total generation. For a generation fleet composed of 10 fuel types, the maximum achievable index is 0.9. The fuel type categories used in the calculation of the FDI_c are the 10 primary fuel sources in Table 3-9 with nonzero generation values. The FDI_c exhibited seasonality in prior years with most of the peaks occurring in the spring and summer months, and the valleys occurring in the fall and winter months. As fuel diversity has increased, the seasonality in the FDI_c has decreased and the FDI_c has exhibited less volatility. A significant drop in the FDI_c occurred in the fall of 2004 as a result of the expansion of the PJM market footprint into ComEd, AEP, and Dayton Power & Light control zones and the increased

²² Monitoring Analytics developed the FDI to provide an objective metric of fuel diversity. The FDI metric is similar to the HHI used to measure market concentration. The FDI is calculated separately for energy output and for installed capacity.

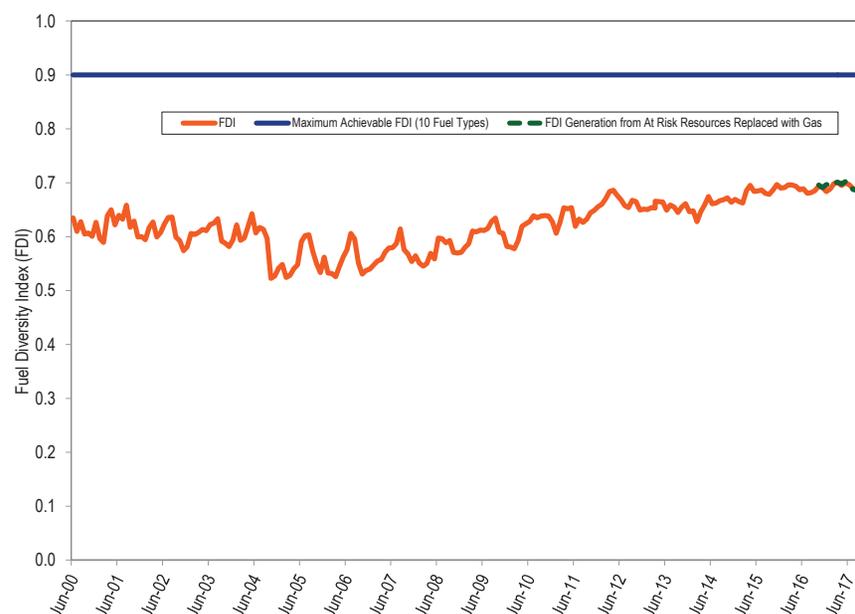
shares of coal and nuclear that resulted.²³ The increasing trend that began in 2008 corresponds to a period of decreasing coal generation, increasing gas generation and increasing wind generation. Coal generation as a share of total generation dropped 20.5 percentage points from 2008 to 2016 and gas generation increased 19.3 percentage points. Wind generation was 2.2 percent of total generation in 2016 and 0.5 percent of total generation in 2008, an increase of 1.7 percentage points. The average FDI_c increased 0.7 percent from the first nine months of 2016 to the first nine months of 2017.

The FDI_c was used to measure the impact of potential retirements by resources that have been identified as being at risk of retirement by the MMUs net revenue adequacy analysis.²⁴ There were 96 resources with installed capacity totaling 14,500 MW identified as at risk. The 96 at risk resources generated 41.7 GWh in the twelve month period ending September 30, 2017, 39.6 GWh from coal and oil fired generators. The dashed line in Figure 3-8 shows the FDI_c calculated assuming that the 39.6 GWh of generation from coal and oil fired generators, identified as being at risk resources, were replaced by gas generation. The FDI_c under these assumptions would have increased in seven of the 12 months with an average monthly increase of 0.2 percent over the actual FDI_c.

²³ See the 2016 State of the Market Report for PJM, Volume II, Appendix A, "PJM Geography" for an explanation of the expansion of the PJM footprint. The integration of the ComEd Control Area occurred in May 2004 and the integration of the AEP and Dayton control zones occurred in October 2004.

²⁴ See the 2016 State of the Market Report for PJM, Volume 2, Section 7: Net Revenue, Units at Risk.

Figure 3-8 Fuel diversity index for PJM monthly generation: June 1, 2000 through September 30, 2017



Net Generation and Load

PJM sums all negative (injections) and positive (withdrawals) load at each designated load bus when calculating net load (accounting load). PJM sums all of the negative (withdrawals) and positive (injections) generation at each generation bus when calculating net generation. Netting withdrawals and injections by bus type (generation or load) affects the measurement of total load and total generation. Energy withdrawn at a generation bus to provide, for example, auxiliary/parasitic power or station power, power to synchronous condenser motors, or power to run pumped storage pumps, is actually load, not negative generation. Energy injected at load buses by behind the meter generation is actually generation, not negative load.

The zonal load-weighted LMP is calculated by weighting the zone's load bus LMPs by the zone's load bus accounting load. The definition of injections and withdrawals of energy as generation or load affects PJM's calculation of zonal load-weighted LMP.

The MMU recommends that during hours when a generation bus shows a net withdrawal, the energy withdrawal be treated as load, not negative generation, for purposes of calculating load and load-weighted LMP. The MMU also recommends that during hours when a load bus shows a net injection, the energy injection be treated as generation, not negative load, for purposes of calculating generation and load-weighted LMP.

Real-Time Supply

The maximum of average offered real-time generation in the summer of 2017 increased by 2,551 MW, or 1.5 percent, from the summer of 2016, from 171,300 MW to 173,851 MW.²⁵

In the first nine months of 2017, 3,941.0 MW of new resources were added and 2,072.8 MW were retired.

PJM average real-time cleared generation in the first nine months of 2017 decreased by 1.2 percent from the first nine months of 2016, from 92,799 MW to 91,658 MW.²⁶

PJM average real-time cleared supply including imports in the first nine months of 2017 decreased by 3.7 percent from the first nine months of 2016, from 96,907 MW to 93,322 MW.

In the PJM Real-Time Energy Market, there are three types of supply offers:

- **Self Scheduled Generation Offer.** Offer to supply a fixed block of MWh, as a price taker, from a unit that may also have a dispatchable component above the minimum.

²⁵ Calculated values shown in Section 3, "Energy Market," are based on unrounded, underlying data and may differ from calculations based on the rounded values shown in tables.

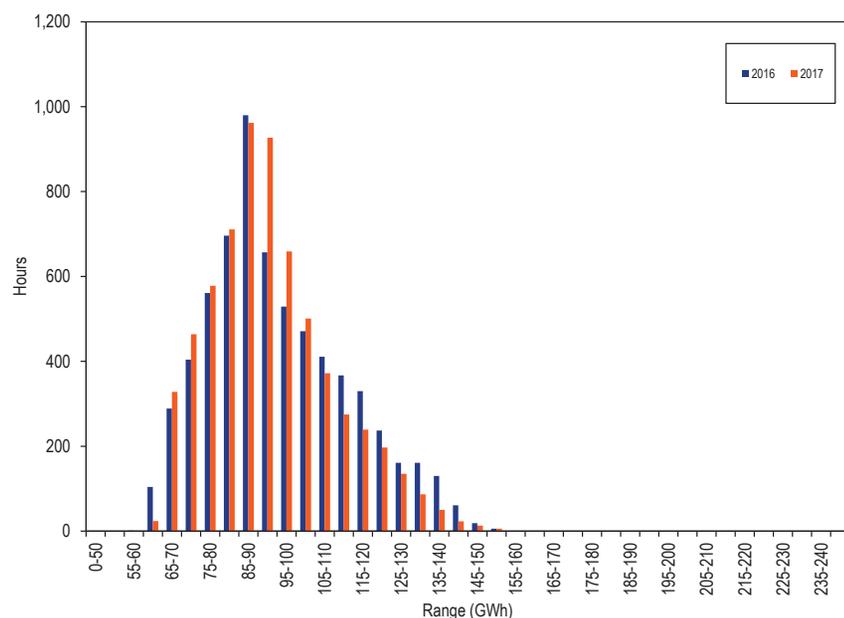
²⁶ Generation data are the net MWh injections and withdrawals MWh at every generation bus in PJM.

- Dispatchable Generation Offer. Offer to supply a schedule of MWh and corresponding offer prices from a specific unit.
- Import. An import is an external energy transaction scheduled to PJM from another balancing authority. A real-time import must have a valid OASIS reservation when offered, must have available ramp room to support the import, must be accompanied by a NERC Tag, and must pass the neighboring balancing authority checkout process.

PJM Real-Time Supply Duration

Figure 3-9 shows the hourly distribution of PJM real-time generation plus imports for the first nine months of 2016 and 2017.

Figure 3-9 Distribution of PJM real-time generation plus imports: January 1 through September 30, 2016 and 2017²⁷



²⁷ Each range on the horizontal axis excludes the start value and includes the end value.

PJM Real-Time, Average Supply

Table 3-13 presents summary real-time supply statistics for the first nine months of each year for the 18-year period from 2000 through 2017.²⁸

Table 3-13 PJM real-time average hourly generation and real-time average hourly generation plus average hourly imports: January 1 through September 30, 2000 through 2017

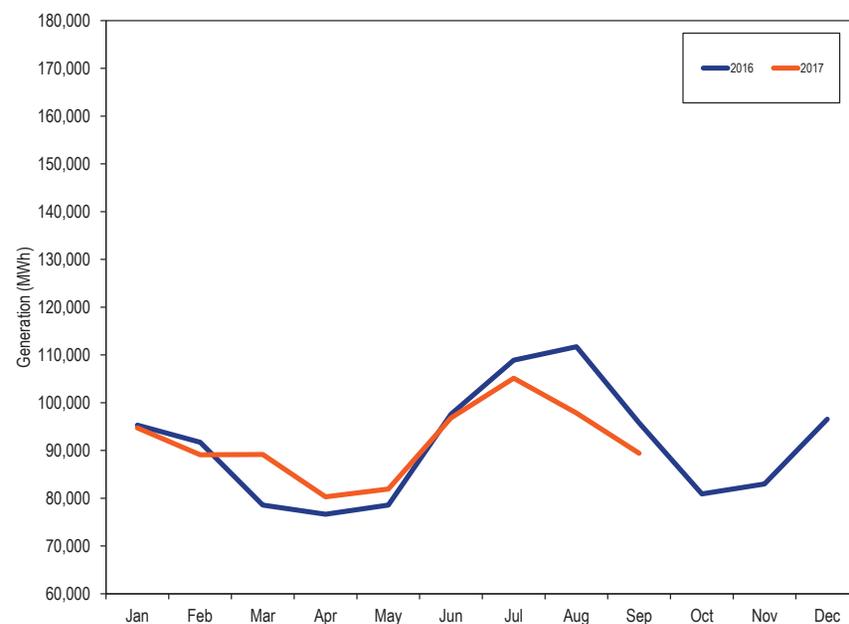
Jan-Sep	PJM Real-Time Supply (MWh)				Year-to-Year Change			
	Generation		Generation Plus Imports		Generation		Generation Plus Imports	
	Generation	Standard Deviation	Supply	Standard Deviation	Generation	Standard Deviation	Supply	Standard Deviation
2000	30,989	5,216	33,855	5,966	NA	NA	NA	NA
2001	30,304	5,216	33,299	5,571	(2.2%)	0.0%	(1.6%)	(6.6%)
2002	34,467	8,217	38,207	8,540	13.7%	57.5%	14.7%	53.3%
2003	37,211	6,556	40,815	6,526	8.0%	(20.2%)	6.8%	(23.6%)
2004	45,888	11,035	49,990	11,185	23.3%	68.3%	22.5%	71.4%
2005	81,095	16,710	86,330	17,216	76.7%	51.4%	72.7%	53.9%
2006	84,260	14,696	88,621	15,399	3.9%	(12.1%)	2.7%	(10.5%)
2007	87,297	14,853	91,647	15,668	3.6%	1.1%	3.4%	1.7%
2008	85,241	14,203	90,621	14,646	(2.4%)	(4.4%)	(1.1%)	(6.5%)
2009	78,850	14,242	83,986	14,728	(7.5%)	0.3%	(7.3%)	0.6%
2010	84,086	16,346	88,876	17,001	6.6%	14.8%	5.8%	15.4%
2011	86,966	17,369	91,746	18,276	3.4%	6.3%	3.2%	7.5%
2012	90,367	16,893	95,726	17,810	3.9%	(2.7%)	4.3%	(2.5%)
2013	90,432	15,792	95,639	16,729	0.1%	(6.5%)	(0.1%)	(6.1%)
2014	92,449	16,002	97,922	17,064	2.2%	1.3%	2.4%	2.0%
2015	91,901	16,711	97,896	17,863	(0.6%)	4.4%	(0.0%)	4.7%
2016	92,799	19,003	96,907	19,067	1.0%	13.7%	(1.0%)	6.7%
2017	91,658	15,964	93,322	16,230	(1.2%)	(16.0%)	(3.7%)	(14.9%)

²⁸ The import data in this table is not available before June 1, 2000. The data that includes imports in 2000 is calculated from the last six months of that year.

PJM Real-Time, Monthly Average Generation

Figure 3-10 compares the real-time, monthly average hourly generation in 2016 and the first nine months of 2017.

Figure 3-10 PJM real-time average monthly hourly generation: January 1, 2016 through September 30, 2017



Day-Ahead Supply

PJM average day-ahead cleared supply in the first nine months of 2017, including INCs and up to congestion transactions, increased by 0.2 percent from the first nine months of 2016, from 133,089 MW to 133,377 MW.

PJM average day-ahead cleared supply in the first nine months of 2017, including INCs, up to congestion transactions, and imports, decreased by 0.9 percent from the first nine months of 2016, from 134,881 MW to 133,695 MW.

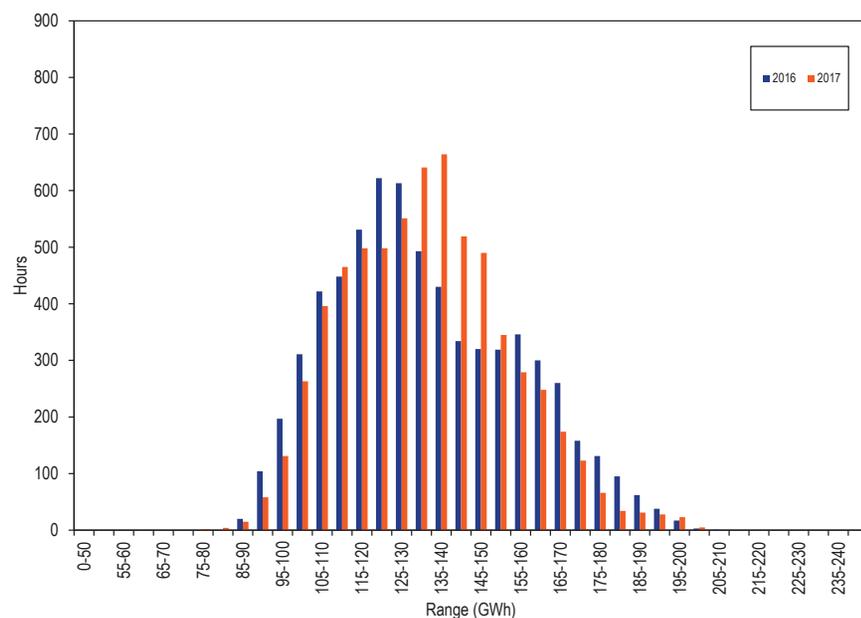
In the PJM Day-Ahead Energy Market, there are five types of financially binding supply offers:

- **Self Scheduled Generation Offer.** Offer to supply a fixed block of MWh, as a price taker, from a unit that may also have a dispatchable component above the minimum.
- **Dispatchable Generation Offer.** Offer to supply a schedule of MWh and corresponding offer prices from a unit.
- **Increment Offer (INC).** Financial offer to supply MWh and corresponding offer prices. INCs can be submitted by any market participant.
- **Up to Congestion Transaction (UTC).** Conditional transaction that permits a market participant to specify a maximum price spread between the transaction source and sink. An up to congestion transaction is evaluated as a matched pair of an injection and a withdrawal analogous to a matched pair of an INC offer and a DEC bid.
- **Import.** An import is an external energy transaction scheduled to PJM from another balancing authority. An import must have a valid willing to pay congestion (WPC) OASIS reservation when offered. An import energy transaction that clears the Day-Ahead Energy Market is financially binding. There is no link between transactions submitted in the PJM Day-Ahead Energy Market and the PJM Real-Time Energy Market, so an import energy transaction approved in the Day-Ahead Energy Market will not physically flow in real time unless it is also submitted through the real-time energy market scheduling process.

PJM Day-Ahead Supply Duration

Figure 3-11 shows the hourly distribution of PJM day-ahead supply, including increment offers, up to congestion transactions, and imports for the first nine months of 2016 and 2017.

Figure 3-11 Distribution of PJM day-ahead supply plus imports: January 1 through September 30, 2016 and 2017²⁹



²⁹ Each range on the horizontal axis excludes the start value and includes the end value.

PJM Day-Ahead, Average Supply

Table 3-14 presents summary day-ahead supply statistics for the first nine months of each year for the 18-year period from 2000 through 2017.³⁰

Table 3-14 PJM day-ahead average hourly supply and day-ahead average hourly supply plus average hourly imports: January 1 through September 30, 2000 through 2017

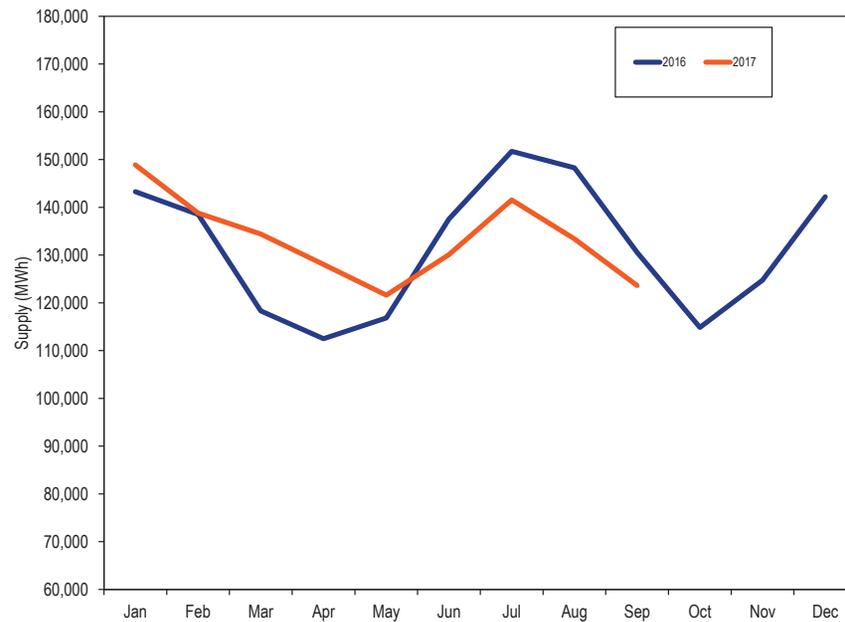
Jan-Sep	PJM Day-Ahead Supply (MWh)				Year-to-Year Change			
	Supply		Supply Plus Imports		Supply		Supply Plus Imports	
	Supply	Standard Deviation	Supply	Standard Deviation	Supply	Standard Deviation	Supply	Standard Deviation
2000	27,853	5,340	28,233	5,395	NA	NA	NA	NA
2001	27,519	4,839	28,279	4,911	(1.2%)	(9.4%)	0.2%	(9.0%)
2002	30,080	10,982	30,629	10,992	9.3%	126.9%	8.3%	123.8%
2003	40,024	9,079	40,556	9,066	33.1%	(17.3%)	32.4%	(17.5%)
2004	56,103	13,380	56,799	13,349	40.2%	47.4%	40.0%	47.2%
2005	94,437	18,671	96,315	18,963	68.3%	39.5%	69.6%	42.1%
2006	100,888	18,061	103,029	18,071	6.8%	(3.3%)	7.0%	(4.7%)
2007	110,300	17,561	112,575	17,752	9.3%	(2.8%)	9.3%	(1.8%)
2008	107,367	16,601	109,811	16,717	(2.7%)	(5.5%)	(2.5%)	(5.8%)
2009	98,527	17,462	101,123	17,526	(8.2%)	5.2%	(7.9%)	4.8%
2010	108,309	23,295	111,059	23,464	9.9%	33.4%	9.8%	33.9%
2011	116,988	22,722	119,488	23,015	8.0%	(2.5%)	7.6%	(1.9%)
2012	135,213	18,553	137,670	18,788	15.6%	(18.3%)	15.2%	(18.4%)
2013	148,489	18,858	150,785	19,073	9.8%	1.6%	9.5%	1.5%
2014	161,137	23,922	163,431	24,080	8.5%	26.9%	8.4%	26.2%
2015	116,975	20,289	119,349	20,502	(27.4%)	(15.2%)	(27.0%)	(14.9%)
2016	133,089	23,414	134,881	23,403	13.8%	15.4%	13.0%	14.1%
2017	133,377	20,602	133,695	20,616	0.2%	(12.0%)	(0.9%)	(11.9%)

³⁰ Since the Day-Ahead Energy Market did not start until June 1, 2000, the day-ahead data for 2000 only includes data for the last six months of that year.

PJM Day-Ahead, Monthly Average Supply

Figure 3-12 compares the day-ahead, monthly average hourly supply, including increment offers and up to congestion transactions, for 2016 and the first nine months of 2017.

Figure 3-12 PJM day-ahead monthly average hourly supply: January 1, 2016 through September 30, 2017



Real-Time and Day-Ahead Supply

Table 3-15 presents summary statistics for the first nine months of 2016 and 2017, for day-ahead and real-time supply. All data are cleared MW. The last two columns of Table 3-15 are the day-ahead supply minus the real-time supply. The first of these columns is the total day-ahead supply less the total real-time supply and the second of these columns is the total physical day-ahead generation less the total physical real-time generation. In the first nine months of 2017, up to congestion transactions were 27.3 percent of the total day-ahead supply compared to 25.5 percent in the first nine months of 2016.

Table 3-15 Day-ahead and real-time supply (MW): January 1 through September 30, 2016 and 2017

	(Jan-Sep)	Day-Ahead				Total Supply	Real-Time		Day-Ahead Less Real-Time	
		Generation	INC Offers	Up to Congestion	Imports		Generation	Total Supply	Total Supply	Total Generation
Average	2016	93,714	5,171	34,201	840	133,930	92,799	95,499	38,430	915
	2017	92,035	4,876	36,467	318	133,695	91,658	93,322	40,373	377
Median	2016	90,172	5,027	33,655	869	130,152	89,013	91,578	38,574	1,159
	2017	90,180	4,844	36,007	275	133,173	89,480	91,067	42,106	700
Standard Deviation	2016	19,435	1,054	6,936	795	23,325	19,003	18,525	4,800	432
	2017	16,644	1,498	8,567	207	20,616	15,964	16,230	4,386	680
Peak Average	2016	104,030	5,281	36,337	886	146,546	101,857	104,842	41,705	2,173
	2017	101,701	5,265	38,806	281	146,053	100,621	102,436	43,616	1,080
Peak Median	2016	102,122	5,146	35,655	859	145,102	98,442	102,414	42,688	3,680
	2017	98,144	5,222	38,446	234	143,967	96,861	99,062	44,905	1,283
Peak Standard Deviation	2016	17,542	1,019	6,660	871	20,911	18,233	17,137	3,774	(691)
	2017	14,088	1,475	8,356	204	16,641	14,170	14,374	2,267	(82)
Off-Peak Average	2016	84,307	5,071	32,254	799	122,425	84,539	86,980	35,445	(232)
	2017	83,245	4,522	34,339	351	122,458	83,506	85,034	37,424	(262)
Off-Peak Median	2016	81,898	4,903	31,398	874	119,175	81,922	84,714	34,461	(24)
	2017	81,136	4,510	33,531	314	119,843	81,253	82,654	37,189	(118)
Off-Peak Standard Deviation	2016	16,002	1,075	6,602	717	19,077	15,630	15,368	3,709	372
	2017	13,647	1,429	8,196	204	17,165	12,826	13,072	4,093	820

Figure 3-13 shows the average hourly cleared volumes of day-ahead supply and real-time supply for the first nine months of 2017. The day-ahead supply consists of cleared MW of day-ahead generation, imports, increment offers and up to congestion transactions. The real-time generation includes generation and imports.

Figure 3-13 Day-ahead and real-time supply (Average hourly volumes): January 1 through September 30, 2017

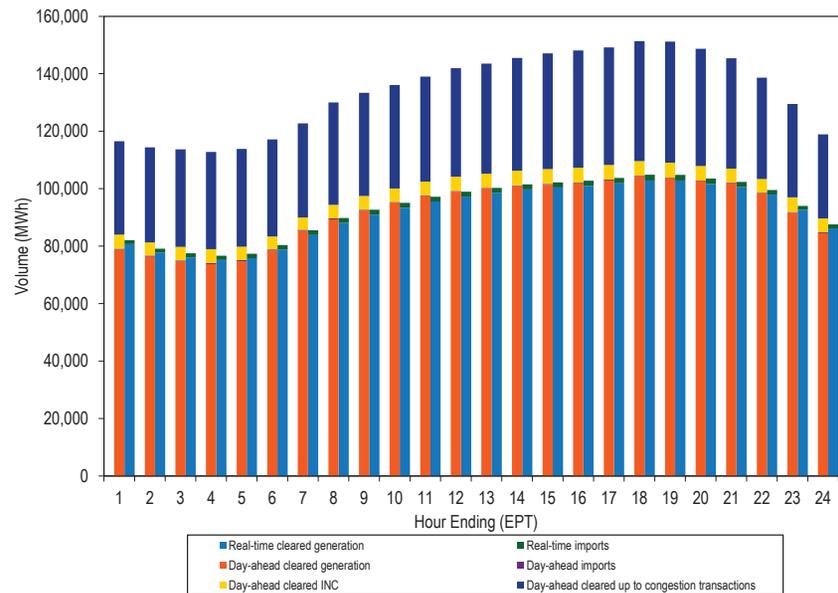


Figure 3-14 shows the difference between the day-ahead and real-time average daily supply for 2016 and the first nine months of 2017.

Figure 3-14 Difference between day-ahead and real-time supply (Average daily volumes): January 1, 2016 through September 30, 2017

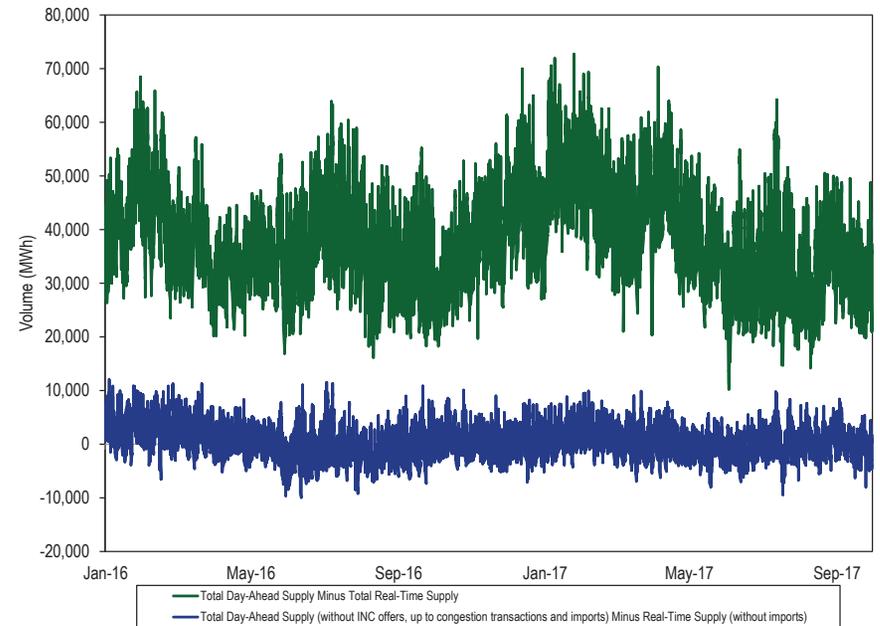


Figure 3-15 shows the difference between the PJM real-time generation and real-time load by zone in the first nine months of 2017. Figure 3-15 is color coded using a scale on which red shades represent zones that have less generation than load and green shades represent zones that have more generation than load, with darker shades meaning greater amounts of net generation or load. For example, the Pepco Control Zone has less generation than load, while the PENELEC Control Zone has more generation than load. Table 3-16 shows the difference between the PJM real-time generation and real-time load by zone in the first nine months of 2016 and 2017.

Figure 3-15 Map of PJM real-time generation, less real-time load, by zone: January 1 through September 30, 2017³¹

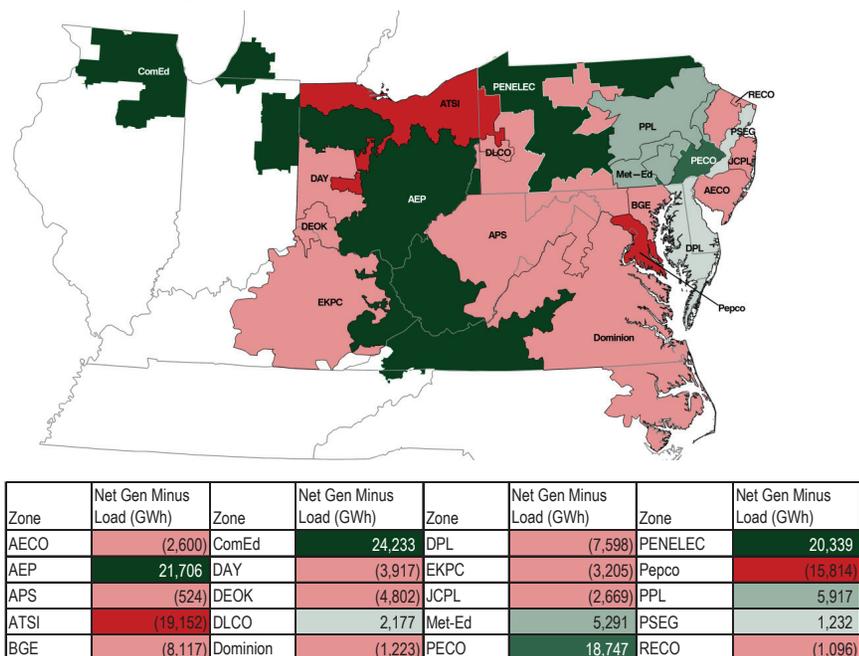


Table 3-16 PJM real-time generation less real-time load by zone (GWh): January 1 through September 30, 2016 and 2017

Zone	2016			2017		
	Generation	Load	Net	Generation	Load	Net
AECO	5,195.8	7,936.3	(2,740.5)	4,899.3	7,499.2	(2,599.9)
AEP	107,334.2	96,377.8	10,956.4	114,158.4	92,452.2	21,706.2
APS	35,689.9	36,411.3	(721.4)	34,647.6	35,171.9	(524.3)
ATSI	32,444.5	51,198.8	(18,754.3)	30,025.8	49,178.0	(19,152.2)
BGE	16,707.9	24,265.5	(7,557.6)	14,772.8	22,889.4	(8,116.6)
ComEd	96,426.6	75,186.5	21,240.1	95,716.8	71,484.1	24,232.7
DAY	11,558.1	13,185.0	(1,626.8)	8,697.8	12,614.6	(3,916.7)
DEOK	11,615.0	20,945.1	(9,330.1)	15,071.4	19,873.9	(4,802.5)
DLCO	13,229.8	10,672.7	2,557.0	12,320.7	10,143.4	2,177.2
Dominion	75,782.2	73,832.2	1,950.0	70,692.7	71,915.3	(1,222.7)
DPL	6,769.1	14,031.5	(7,262.4)	5,847.9	13,446.0	(7,598.1)
EKPC	7,690.8	9,550.0	(1,859.2)	5,822.5	9,027.8	(3,205.3)
JCPL	13,594.9	17,705.2	(4,110.3)	14,184.4	16,853.2	(2,668.9)
Met-Ed	17,425.0	11,618.3	5,806.8	16,578.8	11,288.2	5,290.6
PECO	49,379.9	30,884.9	18,494.9	48,514.8	29,768.2	18,746.6
PENELEC	27,295.5	12,697.9	14,597.7	32,814.0	12,474.7	20,339.4
Pepco	8,531.3	23,478.2	(14,946.9)	6,383.8	22,198.1	(15,814.3)
PPL	38,342.7	30,561.7	7,781.0	35,461.3	29,544.3	5,916.9
PSEG	35,140.4	33,845.3	1,295.2	33,838.1	32,605.8	1,232.3
RECO	0.0	1,154.3	(1,154.3)	0.0	1,095.6	(1,095.6)

Demand

Demand includes physical load and exports and virtual transactions.

Peak Demand

In this section, demand refers to accounting load and exports and in the Day-Ahead Energy Market also includes virtual transactions.³²

The PJM system real-time peak load in the first nine months of 2017 was 145,635.9 MW in the HE 1800 on July 19, 2017, which was 6,541 MW, or 4.3 percent, lower than the peak load in the first nine months of 2016, which was 152,176.9 MW in the HE 1600 on August 11, 2016.

³² PJM reports peak load including accounting load plus an addback equal to PJM's estimated load drop from demand side resources. This will generally result in PJM reporting peak load values greater than accounting load values. PJM's load drop estimate is based PJM Manual 19: Load Forecasting and Analysis Attachment A: Load Drop Estimate Guidelines at <<http://www.pjm.com/~media/documents/manuals/m19.ashx>>.

³¹ Zonal real-time generation data for the map and corresponding table is based on the zonal designation for every bus listed in the most current PJM LMP bus model, which can be found at <<http://www.pjm.com/markets-and-operations/energy/lmp-model-info.aspx>>.

Table 3-17 shows the peak loads for the first nine months of 1999 through 2017.

Table 3-17 Actual PJM footprint peak loads: January through September, 1999 to 2017³³

(Jan – Sep)	Date	Hour Ending (EPT)	PJM Load (MW)	Annual Change (MW)	Annual Change (%)
1999	Fri, July 30	17	120,227	NA	NA
2000	Wed, August 09	17	114,036	(6,191)	(5.1%)
2001	Wed, August 08	17	128,535	14,499	12.7%
2002	Thu, August 01	17	130,159	1,625	1.3%
2003	Thu, August 21	17	126,259	(3,900)	(3.0%)
2004	Wed, June 09	17	120,218	(6,041)	(4.8%)
2005	Tue, July 26	16	133,761	13,543	11.3%
2006	Wed, August 02	17	144,644	10,883	8.1%
2007	Wed, August 08	16	139,428	(5,216)	(3.6%)
2008	Mon, June 09	17	130,100	(9,328)	(6.7%)
2009	Mon, August 10	17	126,798	(3,302)	(2.5%)
2010	Tue, July 06	17	136,460	9,662	7.6%
2011	Thu, July 21	17	158,016	21,556	15.8%
2012	Tue, July 17	17	154,344	(3,672)	(2.3%)
2013	Thu, July 18	17	157,508	3,165	2.1%
2014	Tue, June 17	17	141,673	(15,835)	(10.1%)
2015	Tue, July 28	17	143,697	2,023	1.4%
2016	Thu, August 11	16	152,177	8,480	5.9%
2017	Wed, July 19	18	145,636	(6,541)	(4.3%)

Figure 3-16 shows the peak loads for the first nine months of 1999 through 2017.

Figure 3-16 PJM footprint calendar year peak loads: January 1 through September 30, 1999 to 2017

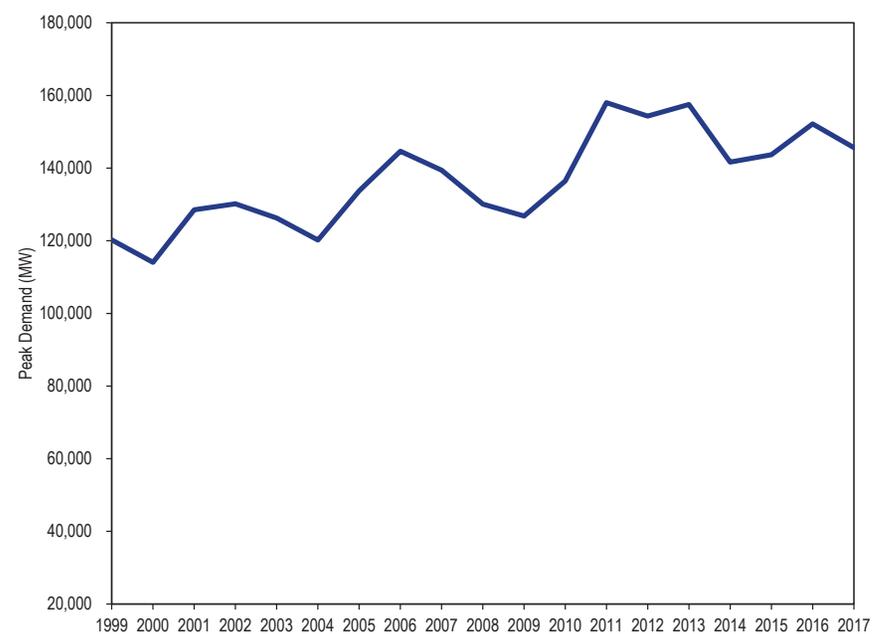
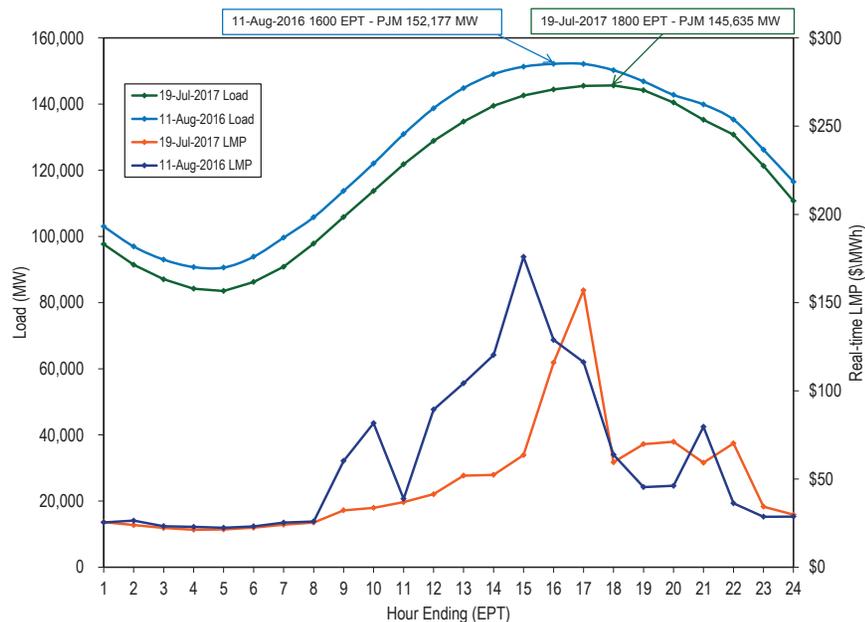


Figure 3-17 compares the peak load days during the first nine months of 2016 and 2017. The average real-time LMP for the July 19, 2017 peak load hour was \$59.49 and for the August 11, 2016 peak load hour was \$128.83.

³³ Peak loads shown are Power accounting load. See the *MMU Technical Reference for the PJM Markets*, at "Load Definitions" for detailed definitions of load. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

Figure 3-17 PJM peak-load comparison Thursday, August 11, 2016 and Wednesday, July 19, 201



Real-Time Demand

PJM average real-time load in the first nine months of 2017 decreased by 3.7 percent from the first nine months of 2016, from 90,599 MW to 87,243 MW.³⁴

PJM average real-time demand including export, in the first nine months of 2017 decreased by 3.9 percent from the first nine months of 2016, from 95,340 MW to 91,616 MW.

In the PJM Real-Time Energy Market, there are two types of demand:

- Load. The actual MWh level of energy used by load within PJM.
- Export. An export is an external energy transaction scheduled from PJM to another balancing authority. A real-time export must have a valid

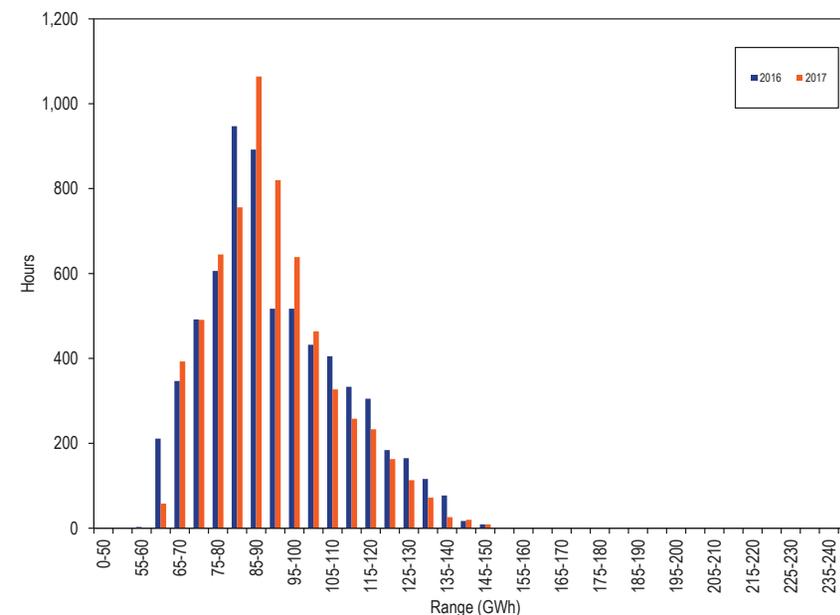
³⁴ Load data are the net MWh injections and withdrawals MWh at every load bus in PJM.

OASIS reservation when offered, must have available ramp room to support the export, must be accompanied by a NERC Tag, and must pass the neighboring balancing authority checkout process.

PJM Real-Time Demand Duration

Figure 3-18 shows the hourly distribution of PJM real-time load plus exports for the first nine months of 2016 and 2017.³⁵

Figure 3-18 Distribution of PJM real-time accounting load plus exports: January 1 through September 30, 2016 and 2017³⁶



³⁵ All real-time load data in Section 3, "Energy Market," "Market Performance: Load and LMP," are based on PJM accounting load. See the *Technical Reference for PJM Markets*, "Load Definitions," for detailed definitions of accounting load. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

³⁶ Each range on the horizontal axis excludes the start value and includes the end value.

PJM Real-Time, Average Load

Table 3-18 presents summary real-time demand statistics for the first nine months of 1998 to 2017. Before June 1, 2007, transmission losses were included in accounting load. After June 1, 2007, transmission losses were excluded from accounting load and losses were addressed through marginal loss pricing.³⁷

Table 3-18 PJM real-time average hourly load and real-time average hourly load plus average hourly exports: January 1 through September 30, 1998 through 2017³⁸

Jan-Sep	PJM Real-Time Demand (MWh)				Year-to-Year Change			
	Load		Load Plus Exports		Load		Load Plus Exports	
	Load	Standard Deviation	Demand	Standard Deviation	Load	Standard Deviation	Demand	Standard Deviation
1998	29,112	5,780	29,112	5,780	NA	NA	NA	NA
1999	30,236	6,306	30,236	6,306	3.9%	9.1%	3.9%	9.1%
2000	30,266	5,765	31,060	5,977	0.1%	(8.6%)	2.7%	(5.2%)
2001	31,060	6,156	32,900	5,861	2.6%	6.8%	5.9%	(2.0%)
2002	35,715	8,688	37,367	8,878	15.0%	41.1%	13.6%	51.5%
2003	37,996	7,187	39,965	7,120	6.4%	(17.3%)	7.0%	(19.8%)
2004	45,294	10,512	49,176	11,556	19.2%	46.3%	23.0%	62.3%
2005	78,235	17,541	85,295	17,794	72.7%	66.9%	73.4%	54.0%
2006	80,717	15,568	87,326	16,147	3.2%	(11.2%)	2.4%	(9.3%)
2007	83,114	15,386	89,390	16,008	3.0%	(1.2%)	2.4%	(0.9%)
2008	80,611	14,389	87,788	14,893	(3.0%)	(6.5%)	(1.8%)	(7.0%)
2009	76,954	13,879	82,118	14,360	(4.5%)	(3.5%)	(6.5%)	(3.6%)
2010	81,068	16,209	86,994	16,687	5.3%	16.8%	5.9%	16.2%
2011	83,762	17,604	89,628	17,799	3.3%	8.6%	3.0%	6.7%
2012	88,687	17,431	93,763	17,329	5.9%	(1.0%)	4.6%	(2.6%)
2013	89,123	16,384	93,647	16,254	0.5%	(6.0%)	(0.1%)	(6.2%)
2014	90,567	16,662	96,015	16,518	1.6%	1.7%	2.5%	1.6%
2015	91,857	17,211	96,102	17,300	1.4%	3.3%	0.1%	4.7%
2016	90,599	18,183	95,340	18,571	(1.4%)	5.6%	(0.8%)	7.3%
2017	87,243	16,008	91,616	15,811	(3.7%)	(12.0%)	(3.9%)	(14.9%)

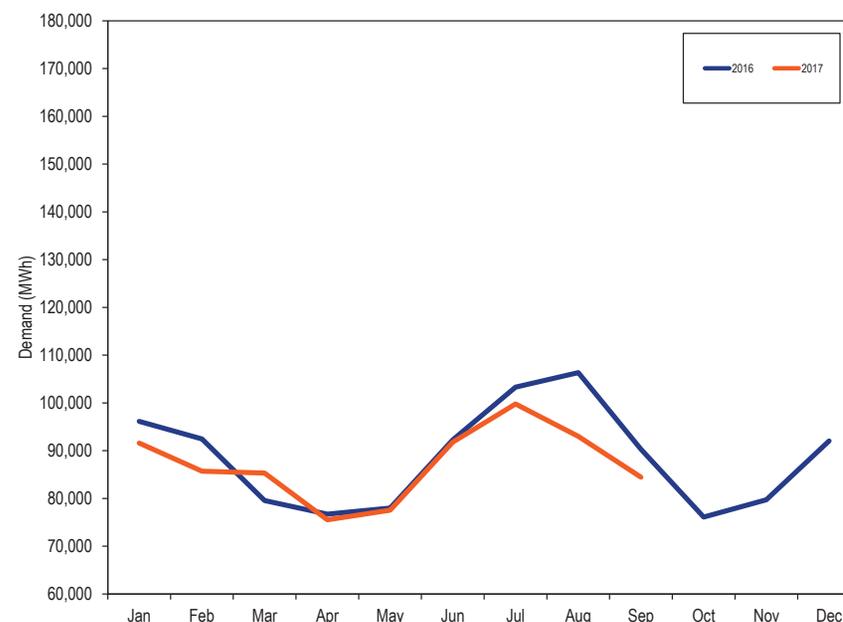
³⁷ Accounting load is used here because PJM uses accounting load in the settlement process, which determines how much load customers pay for. In addition, the use of accounting load with losses before June 1, and without losses after June 1, 2007, is consistent with PJM's calculation of LMP, which excluded losses prior to June 1 and includes losses after June 1.

³⁸ Export data are not available before June 1, 2000. The export data for 2000 are for the last six months of 2000.

PJM Real-Time, Monthly Average Load

Figure 3-19 compares the real-time, monthly average hourly loads for 2016 and the first nine months of 2017.

Figure 3-19 PJM real-time monthly average hourly load: January 1, 2016 through September 30, 2017



PJM real-time load is significantly affected by temperature. Figure 3-20 and Table 3-19 compare the PJM monthly heating and cooling degree days in 2016 and the first nine months of 2017.³⁹ Heating degree days decreased 16.3 percent from the first nine months of 2016 to 2017.

³⁹ A heating degree day is defined as the number of degrees that a day's average temperature is below 65 degrees F (the temperature below which buildings need to be heated). A cooling degree day is the number of degrees that a day's average temperature is above 65 degrees F (the temperature when people will start to use air conditioning to cool buildings). PJM uses 60 degrees F for a heating degree day as stated in Manual 19.

Heating and cooling degree days are calculated by weighting the temperature at each weather station in the individual transmission zones using weights provided by PJM in Manual 19. Then the temperature is weighted by the real-time zonal accounting load for each transmission zone. After calculating an average hourly temperature across PJM, the heating and cooling degree formulas are used to calculate the daily heating and cooling degree days, which are summed for monthly reporting. The weather stations that provided the

Figure 3-20 PJM heating and cooling degree days: January 1, 2016 through September 30, 2017

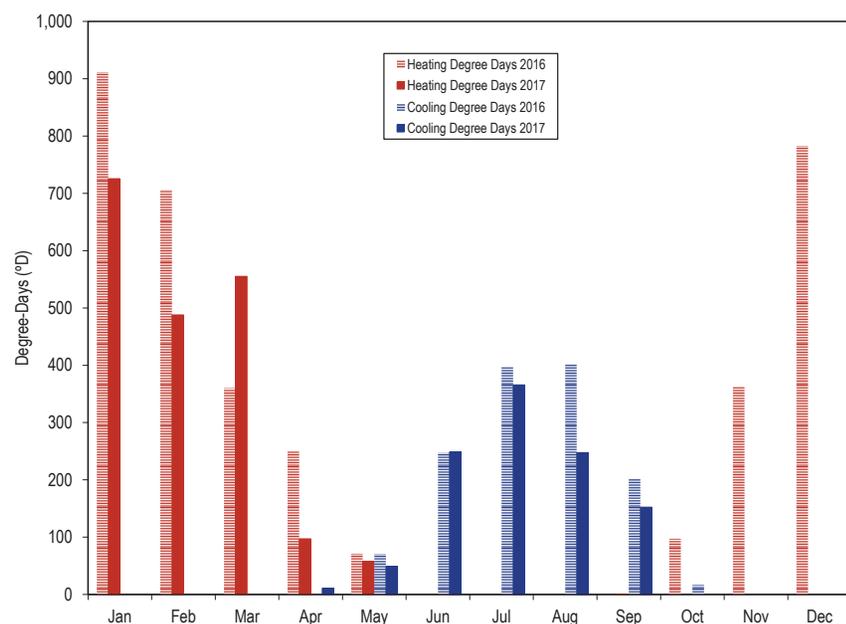


Table 3-19 PJM heating and cooling degree days: January 2016 through September, 2017

	2016		2017		Percent Change	
	Heating Degree Days	Cooling Degree Days	Heating Degree Days	Cooling Degree Days	Heating Degree Days	Cooling Degree Days
Jan	911	0	725	0	(20.4%)	0.00%
Feb	706	0	488	0	(30.9%)	0.00%
Mar	360	0	555	0	54.1%	0.00%
Apr	250	1	97	11	(61.0%)	1,375.86%
May	71	71	58	49	(18.9%)	(30.64%)
Jun	0	247	0	249	0.0%	0.59%
Jul	0	397	0	366	0.0%	(7.95%)
Aug	0	402	0	248	0.0%	(38.32%)
Sep	0	203	1	152	0.0%	(24.83%)
Oct	98	17				
Nov	363	0				
Dec	782	0				
Jan-Sep	2,298	1,320	1,924	1,074	(16.3%)	(18.62%)

Day-Ahead Demand

PJM average day-ahead demand in the first nine months of 2017, including DECs and up to congestion transactions, decreased by 0.5 percent from the first nine months of 2016, from 129,070 MW to 128,450 MW.

PJM average day-ahead demand in the first nine months of 2017, including DECs, up to congestion transactions, and exports, decreased by 1.0 percent from the first nine months of 2016, from 132,607 MW to 131,264 MW.

The reduction in up to congestion transactions (UTC) that had followed a FERC order setting September 8, 2014, as the effective date for any uplift charges subsequently assigned to UTCs, was reversed. There was an increase in up to congestion volume as a result of the expiration of the 15 month refund period for the proceeding related to uplift charges for UTC transactions.⁴⁰

basis for the analysis are ABE, ACY, AVP, BWI, CAK, CLE, CMH, CRW, CVG, DAY, DCA, ERI, EWR, FWA, IAD, ILG, IPT, LEX, ORD, ORF, PHL, PIT, RIC, ROA, TOL and WAL.

40 148 FERC ¶ 61,144 (2014).

In the PJM Day-Ahead Energy Market, five types of financially binding demand bids are made and cleared:

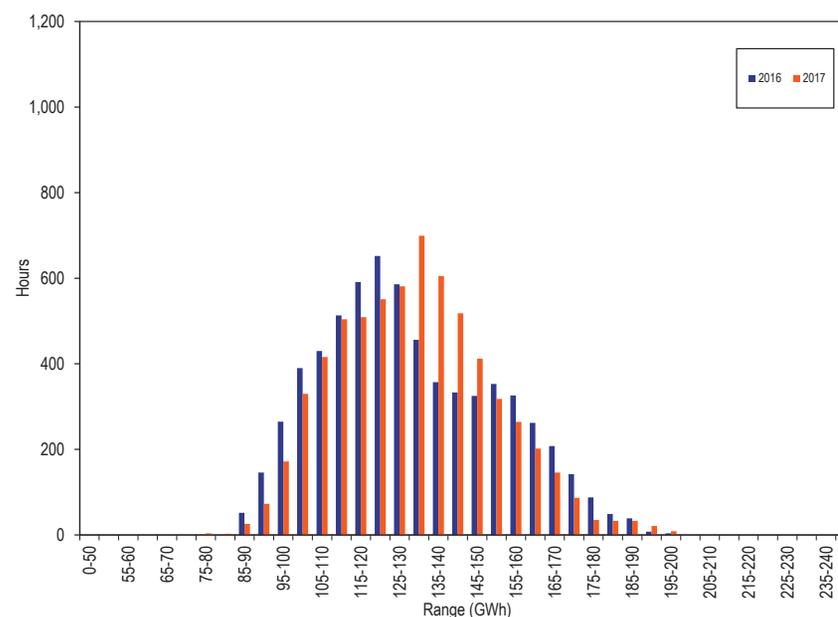
- **Fixed-Demand Bid.** Bid to purchase a defined MWh level of energy, regardless of LMP.
- **Price-Sensitive Bid.** Bid to purchase a defined MWh level of energy only up to a specified LMP, above which the load bid is zero.
- **Decrement Bid (DEC).** Financial bid to purchase a defined MWh level of energy up to a specified LMP, above which the bid is zero. A DEC can be submitted by any market participant.
- **Up to Congestion Transaction (UTC).** A conditional transaction that permits a market participant to specify a maximum price spread between the transaction source and sink. An up to congestion transaction is evaluated as a matched pair of an injection and a withdrawal analogous to a matched pair of an INC offer and a DEC bid.
- **Export.** An external energy transaction scheduled from PJM to another balancing authority. An export must have a valid willing to pay congestion (WPC) OASIS reservation when offered. An export energy transaction that clears the Day-Ahead Energy Market is financially binding. There is no link between transactions submitted in the PJM Day-Ahead Energy Market and the PJM Real-Time Energy Market, so an export energy transaction approved in the Day-Ahead Energy Market will not physically flow in real time unless it is also submitted through the Real-Time Energy Market scheduling process.

PJM day-ahead demand is the hourly total of the five types of cleared demand bids.

PJM Day-Ahead Demand Duration

Figure 3-21 shows the hourly distribution of PJM day-ahead demand, including decrement bids, up to congestion transactions, and exports for the first nine months of 2016 and 2017.

Figure 3-21 Distribution of PJM day-ahead demand plus exports: January 1 through September 30, 2016 and 2017⁴¹



⁴¹ Each range on the horizontal axis excludes the start value and includes the end value.

PJM Day-Ahead, Average Demand

Table 3-20 presents summary day-ahead demand statistics for the first nine months of each year from 2000 to 2017.⁴²

Table 3-20 PJM day-ahead average demand and day-ahead average hourly demand plus average hourly exports: January 1 through September 30, 2000 through 2017

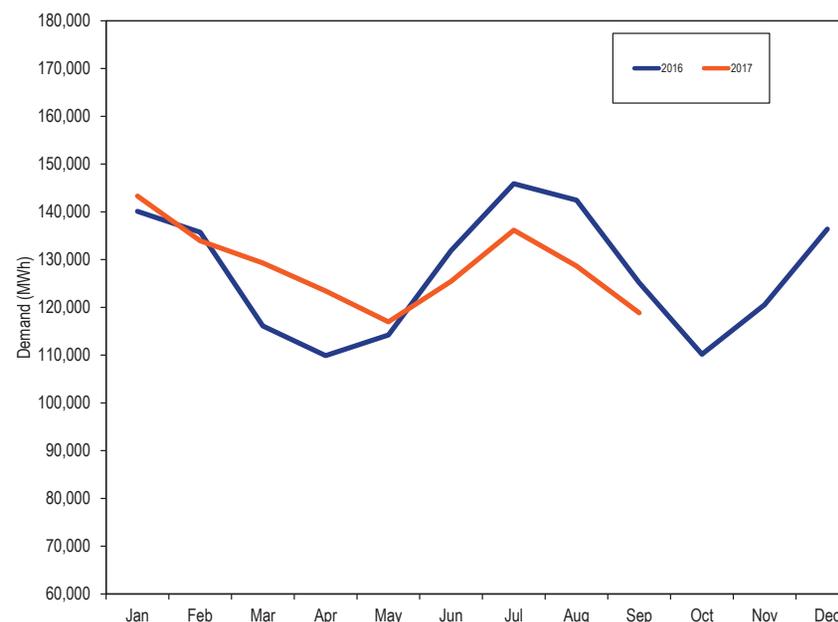
Jan-Sep	PJM Day-Ahead Demand (MWh)				Year-to-Year Change			
	Demand		Demand Plus Exports		Demand		Demand Plus Exports	
	Demand	Standard Deviation	Demand	Standard Deviation	Demand	Standard Deviation	Demand	Standard Deviation
2000	34,064	7,649	34,268	7,553	NA	NA	NA	NA
2001	33,944	7,016	34,444	6,817	(0.4%)	(8.3%)	0.5%	(9.7%)
2002	41,634	11,073	41,726	11,120	22.7%	57.8%	21.1%	63.1%
2003	45,371	8,377	45,477	8,354	9.0%	(24.4%)	9.0%	(24.9%)
2004	55,830	13,319	56,558	13,753	23.1%	59.0%	24.4%	64.6%
2005	93,525	19,126	96,302	19,455	67.5%	43.6%	70.3%	41.5%
2006	99,403	18,165	102,520	18,687	6.3%	(5.0%)	6.5%	(3.9%)
2007	107,295	17,580	110,711	17,949	7.9%	(3.2%)	8.0%	(4.0%)
2008	103,586	16,618	107,169	16,810	(3.5%)	(5.5%)	(3.2%)	(6.3%)
2009	96,020	16,995	99,084	17,117	(7.3%)	2.3%	(7.5%)	1.8%
2010	105,018	22,972	109,113	23,286	9.4%	35.2%	10.1%	36.0%
2011	113,724	22,444	117,533	22,651	8.3%	(2.3%)	7.7%	(2.7%)
2012	132,494	18,115	135,840	18,235	16.5%	(19.3%)	15.6%	(19.5%)
2013	145,139	18,667	148,444	18,696	9.5%	3.1%	9.3%	2.5%
2014	156,542	23,584	160,425	23,533	7.9%	26.3%	8.1%	25.9%
2015	113,553	19,788	117,090	19,951	(27.5%)	(16.1%)	(27.0%)	(15.2%)
2016	129,070	22,508	132,607	22,817	13.7%	13.7%	13.3%	14.4%
2017	128,450	20,002	131,264	20,067	(0.5%)	(11.1%)	(1.0%)	(12.1%)

⁴² Since the Day-Ahead Energy Market did not start until June 1, 2000, the day-ahead data for 2000 only includes data for the last six months of that year.

PJM Day-Ahead, Monthly Average Demand

Figure 3-22 compares the day-ahead, monthly average hourly demand, including decrement bids and up to congestion transactions in 2016 and the first nine months of 2017

Figure 3-22 PJM day-ahead monthly average hourly demand: January 1, 2016 through September 30, 2017



Real-Time and Day-Ahead Demand

Table 3-21 presents summary statistics for the first nine months of 2016 and 2017 day-ahead and real-time demand. All data are cleared MW. The last two columns of Table 3-21 are the day-ahead demand minus the real-time demand. The first such column is the total day-ahead demand less the total real-time demand and the second such column is the total physical day-ahead load (fixed demand plus price-sensitive demand) less the physical real-time load.

Table 3-21 Cleared day-ahead and real-time demand (MWh): January 1 through September 30, 2016 and 2017

	Year	Day-Ahead					Real-Time		Day-Ahead Less Real-Time		
		Fixed Demand	Price Sensitive	DEC Bids	Up-to Congestion	Exports	Total Demand	Total Load	Total Demand	Total Load	
Average	2016	86,989	3,134	4,743	34,201	1,404	130,474	90,599	92,568	37,906	52,693
	2017	84,661	2,925	4,397	36,467	2,814	131,264	87,243	91,616	39,644	47,595
Median	2016	83,781	3,122	4,494	33,655	1,457	127,047	86,646	88,703	38,344	48,302
	2017	82,853	2,901	4,383	36,007	2,694	130,754	85,019	89,413	41,341	43,678
Standard Deviation	2016	16,989	412	1,422	6,936	1,225	22,408	18,183	17,874	4,535	13,648
	2017	15,347	437	1,282	8,567	913	20,067	16,008	15,811	4,255	11,752
Peak Average	2016	96,483	3,398	5,124	36,337	1,418	142,773	99,962	101,873	40,900	59,063
	2017	93,811	3,202	4,670	38,806	2,848	143,336	96,230	100,517	42,819	53,411
Peak Median	2016	94,579	3,364	4,950	35,655	1,538	141,302	97,178	99,470	41,832	55,345
	2017	91,183	3,137	4,675	38,446	2,723	141,310	93,035	97,213	44,097	48,938
Peak Standard Deviation	2016	15,104	323	1,411	6,660	1,199	19,821	16,657	16,253	3,569	13,088
	2017	13,034	390	1,200	8,356	958	16,196	14,107	13,988	2,208	11,899
Off-Peak Average	2016	78,331	2,893	4,395	32,254	1,392	119,259	82,061	84,083	35,176	46,885
	2017	76,340	2,674	4,148	34,339	2,784	120,286	79,070	83,523	36,763	42,307
Off-Peak Median	2016	76,211	2,843	4,145	31,398	1,399	116,091	79,399	81,454	34,637	44,762
	2017	74,224	2,618	4,023	33,531	2,669	117,808	76,784	81,251	36,557	40,228
Off-Peak Standard Deviation	2016	13,662	329	1,340	6,602	1,248	18,388	15,043	14,799	3,589	11,453
	2017	12,243	307	1,303	8,196	868	16,652	12,965	12,724	3,928	9,037

Figure 3-23 shows the average hourly cleared volumes of day-ahead demand and real-time demand for the first nine months of 2017. The day-ahead demand includes day-ahead load, day-ahead exports, decrement bids and up to congestion transactions. The real-time demand includes real-time load and real-time exports.

Figure 3-23 Day-ahead and real-time demand (Average hourly volumes): January 1 through September 30, 2017

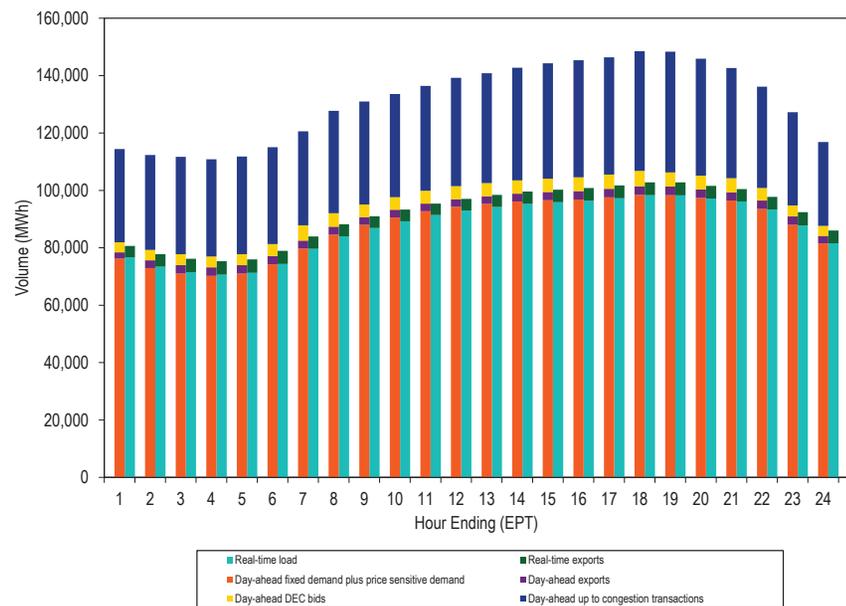
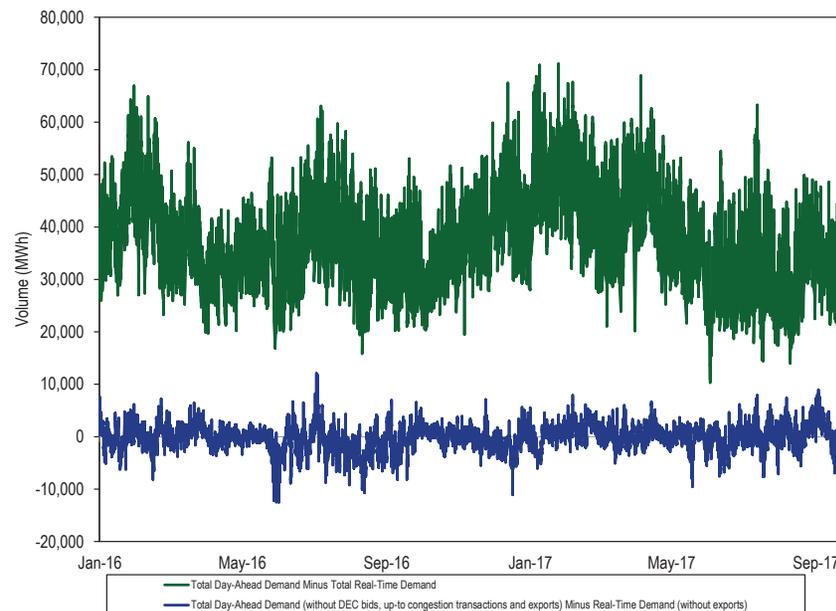


Figure 3-24 shows the difference between the day-ahead and real-time average daily demand from January 2016 through September 2017.

Figure 3-24 Difference between day-ahead and real-time demand (Average daily volumes): January 1, 2016 through September 30, 2017



Supply and Demand: Load and Spot Market

Real-Time Load and Spot Market

Participants in the PJM Real-Time Energy Market can use their own generation to meet load, to sell in the bilateral market or to sell in the spot market in any hour. Participants can both buy and sell via bilateral contracts and buy and sell in the spot market in any hour. If a participant has positive net bilateral transactions in an hour, it is buying energy through bilateral contracts (bilateral purchase). If a participant has negative net bilateral transactions in an hour, it is selling energy through bilateral contracts (bilateral sale). If a participant has positive net spot transactions in an hour, it is buying energy from the spot market (spot purchase). If a participant has negative net spot transactions in an hour, it is selling energy to the spot market (spot sale).

Real-time load is served by a combination of self-supply, bilateral market purchases and spot market purchases. From the perspective of a parent company of a PJM billing organization that serves load, its load could be supplied by any combination of its own generation, net bilateral market purchases and net spot market purchases. In addition to directly serving load, load serving entities can also transfer their responsibility to serve load to other parties through eSchedules transactions referred to as wholesale load responsibility (WLR) or retail load responsibility (RLR) transactions. When the responsibility to serve load is transferred via a bilateral contract, the entity to which the responsibility is transferred becomes the load serving entity. Supply from its own generation (self-supply) means that the parent company is generating power from plants that it owns in order to meet demand. Supply from bilateral purchases means that the parent company is purchasing power under bilateral contracts from a nonaffiliated company at the same time that it is meeting load. Supply from spot market purchases means that the parent company is generating less power from owned plants and/or purchasing less power under bilateral contracts than required to meet load at a defined time and, therefore, is purchasing the required balance from the spot market.

The PJM system's reliance on self-supply, bilateral contracts and spot purchases to meet real-time load is calculated by summing across all the parent companies of PJM billing organizations that serve load in the Real-Time Energy Market for each hour. Table 3-22 shows the monthly average share of real-time load served by self-supply, bilateral contracts and spot purchase in the first nine months of 2016 and 2017 based on parent company. In the first nine months of 2017, 15.5 percent of real-time load was supplied by bilateral contracts, 28.5 percent by spot market purchase and 56.0 percent by self-supply. Compared with the first nine months of 2016, reliance on bilateral contracts increased by 2.6 percentage points, reliance on spot supply increased by 4.6 percentage points and reliance on self-supply decreased by 7.2 percentage points.

Table 3-22 Monthly average percent of real-time self-supply load, bilateral supply load and spot-supply load based on parent companies: January 1 through September 30, 2016 and 2017⁴³

	2016			2017			Difference in Percentage Points		
	Bilateral Contract	Spot	Self-Supply	Bilateral Contract	Spot	Self-Supply	Bilateral Contract	Spot	Self-Supply
Jan	11.1%	25.9%	63.0%	16.5%	25.6%	57.9%	5.4%	(0.3%)	(5.1%)
Feb	11.5%	25.5%	63.0%	17.9%	25.2%	56.9%	6.4%	(0.3%)	(6.1%)
Mar	11.7%	26.4%	61.9%	14.9%	27.2%	57.9%	3.2%	0.8%	(4.0%)
Apr	12.7%	24.0%	63.4%	14.4%	32.4%	53.2%	1.7%	8.4%	(10.1%)
May	12.6%	24.5%	62.9%	14.3%	31.7%	54.0%	1.7%	7.2%	(8.9%)
Jun	12.5%	24.2%	63.2%	13.5%	32.7%	53.8%	1.0%	8.4%	(9.4%)
Jul	12.8%	23.3%	63.9%	17.1%	24.7%	58.3%	4.3%	1.4%	(5.6%)
Aug	12.7%	23.6%	63.7%	17.6%	24.0%	58.5%	4.8%	0.4%	(5.2%)
Sep	12.4%	22.7%	64.9%	16.0%	27.7%	56.4%	3.6%	4.9%	(8.5%)
Jan~Sep	12.9%	23.9%	63.2%	15.5%	28.5%	56.0%	2.6%	4.6%	(7.2%)

Day-Ahead Load and Spot Market

In the PJM Day-Ahead Energy Market, participants can not only use their own generation, bilateral contracts and spot market purchases to supply their load serving obligation, but can also use virtual resources to meet their load serving obligations in any hour. Virtual supply is treated as supply in the day-ahead analysis and virtual demand is treated as demand in the day-ahead analysis.

The PJM system's reliance on self-supply, bilateral contracts, and spot purchases to meet day-ahead demand (cleared fixed-demand, price-sensitive load and decrement bids) is calculated by summing across all the parent companies of PJM billing organizations that serve demand in the Day-Ahead Energy Market for each hour. Table 3-23 shows the monthly average share of day-ahead demand served by self-supply, bilateral contracts and spot purchases in the first nine months of 2016 and 2017, based on parent companies. In the first nine months of 2017, 9.4 percent of day-ahead demand was supplied by bilateral contracts, 22.2 percent by spot market purchases, and 68.4 percent by self-supply. Compared with the first nine months of 2016, reliance on bilateral contracts increased by 0.5 percentage points, reliance on spot supply

⁴³ Table 3-22 and Table 3-23 were calculated as of October 18, 2017. The values may change slightly as billing values are updated by PJM.

decreased by 0.8 percentage points, and reliance on self-supply increased by 0.3 percentage points.

Table 3-23 Monthly average share of day-ahead self-supply demand, bilateral supply demand, and spot-supply demand based on parent companies: January 1 through September 30, 2016 and 2017

	2016			2017			Difference in Percentage Points		
	Bilateral Contract	Spot	Self-Supply	Bilateral Contract	Spot	Self-Supply	Bilateral Contract	Spot	Self-Supply
Jan	8.2%	25.2%	66.6%	10.8%	20.5%	68.7%	2.6%	(4.8%)	2.1%
Feb	8.5%	24.8%	66.7%	11.0%	20.6%	68.4%	2.6%	(4.3%)	1.7%
Mar	7.9%	26.5%	65.6%	9.2%	21.9%	68.9%	1.2%	(4.6%)	3.4%
Apr	9.9%	23.9%	66.2%	8.3%	22.0%	69.6%	(1.6%)	(1.9%)	3.5%
May	9.6%	24.1%	66.3%	7.8%	22.3%	69.9%	(1.8%)	(1.8%)	3.6%
Jun	8.3%	21.9%	69.8%	8.6%	23.6%	67.8%	0.3%	1.7%	(2.0%)
Jul	8.6%	22.3%	69.0%	9.4%	23.2%	67.4%	0.8%	0.9%	(1.7%)
Aug	8.5%	22.3%	69.3%	9.8%	22.9%	67.3%	1.3%	0.7%	(2.0%)
Sep	7.9%	22.2%	70.0%	9.1%	22.8%	68.1%	1.2%	0.6%	(1.9%)
Jan~Sep	8.8%	23.1%	68.1%	9.4%	22.2%	68.4%	0.5%	(0.8%)	0.3%

Market Behavior

Offer Capping for Local Market Power

In the PJM energy market, offer capping occurs as a result of structurally noncompetitive local markets and noncompetitive offers in the Day-Ahead and Real-Time Energy Markets. PJM also uses offer capping for units that are committed for reliability reasons, specifically for providing black start and reactive service as well as for conservative operations. There are no explicit rules governing market structure or the exercise of market power in the aggregate energy market. PJM's market power mitigation goals have focused on market designs that promote competition and that limit local market power mitigation to situations where the local market structure is not competitive and thus where market design alone cannot mitigate market power.

The analysis of the application of the three pivotal supplier test demonstrates that it is working for most hours to exempt owners when the local market structure is competitive and to offer cap owners when the local market structure is noncompetitive. However, there are some issues with the application of

mitigation in the Day-Ahead Energy Market and the Real-Time Energy Market when market sellers fail the TPS test. There is no tariff or manual language that defines in detail the application of the TPS test and offer capping in the Day-Ahead Energy Market and the Real-Time Energy Market.

In both the Day-Ahead and Real-Time Energy Markets, generators have the ability to avoid mitigation by using varying markups in their price-based offers, offering different operating parameters in their price-based and cost-based offers, and using different fuels in their price-based and cost-based offers. These issues can be resolved by simple rule changes.

When an owner fails the TPS test, the units offered by the owner that are committed to provide relief are committed on the cheaper of cost or price-based offers. In the Day-Ahead Energy Market, PJM commits a unit on the schedule that results in the lower overall system production cost. In the Real-Time Energy Market, PJM uses a dispatch cost formula to compare price-based offers and cost-based offers to select the cheaper offer.⁴⁴ Dispatch cost is calculated as:

$$\{(\text{Incremental Energy Offer@EcoMin} \times \text{EcoMin MW}) + \text{No Load Cost}\} \times \text{Min Run Time} + \text{Start Cost}$$

With the ability to submit offer curves with varying markups at different output levels in the price-based offer, units can avoid mitigation by using a low markup at low output levels and a high markup at higher output levels. Figure 3-25 shows an example of offers from a unit that has a negative markup at the economic minimum MW level and a positive markup at the economic maximum MW level. The result would be that a unit that failed the TPS test would be committed on its price-based offer that has a lower dispatch cost, even though the price-based offer is higher than cost-based offer at higher output levels and includes positive markups, inconsistent with the explicit goal of local market power mitigation.

⁴⁴ See PJM OA Schedule 1 § 6.4.1 (g).

Figure 3-25 Offers with varying markups at different MW output levels

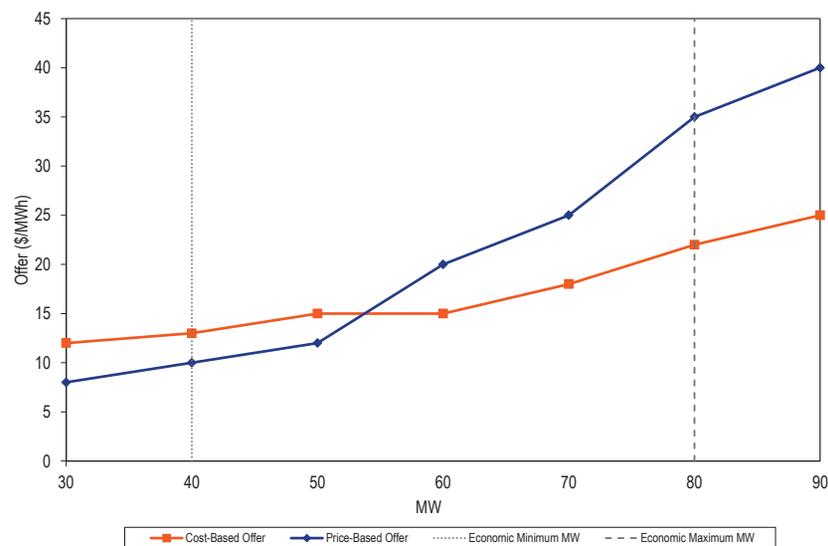


Table 3-24 Units offered with crossing curves in the Day-Ahead and Real-Time Energy Markets: January 1 through September 30, 2017

	Day-Ahead			Real-Time		
	Number of Schedule Hours with Crossing Curves	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Crossing Curves	Number of Schedule Hours with Crossing Curves	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Crossing Curves
2017						
Jan	21,600	803,424	2.7%	19,381	803,424	2.4%
Feb	20,435	729,264	2.8%	19,318	729,264	2.6%
Mar	22,429	806,810	2.8%	20,547	806,810	2.5%
Apr	18,940	792,480	2.4%	17,970	792,480	2.3%
May	18,797	822,552	2.3%	18,168	822,552	2.2%
Jun	19,523	810,240	2.4%	18,606	810,240	2.3%
Jul	25,533	833,568	3.1%	23,352	833,568	2.8%
Aug	18,211	838,248	2.2%	17,798	838,248	2.1%
Sep	21,017	810,048	2.6%	20,343	810,048	2.5%

Table 3-24 shows the number and percent of unit schedule hours, by month, when units offered with crossing curves in the PJM Day-Ahead and Real-Time Energy Markets resulted in the dispatch cost being lower for the price-based offer than the cost-based offer, in the first nine months of 2017. The analysis only includes price-based units because the determination of the cheaper of price-based and cost-based offers is required to be made only if a unit elects to offer both cost-based and price-based offers. Units in PJM are only required to submit cost-based offers, and they may elect to offer price-based offers, but are not required to do so.

Offering a different economic minimum MW level, different minimum run times, different start up and notification times in the cost-based and price-based offers can also be used to avoid mitigation. For example, a unit may offer its price-based offer with a positive markup, but have a shorter minimum run time (MRT) in the price-based offer resulting in a lower dispatch cost for the price-based offer but setting prices at a level that includes a positive markup. Table 3-25 shows the number and percent of unit schedule hours when units offered lower minimum run times in price-based offers than in cost-based offers while having a positive markup that resulted in the dispatch cost being lower for the price-based offer.

Table 3-25 Units offered with lower minimum run time on price compared to cost but with positive markup in the Day-Ahead and Real-Time Energy Markets: January 1 through September 30, 2017

	Day-Ahead			Real-Time		
	Number of Schedule Hours with Lower Min Run Time in Price Compared to Cost	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Lower Min Run Time in Price Compared to Cost	Number of Schedule Hours with Lower Min Run Time in Price Compared to Cost	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Lower Min Run Time in Price Compared to Cost
2017						
Jan	12,346	803,424	1.5%	11,996	803,424	1.5%
Feb	10,356	729,264	1.4%	10,374	729,264	1.4%
Mar	6,831	806,810	0.8%	6,759	806,810	0.8%
Apr	5,757	792,480	0.7%	5,462	792,480	0.7%
May	5,904	822,552	0.7%	5,720	822,552	0.7%
Jun	8,750	810,240	1.1%	8,669	810,240	1.1%
Jul	7,162	833,568	0.9%	7,072	833,568	0.8%
Aug	7,128	838,248	0.9%	7,128	838,248	0.9%
Sep	6,480	810,048	0.8%	6,119	810,048	0.8%

A unit may offer a lower economic minimum MW level on the price-based offer than the cost-based offer. Such a unit may appear to be cheaper to commit on the price-based offer even with a positive markup. A unit with a positive markup can have lower dispatch cost with price-based offer because of a lower economic minimum level compared to cost-based offer. Figure 3-26 shows an example of offers from a unit that has a positive markup and a price-based offer with a lower economic minimum MW than the cost-based offer. Keeping the startup cost, Minimum Run Time and No-load cost constant between the price-based offer and cost-based offer, the dispatch cost for this unit is lower on the price-based offer than on the cost-based offer. However, the price-based offer includes a positive markup and could result in setting the market price at a noncompetitive level even after the resource owner fails the TPS test.

Figure 3-26 Offers with a positive markup but different economic minimum MW

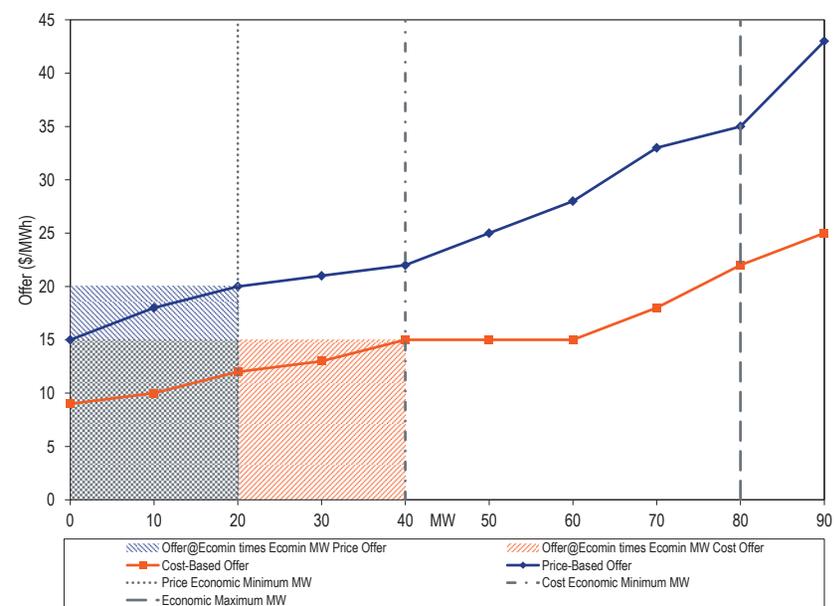


Table 3-26 shows the number and percent of unit schedule hours when units offered lower economic minimum MW in price-based offers than in cost-based offers while having a positive markup that resulted in the dispatch cost being lower for the price-based offer.

Table 3-26 Units offered with lower economic minimum MW on price compared to cost but with positive markup in the Day-Ahead and Real-Time Energy Markets: January 1 through September 30, 2017

	Day-Ahead			Real-Time		
	Number of Schedule Hours with Lower Economic Minimum MW in Price Compared to Cost	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Lower Economic Minimum MW in Price Compared to Cost	Number of Schedule Hours with Lower Economic Minimum MW in Price Compared to Cost	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Lower Economic Minimum MW in Price Compared to Cost
2017						
Jan	72	803,424	0.01%	48	803,424	0.01%
Feb	0	729,264	0.00%	0	729,264	0.00%
Mar	168	806,810	0.02%	136	806,810	0.02%
Apr	24	792,480	0.00%	0	792,480	0.00%
May	216	822,552	0.03%	216	822,552	0.03%
Jun	168	810,240	0.02%	168	810,240	0.02%
Jul	168	833,568	0.02%	152	833,568	0.02%
Aug	0	838,248	0.00%	0	838,248	0.00%
Sep	0	810,048	0.00%	0	810,048	0.00%

Table 3-27 Units with lower dispatch cost on price based offer compared to cost based offer, having positive markup in the Day-Ahead and Real-Time Energy Markets: January 1 through September 30, 2017

	Day-Ahead			Real-Time		
	Number of Schedule Hours with Potential Evasion	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Potential Evasion	Number of Schedule Hours with Potential Evasion	Total Number of Cost Schedule Hours Offered by Price Based Units	Percent of Schedule Hours with Potential Evasion
2017						
Jan	30,582	803,424	3.8%	28,882	803,424	3.6%
Feb	28,426	729,264	3.9%	27,861	729,264	3.8%
Mar	27,298	806,810	3.4%	25,838	806,810	3.2%
Apr	23,050	792,480	2.9%	22,124	792,480	2.8%
May	22,757	822,552	2.8%	22,236	822,552	2.7%
Jun	26,414	810,240	3.3%	25,525	810,240	3.2%
Jul	31,365	833,568	3.8%	29,291	833,568	3.5%
Aug	23,891	838,248	2.9%	23,599	838,248	2.8%
Sep	25,769	810,048	3.2%	25,203	810,048	3.1%

Table 3-27 shows the number and percent of unit schedule hours that have exhibited one of the three behaviors (crossing curves, lower minimum run time on price based offer, lower economic minimum on price based offer) that resulted in the dispatch cost being lower for the price-based offer while having a positive markup. The data in Table 3-27 is a combination of the data for each individual behavior that is shown in Table 3-24, Table 3-25, and Table 3-26, adjusted for units that engaged in more than one such behavior simultaneously.

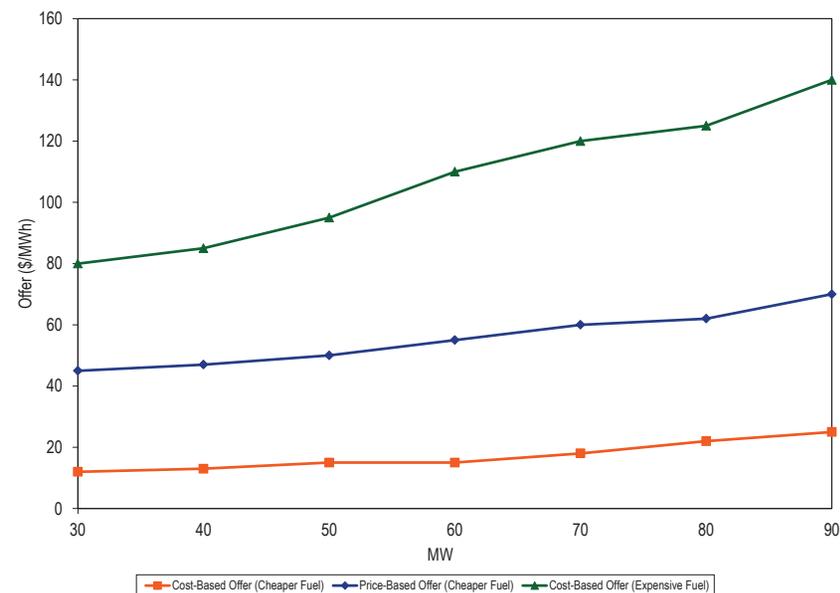
The MMU analyzed the data for units that exhibited any of the three behaviors (crossing curves, lower minimum run time on price based offer, lower economic minimum on price based offer) that also failed the TPS test in the Real-Time Energy Market, and were marginal in those intervals. Table 3-28 shows the total number of schedule hours when the units with behavior that resulted in evasion of market power mitigation rules failed the TPS test and were marginal in the Real-Time Energy Market.

Table 3-28 Units with potential evasion that failed the TPS test and were marginal in the Real-Time Energy Market: January 1 through September 30, 2017

2017	Schedule Hours with Potential Evasion When Units were Marginal	Number of Schedule Hours with Potential Evasion	Total Number of Cost Schedule Hours Offered by Price Based Units	Marginal Units with Evasion as a Percent of Total Schedule Hours	Marginal Units with Evasion as a Percent of Schedule Hours with Potential Evasion
Jan	848	28,882	803,424	0.1%	2.9%
Feb	894	27,861	729,264	0.1%	3.2%
Mar	1,495	25,838	806,810	0.2%	5.8%
Apr	814	22,124	792,480	0.1%	3.7%
May	505	22,236	822,552	0.1%	2.3%
Jun	327	25,525	810,240	0.0%	1.3%
Jul	623	29,291	833,568	0.1%	2.1%
Aug	389	23,599	838,248	0.0%	1.6%
Sep	1,739	25,203	810,048	0.2%	6.9%

In case of dual fuel units, if the price-based offer uses a cheaper fuel and the cost-based offer uses a more expensive fuel, the price-based offer will appear to be lower cost even when it includes a markup. Figure 3-27 shows an example of offers by a dual fuel unit, where the active cost-based offer uses a more expensive fuel and the price-based offer uses a cheaper fuel and includes a markup.

Figure 3-27 Dual fuel unit offers



These issues can be solved by simple rule changes.⁴⁵ The MMU recommends that markup of price based offers over cost-based offers be constant across the offer curve, that there be at least one cost-based offer using the same fuel as the available price-based offer, and that operating parameters on parameter limited schedules (PLS) be at least as flexible as price-based non-PLS offers.

Levels of offer capping have historically been low in PJM, as shown in Table 3-29. The offer capping percentages shown in Table 3-29 include units that are committed to provide constraint relief whose owners failed the TPS test in the energy market as well as units committed as part of conservative operations, excluding units that were committed for providing black start and reactive service.

Table 3-29 Offer capping statistics – energy only: January 1 through September 30, 2013 to 2017

(Jan-Sep)	Real-Time		Day-Ahead	
	Unit Hours Capped	MW Capped	Unit Hours Capped	MW Capped
2013	0.4%	0.1%	0.2%	0.0%
2014	0.5%	0.2%	0.2%	0.1%
2015	0.4%	0.2%	0.2%	0.1%
2016	0.4%	0.2%	0.1%	0.0%
2017	0.3%	0.1%	0.0%	0.0%

Table 3-30 shows the offer capping percentages including units committed to provide constraint relief and units committed to provide black start service and reactive support. The units that are committed and offer capped for black start service and reactive support reasons increased from 2012 through 2013. Before 2011, the units that ran to provide black start service and reactive support were generally economic in the energy market. From 2011 through 2013, the percentage of hours when these units were not economic (and were therefore committed on their cost schedule for reliability reasons) increased. This trend reversed in 2014 because higher LMPs resulted in the increased economic dispatch of black start and reactive service resources. As of April 2015, the Automatic Load Rejection (ALR) units that were committed for black

start previously no longer provide black start service, and are not included in the offer capping statistics for black start. PJM also created closed loop interfaces to, in some cases, model reactive constraints. The result was higher LMPs, which increased economic dispatch, which contributed to the reduction in units offer capped for reactive support. In instances where units are now committed for the modeled closed loop interface constraints, they are considered offer capped for providing constraint relief. They are included in the offer capping percentages in Table 3-29.

Table 3-30 Offer capping statistics for energy and reliability: January 1 through September 30, 2013 to 2017

(Jan-Sep)	Real-Time		Day-Ahead	
	Unit Hours Capped	MW Capped	Unit Hours Capped	MW Capped
2013	2.9%	2.3%	3.2%	2.1%
2014	0.8%	0.6%	0.5%	0.4%
2015	0.8%	0.9%	0.7%	0.8%
2016	0.4%	0.2%	0.1%	0.1%
2017	0.4%	0.4%	0.1%	0.3%

Table 3-31 shows the offer capping percentages for units committed to provide black start service and reactive support. The data in Table 3-31 is the difference between the offer cap percentages shown in Table 3-30 and Table 3-29.

Table 3-31 Offer capping statistics for reliability: January 1 through September 30, 2013 to 2017

(Jan-Sep)	Real-Time		Day-Ahead	
	Unit Hours Capped	MW Capped	Unit Hours Capped	MW Capped
2013	2.5%	2.1%	3.0%	2.1%
2014	0.3%	0.3%	0.3%	0.3%
2015	0.5%	0.7%	0.5%	0.7%
2016	0.0%	0.0%	0.0%	0.0%
2017	0.1%	0.3%	0.1%	0.3%

⁴⁵ The MMU proposed these offer rule changes as part of a broader reform to address generator offer flexibility and associated impact on market power mitigation rules in the Generator Offer Flexibility Senior Task Force (GOFSTF) and subsequently in the MMU's protest in the hourly offers proceeding in Docket No. ER16-372-000, filed December 14, 2015.

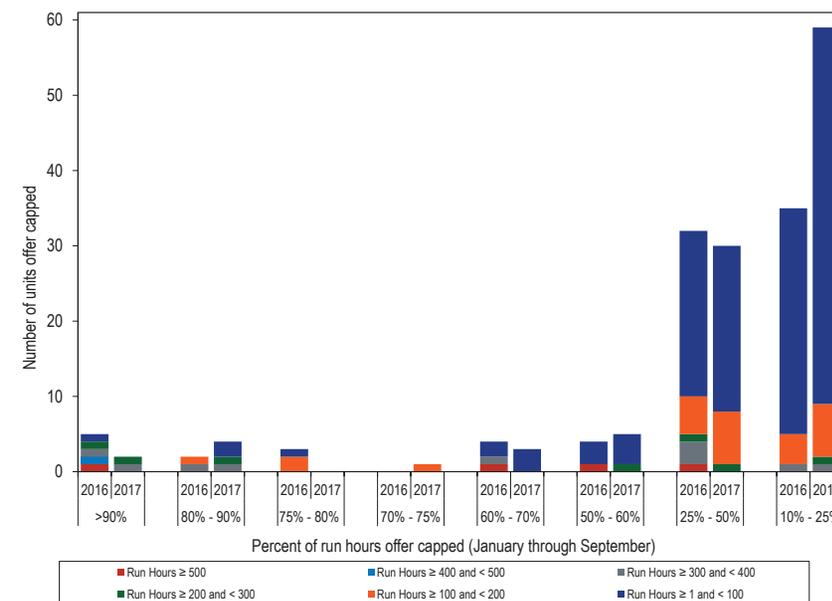
Table 3-32 presents data on the frequency with which units were offer capped in the first nine months of 2016 and 2017 for failing the TPS test to provide energy for constraint relief in the Real-Time Energy Market. Table 3-32 shows that two units were offer capped for 90 percent or more of their run hours in the first nine months of 2017 compared to five in the first nine months of 2016.

Table 3-32 Real-time offer capped unit statistics: January 1 through September 30, 2016 and 2017

Run Hours Offer-Capped, Percent Greater Than Or Equal To:	(Jan - Sep)	Offer-Capped Hours					
		Hours ≥ 500	Hours ≥ 400 and < 500	Hours ≥ 300 and < 400	Hours ≥ 200 and < 300	Hours ≥ 100 and < 200	Hours ≥ 1 and < 100
		2016	2017	2016	2017	2016	2017
90%	2016	1	1	1	1	0	1
	2017	0	0	1	1	0	0
80% and < 90%	2016	0	0	1	0	1	0
	2017	0	0	1	1	0	2
75% and < 80%	2016	0	0	0	0	2	1
	2017	0	0	0	0	0	0
70% and < 75%	2016	0	0	0	0	1	0
	2017	1	0	1	0	0	2
60% and < 70%	2016	1	0	0	0	0	3
	2017	0	0	0	0	0	3
50% and < 60%	2016	1	0	3	1	5	22
	2017	0	0	0	1	7	22
25% and < 50%	2016	0	0	1	0	4	30
	2017	0	0	1	1	7	50

Figure 3-28 shows the frequency with which units were offer capped in the first nine months of 2016 and 2017 for failing the TPS test to provide energy for constraint relief in the Real-Time Energy Market.

Figure 3-28 Real-time offer capped unit statistics: January 1 through September 30, 2016 and 2017



TPS Test Statistics

In the first nine months of 2017, the AEP, APS, ATSI, BGE, ComEd, Dominion, DPL, JCPL, PECO, PENELEC, and PPL control zones experienced congestion resulting from one or more constraints binding for 75 or more hours or resulting from an interface constraint (Table 3-33). The AECO, DAY, DEOK, DLCO, EKPC, Met-Ed, Pepco, PSEG, and RECO control zones did not have constraints binding for 75 or more hours in the first nine months of 2017. Table 3-33 shows that AEP, BGE, ComEd, Dominion and PPL were the control zones that experienced congestion resulting from one or more constraints binding for 75 or more hours or resulting from an interface constraint that was binding for one or more hours in the first nine months of every year from 2009 through 2017. The constrained hours in the BGE Zone decreased from 8,506 hours in the first nine months of 2016 to 1,748 hours in the first nine

months of 2017 due to the completion of RTEP upgrades in the zone. The constrained hours in the ComEd Zone decreased from 4,754 hours in the first nine months of 2016 to 1,401 hours in the first nine months of 2017 due to the completion of equipment outages.

Table 3-33 Numbers of hours when control zones experienced congestion resulting from one or more constraints binding for 75 or more hours or from an interface constraint: January 1 through September 30, 2009 through 2017

	(Jan - Sep)									
	2009	2010	2011	2012	2013	2014	2015	2016	2017	
AECO	149	163	234	0	0	0	192	413	0	
AEP	1,005	1,265	2,452	178	2,018	1,821	1,891	633	469	
APS	421	1,121	87	89	0	170	451	157	136	
ATSI	140	0	0	208	68	481	424	1	427	
BGE	127	274	368	1,582	1,192	4,416	6,006	8,506	1,748	
ComEd	784	2,108	1,118	1,808	3,169	1,928	1,708	4,754	1,401	
DEOK	0	0	0	185	0	0	0	0	0	
DLCO	156	393	0	209	0	223	617	0	0	
Dominion	456	889	1,266	559	674	77	1,341	647	80	
DPL	0	111	0	382	783	542	1,138	2,691	326	
JCPL	0	0	0	0	0	0	79	170	253	
Met-Ed	0	168	0	0	0	0	222	0	0	
PECO	247	0	276	0	390	1,826	718	826	975	
PENELEC	80	96	77	0	0	2,147	1,287	451	1,992	
Pepco	149	0	76	143	200	41	0	0	0	
PPL	176	117	40	146	609	148	224	398	1,370	
PSEG	379	515	1,132	259	1,993	2,268	2,509	0	0	

The local market structure in the Real-Time Energy Market associated with each of the frequently binding constraints was analyzed using the three pivotal supplier results in the first nine months of 2017.⁴⁶ The three pivotal supplier (TPS) test is applied every time the system solution indicates that out of merit resources are needed to relieve a transmission constraint. Only uncommitted resources, which would be started to relieve the transmission constraint, are subject to offer capping. Already committed units that can provide incremental relief cannot be offer capped. The results of the TPS test are shown for tests that could have resulted in offer capping and tests that resulted in offer capping.

⁴⁶ See the *MMU Technical Reference for PJM Markets*, at "Three Pivotal Supplier Test" for a more detailed explanation of the three pivotal supplier test. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

Overall, the results confirm that the three pivotal supplier test results in offer capping when the local market is structurally noncompetitive and does not result in offer capping when that is not the case. Local markets are noncompetitive when the number of suppliers is relatively small.

Table 3-34 shows the average constraint relief required on the constraint, the average effective supply available to relieve the constraint, the average number of owners with available relief in the defined market and the average number of owners passing and failing for the transfer interface constraints.

Table 3-34 Three pivotal supplier test details for interface constraints: January 1 through September 30, 2017

Constraint	Period	Average	Average	Average	Average	Average
		Constraint Relief (MW)	Effective Supply (MW)	Number Owners	Number Owners Passing	Number Owners Failing
AEP - DOM	Peak	197	106	11	0	11
	Off Peak	225	173	7	0	7
AP South	Peak	448	656	15	2	13
	Off Peak	426	645	11	0	10
Bedington - Black Oak	Peak	118	191	12	4	7
	Off Peak	100	100	8	1	7
Seneca	Peak	125	132	1	0	1
	Off Peak	139	151	1	0	1

The three pivotal supplier test is applied every time the PJM market system solution indicates that incremental relief is needed to relieve a transmission constraint. While every system solution that requires incremental relief to transmission constraints will result in a test, not all tested providers of effective supply are eligible for capping. Steam units that are offer capped in the Day-Ahead Energy Market continue to be offer capped in the Real-Time Energy Market regardless of their inclusion in the TPS test in real time and the outcome of the TPS test in real time. Only uncommitted resources, which would be started as a result of incremental relief needs, are eligible to be offer capped. Already committed units that can provide incremental relief cannot, regardless of test score, be switched from price to cost offers. Table 3-35 provides, for the identified interface constraints, information on total tests applied, the subset of three pivotal supplier tests that could have resulted in

the offer capping of uncommitted units and the portion of those tests that did result in offer capping uncommitted units. The three pivotal supplier tests that resulted in offer capping do not explain all the offer capped units in the Real-Time Energy Market. PJM operators also manually commit units for reliability reasons that are not specifically for providing relief to a binding constraint.

Table 3-35 Summary of three pivotal supplier tests applied for interface constraints: January 1 through September 30, 2017

Constraint	Period	Total Tests Applied	Total Tests that Could Have Resulted in Offer Capping	Percent Total Tests that Could Have Resulted in Offer Capping	Total Tests Resulted in Offer Capping	Percent Total Tests Resulted in Offer Capping	Tests Resulted in Offer Capping as Percent of Tests that Could Have Resulted in Offer Capping
AEP - DOM	Peak	2	2	100%	0	0%	0%
	Off Peak	95	53	56%	7	7%	13%
AP South	Peak	201	123	61%	10	5%	8%
	Off Peak	390	184	47%	9	2%	5%
Bedington - Black Oak	Peak	50	36	72%	2	4%	6%
	Off Peak	151	98	65%	7	5%	7%
Seneca	Peak	366	2	1%	0	0%	0%
	Off Peak	582	0	0%	0	0%	NA

Parameter Limited Schedules

Cost-Based Offers

All capacity resources in PJM are required to submit at least one cost-based offer. During the 2016/2017 and 2017/2018 delivery years, all cost-based offers, submitted by resources that are not capacity performance resources, are parameter limited in accordance with the Parameter Limited Schedule (PLS) matrix or with the level of an approved exception.⁴⁷ During the 2016/2017 and 2017/2018 delivery years, all cost-based offers, submitted by capacity performance resources, are parameter limited in accordance with predetermined unit specific parameter limits. During the 2016/2017 and 2017/2018 delivery years, there was no base capacity procured.

⁴⁷ See PJM OAIT Attachment K Appendix 5.6.6 (Minimum Generator Operating Parameters—Parameter-Limited Schedules) (June 1, 2017) at 2367 - 2376.

For the 2018/2019 and 2019/2020 delivery years, PJM procured two types of capacity resources, capacity performance resources and base capacity resources. Beginning June 1, 2018, there will no longer be any resources committed as the current annual capacity product. All cost-based offers, submitted by capacity performance resources and base capacity resources, are parameter limited in accordance with predetermined unit specific parameter limits.

Price-Based Offers

All capacity resources that choose to offer price-based offers are required to make available at least one price-based parameter limited offer (referred to as price-based PLS). For resources that are not capacity performance resources or not base capacity resources, the price-based parameter limited schedule is to be used by PJM for committing generation resources when a

maximum emergency generation alert is declared. For capacity performance resources, the price-based parameter limited schedule is to be used by PJM for committing generation resources when hot weather alerts and cold weather alerts are declared. For base capacity resources (during the 2018/2019 and 2019/2020 delivery years only), the price-based parameter limited schedule is to be used by PJM for committing generation resources when hot weather alerts are declared.

Parameter Limits

During the extreme cold weather conditions in the first three months of 2016, as well as 2015 and 2014, a number of gas fired generators requested temporary exceptions to parameter limits for their parameter limited schedules due to restrictions imposed by natural gas pipelines. The parameters that were affected because of gas pipeline restrictions include minimum run time (MRT) and turn down ratio (TDR, the ratio of economic maximum MW to economic

minimum MW). When pipelines issue critical notices and enforce ratable take requirements, generators may, depending on the nature of the transportation service purchased, be forced to nominate an equal amount of gas for each hour in a 24 hour period, with penalties for deviating from the nominated quantity. This led to requests for 24 hour minimum run times and turn down ratios close to 1.0, to avoid deviations from the hourly nominated quantity.

Key parameters like startup and notification time were not included in the PLS matrix in 2016 and prior periods for annual resources that do not have capacity performance obligations. Some resource owners notified PJM that they needed extended notification times based on the claimed necessity for generation owners to nominate gas prior to gas nomination cycle deadlines. Startup and notification times are limited for capacity performance resources beginning June 1, 2016, in accordance with predetermined unit specific parameter limits. The unit specific parameter limits for capacity performance resources were based on default minimum operating parameter limits posted by PJM by technology type. These default parameters were based on analysis by the MMU. Market participants could request an adjustment to the default values by submitting supporting documentation, which was reviewed by PJM and the MMU. The default minimum operating parameter limits or approved adjusted values are used by capacity performance resources for their parameter limited schedules.

PJM has the authority to approve adjusted parameters with input from the MMU. PJM has inappropriately applied different review standards to coal units than to CTs and CCs despite the objections of the MMU. PJM has approved parameter limits for steam units based on historical performance and existing equipment while holding CTs and CCs to higher standards based on OEM documentation and up to date equipment configuration.

Currently, there are no rules in the PJM tariff or manuals that limit the nonparameter attributes of price-based PLS offers. The intent of the price-based PLS offer is to prevent the exercise of market power during high demand conditions by preventing units from offering inflexible operating parameters in order to extract higher market revenues or higher uplift payments. However,

a generator can include a higher markup in the price-based PLS offer than in the price-based non-PLS schedule. The result is that the offer is higher and market prices are higher as a result of the exercise of market power using the PLS offer. This defeats the purpose of requiring price-based PLS offers.

The MMU recommends that in order to ensure rigorous market power mitigation when the TPS test is failed, the operating parameters in the cost-based offer and the price-based parameter limited schedule (PLS) offer be at least as flexible as the operating parameters in the available non-PLS price-based offer, and that the price-MW pairs in the price-based PLS offer be exactly equal to the price-based non-PLS offer.

Parameter Limited Schedules under Capacity Performance

Beginning in the 2016/2017 delivery year, resources that have capacity performance (CP) commitments are required to submit, in their parameter limited schedules (cost-based offers and price-based PLS offers), unit specific parameters that reflect the physical capability of the technology type of the resource. For the 2018/2019 and 2019/2020 delivery years, resources that have base capacity commitments are also required to submit, in their parameter limited schedules, unit specific parameters that reflect the physical capability of the technology type of the resource. In its order on capacity performance, the Commission determined that capacity performance resources should be able to reflect actual constraints based on not just the resource physical constraints, but also other constraints, such as contractual limits that are not based on the physical characteristics of the generator.⁴⁸ The Commission directed that capacity performance resources with parameters based on nonphysical constraints should receive uplift payments.⁴⁹ The Commission directed PJM to submit tariff language to establish a process through which capacity performance resources that operate outside the defined unit-specific parameter limits can justify such operation and therefore remain eligible for make whole payments.⁵⁰

⁴⁸ 151 FERC ¶ 61,208 at P 437 (June 9th Order).

⁴⁹ *Id.* at P 439.

⁵⁰ *Id.* at P 440.

A primary goal of the capacity performance market design is to assign performance risk to generation owners and to ensure that capacity prices reflect underlying supply and demand conditions, including the cost of taking on performance risk. The June 9th Order's determination on parameters is not consistent with that goal. By permitting generation owners to establish unit parameters based on nonphysical limits, the June 9th Order has weakened the incentives for units to be flexible and has weakened the assignment of performance risk to generation owners. Contractual limits, unlike generating unit operational limits, are a function of the interests and incentives of the parties to the contracts. If a generation owner expects to be compensated through uplift payments for running for 24 hours regardless of whether the energy is economic or needed, that generation owner has no incentive to pay more to purchase the flexible gas service that would permit the unit to be flexible in response to dispatch.

The fact that a contract may be just and reasonable because it was an arm's length contract entered into by two willing parties does not mean that is the only possible arrangement between the two parties or that it is consistent with an efficient market outcome or that such a contract can reasonably impose costs on customers who were not party to the contract. The actual contractual terms are a function of the incentives and interests of the parties. The fact that a just and reasonable contract exists between a generation owner and a gas supplier does not mean that it is appropriate or efficient to impose the resultant costs on electric customers or that it incorporates an efficient allocation of performance risk between the generation owner and other market participants.

The approach to parameters defined in the June 9th Order will increase energy market uplift payments substantially. Uplift costs are unpredictable, opaque and unhedgeable. While some uplift is necessary and efficient in an LMP market, this uplift is not. Electric customers are not in a position to determine the terms of the contracts that resources enter into. Customers rely on the market rules to create incentives that protect them by assigning operational risk to generators, who are in the best position to efficiently manage those risks.

The MMU recommends that the revised rules recognize the difference between operational parameters that indicate to PJM dispatchers what a unit is capable of during the operating day and the parameters that are reflected in uplift payments. The parameters provided to PJM dispatchers each day should reflect what units are physically capable of. That is an operational necessity. However, the parameters which determine the amount of uplift payments to those generators should reflect the flexibility goals of the capacity performance construct and the assignment of performance risk to generation owners.

The MMU recommends that capacity performance resources and base capacity resources (during the June through September period) be held to the OEM operating parameters of the capacity market CONE reference resource for performance assessment and energy uplift payments and that this standard be applied to all technologies on a uniform basis. This solution creates the incentives for flexibility and preserves, to the extent possible, the incentives to follow PJM's dispatch instructions during high demand conditions. The proposed operating parameters should be based on the physical capability of the Reference Resource used in the Cost of New Entry, currently two GE Frame 7FA turbines with dual fuel capability. All resources that are less flexible than the Reference Resource are expected to be scheduled and running during high demand conditions anyway, while the flexible CTs that are used as peaking plants would still have the incentive to follow LMP and dispatch instructions. CCs would also have the capability to be as flexible as the reference resource. These units will be exempt from nonperformance charges and made whole as long as they perform in accordance with their parameters. This ensures that all the peaking units that are needed by PJM for flexible operation do not self schedule at their maximum output, and follow PJM dispatch instructions during high demand conditions. If any of the less flexible resources need to be dispatched down by PJM for reliability reasons, they would be exempt from nonperformance charges.

Such an approach is consistent with the Commission's no excuses policy for nonperformance because the flexibility target is set based on the optimal OEM-defined capability for the marginal resource that is expected to meet peak demand, which is consistent with the level of performance that customers

are paying for in the capacity market. Any resource that is less flexible is not excused for nonperformance and any resource that meets the flexibility target is performing according to the commitments made in the capacity market.

The June 9th Order pointed out that the way to ensure that a resource's parameters are exposed to market consequences is to not allow any parameter limitations as an excuse for nonperformance. The same logic should apply to energy market uplift rules. A resource's parameters should be exposed to market consequences and the resource should not be made whole if it is operating less flexibly than the reference resource. Paying energy market uplift on the basis of parameters consistent with the flexibility goals of the capacity performance construct would ensure that performance incentives are consistent across the capacity and energy markets and ensure that performance risk is appropriately assigned to generation owners.

Markup Index

Markup is a summary measure of participant offer behavior or conduct for individual units. When a seller responds competitively to a market price, markup is zero. When a seller exercises market power in its pricing, markup is positive. The degree of markup increases with the degree of market power. The markup index for each marginal unit is calculated as $(\text{Price} - \text{Cost})/\text{Price}$.⁵¹ The markup index is normalized and can vary from -1.00 when the offer price is less than short run marginal cost, to 1.00 when the offer price is higher than short run marginal cost. The markup index does not measure the impact of unit markup on total LMP. The dollar markup for a unit is the difference between price and cost.

Real-Time Markup

Table 3-36 shows the average markup index of marginal units in the Real-Time Energy Market, by offer price category using unadjusted cost offers. Table 3-37 shows the average markup index of marginal units in the Real-Time Energy Market, by offer price category using adjusted cost offers. The unadjusted markup is the difference between the price offer and the cost offer

⁵¹ In order to normalize the index results (i.e., bound the results between +1.00 and -1.00) for comparison across both low and high cost units, the index is calculated as $(\text{Price} - \text{Cost})/\text{Price}$ when price is greater than cost, and $(\text{Price} - \text{Cost})/\text{Cost}$ when price is less than cost.

including the 10 percent adder in the cost offer. The adjusted markup is the difference between the price offer and the cost offer excluding the 10 percent adder from the cost offer. The adjusted markup is calculated for coal, gas and oil units because these units have consistently had price-based offers less than cost-based offers.⁵² The markup is negative if the cost-based offer of the marginal unit exceeds its price-based offer at its operating point.

All generating units are allowed to add an additional 10 percent to their cost offer. The additional 10 percent was included in the definition of cost offers prior to the implementation of PJM markets in 1999, based on the uncertainty of calculating the hourly operating costs of CTs under changing ambient conditions. The owners of coal units, facing competition, typically exclude the additional 10 percent from their actual offers. The owners of gas fired and oil fired units have also begun to exclude the 10 percent adder. The unadjusted markup is calculated as the difference between the price offer and the cost offer including the additional 10 percent in the cost offer for coal gas and oil fired units. The adjusted markup is calculated as the difference between the price offer and the cost offer excluding the additional 10 percent from the cost offers of coal gas and oil fired units. Even the adjusted markup overestimates the negative markup because units facing increased competitive pressure have excluded both the 10 percent and the components of operating and maintenance cost that are not short run marginal cost. While the 10 percent adder is permitted under the definition of cost-based offers in the PJM Market Rules and some have interpreted the rules to permit maintenance costs that are not short run marginal costs, neither are part of a competitive offer because they are not actually short run marginal costs, and actual market behavior reflects that fact.⁵³

In the first nine months of 2017, 93.0 percent of marginal units had offer prices less than \$50 per MWh. The average dollar markups of units with offer prices less than \$25 was positive (\$0.21 per MWh) when using unadjusted cost offers. The average dollar markups of units with offer prices between \$25 and \$50 was positive (\$1.67 per MWh) when using unadjusted cost offers.

⁵² The MMU will calculate adjusted markup for gas units also in future reports because gas units also more consistently have price-based offers less than cost-based offers.

⁵³ See PJM, "Manual 15: Cost Development Guidelines," Revision 29 (May 15, 2017).

Negative markup means the unit is offering to run at a price less than its cost-based offer, revealing a short run marginal cost that is less than the maximum allowable cost-based offer under the PJM Market Rules.

Some marginal units did have substantial markups. Among the units that were marginal in the first nine months of 2017, none had offer prices above \$400 per MWh. Among the units that were marginal in the first nine months of 2016, less than 0.1 percent had offer prices greater than \$400 per MWh. Using the unadjusted cost offers, the highest markup for any marginal unit in the first nine months of 2017 was \$755.09 while the highest markup in the first nine months of 2016 was \$258.16.

Table 3-36 Average, real-time marginal unit markup index (By offer price category unadjusted): January 1 through September 30, 2016 and 2017

Offer Price Category	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Average Markup Index	Average Dollar Markup	Frequency	Average Markup Index	Average Dollar Markup	Frequency
< \$25	0.01	(\$0.92)	62.6%	0.17	\$0.21	65.2%
\$25 to \$50	(0.03)	(\$2.08)	25.7%	0.06	\$1.67	27.8%
\$50 to \$75	0.18	\$10.11	1.6%	0.38	\$22.33	1.8%
\$75 to \$100	0.31	\$26.46	0.5%	0.28	\$24.21	0.7%
\$100 to \$125	0.05	\$5.04	2.4%	0.37	\$40.82	0.2%
\$125 to \$150	0.01	\$1.43	5.2%	0.25	\$32.45	0.3%
>= \$150	0.04	\$7.31	2.0%	0.01	\$1.40	4.0%

Table 3-37 Average, real-time marginal unit markup index (By offer price category adjusted): January 1 through September 30, 2016 and 2017

Offer Price Category	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Average Markup Index	Average Dollar Markup	Frequency	Average Markup Index	Average Dollar Markup	Frequency
< \$25	0.09	\$0.78	62.6%	0.25	\$1.75	65.2%
\$25 to \$50	0.06	\$0.98	25.7%	0.15	\$4.34	27.8%
\$50 to \$75	0.25	\$14.35	1.6%	0.44	\$25.42	1.8%
\$75 to \$100	0.37	\$32.06	0.5%	0.35	\$30.06	0.7%
\$100 to \$125	0.14	\$14.59	2.4%	0.43	\$47.22	0.2%
\$125 to \$150	0.11	\$13.80	5.2%	0.32	\$41.91	0.3%
>= \$150	0.13	\$22.59	2.0%	0.10	\$20.27	4.0%

Table 3-38 shows the percentage of marginal units that had markups, calculated using unadjusted cost offers, below, above and equal to zero for coal, gas and oil fuel types.⁵⁴ Table 3-39 shows the percentage of marginal units that had markups, calculated using adjusted cost offers, below, above and equal to zero for coal, gas and oil fuel types. In the first nine months of 2017, using unadjusted cost-based offers for coal units, 45.78 percent of coal units had negative markups. In the first nine months of 2017, using adjusted cost-based offers for coal units, 25.06 percent of coal units had negative markups.

Table 3-38 Percent of marginal units with markup below, above and equal to zero (By fuel type unadjusted): January 1 through September 30, 2016 and 2017

Type/Fuel	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Negative	Zero	Positive	Negative	Zero	Positive
Coal	62.77%	19.54%	17.69%	45.78%	21.65%	32.57%
Gas	22.17%	16.19%	61.64%	37.18%	13.22%	49.60%
Oil	11.04%	85.20%	3.75%	38.90%	60.17%	0.94%

Table 3-39 Percent of marginal units with markup below, above and equal to zero (By fuel type adjusted): January 1 through September 30, 2016 and 2017

Type/Fuel	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Negative	Zero	Positive	Negative	Zero	Positive
Coal	44.62%	2.83%	52.55%	24.76%	5.47%	69.77%
Gas	5.40%	2.64%	91.96%	9.72%	5.88%	84.40%
Oil	0.02%	0.00%	99.98%	0.07%	0.00%	99.93%

Figure 3-29 shows the frequency distribution of hourly markups for all gas units offered in the first nine months of 2016 and 2017 using unadjusted cost offers. The highest markup within the economic operating range of the unit's offer curve was used for creating the frequency distributions.⁵⁵ Of the gas units offered in the PJM market in the first nine months of 2017, nearly 28 percent of gas unit-hours had a maximum markup that was negative. More than 6.5 percent of gas fired unit-hours had a maximum markup above \$100 per MWh.

⁵⁴ Other fuel types were excluded based on data confidentiality rules.
⁵⁵ The categories in the frequency distribution were chosen so as to maintain data confidentiality.

Figure 3-29 Frequency distribution of highest markup of gas units offered using unadjusted cost offers: January 1 through September 30, 2016 and 2017

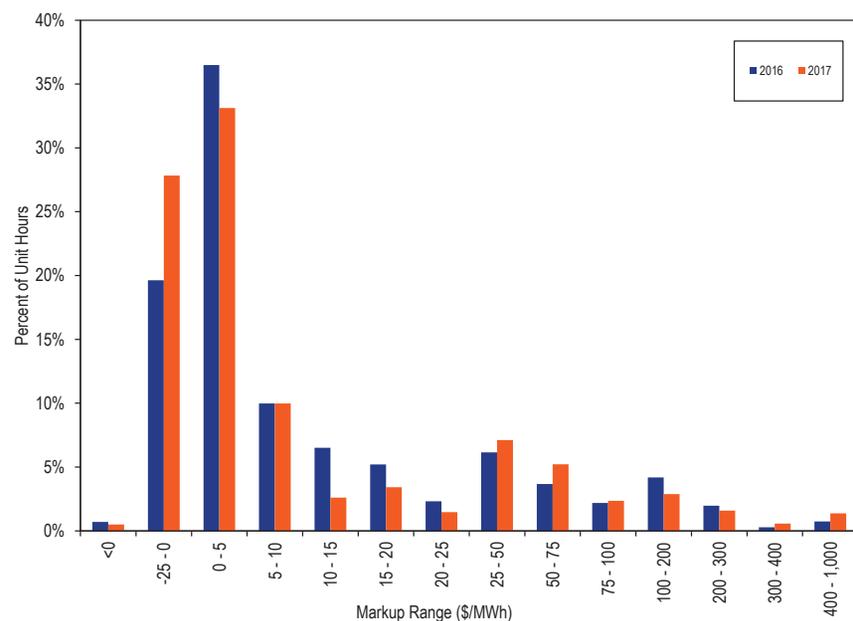


Figure 3-30 shows the frequency distribution of hourly markups for all coal units offered in the first nine months of 2016 and 2017 using unadjusted cost offers. Of the coal units offered in the PJM market in the first nine months of 2017, nearly 41 percent of coal unit-hours had a maximum markup that was negative.

Figure 3-30 Frequency distribution of highest markup of coal units offered using unadjusted cost offers: January 1 through September 30, 2016 and 2017

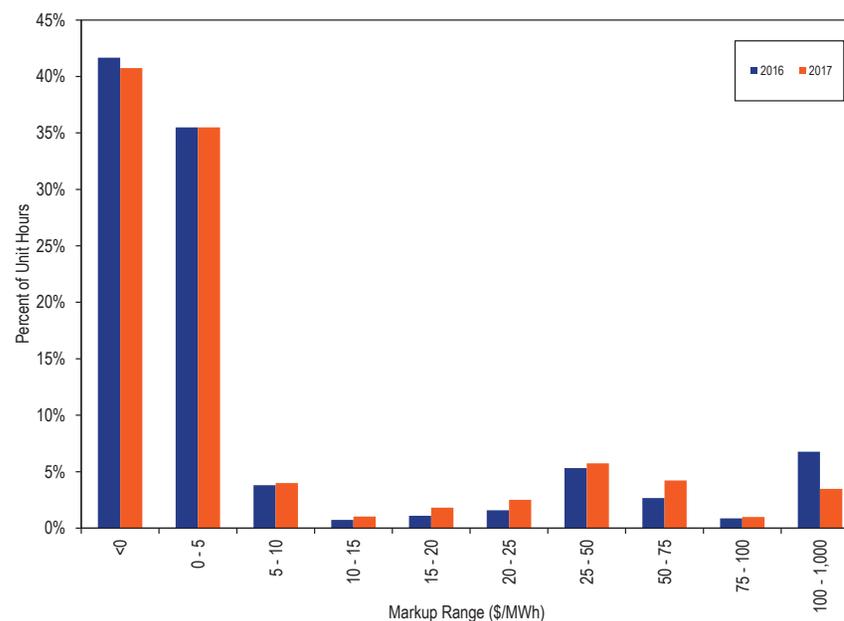
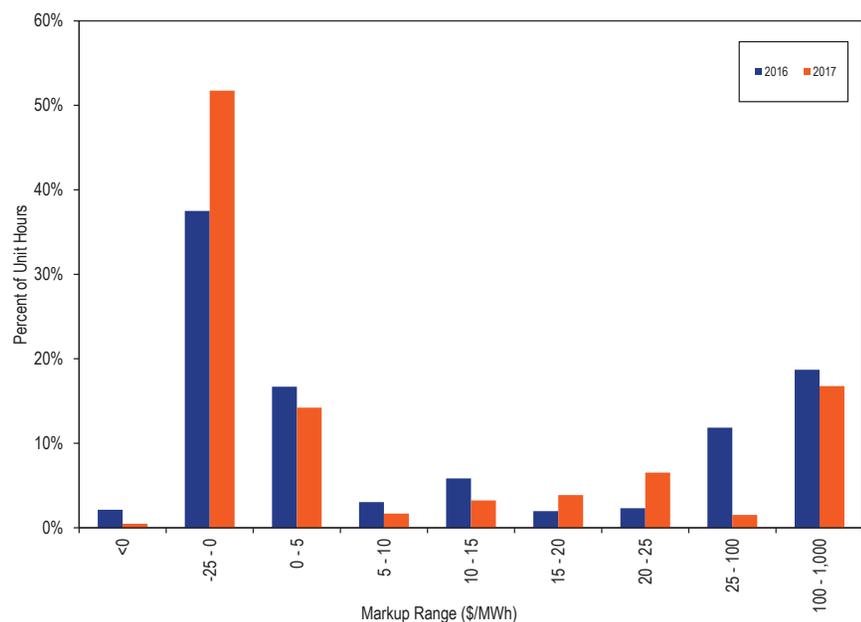


Figure 3-31 shows the frequency distribution of hourly markups for all offered oil units in the first nine month of 2016 and 2017 using unadjusted cost offers. Of the oil units offered in the PJM market in the first nine months of 2017, nearly 52 percent of oil unit-hours had a maximum markup that was negative.

Figure 3-31 Frequency distribution of highest markup of oil units offered using unadjusted cost offers: January 1 through September 30, 2016 and 2017

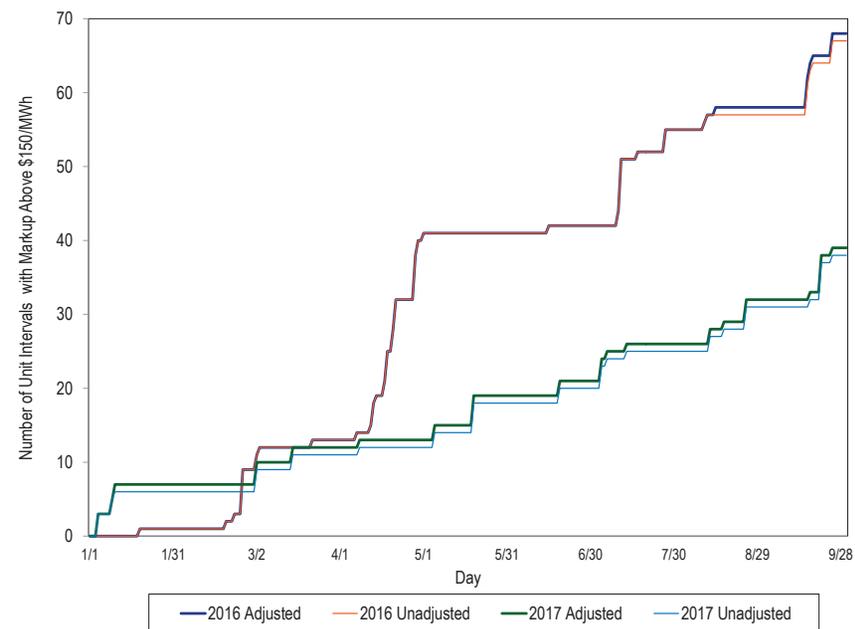


The markup frequency distributions show that a significant proportion of units make price-based offers less than the cost-based offers permitted under the PJM market rules. This behavior means that competitive price-based offers reveal actual unit marginal costs and that PJM market rules permit the inclusion of costs in cost-based offers that are not short run marginal costs.

The markup behavior shown in the markup frequency distributions also shows that a substantial number of units were offered with high markups, consistent with the exercise of market power.

Figure 3-32 show the number of marginal unit intervals in the first nine months of 2017 and 2016 with markup above \$150 per MWh.

Figure 3-32 Cumulative number of unit intervals with markups above \$150 per MWh: January 1 through September 30, 2016 and 2017



Day-Ahead Markup

Table 3-40 shows the average markup index of marginal generating units in the Day-Ahead Energy Market, by offer price category using unadjusted offers. The majority of marginal units are virtual transactions, which do not have markup. In the first nine months of 2017, 94.3 percent of marginal generating units had offer prices less than \$50 per MWh. The average dollar markups of units with offer prices less than \$25 was positive (\$0.23 per MWh) when using unadjusted cost offers. The average dollar markups of units with offer prices between \$25 and \$50 was positive (\$3.23 per MWh) when using unadjusted cost offers.

Some marginal units did have substantial markups. Among the units that were marginal in the first nine months of 2017, none had offer prices above \$400

per MWh. Among the units that were marginal in the first nine months of 2016, none had offer prices greater than \$400 per MWh. Using the unadjusted cost offers, the highest markup for any marginal unit in the first nine months of 2017 was \$47.74 while the highest markup in the first nine months of 2016 was \$170.99.

Table 3-40 Average day-ahead marginal unit markup index (By offer price category, unadjusted): January 1 through September 30, 2016 and 2017

Offer Price Category	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Average Markup Index	Average Dollar Markup	Frequency	Average Markup Index	Average Dollar Markup	Frequency
< \$25	0.10	(\$0.15)	60.8%	0.17	\$0.23	61.5%
\$25 to \$50	0.03	\$0.01	26.6%	0.10	\$3.23	32.8%
\$50 to \$75	0.09	\$5.42	1.6%	0.21	\$11.82	0.7%
\$75 to \$100	0.03	\$2.04	0.1%	0.02	\$1.43	0.4%
\$100 to \$125	(0.01)	(\$0.72)	0.4%	0.00	\$0.00	0.0%
\$125 to \$150	0.00	\$0.00	9.1%	0.00	\$0.00	0.0%
>= \$150	0.01	\$2.66	1.3%	(0.01)	(\$1.56)	4.6%

Table 3-41 shows the average markup index of marginal generating units in the Day-Ahead Energy Market, by offer price category using adjusted offers. In the first nine months of 2017, 0.4 percent of marginal generating units had offers between \$75 and \$100 per MWh and the average dollar markup and the average markup index were both positive. The average markup index increased from 0.17 in the first nine months of 2016, to 0.25 in the first nine months of 2017 in the offer price category less than \$25.

Table 3-41 Average day-ahead marginal unit markup index (By offer price category, adjusted): January 1 through September 30, 2016 and 2017

Offer Price Category	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Average Markup Index	Average Dollar Markup	Frequency	Average Markup Index	Average Dollar Markup	Frequency
< \$25	0.17	\$1.57	60.8%	0.25	\$1.90	61.5%
\$25 to \$50	0.11	\$2.88	26.6%	0.18	\$5.68	32.8%
\$50 to \$75	0.17	\$9.97	1.6%	0.28	\$15.65	0.7%
\$75 to \$100	0.12	\$9.60	0.1%	0.11	\$9.80	0.4%
\$100 to \$125	0.08	\$9.76	0.4%	0.00	\$0.00	0.0%
\$125 to \$150	0.09	\$12.44	9.1%	0.09	\$11.86	0.0%
>= \$150	0.10	\$19.46	1.3%	0.09	\$16.75	4.6%

Energy Market Cost-Based Offers

The application of market power mitigation rules in the Day-Ahead Energy Market and the Real-Time Energy Market helps ensure competitive market outcomes even in the presence of structural market power. But the efficacy of market power mitigation rules depends on the definition of a competitive offer. A competitive offer is equal to short run marginal costs. The enforcement of market power mitigation rules is undermined if the definition of a competitive offer is not correct. The significance of competition metrics like markup is also undermined if the definition of a competitive offer is not correct. The definition of a competitive offer, as interpreted by PJM, is not currently correct. Some unit owners include costs that are not short run marginal costs in offers, including maintenance costs. This issue can be resolved by simple changes to the PJM market rules to incorporate a clear and accurate definition of short run marginal costs.

Short Run Marginal Costs

There are three types of costs identified under PJM rules:

- Short run marginal costs (or incremental costs). Short run costs incurred directly as a result of producing energy for an hour;
- Avoidable costs. Annual costs that would be avoided if energy were not produced over an annual period;
- Fixed costs. Costs associated with an investment in a facility including the return on and of capital.

Marginal costs are the only costs relevant to the energy market. Specifically, the competitive energy offer level is the short run marginal cost of production.

The MMU recommends that PJM require that the level of incremental costs includable in cost-based offers not exceed the unit's short run marginal cost.

Fuel Cost Policies

The fuel cost policy documents the process by which the Market Seller calculates the fuel cost component of its cost-based offers. Short run marginal

fuel costs include commodity costs, transportation costs, fees, and taxes for the purchase of fuel. Fuel handling costs and fuel additive costs are included in the cost-based offer as variable operations and maintenance (VOM) costs. The fuel cost policy documents the frequency with which the Market Seller updates VOM and other nonfuel cost inputs.

The verification of accurate fuel costs in cost-based offers is not possible unless the fuel cost policy is algorithmic, verifiable, and systematic. Algorithmic means that the fuel cost policy must use a set of defined, logical steps to use defined inputs to get to defined outputs. Verifiable means that the fuel cost policy must provide a fuel price that can be calculated by the MMU after the fact with the same data available to the generation owner at the time the decision was made, and documentation for that data from a public or a private source. Systematic means that the fuel cost policy must document a standardized method or methods for calculating fuel costs including objective triggers for each method.

The MMU recommends that PJM require that all fuel cost policies be algorithmic, verifiable, and systematic.

Cost Development Guidelines

The Cost Development Guidelines contained in PJM Manual 15 do not clearly or accurately describe the short run marginal cost of generation. The MMU recommends that Manual 15 be replaced with a straightforward description of the components of cost offers based on short run marginal costs and the correct calculation of cost offers.

FERC System of Accounts

PJM Manual 15 relies heavily on the FERC System of Accounts, which predates markets and does not define costs consistently with market economics.

The MMU recommends removal of all use of the FERC System of Accounts in the Cost Development Guidelines.

Cyclic Starting and Peaking Factors

The use of cyclic starting and peaking factors for calculating VOM costs for combined cycles and combustion turbines is designed to allocate a greater proportion of long term maintenance costs to starts and the tail block of the cost curve. The use of such factors is not appropriate given that long term maintenance costs are not short run marginal costs and should not be included in cost offers.

The MMU recommends the removal of all cyclic starting and peaking factors from the Cost Development Guidelines.

Labor Costs

PJM Manual 15 allows for the inclusion of plant staffing costs in energy market cost offers. This is inappropriate given that labor costs are avoidable costs, not short run marginal costs, and are correctly includable in the RPM Avoidable Cost Rate.

The MMU recommends the removal of all labor costs from the Cost Development Guidelines.

Combined Cycle Start Heat Input Definition

PJM Manual 15 defines the start heat input of combined cycles as the amount of fuel used from the firing of the first combustion turbine to the close of the steam turbine breaker plus any fuel used by other combustion turbines in the combined cycle from firing to the point at which the HRSG steam pressure matches the steam turbine steam pressure. This definition is inappropriate given that after each combustion turbine is synchronized, some of the fuel is used to produce energy for which the resource is compensated in the energy market.

The MMU recommends changing the definition of the start heat input for combined cycles to include only the amount of fuel used from firing each combustion turbine in the combined cycle to the breaker close of each combustion turbine. This change will make the treatment of combined cycles consistent with steam turbines.

Nuclear Costs

The fuel costs for nuclear plants are fixed in the short run and amortized over the period between refueling outages. The short run marginal cost of fuel for nuclear plants is zero. Operations and maintenance costs for nuclear power plants consist primarily of labor and maintenance costs incurred during outages, which are also fixed in the short run.

The MMU recommends the removal of nuclear fuel and nonfuel operations and maintenance costs that are not short run marginal costs from the Cost Development Guidelines.

Pumped Hydro Costs

The calculation of pumped hydro costs for energy storage in Section 7.3 of PJM Manual 15 is inaccurate. The mathematical formulation contains an error in the calculation of the weighted average pumping cost, and it does not take into account the purchase of power for pumping in the day-ahead market.

The MMU recommends revising the pumped hydro fuel cost calculation to include day-ahead and real-time power purchases.

Energy Market Opportunity Costs

The calculation of energy market opportunity costs for energy limited units in Section 12 of PJM Manual 15 fails to account for a number of physical unit characteristics and environmental restrictions that influence opportunity costs. These include start up time, notification time, minimum down time, multiple fuel capability, multiple emissions limitations, and fuel usage limitations.

The MMU recommends revisions to the calculation of energy market opportunity costs to incorporate all time based offer parameters and all limitations that affect the opportunity cost of generating unit output.

The use of Catastrophic Force Majeure as the criterion for the use of opportunity costs for fuel supply limitations in Schedule 2 of the Operating Agreement is overly restrictive. This criterion would not allow the use of opportunity costs

to allocate limited fuel in the case of regional fuel transportation disruptions or extreme weather events.

The MMU recommends removing the catastrophic designation for force majeure fuel supply limitations in Schedule 2.

Frequently Mitigated Units (FMU) and Associated Units (AU)

An FMU is a frequently mitigated unit. The results reported here include units that were mitigated for any reason, including both structural market power in the energy market and units called on for reliability reasons, including reactive and black start service.

The FMU adder was filed with FERC in 2005, and approved effective February 2006.⁵⁶ The goal, in 2005, was to ensure that units that were offer capped for most of their run hours could cover their going forward or avoidable costs (also known as ACR in the PJM Capacity Market). That function became unnecessary with the introduction of the RPM capacity market design in 2007, and changes to the scarcity pricing rules in 2012. Under the RPM design, units can make offers in the capacity market that include their ACR net of net revenues. Thus, if there is a shortfall in ACR recovery, that shortfall is included in the RPM offer. If the unit clears in RPM, it covers its shortfall in ACR costs. If the unit does not clear, then the market result means that PJM can provide reliability without the unit and no additional revenue is needed.

For those reasons, the MMU recommended the elimination of FMU and AU adders.⁵⁷ FMU and AU adders no longer serve the purpose for which they were created and interfere with the efficient operation of PJM markets.

The MMU and PJM proposed a compromise on the elimination of FMU adders that maintains the ability of generating units to qualify for FMU adders when units have net revenues less than unit going forward costs or ACR. PJM submitted the joint MMU/PJM proposal to the Commission pursuant to

⁵⁶ 110 FERC ¶ 61,053 (2005).

⁵⁷ See the "FMU Problem Statement and Issue Charge," MIC <http://www.monitoringanalytics.com/reports/Presentations/2013/IMM_MIC_FMUProblemStatementandIssueCharge_20130306.pdf>.

section 206 of the Federal Power Act. On October 31, 2014, the Commission conditionally approved the filing and the new rule became effective November 1, 2014.

The definition of FMUs provides for a set of graduated adders associated with increasing levels of offer capping. Units capped for 60 percent or more of their run hours and less than 70 percent are eligible for an adder of either 10 percent of their cost-based offer or \$20 per MWh. Units capped for 70 percent or more of their run hours and less than 80 percent are eligible for an adder of either 10 percent of their cost-based offer or \$30 per MWh. Units capped for 80 percent or more of their run hours are eligible for an adder of either 10 percent of their cost-based offer or \$40 per MWh. These categories are designated Tier 1, Tier 2 and Tier 3.

In addition to being offer capped for the designated percent of run hours, in order to qualify for an FMU adder, a generating unit's Projected PJM Market Revenues plus the unit's PJM capacity market revenues on a rolling 12-month basis, divided by the unit's MW of installed capacity (in \$/MW-year) must be less than its accepted unit specific Avoidable Cost Rate (in \$/MW-year) (excluding APIR and ARPIR), or its default Avoidable Cost Rate (in \$/MW-year) if no unit-specific Avoidable Cost Rate is accepted for the BRAs for the Delivery Years included in the rolling 12-month period, determined pursuant to Sections 6.7 and 6.8 of Attachment DD of the Tariff. (The relevant Avoidable Cost Rate is the weighted average of the Avoidable Cost Rates for each Delivery Year included in the rolling 12-month period, weighted by month.) No portion of the unit may be included in an FRR capacity plan or be receiving compensation under Part V of the PJM Tariff and the unit must be internal to the PJM Region and subject only to PJM dispatch.⁵⁸

An AU, or associated unit, is a unit that is physically, electrically and economically identical to an FMU, but does not qualify for the same FMU adder based on the number of run-hours the unit is offer capped.⁵⁹ For example, if a generating station had two identical units with identical electrical impacts

⁵⁸ OA, Schedule 1 § 6.4.2.

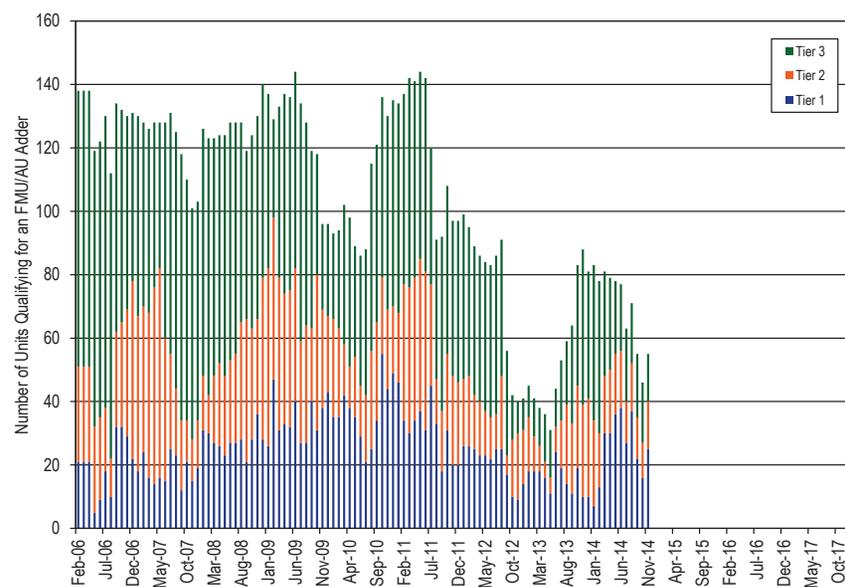
⁵⁹ An associated unit (AU) must belong to the same design class (where a design class includes generation that is the same size and uses the same technology, without regard to manufacturer) and uses the identical primary fuel as the FMU.

on the system, one of which was offer capped for more than 80 percent of its run hours, that unit would be designated a Tier 3 FMU. If the second unit were capped for 30 percent of its run hours, that unit would be an AU and receive the same Tier 3 adder as the FMU at the site. The AU designation was implemented to ensure that the associated unit is not dispatched in place of the FMU, resulting in no effective adder for the FMU. In the absence of the AU designation, the associated unit would be an FMU after its dispatch and the FMU would be dispatched in its place after losing its FMU designation.

Figure 3-33 shows the total number of FMUs and AUs that qualified for an adder since the inception of the business rule in February 2006. The new rules for determining the qualification of a unit as an FMU or AU became effective November 1, 2014. FMUs and AUs are designated monthly, and a unit's capping percentage is based on a rolling 12-month average, effective with a one-month lag.⁶⁰ The number of units that were eligible for an FMU or AU adder declined from an average of 70 units during the first 11 months of 2014, to zero since December 2014.

⁶⁰ OA, Schedule 1 § 6.4.2. In 2007, the FERC approved OA revisions to clarify the AU criteria.

Figure 3-33 Frequently mitigated units and associated units (By month): February 1, 2006 through September 30, 2017



Virtual Offers and Bids

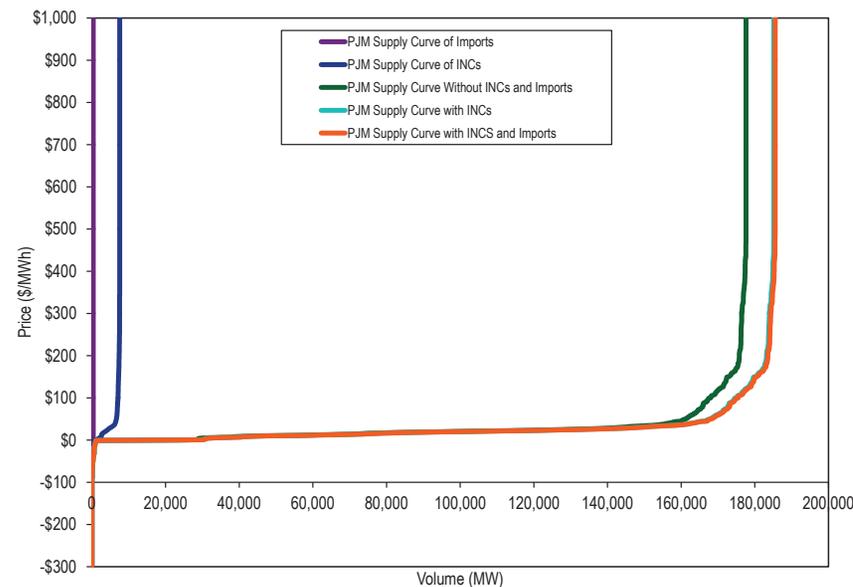
There is a substantial volume of virtual offers and bids in the PJM Day-Ahead Energy Market and such offers and bids may be marginal, based on the way in which the PJM market clearing algorithm works.

Any market participant in the PJM Day-Ahead Energy Market can use increment offers, decrement bids, up to congestion transactions, import transactions and export transactions as financial instruments that do not require physical generation or load. Increment offers and decrement bids may be submitted at any hub, transmission zone, aggregate, or single bus for which LMP is calculated. Up to congestion transactions may be submitted between any two buses on a list of 431 buses, eligible for up to congestion transaction

bidding.⁶¹ Financial Transaction Rights (FTRs) bids may be submitted at any bus on a list of selected buses that change every planning period, eligible for FTRs. Import and export transactions may be submitted at any interface pricing point, where an import is equivalent to a virtual offer that is injected into PJM and an export is equivalent to a virtual bid that is withdrawn from PJM.

Figure 3-34 shows the PJM day-ahead daily aggregate supply curve of increment offers, the system aggregate supply curve of imports, the system aggregate supply curve without increment offers and imports, the system aggregate supply curve with increment offers, and the system aggregate supply curve with increment offers and imports for an example day in 2017.

Figure 3-34 PJM day-ahead aggregate supply curves: 2017 example day



⁶¹ Market participants were required to specify an interface pricing point as the source for imports, an interface pricing point as the sink for exports or an interface pricing point as both the source and sink for transactions wheeling through PJM. On November 1, 2012, PJM eliminated this requirement. For the list of eligible sources and sinks for up to congestion transactions, see www.pjm.com/~media/etools/oasis/references/oasis-source-sink-link.ashx.

Table 3-42 shows the hourly average number of cleared and submitted increment offers and decrement bids by month in 2016 and the first nine months of 2017. The hourly average submitted and cleared increment MW increased by 21.4 and 6.5 percent, from 7,017 MW and 4,577 MW in the first nine months of 2016 to 8,521 MW and 4,876 MW in the first nine months of 2017. The hourly average submitted and cleared decrement MW increased by 20.7 percent and 7.6 percent, from 6,918 MW and 4,087 MW in the first nine months of 2016 to 8,349 MW and 4,397 MW in the first nine months of 2017.

Table 3-42 Hourly average number of cleared and submitted INCs, DEC by month: January 1, 2016 through September 30, 2017

Year		Increment Offers				Decrement Bids			
		Average Cleared	Average Submitted	Average Cleared	Average Submitted	Average Cleared	Average Submitted	Average Cleared	Average Submitted
		MW	MW	Volume	Volume	MW	MW	Volume	Volume
2016	Jan	4,350	6,447	78	398	5,153	7,320	76	295
2016	Feb	4,754	7,109	116	578	4,511	7,445	72	409
2016	Mar	4,973	8,689	142	760	4,305	8,894	101	648
2016	Apr	4,511	6,351	187	558	3,453	6,990	84	451
2016	May	5,089	7,459	181	656	4,171	6,823	94	404
2016	Jun	4,592	7,043	143	697	4,196	6,696	89	410
2016	Jul	4,101	6,534	128	745	3,335	5,830	86	448
2016	Aug	4,457	6,956	135	749	3,433	5,506	74	398
2016	Sep	4,527	6,772	148	733	4,391	7,030	112	437
2016	Oct	4,631	7,112	199	846	3,990	6,757	112	462
2016	Nov	5,022	7,822	223	1,008	3,671	6,435	109	482
2016	Dec	5,102	7,775	189	1,010	4,028	6,869	129	486
2016	Annual	4,675	7,175	156	729	4,051	6,879	95	444
2017	Jan	5,855	10,169	205	1,288	4,811	9,753	136	821
2017	Feb	6,058	10,590	266	1,430	4,599	9,326	149	784
2017	Mar	6,427	10,516	312	1,669	5,170	9,915	170	1,019
2017	Apr	5,115	8,860	280	1,401	5,139	8,986	178	776
2017	May	5,643	9,724	278	1,286	5,030	9,188	164	768
2017	Jun	3,961	7,705	193	1,153	4,314	8,257	173	831
2017	Jul	3,921	7,087	233	1,014	3,807	7,828	167	779
2017	Aug	3,418	5,951	279	1,022	3,209	5,845	169	593
2017	Sep	3,537	6,201	190	919	3,502	6,076	139	603
2017	Annual	4,876	8,521	248	1,241	4,397	8,349	161	775

Table 3-43 shows the average hourly number of up to congestion transactions and the average hourly MW in 2016 and the first nine months of 2017. In the first nine months of 2017, the average hourly up to congestion submitted MW increased 1.1 percent and cleared MW increased 6.6 percent, compared to the first nine months of 2016.

Table 3-43 Hourly average of cleared and submitted up to congestion bids by month: January 1, 2016 through September 30, 2017

Year		Up to Congestion			
		Average Cleared MW	Average Submitted MW	Average Cleared Volume	Average Submitted Volume
2016	Jan	39,639	135,369	2,466	6,015
2016	Feb	38,814	152,891	2,091	5,748
2016	Mar	31,817	148,162	1,703	5,101
2016	Apr	29,212	128,349	2,689	6,079
2016	May	32,883	120,132	2,977	6,006
2016	Jun	35,469	151,414	2,528	6,406
2016	Jul	37,668	181,720	2,413	7,158
2016	Aug	32,986	147,289	2,294	6,774
2016	Sep	29,368	129,498	2,309	6,065
2016	Oct	28,250	121,377	2,612	6,498
2016	Nov	36,506	141,491	2,927	7,324
2016	Dec	40,090	147,343	3,552	8,803
2016	Annual	34,387	142,075	2,549	6,503
2017	Jan	46,856	196,472	3,568	10,246
2017	Feb	41,841	207,994	2,711	8,309
2017	Mar	38,780	164,063	2,272	6,252
2017	Apr	42,274	152,868	2,247	6,022
2017	May	34,477	116,688	1,962	4,957
2017	Jun	29,996	112,071	1,801	4,839
2017	Jul	32,287	118,609	1,875	5,108
2017	Aug	31,511	122,677	1,931	5,062
2017	Sep	30,485	120,956	1,740	4,423
2017	Annual	36,478	145,467	2,235	6,134

Table 3-44 shows the average hourly number of import and export transactions and the average hourly MW in 2016 and first nine months of 2017. In the first nine months of 2017, the average hourly submitted and cleared import transaction MW decreased by 60.5 and 62.5 percent, and the average hourly submitted and cleared export transaction MW increased 8.4 and 5.4 percent, compared to the first nine months of 2016.

Table 3-44 Hourly average day-ahead number of cleared and submitted import and export transactions by month: January 1, 2016 through September 30, 2017

Year		Imports				Exports			
		Average Cleared MW	Average Submitted MW	Average Cleared Volume	Average Submitted Volume	Average Cleared MW	Average Submitted MW	Average Cleared Volume	Average Submitted Volume
2016	Jan	2,633	2,103	20	20	3,044	2,571	16	16
2016	Feb	2,396	2,480	20	22	2,634	2,653	13	13
2016	Mar	2,097	2,145	17	18	2,324	2,330	11	11
2016	Apr	2,150	2,180	16	16	2,620	2,635	13	13
2016	May	1,889	1,947	12	14	2,484	2,492	14	15
2016	Jun	1,335	1,366	6	7	4,428	4,471	23	24
2016	Jul	1,315	1,247	6	6	4,327	3,389	21	21
2016	Aug	1,384	1,424	6	7	4,331	4,351	20	20
2016	Sep	939	956	5	5	3,997	4,004	21	21
2016	Oct	1,104	997	6	6	3,800	2,902	22	22
2016	Nov	1,012	1,030	6	7	2,883	2,894	17	17
2016	Dec	1,302	1,354	8	9	4,284	4,306	22	22
2016	Annual	1,628	1,600	11	11	3,434	3,250	18	17
2017	Jan	1,264	1,289	6	6	3,169	3,171	16	16
2017	Feb	1,379	1,418	7	8	3,540	3,552	18	19
2017	Mar	1,125	1,157	6	7	3,791	3,813	18	18
2017	Apr	521	526	3	3	2,475	2,483	14	14
2017	May	188	201	4	4	2,805	2,817	18	18
2017	Jun	248	255	3	4	2,705	2,730	16	16
2017	Jul	308	309	2	3	2,605	2,643	14	14
2017	Aug	368	362	2	2	2,505	2,556	12	12
2017	Sep	428	416	1	2	2,405	2,469	9	10
2017	Annual	782	802	5	6	3,079	3,092	17	17

Table 3-45 shows the frequency with which generation offers, import or export transactions, up to congestion transactions, decrement bids, increment offers and price-sensitive demand were marginal from January 1, 2016, through September 30, 2017.

Table 3-45 Type of day-ahead marginal units: January 1, 2016 through September 30, 2017

	2016						2017				
	Generation	Dispatchable Transaction	Up to Congestion Transaction	Decrement Bid	Increment Offer	Price Sensitive Demand	Generation	Dispatchable Transaction	Up to Congestion Transaction	Decrement Bid	Increment Offer
Jan	5.3%	0.1%	85.2%	5.6%	3.8%	0.0%	3.2%	0.0%	85.3%	7.7%	3.7%
Feb	5.5%	0.0%	83.5%	7.4%	3.6%	0.0%	4.9%	0.0%	83.9%	6.5%	4.6%
Mar	7.0%	0.1%	80.6%	7.7%	4.7%	0.0%	4.3%	0.1%	81.5%	8.5%	5.6%
Apr	5.8%	0.0%	82.3%	8.1%	3.7%	0.0%	2.8%	0.0%	83.4%	8.9%	4.9%
May	6.2%	0.1%	83.8%	6.5%	3.4%	0.0%	3.5%	0.0%	77.4%	11.8%	7.2%
Jun	3.5%	0.0%	84.2%	8.5%	3.7%	0.0%	4.3%	0.0%	73.5%	15.4%	6.7%
Jul	3.0%	0.0%	83.1%	10.1%	3.7%	0.0%	2.9%	0.0%	77.1%	13.6%	6.4%
Aug	3.1%	0.0%	78.4%	13.1%	5.4%	0.0%	3.8%	0.0%	81.8%	9.0%	5.4%
Sep	6.1%	0.0%	76.3%	11.4%	6.2%	0.0%	6.6%	0.0%	77.8%	9.8%	5.8%
Oct	6.1%	0.1%	77.0%	10.9%	5.9%	0.0%					
Nov	4.0%	0.0%	86.5%	6.3%	3.1%	0.0%					
Dec	3.1%	0.0%	86.6%	6.9%	3.3%	0.0%					
Annual	4.7%	0.0%	82.4%	8.6%	4.2%	0.0%	4.0%	0.0%	80.4%	10.1%	5.5%

Figure 3-35 shows the monthly volume of bid and cleared INC, DEC and up to congestion bids by month from January 1, 2005, through September 30, 2017.

Figure 3-35 Monthly bid and cleared INCs, DEC and UTCs (MW): January 1, 2005 through September 30, 2017

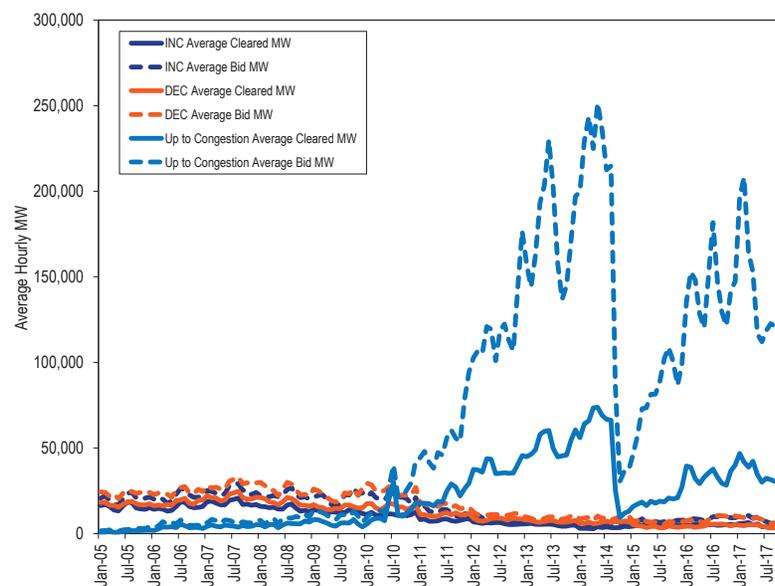
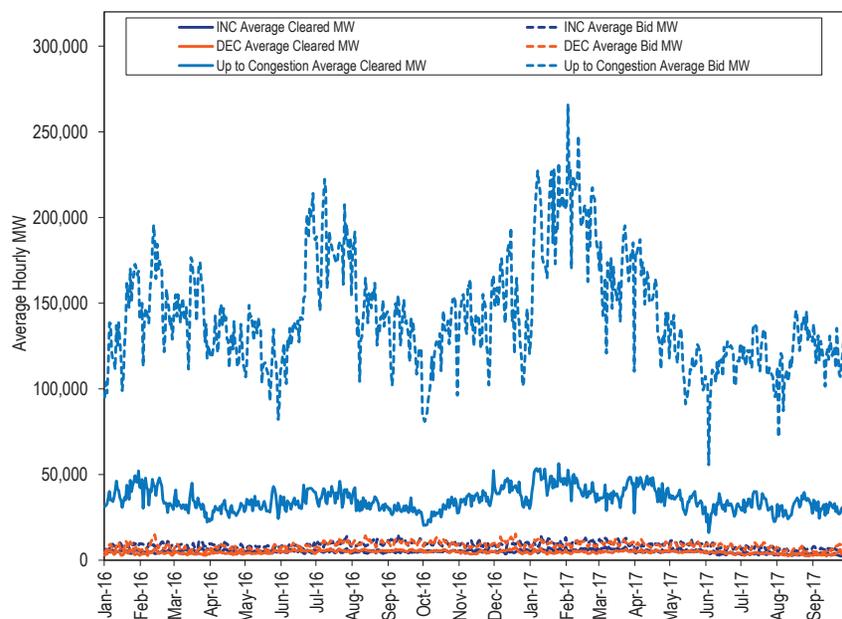


Figure 3-36 shows the daily volume of bid and cleared INC, DEC and up to congestion bids from January 1, 2016 through September 30, 2017.

Figure 3-36 Daily bid and cleared INCs, DECs, and UTCs (MW): January 1, 2016 through September 30, 2017



In order to evaluate the ownership of virtual bids, the MMU categorizes all participants making virtual bids 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 3-46 shows, in the first nine months of 2016 and 2017, the total increment offers and decrement bids and cleared MW by whether the parent organization is financial or physical.

Table 3-46 PJM INC and DEC bids and cleared MW by type of parent organization (MW): January 1 through September 30, 2016 and 2017

Category	Jan-Sep 2016				Jan-Sep 2017			
	Total Virtual Bid MW	Percent	Total Virtual Cleared MW	Percent	Total Virtual Bid MW	Percent	Total Virtual Cleared MW	Percent
Financial	61,124,874	54.1%	21,936,954	33.7%	65,722,185	59.5%	26,832,370	44.2%
Physical	51,819,249	45.9%	43,249,868	66.3%	44,791,770	40.5%	33,908,176	55.8%
Total	112,944,124	100.0%	65,186,822	100.0%	110,513,955	100.0%	60,740,546	100.0%

Table 3-47 shows, in the first nine months of 2016 and 2017, the total up to congestion bids and cleared MW by whether the parent organization was financial or physical.

Table 3-47 PJM up to congestion transactions by type of parent organization (MW): January 1 through September 30, 2016 and 2017

Category	Jan-Sep 2016				Jan-Sep 2017			
	Total Up to Congestion Bid MW	Percent	Total Up to Congestion Cleared MW	Percent	Total Up to Congestion Bid MW	Percent	Total Up to Congestion Cleared MW	Percent
Financial	904,636,563	95.6%	209,224,861	93.0%	931,474,310	98.1%	228,911,492	96.1%
Physical	41,404,176	4.4%	15,648,427	7.0%	17,985,716	1.9%	9,178,854	3.9%
Total	946,040,739	100.0%	224,873,289	100.0%	949,460,026	100.0%	238,090,346	100.0%

Table 3-48 shows, in the first nine months of 2016 and 2017, the total import and export transactions by whether the parent organization was financial or physical.

Table 3-48 PJM import and export transactions by type of parent organization (MW): January 1 through September 30, 2016 and 2017

		Jan-Sep 2016		Jan-Sep 2017	
Category		Total Import and Export MW	Percent	Total Import and Export MW	Percent
Day-Ahead	Financial	14,036,369	41.5%	9,725,219	39.7%
	Physical	19,813,715	58.5%	14,790,242	60.3%
	Total	33,850,084	100.0%	24,515,462	100.0%
Real-Time	Financial	19,648,594	34.4%	17,003,782	38.8%
	Physical	37,488,532	65.6%	26,834,587	61.2%
	Total	57,137,126	100.0%	43,838,369	100.0%

Table 3-49 shows increment offers and decrement bids bid by top 10 locations in the first nine months of 2016 and 2017.

Table 3-49 PJM virtual offers and bids by top 10 locations (MW): January 1 through September 30, 2016 and 2017

Jan-Sep 2016					Jan-Sep 2017				
Aggregate/Bus Name	Aggregate/Bus Type	INC MW	DEC MW	Total MW	Aggregate/Bus Name	Aggregate/Bus Type	INC MW	DEC MW	Total MW
WESTERN HUB	HUB	17,601,316	16,931,839	34,533,154	WESTERN HUB	HUB	16,303,266	12,276,948	28,580,213
MISO	INTERFACE	330,509	3,360,916	3,691,425	MISO	INTERFACE	221,785	5,278,718	5,500,503
SOUTHIMP	INTERFACE	3,052,550	0	3,052,550	AEP-DAYTON HUB	HUB	2,055,810	508,370	2,564,180
N ILLINOIS HUB	HUB	935,621	1,832,960	2,768,582	NYIS	INTERFACE	1,232,270	1,042,835	2,275,104
NYIS	INTERFACE	1,245,580	941,396	2,186,976	N ILLINOIS HUB	HUB	457,428	1,689,308	2,146,736
BGE	ZONE	397,423	1,787,677	2,185,100	SOUTHIMP	INTERFACE	1,999,033	0	1,999,033
AEP-DAYTON HUB	HUB	1,010,667	634,063	1,644,729	FOWLER 34.5 KV FWLR1AWF	GEN	366,891	1,193,753	1,560,644
PEPCO	ZONE	390,455	645,873	1,036,328	DCKCRKCE345 KV UN1 DYN	GEN	1,086,888	445,631	1,532,519
IMO	INTERFACE	947,847	44,607	992,453	BGE	ZONE	327,412	1,072,672	1,400,084
PECO	ZONE	704,416	214,326	918,742	PEPCO	ZONE	400,553	542,606	943,159
Top ten total		26,616,383	26,393,656	53,010,039			24,451,336	24,050,840	48,502,176
PJM total		58,672,006	54,272,117	112,944,124			55,822,362	54,691,593	110,513,955
Top ten total as percent of PJM total		45.4%	48.6%	46.9%			43.8%	44.0%	43.9%

Table 3-50 shows up to congestion transactions by import bids for the top 10 locations and associated profits at each path in the first nine months of 2016 and 2017.⁶²

⁶² The source and sink aggregates in these tables refer to the name and location of a bus and do not include information about the behavior of any individual market participant.

Table 3-50 PJM cleared up to congestion import bids by top 10 source and sink pairs (MW): January 1 through September 30, 2016 and 2017

Jan-Sep 2016							
Imports							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
MISO	INTERFACE	COOK	EHVAGG	420,275	\$81,672	\$27,211	\$108,883
HUDSONTP	INTERFACE	LEONIA 230 T-2	AGGREGATE	412,447	\$987,993	(\$956,659)	\$31,334
SOUTHWEST	INTERFACE	DUMONT	EHVAGG	402,413	\$9,043	(\$20,474)	(\$11,431)
NEPTUNE	INTERFACE	SOUTHRIV 230	AGGREGATE	387,958	\$383,410	(\$197,930)	\$185,480
MISO	INTERFACE	112 WILTON	EHVAGG	346,995	\$455,544	(\$347,208)	\$108,336
SOUTHIMP	INTERFACE	NAGELAEP	EHVAGG	311,554	\$266,334	(\$360,165)	(\$93,831)
OVEC	INTERFACE	COOK	EHVAGG	297,528	\$146,628	(\$54,084)	\$92,544
NORTHWEST	INTERFACE	COMED	ZONE	283,823	\$54,942	(\$29,765)	\$25,177
SOUTHWEST	INTERFACE	COOK	EHVAGG	267,209	\$21,575	\$54,108	\$75,684
OVEC	INTERFACE	DEOK	ZONE	267,145	\$232,491	(\$179,793)	\$52,698
Top ten total				3,397,349	\$2,639,632	(\$2,064,758)	\$574,874
PJM total				20,730,628	\$13,599,867	(\$9,478,576)	\$4,121,291
Top ten total as percent of PJM total				16.4%	19.4%	21.8%	13.9%
Jan-Sep 2017							
Imports							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
MISO	INTERFACE	COOK	EHVAGG	854,805	\$521,201	(\$354,941)	\$166,260
HUDSONTP	INTERFACE	LEONIA 230 T-2	AGGREGATE	466,687	\$150,439	(\$147,219)	\$3,220
NYIS	INTERFACE	PSEG	ZONE	372,599	\$527,718	(\$582,513)	(\$54,795)
SOUTHEAST	INTERFACE	WEST INT HUB	HUB	369,699	\$197,151	(\$151,637)	\$45,514
OVEC	INTERFACE	DEOK	ZONE	319,538	\$193,104	(\$64,012)	\$129,092
OVEC	INTERFACE	ATSI	ZONE	277,086	\$60,419	\$116,940	\$177,359
SOUTHEAST	INTERFACE	VP KERR DAM 1-7	AGGREGATE	265,948	\$212,672	(\$155,282)	\$57,390
NORTHWEST	INTERFACE	COMED	ZONE	241,666	\$73,282	\$94,586	\$167,867
SOUTHEAST	INTERFACE	WILLIAMSPORT - AP	AGGREGATE	229,512	\$297,905	(\$226,827)	\$71,077
OVEC	INTERFACE	SPORN 1	AGGREGATE	226,980	\$137,726	(\$111,796)	\$25,930
Top ten total				3,624,519	\$2,371,616	(\$1,582,701)	\$788,915
PJM total				17,758,402	\$12,260,566	(\$10,137,747)	\$2,122,819
Top ten total as percent of PJM total				20.4%	19.3%	15.6%	37.2%

Table 3-51 shows up to congestion transactions by export bids for the top 10 locations and associated profits at each path in the first nine months of 2016 and 2017.

Table 3-51 PJM cleared up to congestion export bids by top 10 source and sink pairs (MW): January 1 through September 30, 2016 and 2017

Jan-Sep 2016							
Exports							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
COMED	ZONE	NIPSCO	INTERFACE	1,193,829	\$922,273	\$386,705	\$1,308,978
21 KINCA ATR24304	AGGREGATE	SOUTHWEST	INTERFACE	816,704	\$873,223	(\$692,677)	\$180,546
SULLIVAN-AEP	EHVAGG	OVEC	INTERFACE	796,526	\$916,708	(\$630,209)	\$286,499
21 KINCA ATR24304	AGGREGATE	NIPSCO	INTERFACE	680,935	\$623,866	\$135,178	\$759,045
ROCKPORT	EHVAGG	SOUTHWEST	INTERFACE	357,690	(\$73,298)	\$149,178	\$75,879
21 KINCA ATR24404	AGGREGATE	SOUTHWEST	INTERFACE	355,384	(\$72,043)	\$234,560	\$162,517
STMARYSGEN	AGGREGATE	NIPSCO	INTERFACE	351,173	\$218,264	(\$143,020)	\$75,244
EAST BEND 2	AGGREGATE	SOUTHWEST	INTERFACE	320,779	\$220,091	(\$151,543)	\$68,549
GRAND RIDGE WF	AGGREGATE	NIPSCO	INTERFACE	312,809	\$164,772	\$58,445	\$223,217
CLOVERDALE	EHVAGG	SOUTHEXP	INTERFACE	312,039	\$253,486	(\$141,037)	\$112,449
Top ten total				5,497,868	\$4,047,342	(\$794,420)	\$3,252,922
PJM total				16,874,053	\$10,543,810	(\$3,181,309)	\$7,362,501
Top ten total as percent of PJM total				32.6%	38.4%	25.0%	44.2%
Jan-Sep 2017							
Exports							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
JEFFERSON	EHVAGG	SOUTHWEST	INTERFACE	948,831	\$1,095,813	(\$824,364)	\$271,450
21 KINCA ATR24304	AGGREGATE	SOUTHWEST	INTERFACE	785,957	\$462,812	(\$331,760)	\$131,051
COMED	ZONE	NIPSCO	INTERFACE	733,390	\$179,536	\$767,350	\$946,886
SULLIVAN-AEP	EHVAGG	SOUTHWEST	INTERFACE	391,617	\$144,407	(\$51,237)	\$93,170
JEFFERSON	EHVAGG	NIPSCO	INTERFACE	386,653	\$401,933	(\$294,436)	\$107,497
ROCKPORT	EHVAGG	SOUTHWEST	INTERFACE	384,148	\$104,896	(\$92,301)	\$12,595
21 KINCA ATR24304	AGGREGATE	NIPSCO	INTERFACE	349,219	\$118,071	(\$84,517)	\$33,554
POWERTON 5	AGGREGATE	NORTHWEST	INTERFACE	295,770	(\$118,521)	\$5,332	(\$113,190)
GENEVA	AGGREGATE	NIPSCO	INTERFACE	287,642	\$246,941	(\$263,806)	(\$16,865)
QUAD CITIES 2	AGGREGATE	MISO	INTERFACE	280,514	\$11,169	(\$6,960)	\$4,210
Top ten total				4,843,740	\$2,647,058	(\$1,176,699)	\$1,470,359
PJM total				16,060,146	\$5,192,338	(\$113,341)	\$5,078,997
Top ten total as percent of PJM total				30.2%	51.0%	1038.2%	28.9%

Table 3-52 shows up to congestion transactions by wheel bids and associated profits at each path for the top 10 locations in the first nine months of 2016 and 2017.

Table 3-52 PJM cleared up to congestion wheel bids by top 10 source and sink pairs (MW): January 1 through September 30, 2016 and 2017

Jan-Sep 2016							
Wheels							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
NORTHWEST	INTERFACE	MISO	INTERFACE	368,290	\$68,502	\$25,240	\$93,742
MISO	INTERFACE	NIPSCO	INTERFACE	347,090	\$318,960	(\$72,526)	\$246,434
NYIS	INTERFACE	IMO	INTERFACE	234,305	\$17,005	\$42,083	\$59,088
SOUTHWEST	INTERFACE	SOUTHEXP	INTERFACE	185,952	\$289,962	(\$207,680)	\$82,282
MISO	INTERFACE	NORTHWEST	INTERFACE	157,480	\$107,182	(\$12,516)	\$94,666
IMO	INTERFACE	NYIS	INTERFACE	120,984	\$80,681	(\$134,532)	(\$53,850)
SOUTHWEST	INTERFACE	NIPSCO	INTERFACE	78,789	\$92,987	(\$51,023)	\$41,964
IMO	INTERFACE	MISO	INTERFACE	50,526	\$32,174	(\$59,262)	(\$27,088)
MISO	INTERFACE	SOUTHEXP	INTERFACE	36,874	\$102,954	(\$75,081)	\$27,874
NEPTUNE	INTERFACE	NYIS	INTERFACE	32,018	\$41,928	(\$35,602)	\$6,326
Top ten total				1,612,308	\$1,152,335	(\$580,899)	\$571,436
PJM total				1,883,658	\$1,306,706	(\$651,436)	\$655,270
Top ten total as percent of PJM total				85.6%	88.2%	89.2%	87.2%
Jan-Sep 2017							
Wheels							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
MISO	INTERFACE	NIPSCO	INTERFACE	256,570	\$285,988	(\$164,424)	\$121,564
NORTHWEST	INTERFACE	MISO	INTERFACE	213,680	\$214,802	(\$60,349)	\$154,452
MISO	INTERFACE	NORTHWEST	INTERFACE	197,138	\$88,379	(\$79,447)	\$8,932
SOUTHWEST	INTERFACE	SOUTHEXP	INTERFACE	173,826	\$350,520	(\$330,303)	\$20,217
NORTHWEST	INTERFACE	NIPSCO	INTERFACE	63,521	\$10,902	\$89,325	\$100,226
SOUTHWEST	INTERFACE	NIPSCO	INTERFACE	54,387	\$56,776	(\$18,685)	\$38,091
OVEC	INTERFACE	SOUTHWEST	INTERFACE	26,050	(\$10,819)	\$14,112	\$3,293
SOUTHIMP	INTERFACE	MISO	INTERFACE	15,616	(\$654)	\$19,407	\$18,753
MISO	INTERFACE	SOUTHWEST	INTERFACE	15,377	(\$4,322)	\$5,687	\$1,365
NORTHWEST	INTERFACE	SOUTHWEST	INTERFACE	15,224	(\$17,536)	\$14,618	(\$2,917)
Top ten total				1,031,389	\$974,036	(\$510,060)	\$463,976
PJM total				1,226,777	\$1,084,615	(\$589,413)	\$495,202
Top ten total as percent of PJM total				84.1%	89.8%	86.5%	93.7%

On November 1, 2012, PJM eliminated the requirement for market participants to specify an interface pricing point as either the source or sink of an up to congestion transaction. The top 10 internal up to congestion transaction locations were 5.5 percent of the PJM total internal up to congestion transactions MW in the first nine months of 2017.

Table 3-53 shows up to congestion transactions by internal bids for the top 10 locations and associated profits at each path in the first nine months of 2016 and 2017. The total UTC profit by top 10 locations decreased by \$0.6 million, from \$2.5 million in the first nine months of 2016 to \$1.9 million in the first nine months of 2017. The total internal cleared MW increased by 18.5 million MW, or 10.0 percent, from 185.4 million MW in the first nine months of 2016 to 203.8 million MW in the first nine months of 2017.

Table 3-53 PJM cleared up to congestion internal bids by top 10 source and sink pairs (MW): January 1 through September 30, 2016 and 2017

Jan-Sep 2016							
Internal							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
21 KINCA ATR24304	AGGREGATE	MICHFE	AGGREGATE	1,644,791	\$79,429	\$336,092	\$415,520
21 KINCA ATR24404	AGGREGATE	MICHFE	AGGREGATE	1,187,493	(\$400,827)	\$527,561	\$126,734
BERGEN 2CC	AGGREGATE	LEONIA 230 T-1	AGGREGATE	991,052	\$1,995,116	(\$1,991,033)	\$4,084
BYRON 1	AGGREGATE	ROCKFORD	AGGREGATE	956,523	\$837,695	\$367,038	\$1,204,733
ROCKPORT	EHVAGG	JEFFERSON	EHVAGG	847,431	\$682,497	(\$606,096)	\$76,402
BLACKOAK	EHVAGG	BEDINGTON	EHVAGG	775,892	\$506,532	(\$1,054,900)	(\$548,369)
112 WILTON	EHVAGG	DUMONT	EHVAGG	763,018	\$356,648	(\$313,595)	\$43,054
CLOVERDALE	EHVAGG	CLOVERD2 138 KV T4	AGGREGATE	758,676	\$541,175	\$577,399	\$1,118,575
BRISTERS	EHVAGG	OX	EHVAGG	740,821	\$974,035	(\$903,879)	\$70,157
WHIPPANY BK 7	AGGREGATE	TRAYNOR	AGGREGATE	740,246	\$537,051	(\$517,714)	\$19,338
Top ten total				9,405,943	\$6,109,352	(\$3,579,126)	\$2,530,226
PJM total				185,384,950	\$109,392,657	(\$86,319,972)	\$23,072,685
Top ten total as percent of PJM total				5.1%	5.6%	4.1%	11.0%
Jan-Sep 2017							
Internal							
Source	Source Type	Sink	Sink Type	MW	Source Profit	Sink Profit	UTC Profit
DUMONT	EHVAGG	COOK	EHVAGG	2,122,722	\$1,066,199	(\$771,161)	\$295,038
AEP-DAYTON HUB	HUB	N ILLINOIS HUB	HUB	1,210,561	\$34,835	\$42,024	\$76,860
JEFFERSON	EHVAGG	OHIO HUB	HUB	1,125,462	\$873,830	(\$525,924)	\$347,906
BAKER	EHVAGG	AMP-OHIO	AGGREGATE	1,117,855	\$182,468	\$139,340	\$321,808
STUART 3	AGGREGATE	MICHFE	AGGREGATE	1,111,651	\$66,977	\$290,770	\$357,746
DAY	ZONE	BUCKEYE - DPL	AGGREGATE	1,101,271	\$297,706	(\$136,041)	\$161,665
FE GEN	AGGREGATE	ATSI	ZONE	1,033,870	(\$449,838)	\$625,110	\$175,273
WINNETKA	AGGREGATE	CHICAGO HUB	HUB	801,143	\$322,998	(\$223,897)	\$99,101
HOMERCIT	AGGREGATE	AEC - PN	AGGREGATE	799,122	\$485,266	(\$473,412)	\$11,854
NORTH PROCTORVILLE	EHVAGG	APS	ZONE	796,992	\$365,102	(\$326,300)	\$38,802
Top ten total				11,220,648	\$3,245,543	(\$1,359,490)	\$1,886,053
PJM total				203,847,327	\$61,135,224	(\$34,975,367)	\$26,159,857
Top ten total as percent of PJM total				5.5%	5.3%	3.9%	7.2%

Table 3-54 shows the number of source-sink pairs that were offered and cleared monthly for January 2016 through September 2017.

Table 3-54 Number of PJM offered and cleared source and sink pairs: January 1, 2016 through September 30, 2017

Daily Number of Source-Sink Pairs					
Year	Month	Average Offered	Max Offered	Average Cleared	Max Cleared
2016	Jan	7,714	8,793	6,174	7,374
2016	Feb	9,200	11,172	7,203	7,957
2016	Mar	8,826	11,572	6,338	8,126
2016	Apr	7,697	8,473	5,958	6,767
2016	May	8,521	9,398	6,707	7,273
2016	Jun	9,261	10,948	6,913	7,770
2016	Jul	12,401	16,103	8,571	11,695
2016	Aug	12,464	13,576	8,725	9,224
2016	Sep	12,297	16,324	7,736	9,230
2016	Oct	11,248	13,114	7,648	8,539
2016	Nov	13,151	16,725	8,173	11,581
2016	Dec	12,688	15,868	8,101	9,630
2016	Annual	10,455	12,672	7,354	8,764
2017	Jan	11,893	13,258	7,785	8,839
2017	Feb	9,337	11,902	6,756	7,758
2017	Mar	7,795	8,776	6,051	7,001
2017	Apr	8,168	8,805	6,494	7,172
2017	May	7,988	9,117	6,504	7,294
2017	Jun	9,776	13,012	5,822	6,228
2017	Jul	12,726	13,334	5,960	6,481
2017	Aug	12,966	15,729	6,578	7,201
2017	Sep	7,758	9,229	6,030	7,162
2017	Jan-Sep	9,823	11,462	6,442	7,237

Table 3-55 and Figure 3-37 show total cleared up to congestion transactions by type in the first nine months of 2016 and 2017. Total up to congestion transactions in the first nine months of 2017 increased by 5.9 percent from 224.9 million MW in the first nine months of 2016 to 238.1 million MW in the first nine months of 2017. Internal up to congestion transactions in the first nine months of 2017 were 85.3 percent of all up to congestion transactions compared to 82.4 percent in the first nine months of 2016.

Table 3-55 PJM cleared up to congestion transactions by type (MW): January 1 through September 30, 2016 and 2017

	Jan-Sep 2016				
	Cleared Up to Congestion Bids				
	Import	Export	Wheel	Internal	Total
Top ten total (MW)	3,397,349	5,497,868	1,612,308	9,405,943	19,913,468
PJM total (MW)	20,730,628	16,874,053	1,883,658	185,384,950	224,873,289
Top ten total as percent of PJM total	16.4%	32.6%	85.6%	5.1%	8.9%
PJM total as percent of all up to congestion transactions	9.2%	7.5%	0.8%	82.4%	100.0%
	Jan-Sep 2017				
	Cleared Up to Congestion Bids				
	Import	Export	Wheel	Internal	Total
Top ten total (MW)	3,624,519	4,843,740	1,031,389	11,220,648	20,720,296
PJM total (MW)	17,758,402	16,060,146	1,226,777	203,847,327	238,892,652
Top ten total as percent of PJM total	20.4%	30.2%	84.1%	5.5%	8.7%
PJM total as percent of all up to congestion transactions	7.4%	6.7%	0.5%	85.3%	100.0%

Figure 3-37 shows the initial increase and continued increase in internal up to congestion transactions by month following the November 1, 2012 rule change permitting such transactions, until September 8, 2014. The reduction in up to congestion transactions (UTC) that followed a FERC order setting September 8, 2014, as the effective date for any uplift charges subsequently assigned to UTCs, was reversed. There was an increase in up to congestion volume as a result of the expiration of the fifteen month refund period for the proceeding related to uplift charges for UTC transactions.⁶³

⁶³ *Id.*

Figure 3-37 PJM monthly cleared up to congestion transactions by type (MW): January 1, 2005, through September 30, 2017

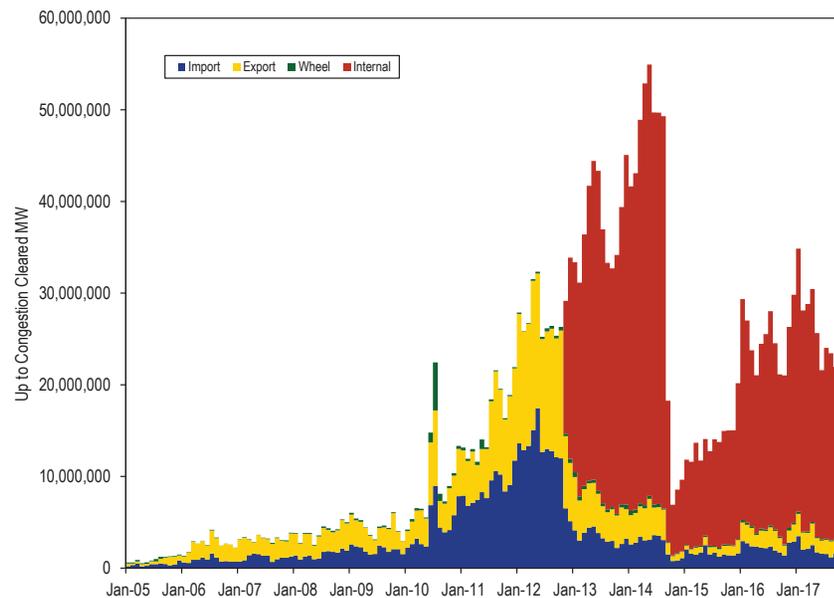
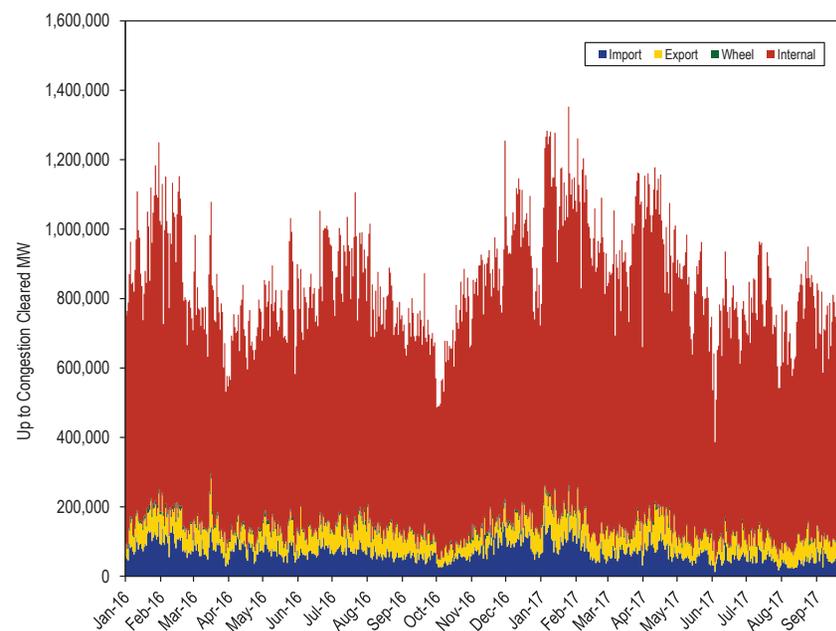


Figure 3-38 shows the daily cleared up to congestion MW by transaction type from January 1, 2016 through September 30, 2017.

Figure 3-38 PJM daily cleared up to congestion transaction by type (MW): January 1, 2016, through September 30, 2017



Market Performance

PJM locational marginal prices (LMPs) are a direct measure of market performance. The market performs optimally when the market structure provides incentives for market participants to behave competitively. With price formation in a competitive market, prices equal the value of the marginal unit of output and reflect the most efficient and least cost allocation of resources to meet demand.

Markup

The markup index is a measure of the competitiveness of participant behavior for individual units. The markup in dollars is a measure of the impact of

participant behavior on the generator bus market price when a unit is marginal. As an example, if unit A has a \$90 cost and a \$100 price, while unit B has a \$9 cost and a \$10 price, both would show a markup index of 10 percent, but the price impact of unit A's markup at the generator bus would be \$10 while the price impact of unit B's markup at the generator bus would be \$1. Depending on each unit's location on the transmission system, those bus level impacts could also have different impacts on total system price. Markup can also affect prices when units with high markups are not marginal by altering the economic dispatch order of supply.

The MMU calculates an explicit measure of the impact of marginal unit markups on LMP using the mathematical relationships among LMPs in the market solution.⁶⁴ The markup impact calculation sums, over all marginal units, the product of the dollar markup of the unit and the marginal impact of the unit's offer on the system load-weighted LMP. The markup impact includes the impact of the identified markup behavior of all marginal units. Positive and negative markup impacts may offset one another. The markup analysis is a direct measure of market performance. It does not take into account whether or not marginal units have either locational or aggregate structural market power.

The markup calculation is not based on a counterfactual redispatch of the system to determine the marginal units and their marginal costs that would have occurred if all units had made all offers at short run marginal cost. A full redispatch analysis is practically impossible and a limited redispatch analysis would not be dispositive. Nonetheless, such a hypothetical counterfactual analysis would reveal the extent to which the actual system dispatch is less than competitive if it showed a difference between dispatch based on short run marginal cost and actual dispatch. It is possible that the unit-specific markup, based on a redispatch analysis, would be lower than the markup component of price if the reference point were an inframarginal unit with a lower price and a higher cost than the actual marginal unit. If the actual marginal unit

has short run marginal costs that would cause it to be inframarginal, a new unit would be marginal. If the offer of that new unit were greater than the cost of the original marginal unit, the markup impact would be lower than the MMU measure. If the newly marginal unit is on a price-based schedule, the analysis would have to capture the markup impact of that unit as well.

Real-Time Markup

Markup Component of Real-Time Price by Fuel, Unit Type

The markup component of price is the difference between the system price, when the system price is determined by the active offers of the marginal units, whether price or cost-based, and the system price, based on the cost-based offers of those marginal units.

Table 3-56 shows the impact (markup component of LMP) of the markup behavior by fuel type and unit type on the real-time load-weighted average system LMP, using unadjusted and adjusted offers. The adjusted markup component of LMP increased from \$2.36 per MWh in the first nine months of 2016 to \$4.74 per MWh in the first nine months of 2017. The adjusted markup contribution of coal units in the first nine months of 2017 was \$0.10 per MWh. The adjusted mark-up component of gas fired units in the first nine months of 2017 was \$3.41 per MWh, an increase of \$1.05 per MWh from the first nine months of 2016. The markup component of wind units was \$0.06 per MWh. If a price-based offer is negative, but less negative than a cost-based offer, the markup is positive. In the first nine months of 2017, among the wind units that were marginal, 6.9 percent had positive offer prices.

⁶⁴ The MMU calculates the impact on system prices of marginal unit price-cost markup, based on analysis using sensitivity factors. The calculation shows the markup component of LMP based on a comparison between the price-based offer and the cost-based offer of each actual marginal unit on the system. This is the same method used to calculate the fuel cost adjusted LMP and the components of LMP. See Calculation and Use of Generator Sensitivity/Unit Participation Factors, 2010 State of the Market Report for PJM: Technical Reference for PJM Markets.

Table 3-56 Markup component of the overall PJM real-time, load-weighted, average LMP by primary fuel type and unit type: January 1 through September 30, 2016 and 2017⁶⁵

Fuel Type	Unit Type	2016 (Jan-Sep)		2017 (Jan-Sep)	
		Markup Component of LMP (Unadjusted)	Markup Component of LMP (Adjusted)	Markup Component of LMP (Unadjusted)	Markup Component of LMP (Adjusted)
Coal	Steam	(\$1.48)	\$0.10	\$0.22	\$1.28
Gas	CC	\$1.10	\$1.55	\$1.86	\$2.86
Gas	CT	\$0.17	\$0.38	\$0.27	\$0.44
Gas	Diesel	\$0.00	\$0.00	(\$0.00)	\$0.00
Gas	Steam	\$0.29	\$0.43	\$0.03	\$0.11
Municipal Waste	Diesel	\$0.01	\$0.01	\$0.00	\$0.00
Municipal Waste	Steam	(\$0.00)	(\$0.00)	\$0.00	\$0.00
Oil	CC	\$0.00	\$0.00	\$0.00	\$0.00
Oil	CT	\$0.01	\$0.04	(\$0.06)	(\$0.04)
Oil	Diesel	\$0.00	\$0.00	\$0.00	\$0.00
Oil	Steam	\$0.00	\$0.00	(\$0.00)	\$0.00
Other	Steam	(\$0.18)	(\$0.18)	\$0.02	\$0.02
Uranium		\$0.00	\$0.00	\$0.00	\$0.00
Wind		\$0.02	\$0.02	\$0.06	\$0.06
Total		(\$0.05)	\$2.36	\$2.41	\$4.74

Markup Component of Real-Time Price

Table 3-57 shows the markup component, calculated using unadjusted offers, of average prices and of average monthly on peak and off peak prices. Table 3-58 shows the markup component, calculated using adjusted offers, of average prices and of average monthly on peak and off peak prices. In the first nine months of 2017, when using unadjusted cost offers, \$2.41 per MWh of the PJM real-time load-weighted average LMP was attributable to markup. Using adjusted cost offers, \$4.74 per MWh of the PJM real-time load-weighted average LMP was attributable to markup. In the first nine months of 2017, the peak markup component was highest in May, \$5.51 per MWh using unadjusted cost offers and \$8.23 per MWh using adjusted cost offers. This corresponds to 14.54 percent and 21.72 percent of the real-time peak load-weighted average LMP in May.

⁶⁵ The Unit Type Diesel refers to power generation using reciprocating internal combustion engines. Such Diesel units can use a variety of fuel types including diesel, natural gas, oil and gas from municipal waste.

Table 3-57 Monthly markup components of real-time load-weighted LMP (Unadjusted): January 1 through September 30, 2016 and 2017

	2016			2017		
	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component
Jan	(\$1.89)	(\$1.95)	(\$1.82)	\$1.75	\$0.47	\$3.11
Feb	(\$0.43)	(\$0.59)	(\$0.28)	\$1.13	\$0.53	\$1.70
Mar	(\$1.24)	(\$1.22)	(\$1.25)	\$1.12	\$1.70	\$0.60
Apr	\$0.32	(\$0.82)	\$1.41	\$1.87	\$0.93	\$2.86
May	(\$1.68)	(\$1.13)	(\$2.24)	\$2.91	(\$0.01)	\$5.51
Jun	\$0.86	\$0.60	\$1.07	\$3.08	\$0.93	\$4.88
Jul	(\$0.06)	(\$1.02)	\$0.89	\$3.63	\$2.16	\$5.14
Aug	\$1.18	\$0.10	\$2.06	\$2.69	\$1.11	\$3.94
Sep	\$2.23	\$1.25	\$3.12	\$3.17	\$1.46	\$4.86
Total	(\$0.04)	(\$0.56)	\$0.44	\$2.41	\$1.07	\$3.67

Table 3-58 Monthly markup components of real-time load-weighted LMP (Adjusted): January 1 through September 30, 2016 and 2017

	2016			2017		
	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component
Jan	\$0.76	\$0.44	\$1.12	\$4.43	\$3.07	\$5.88
Feb	\$1.98	\$1.55	\$2.39	\$3.33	\$2.60	\$4.03
Mar	\$0.63	\$0.49	\$0.76	\$3.58	\$3.82	\$3.37
Apr	\$2.61	\$1.32	\$3.85	\$4.01	\$2.95	\$5.12
May	\$0.35	\$0.65	\$0.06	\$5.33	\$2.07	\$8.23
Jun	\$3.10	\$2.54	\$3.58	\$5.29	\$2.85	\$7.33
Jul	\$2.64	\$1.19	\$4.08	\$6.10	\$4.29	\$7.96
Aug	\$4.02	\$2.39	\$5.35	\$4.89	\$3.04	\$6.35
Sep	\$4.58	\$3.25	\$5.79	\$5.27	\$3.37	\$7.13
Total	\$2.37	\$1.53	\$3.15	\$4.74	\$3.16	\$6.21

Hourly Markup Component of Real-Time Prices

Figure 3-39 shows the markup contribution to the hourly load-weighted LMP using unadjusted cost offers in the first nine months of 2017 and 2016. Figure 3-40 shows the markup contribution to the hourly load-weighted LMP using adjusted cost offers in the first nine months of 2017 and 2016.

Figure 3-39 Markup contribution to real-time hourly load-weighted LMP (Unadjusted): January 1 through September 30, 2016 and 2017

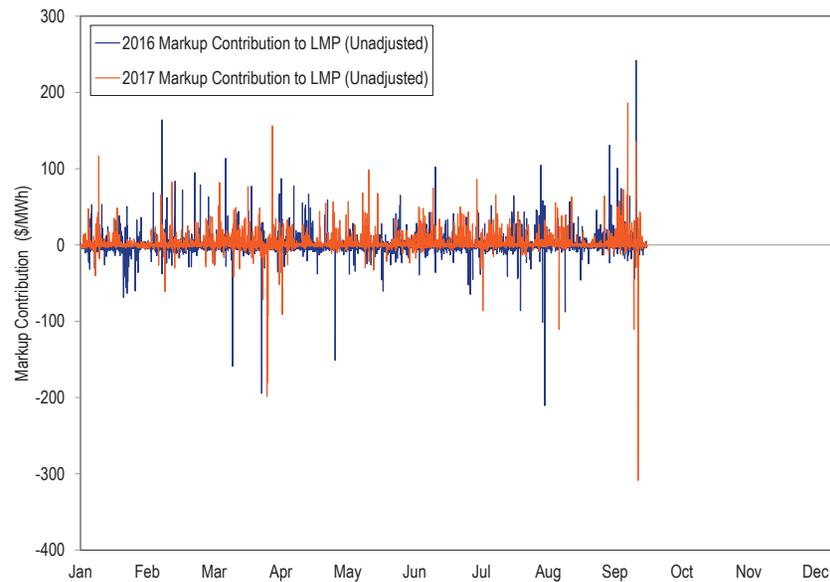
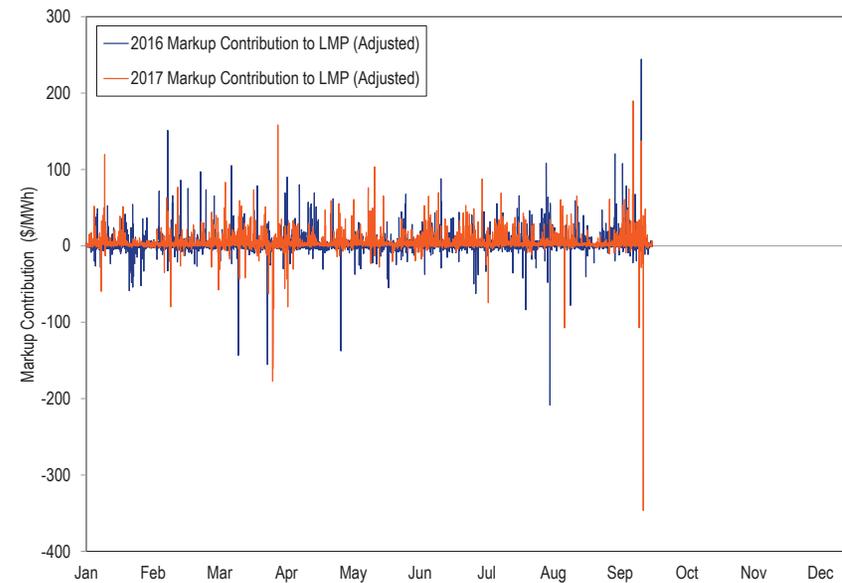


Figure 3-40 Markup contribution to real-time hourly load-weighted LMP (Adjusted): January 1 through September 30, 2016 and 2017



Markup Component of Real-Time Zonal Prices

The unit markup component of average real-time price using unadjusted offers is shown for each zone in the first nine months of 2016 and 2017 in Table 3-59 and for adjusted offers in Table 3-60. The smallest zonal all hours average markup component using unadjusted offers in the first nine months of 2017 was in the Met-Ed Zone, \$1.86 per MWh, while the highest was in the BGE Control Zone, \$3.00 per MWh. The smallest zonal on peak average markup was in the RECO Control Zone, \$2.49 per MWh, while the highest was in the BGE Control Zone, \$4.60 per MWh.

Table 3-59 Average real-time zonal markup component (Unadjusted): January 1 through September 30, 2016 and 2017

	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component
AECO	\$0.99	\$0.55	\$1.40	\$2.11	\$1.21	\$2.98
AEP	(\$0.44)	(\$0.94)	\$0.04	\$2.26	\$1.03	\$3.43
APS	(\$0.30)	(\$0.84)	\$0.21	\$2.37	\$0.98	\$3.70
ATSI	(\$0.23)	(\$0.87)	\$0.37	\$2.35	\$1.08	\$3.53
BGE	(\$1.33)	(\$2.21)	(\$0.49)	\$3.00	\$1.31	\$4.60
ComEd	(\$0.11)	(\$0.68)	\$0.40	\$2.35	\$0.92	\$3.66
DAY	(\$0.48)	(\$0.88)	(\$0.13)	\$2.34	\$1.09	\$3.47
DEOK	(\$0.33)	(\$0.84)	\$0.15	\$2.43	\$1.09	\$3.70
DLCO	(\$0.03)	(\$0.72)	\$0.61	\$2.38	\$1.00	\$3.67
DPL	\$1.44	\$0.84	\$2.02	\$2.37	\$1.48	\$3.21
Dominion	(\$0.61)	(\$0.97)	(\$0.26)	\$2.85	\$1.17	\$4.46
EKPC	(\$0.40)	(\$0.59)	(\$0.21)	\$2.26	\$1.03	\$3.50
JCPL	\$1.15	\$0.71	\$1.55	\$2.49	\$1.21	\$3.64
Met-Ed	\$0.77	\$0.54	\$0.97	\$1.86	\$0.74	\$2.90
PECO	\$1.30	\$0.68	\$1.87	\$2.13	\$1.07	\$3.13
PENELEC	\$0.11	(\$0.40)	\$0.59	\$2.42	\$1.31	\$3.45
PPL	\$0.95	\$0.52	\$1.36	\$1.95	\$0.75	\$3.08
PSEG	\$1.04	\$0.64	\$1.40	\$2.48	\$1.16	\$3.69
Pepco	(\$0.95)	(\$1.46)	(\$0.48)	\$2.73	\$1.13	\$4.20
RECO	\$1.08	\$0.51	\$1.57	\$1.95	\$1.31	\$2.49

Table 3-60 Average real-time zonal markup component (Adjusted): January 1 through September 30, 2016 and 2017

	2016 (Jan-Sep)			2017 (Jan-Sep)		
	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component	Markup Component (All Hours)	Off Peak Markup Component	Peak Markup Component
AECO	\$3.13	\$2.38	\$3.86	\$4.33	\$3.19	\$5.42
AEP	\$1.98	\$1.18	\$2.73	\$4.58	\$3.16	\$5.95
APS	\$2.18	\$1.33	\$2.99	\$4.73	\$3.12	\$6.28
ATSI	\$2.23	\$1.25	\$3.13	\$4.82	\$3.27	\$6.25
BGE	\$1.86	\$0.63	\$3.04	\$5.52	\$3.48	\$7.45
ComEd	\$2.20	\$1.28	\$3.04	\$4.56	\$2.91	\$6.07
DAY	\$1.95	\$1.26	\$2.58	\$4.75	\$3.26	\$6.11
DEOK	\$2.03	\$1.24	\$2.76	\$4.73	\$3.19	\$6.18
DLCO	\$2.39	\$1.35	\$3.37	\$4.77	\$3.15	\$6.28
DPL	\$3.73	\$2.79	\$4.62	\$4.71	\$3.67	\$5.70
Dominion	\$2.13	\$1.43	\$2.80	\$5.23	\$3.34	\$7.05
EKPC	\$1.97	\$1.52	\$2.41	\$4.55	\$3.15	\$5.95
JCPL	\$3.24	\$2.47	\$3.93	\$4.73	\$3.21	\$6.11
Met-Ed	\$2.81	\$2.24	\$3.32	\$4.21	\$2.72	\$5.58
PECO	\$3.31	\$2.39	\$4.18	\$4.31	\$3.05	\$5.48
PENELEC	\$2.39	\$1.55	\$3.17	\$4.78	\$3.43	\$6.02
PPL	\$2.95	\$2.23	\$3.61	\$4.18	\$2.75	\$5.50
PSEG	\$3.13	\$2.37	\$3.84	\$4.73	\$3.14	\$6.20
Pepco	\$1.91	\$1.07	\$2.68	\$5.16	\$3.27	\$6.91
RECO	\$3.24	\$2.27	\$4.07	\$4.24	\$3.36	\$5.00

Markup by Real Time Price Levels

Table 3-61 shows the average markup component of LMP, based on the unadjusted cost-based offers and adjusted cost-based offers of the marginal units, when the PJM average LMP was in the identified price range.

Table 3-61 Average real-time markup component (By price category, unadjusted): January 1 through September 30, 2016 and 2017

LMP Category	2016 (Jan-Sep)		2017 (Jan-Sep)	
	Average Markup Component	Frequency	Average Markup Component	Frequency
< \$25	(\$0.98)	59.6%	(\$0.11)	49.0%
\$25 to \$50	(\$0.32)	34.6%	\$1.18	45.2%
\$50 to \$75	\$0.61	3.7%	\$0.89	4.4%
\$75 to \$100	\$0.36	1.4%	\$0.23	0.8%
\$100 to \$125	\$0.15	0.4%	\$0.10	0.3%
\$125 to \$150	\$0.04	0.1%	\$0.00	0.1%
>= \$150	\$0.09	0.2%	\$0.15	0.2%

Table 3-62 Average real-time markup component (By price category, adjusted): January 1 through September 30, 2016 and 2017

LMP Category	2016 (Jan-Sep)		2017 (Jan-Sep)	
	Average Markup Component	Frequency	Average Markup Component	Frequency
< \$25	\$0.06	59.6%	\$0.72	49.1%
\$25 to \$50	\$0.82	34.6%	\$2.48	45.2%
\$50 to \$75	\$0.76	3.7%	\$1.07	4.4%
\$75 to \$100	\$0.45	1.4%	\$0.26	0.8%
\$100 to \$125	\$0.17	0.4%	\$0.12	0.3%
\$125 to \$150	\$0.05	0.1%	\$0.01	0.1%
>= \$150	\$0.11	0.2%	\$0.15	0.2%

Day-Ahead Markup

Markup Component of Day-Ahead Price by Fuel, Unit Type

The markup component of the PJM day-ahead, load-weighted average LMP by primary fuel and unit type is shown in Table 3-63. INC, DEC and up to congestion transactions have zero markups. INCs were 5.5 percent of marginal resources and DEC were 10.1 percent of marginal resources in the first nine months of 2017. The share of marginal up to congestion transactions

decreased significantly beginning on September 8, 2014, as a result of the FERC's UTC uplift refund notice which became effective on September 8, 2014. However, the share of marginal up to congestion transactions increased from 76.5 percent in the first nine months of 2015 to 81.9 percent in the first nine months of 2016 due to the expiration of the fifteen months resettlement period for the proceeding related to uplift charges for UTC transactions. The share of marginal up to congestion transactions decreased from 81.9 percent in the first nine months of 2016 to 80.4 percent in the first nine months of 2017. The adjusted markup of coal, gas and oil units is calculated as the difference between the price offer, and the cost offer excluding the 10 percent adder. Table 3-63 shows the markup component of LMP for marginal generating resources. Generating resources were only 4.0 percent of marginal resources in the first nine months of 2017. Using adjusted offers, the markup component of LMP for marginal generating resources increased for coal-fired steam units from \$0.04 to \$0.87 and increased for gas-fired CT units from \$0.05 to \$0.08. The markup component of LMP for coal-fired steam units increased from -\$1.35 in the first nine months of 2016 to \$0.15 in the first nine months of 2017 using unadjusted offers. The markup component of LMP for gas-fired steam units increased from \$0.24 in the first nine months of 2016 to \$0.47 in the first nine months of 2017 using unadjusted offers.

Table 3-63 Markup component of the annual PJM day-ahead, load-weighted, average LMP by primary fuel type and unit type: January 1 through September 30, 2016 and 2017

Fuel Type	Unit Type	2016 (Jan - Sep)		2017 (Jan - Sep)	
		Markup Component of LMP (Unadjusted)	Markup Component of LMP (Adjusted)	Markup Component of LMP (Unadjusted)	Markup Component of LMP (Adjusted)
Coal	Steam	(\$1.35)	\$0.04	\$0.15	\$0.87
Gas	CT	\$0.03	\$0.05	\$0.04	\$0.08
Gas	Diesel	\$0.00	\$0.00	\$0.00	\$0.00
Gas	Steam	\$0.24	\$0.53	\$0.47	\$1.00
Oil	CT	\$0.00	\$0.00	(\$0.00)	\$0.00
Oil	Diesel	\$0.00	\$0.00	\$0.00	(\$0.00)
Oil	Steam	\$0.00	\$0.00	\$0.00	\$0.00
Other	Steam	(\$0.15)	(\$0.15)	\$0.01	\$0.01
Wind	Wind	\$0.01	\$0.01	\$0.01	\$0.01
Total		(\$1.22)	\$0.48	\$0.68	\$1.97

Markup Component of Day-Ahead Price

The markup component of price is the difference between the system price, when the system price is determined by the active offers of the marginal units, whether price or cost-based, and the system price, based on the cost-based offers of those marginal units. Only hours when generating units were marginal on either priced-based offers or on cost-based offers were included in the markup calculation.

Table 3-64 shows the markup component of average prices and of average monthly on-peak and off-peak prices using unadjusted offers. In the first nine months of 2017, when using unadjusted cost-based offers, \$0.68 per MWh of the PJM day-ahead load-weighted average LMP was attributable to markup. In the first nine months of 2017, the peak markup component was highest in September, \$2.72 per MWh using unadjusted cost offers.

Table 3-64 Monthly markup components of day-ahead (Unadjusted), load-weighted LMP: January 1 through September 30, 2016 and 2017

	2016			2017		
	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component
Jan	(\$2.04)	(\$1.71)	(\$2.33)	(\$0.03)	\$0.19	(\$0.23)
Feb	(\$1.15)	(\$1.32)	(\$0.96)	\$0.25	\$0.59	(\$0.10)
Mar	(\$1.66)	(\$1.26)	(\$2.12)	\$0.38	\$0.83	(\$0.12)
Apr	(\$0.37)	\$0.76	(\$1.54)	\$0.82	\$1.64	\$0.03
May	(\$0.71)	(\$0.16)	(\$1.26)	\$0.45	\$1.07	(\$0.25)
Jun	\$0.19	\$0.74	(\$0.48)	\$0.90	\$1.35	\$0.35
Jul	(\$3.73)	(\$6.42)	(\$1.05)	\$0.60	\$1.12	\$0.09
Aug	(\$0.05)	\$0.08	(\$0.22)	\$1.13	\$1.94	\$0.09
Sep	(\$0.99)	(\$0.57)	(\$1.47)	\$1.65	\$2.72	\$0.57
Oct	\$0.65	\$1.75	(\$0.45)			
Nov	\$0.08	\$0.52	(\$0.37)			
Dec	\$0.30	\$0.89	(\$0.27)			
Annual	(\$1.22)	(\$1.17)	(\$1.27)	\$0.68	\$1.27	\$0.05

Table 3-65 shows the markup component of average prices and of average monthly on peak and off peak prices using adjusted offers. In the first nine months of 2017, when using adjusted cost-based offers, \$1.97 per MWh of

the PJM day-ahead load-weighted average LMP was attributable to markup. In the first nine months of 2017, the peak markup component was highest in September, \$3.99 per MWh using adjusted cost offers.

Table 3-65 Monthly markup components of day-ahead (Adjusted), load-weighted LMP: January 1, 2016 through September 30, 2017

	2016			2017		
	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component
Jan	(\$0.17)	\$0.19	(\$0.48)	\$1.40	\$1.49	\$1.32
Feb	\$0.44	\$0.27	\$0.62	\$1.65	\$1.89	\$1.39
Mar	(\$0.26)	\$0.14	(\$0.72)	\$1.65	\$1.99	\$1.27
Apr	\$0.92	\$1.86	(\$0.05)	\$1.94	\$2.50	\$1.41
May	\$0.60	\$1.10	\$0.09	\$1.62	\$2.05	\$1.14
Jun	\$1.58	\$2.16	\$0.89	\$2.40	\$2.96	\$1.71
Jul	(\$2.90)	(\$6.38)	\$0.58	\$1.73	\$1.96	\$1.50
Aug	\$3.94	\$6.08	\$1.27	\$2.40	\$3.09	\$1.52
Sep	\$0.17	\$0.17	\$0.16	\$2.98	\$3.99	\$1.96
Oct	\$1.69	\$2.46	\$0.91			
Nov	\$1.25	\$1.51	\$0.99			
Dec	\$1.82	\$2.14	\$1.50			
Annual	\$0.48	\$0.67	\$0.28	\$1.97	\$2.44	\$1.47

Markup Component of Day-Ahead Zonal Prices

The markup component of annual average day-ahead price using unadjusted offers is shown for each zone in Table 3-66. The markup component of annual average day-ahead price using adjusted offers is shown for each zone in Table 3-67. Using unadjusted offers, the markup component of the average day-ahead price increased in all zones from the first nine months of 2016 to the first nine months of 2017. The smallest zonal all hours average markup component using adjusted offers for the first nine months of 2017 was in the ComEd Zone, \$1.70 per MWh, while the highest was in the AECO Control Zone, \$2.39 per MWh. The smallest zonal on peak average markup using adjusted offers was in the ComEd Control Zone, \$2.02 per MWh, while the highest was in the Met-Ed Control Zone, \$3.01 per MWh.

Table 3-66 Day-ahead, average, zonal markup component (Unadjusted): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component
AECO	(\$0.58)	(\$0.80)	(\$0.34)	\$1.08	\$1.78	\$0.34
AEP	(\$1.81)	(\$2.16)	(\$1.44)	\$0.65	\$1.30	(\$0.03)
APS	(\$1.75)	(\$2.30)	(\$1.18)	\$0.60	\$1.18	(\$0.02)
ATSI	(\$1.79)	(\$1.86)	(\$1.71)	\$0.65	\$1.25	(\$0.03)
BGE	(\$2.57)	(\$3.23)	(\$1.85)	\$0.52	\$1.06	(\$0.07)
ComEd	(\$0.45)	\$0.31	(\$1.31)	\$0.47	\$0.90	(\$0.01)
DAY	(\$1.26)	(\$1.17)	(\$1.35)	\$0.71	\$1.38	(\$0.03)
DEOK	(\$0.94)	(\$0.54)	(\$1.38)	\$0.79	\$1.53	(\$0.01)
DLCO	\$0.13	\$1.79	(\$1.70)	\$0.65	\$1.25	(\$0.00)
Dominion	(\$1.07)	(\$0.64)	(\$1.53)	\$0.62	\$1.25	(\$0.04)
DPL	(\$2.90)	(\$5.32)	(\$0.31)	\$0.86	\$1.37	\$0.31
EKPC	(\$0.23)	\$0.86	(\$1.35)	\$0.59	\$1.14	\$0.03
JCPL	(\$1.27)	(\$1.84)	(\$0.63)	\$0.95	\$1.51	\$0.33
Met-Ed	(\$1.37)	(\$2.01)	(\$0.67)	\$1.04	\$1.81	\$0.19
PECO	\$1.21	\$3.01	(\$0.72)	\$0.90	\$1.49	\$0.28
PENELEC	(\$1.52)	(\$1.66)	(\$1.38)	\$0.64	\$1.23	\$0.03
Pepco	(\$1.96)	(\$2.29)	(\$1.61)	\$0.58	\$1.19	(\$0.07)
PPL	(\$1.20)	(\$1.65)	(\$0.70)	\$0.88	\$1.48	\$0.23
PSEG	(\$0.90)	(\$1.02)	(\$0.77)	\$0.95	\$1.55	\$0.29
RECO	(\$1.77)	(\$2.63)	(\$0.76)	\$1.04	\$1.65	\$0.34

Table 3-67 Day-ahead, average, zonal markup component (Adjusted): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component	Markup Component (All Hours)	Peak Markup Component	Off Peak Markup Component
AECO	\$0.88	\$0.77	\$1.00	\$2.39	\$2.98	\$1.76
AEP	(\$0.12)	(\$0.33)	\$0.11	\$1.96	\$2.49	\$1.41
APS	\$0.05	(\$0.51)	\$0.64	\$1.90	\$2.35	\$1.42
ATSI	(\$0.32)	(\$0.40)	(\$0.25)	\$1.97	\$2.46	\$1.43
BGE	(\$0.01)	\$0.09	(\$0.11)	\$1.85	\$2.26	\$1.40
ComEd	\$1.10	\$1.89	\$0.22	\$1.70	\$2.02	\$1.34
DAY	\$0.59	\$0.91	\$0.24	\$2.05	\$2.61	\$1.43
DEOK	\$1.13	\$1.99	\$0.19	\$2.06	\$2.67	\$1.40
DLCO	\$1.83	\$3.75	(\$0.28)	\$1.93	\$2.39	\$1.42
Dominion	\$0.78	\$1.44	\$0.08	\$1.94	\$2.45	\$1.42
DPL	(\$1.65)	(\$4.32)	\$1.21	\$2.18	\$2.56	\$1.77
EKPC	\$1.47	\$2.65	\$0.25	\$1.87	\$2.28	\$1.44
JCPL	\$0.18	(\$0.35)	\$0.78	\$2.24	\$2.67	\$1.75
Met-Ed	(\$0.01)	(\$0.79)	\$0.84	\$2.34	\$3.01	\$1.60
PECO	\$2.85	\$4.85	\$0.70	\$2.20	\$2.66	\$1.71
PENELEC	(\$0.07)	(\$0.23)	\$0.08	\$1.91	\$2.37	\$1.42
Pepco	\$0.48	\$0.82	\$0.11	\$1.91	\$2.40	\$1.39
PPL	\$0.16	(\$0.37)	\$0.74	\$2.17	\$2.65	\$1.65
PSEG	\$0.59	\$0.55	\$0.64	\$2.22	\$2.67	\$1.72
RECO	(\$0.36)	(\$1.16)	\$0.58	\$2.30	\$2.77	\$1.76

Markup by Day-Ahead Price Levels

Table 3-68 and Table 3-69 show the average markup component of LMP, based on the unadjusted cost-based offers and adjusted cost-based offers of the marginal units, when the PJM system LMP was in the identified price range.

Table 3-68 Average, day-ahead markup (By LMP category, unadjusted): January 1 through September 30, 2016 and 2017

LMP Category	2016 (Jan - Sep)		2017 (Jan - Sep)	
	Average Markup Component	Frequency	Average Markup Component	Frequency
< \$25	(\$1.82)	50.7%	(\$0.36)	45.4%
\$25 to \$50	(\$0.21)	45.6%	\$1.16	51.4%
\$50 to \$75	(\$11.23)	3.1%	\$5.49	2.5%
\$75 to \$100	\$2.80	0.5%	\$7.58	0.4%
\$100 to \$125	(\$10.09)	0.2%	\$0.07	0.1%
\$125 to \$150	\$0.00	0.0%	(\$0.03)	0.0%
>= \$150	\$0.00	0.0%	\$24.36	0.1%

Table 3-69 Average, day-ahead markup (By LMP category, adjusted): January 1 through September 30, 2016 and 2017

LMP Category	2016 (Jan - Sep)		2017 (Jan - Sep)	
	Average Markup Component	Frequency	Average Markup Component	Frequency
< \$25	(\$0.11)	50.7%	\$1.33	45.4%
\$25 to \$50	\$1.39	45.6%	\$2.71	51.4%
\$50 to \$75	(\$2.45)	3.1%	\$6.97	2.5%
\$75 to \$100	(\$0.06)	0.5%	\$8.65	0.4%
\$100 to \$125	(\$1.17)	0.2%	(\$0.01)	0.1%
\$125 to \$150	\$0.00	0.0%	(\$0.03)	0.0%
>= \$150	\$0.00	0.0%	\$29.44	0.1%

Prices

The behavior of individual market entities within a market structure is reflected in market prices. PJM locational marginal prices (LMPs) are a direct measure of market performance. Price level is a good, general indicator of market performance, although overall price results must be interpreted carefully because of the multiple factors that affect them. Among other things, overall

average prices reflect changes in supply and demand, generation fuel mix, the cost of fuel, emission related expenses, markup and local price differences caused by congestion. PJM also may administratively set prices with the creation of a closed loop interface related to demand side resources or reactive power.

Real-time and day-ahead energy market load-weighted prices were 3.5 percent and 1.9 percent higher in the first nine months of 2017 than in the first nine months of 2016.

PJM real-time energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The average LMP was 5.0 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$28.79 per MWh versus \$27.43 per MWh. The load-weighted average LMP was 3.5 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.36 per MWh versus \$29.32 per MWh.

The fuel-cost adjusted, load-weighted, average LMP in the first nine months of 2017 was 21.8 percent lower than the load-weighted, average LMP for the first nine months of 2016. If fuel and emission costs in the first nine months of 2017 had been the same as in the first nine months of 2016, holding everything else constant, the load-weighted LMP would have been lower, \$23.75 per MWh instead of the observed \$30.36 per MWh.

PJM day-ahead energy market prices increased in the first nine months of 2017 compared to the first nine months of 2016. The day-ahead average LMP was 3.6 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$28.90 per MWh versus \$27.90 per MWh. The day-ahead load-weighted average LMP was 1.9 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.26 per MWh versus \$29.69 per MWh.

Occasionally, in a constrained market, the LMPs at some pricing nodes can exceed the offer price of the highest cleared generator in the supply stack.⁶⁶ In

⁶⁶ See O'Neill R. P, Mead D. and Malvadkar P. "On Market Clearing Prices Higher than the Highest Bid and Other Almost Paranormal Phenomena." *The Electricity Journal* 2005; 18(2) at 19-27.

the nodal pricing system, the LMP at a pricing node is the total cost of meeting incremental demand at that node. When there are binding transmission constraints, satisfying the marginal increase in demand at a node may require increasing the output of some generators while simultaneously decreasing the output of other generators, such that the transmission constraints are not violated. The total cost of redispatching multiple generators can at times exceed the cost of marginally increasing the output of the most expensive generator offered. Thus, the LMPs at some pricing nodes exceed \$1,000 per MWh, the cap on the generators' offer price in the PJM market.⁶⁷

Real-Time LMP

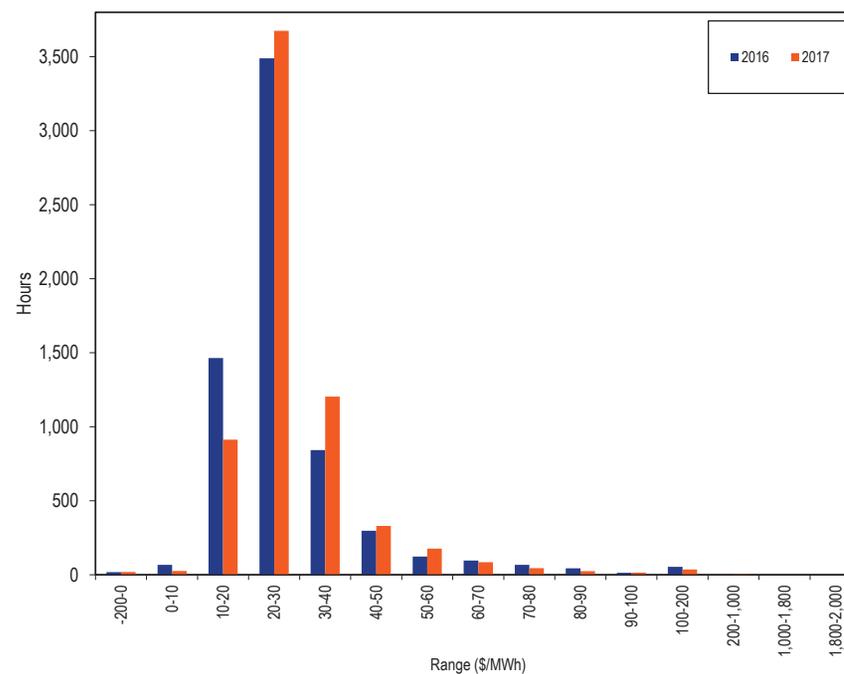
Real-time average LMP is the hourly average LMP for the PJM Real-Time Energy Market.⁶⁸

Real-Time Average LMP

PJM Real-Time Average LMP Duration

Figure 3-41 shows the hourly distribution of PJM real-time average LMP for the first nine months of 2016 and 2017.

Figure 3-41 Average LMP for the PJM Real-Time Energy Market: January 1 through September 30, 2016 and 2017



⁶⁷ The offer cap in PJM was temporarily increased to \$1,800 per MWh prior to the winter of 2014/2015. A new cap of \$2,000 per MWh, only for offers with costs exceeding \$1,000 per MWh, went into effect on December 14, 2015. See 153 FERC ¶ 61,289 (2015).

⁶⁸ See the 2010 State of the Market Report for PJM: *Technical Reference for PJM Markets*, at "Calculating Locational Marginal Price," p 16-18 for detailed definition of Real-Time LMP. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

PJM Real-Time, Average LMP

Table 3-70 shows the PJM real-time, average LMP for the first nine months of each year from 1998 through 2017.⁶⁹

Table 3-70 PJM real-time, average LMP (Dollars per MWh): January 1 through September 30, 1998 through 2017

Jan-Sep	Real-Time LMP			Year-to-Year Change		
	Average	Median	Standard Deviation	Average	Median	Standard Deviation
1998	\$23.18	\$16.86	\$36.00	NA	NA	NA
1999	\$31.65	\$18.77	\$83.28	36.6%	11.3%	131.3%
2000	\$25.88	\$18.22	\$23.70	(18.2%)	(2.9%)	(71.5%)
2001	\$36.00	\$25.48	\$51.30	39.1%	39.9%	116.4%
2002	\$28.13	\$20.70	\$23.92	(21.9%)	(18.8%)	(53.4%)
2003	\$40.42	\$33.68	\$26.00	43.7%	62.7%	8.7%
2004	\$43.85	\$39.99	\$21.82	8.5%	18.7%	(16.1%)
2005	\$54.69	\$44.53	\$33.67	24.7%	11.4%	54.3%
2006	\$51.79	\$43.50	\$34.93	(5.3%)	(2.3%)	3.7%
2007	\$57.34	\$49.40	\$35.52	10.7%	13.6%	1.7%
2008	\$71.94	\$61.33	\$41.64	25.4%	24.2%	17.2%
2009	\$37.42	\$33.00	\$17.92	(48.0%)	(46.2%)	(57.0%)
2010	\$46.13	\$37.89	\$26.99	23.3%	14.8%	50.6%
2011	\$45.79	\$37.05	\$32.25	(0.7%)	(2.2%)	19.5%
2012	\$32.45	\$28.78	\$21.94	(29.1%)	(22.3%)	(32.0%)
2013	\$37.30	\$32.44	\$22.84	15.0%	12.7%	4.1%
2014	\$52.72	\$36.06	\$74.17	41.3%	11.2%	224.8%
2015	\$35.96	\$27.88	\$30.75	(31.8%)	(22.7%)	(58.5%)
2016	\$27.43	\$23.61	\$15.73	(23.7%)	(15.3%)	(48.8%)
2017	\$28.79	\$25.28	\$16.81	5.0%	7.1%	6.9%

Real-Time, Load-Weighted, Average LMP

Higher demand (load) generally results in higher prices, all else constant. As a result, load-weighted, average prices are generally higher than average prices. Load-weighted LMP reflects the average LMP paid for actual MWh consumed during a year. Load-weighted, average LMP is the average of PJM hourly LMP, each weighted by the PJM total hourly load.

⁶⁹ The system average LMP is the average of the hourly LMP without any weighting. The only exception is that market-clearing prices (MCPs) are included for January to April 1998. MCP was the single market-clearing price calculated by PJM prior to implementation of LMP.

PJM Real-Time, Load-Weighted, Average LMP

Table 3-71 shows the PJM real-time, load-weighted, average LMP in the first nine months of 1998 through 2017.

Table 3-71 PJM real-time, load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 1998 through 2017

Jan-Sep	Real-Time, Load-Weighted, Average LMP			Year-to-Year Change		
	Average	Median	Standard Deviation	Average	Median	Standard Deviation
1998	\$26.06	\$18.20	\$44.65	NA	NA	NA
1999	\$38.65	\$20.02	\$104.17	48.3%	10.0%	133.3%
2000	\$28.49	\$19.30	\$26.89	(26.3%)	(3.6%)	(74.2%)
2001	\$40.96	\$28.18	\$64.57	43.8%	46.0%	140.1%
2002	\$31.95	\$23.09	\$29.14	(22.0%)	(18.1%)	(54.9%)
2003	\$43.57	\$38.17	\$26.53	36.3%	65.3%	(9.0%)
2004	\$46.44	\$43.03	\$21.89	6.6%	12.7%	(17.5%)
2005	\$60.44	\$50.10	\$36.52	30.2%	16.4%	66.9%
2006	\$56.39	\$46.82	\$40.70	(6.7%)	(6.5%)	11.4%
2007	\$61.83	\$55.12	\$37.98	9.7%	17.7%	(6.7%)
2008	\$77.27	\$66.73	\$43.80	25.0%	21.1%	15.3%
2009	\$39.57	\$34.57	\$19.04	(48.8%)	(48.2%)	(56.5%)
2010	\$49.91	\$40.33	\$29.65	26.2%	16.7%	55.7%
2011	\$49.48	\$38.72	\$37.02	(0.9%)	(4.0%)	24.8%
2012	\$35.02	\$29.84	\$25.44	(29.2%)	(22.9%)	(31.3%)
2013	\$39.75	\$33.61	\$26.47	13.5%	12.6%	4.0%
2014	\$58.60	\$37.93	\$86.22	47.4%	12.8%	225.8%
2015	\$38.94	\$29.09	\$33.95	(33.5%)	(23.3%)	(60.6%)
2016	\$29.32	\$24.60	\$17.13	(24.7%)	(15.4%)	(49.6%)
2017	\$30.36	\$26.26	\$18.82	3.5%	6.7%	9.8%

Table 3-72 shows zonal real-time, and real-time, load-weighted, average LMP in the first nine months of 2016 and 2017.

Table 3-72 Zone real-time and real-time, load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017

Zone	Real-Time Average LMP			Real-Time, Load-Weighted, Average LMP		
	2016 (Jan-Sep)	2017 (Jan-Sep)	Percent Change	2016 (Jan-Sep)	2017 (Jan-Sep)	Percent Change
AECO	\$24.55	\$26.58	8.3%	\$27.41	\$28.38	3.5%
AEP	\$27.57	\$28.89	4.8%	\$29.06	\$30.15	3.7%
AP	\$28.09	\$29.12	3.7%	\$29.79	\$30.56	2.6%
ATSI	\$28.07	\$29.71	5.8%	\$29.91	\$31.19	4.3%
BGE	\$36.35	\$31.64	(12.9%)	\$39.31	\$33.73	(14.2%)
ComEd	\$25.71	\$26.95	4.8%	\$27.61	\$28.64	3.7%
Day	\$27.65	\$29.58	7.0%	\$29.31	\$31.14	6.2%
DEOK	\$26.94	\$28.99	7.6%	\$28.67	\$30.68	7.0%
DLCO	\$27.41	\$29.03	5.9%	\$29.39	\$30.58	4.1%
Dominion	\$30.04	\$30.35	1.0%	\$32.22	\$32.19	(0.1%)
DPL	\$27.24	\$28.06	3.0%	\$30.57	\$30.36	(0.7%)
EKPC	\$26.44	\$27.87	5.4%	\$27.98	\$29.25	4.5%
JCPL	\$23.75	\$27.35	15.2%	\$26.63	\$29.72	11.6%
Met-Ed	\$23.95	\$28.33	18.3%	\$26.08	\$30.32	16.2%
PECO	\$23.44	\$26.70	13.9%	\$25.76	\$28.42	10.3%
PENELEC	\$26.20	\$28.10	7.3%	\$27.62	\$29.28	6.0%
Pepco	\$32.05	\$30.76	(4.0%)	\$34.30	\$32.63	(4.9%)
PPL	\$23.57	\$27.15	15.2%	\$25.37	\$28.85	13.7%
PSEG	\$23.99	\$27.50	14.6%	\$26.28	\$29.38	11.8%
RECO	\$24.13	\$27.69	14.7%	\$27.07	\$30.02	10.9%
PJM	\$27.43	\$28.79	5.0%	\$29.32	\$30.36	3.5%

Figure 3-42 PJM real-time, load-weighted, average LMP: January 1 through September 30, 2017

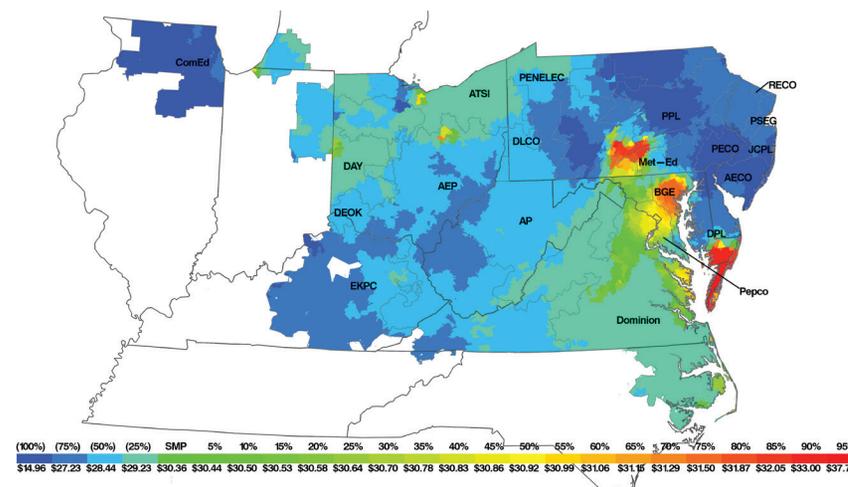
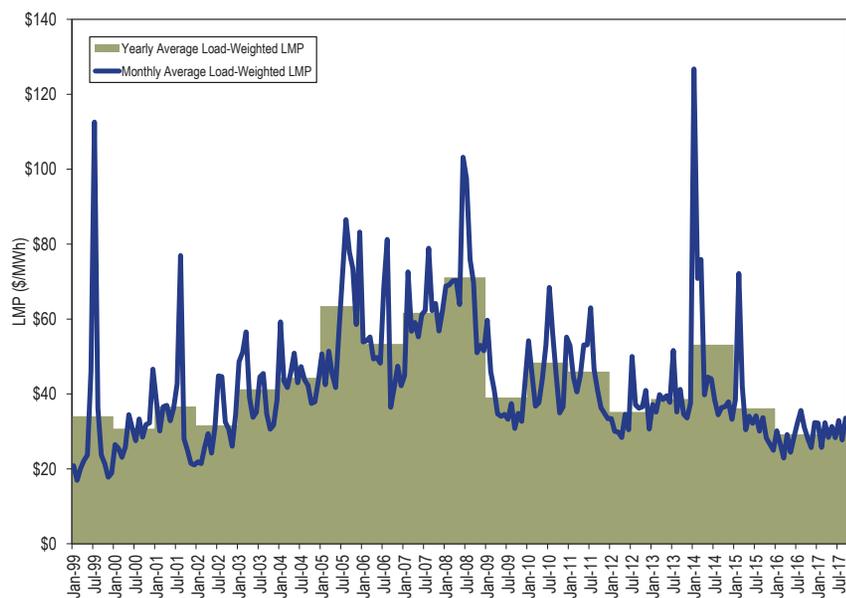


Figure 3-42 is a contour map of the real-time, load-weighted, average LMP in the first nine months of 2017. In the legend, green represents the system marginal price (SMP) and each increment to the right and left of the SMP represents five percent of the pricing nodes above and below the SMP. The LMP for each five percent increment is the highest nodal average LMP for that set of nodes. Each increment to the left of the SMP is the lowest nodal average LMP for that set of nodes.

PJM Real-Time, Monthly, Load-Weighted, Average LMP

Figure 3-43 shows the PJM real-time monthly and annual load-weighted LMP in 1999 through the first nine months of 2017. PJM real-time monthly load-weighted average LMP in June 2016 was \$22.90, which is the lowest real-time monthly load-weighted average LMP since February 2002 at \$21.39.

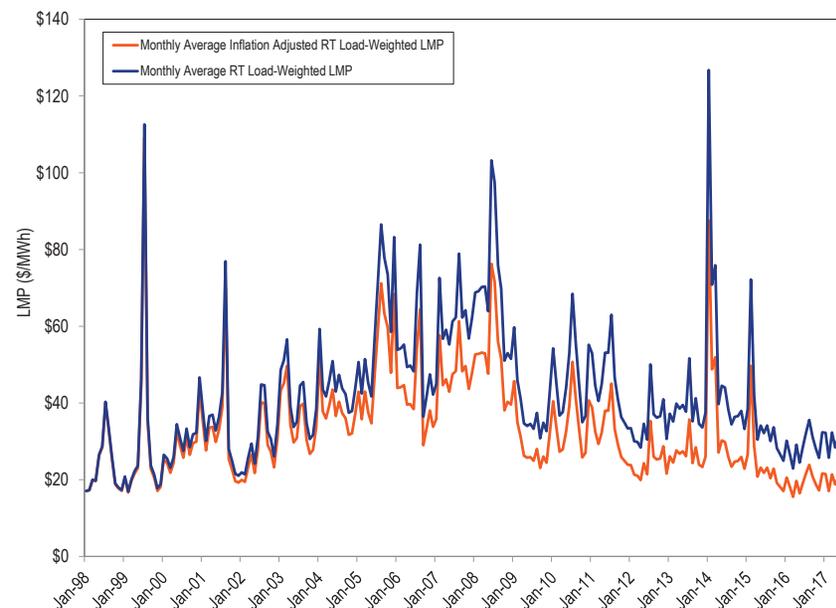
Figure 3-43 PJM real-time, monthly and annual, load-weighted, average LMP: January 1, 1999 through September 30, 2017



PJM Real-Time, Monthly, Inflation Adjusted Load-Weighted, Average LMP

Figure 3-44 shows the PJM real-time monthly load-weighted average LMP and inflation adjusted monthly load-weighted average LMP for January 1, 1998, through September 30, 2017.⁷⁰ Table 3-73 shows the PJM real-time yearly load-weighted average LMP and inflation adjusted yearly load-weighted average LMP for the first nine months of every year starting from 1998 through 2017.

Figure 3-44 PJM real-time, monthly, load-weighted, average LMP and real-time, monthly inflation adjusted load-weighted, average LMP: January 1, 1998 through September 30, 2017



⁷⁰ To obtain the inflation adjusted monthly load-weighted average LMP, the PJM system-wide load-weighted average LMP is deflated using the US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by Bureau of Labor Statistics <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (Accessed October 16, 2017)

Table 3-73 PJM real-time, yearly, load-weighted, average LMP and real-time, yearly inflation adjusted load-weighted, average LMP: January 1 through September 30, 1998 through 2017

Jan-Sep	Load-Weighted, Average LMP	Inflation Adjusted Load-Weighted, Average LMP
1998	\$26.06	\$25.86
1999	\$38.65	\$37.55
2000	\$28.49	\$26.82
2001	\$40.96	\$37.39
2002	\$31.95	\$28.72
2003	\$43.57	\$38.33
2004	\$46.44	\$39.85
2005	\$60.44	\$50.09
2006	\$56.39	\$45.16
2007	\$61.83	\$48.36
2008	\$77.27	\$57.70
2009	\$39.57	\$29.93
2010	\$49.91	\$37.04
2011	\$49.48	\$35.59
2012	\$35.02	\$24.68
2013	\$39.75	\$27.58
2014	\$58.60	\$40.11
2015	\$38.94	\$26.60
2016	\$29.32	\$19.77
2017	\$30.36	\$20.05

Fuel Price Trends and LMP

Changes in LMP can result from changes in the marginal costs of marginal units, the units setting LMP. In general, fuel costs make up between 80 percent and 90 percent of marginal cost depending on generating technology, unit efficiency, unit age and other factors. The impact of fuel cost on marginal cost and on LMP depends on the fuel burned by marginal units and changes in fuel costs. Changes in emission allowance costs are another contributor to changes in the marginal cost of marginal units. Natural gas prices and coal prices increased in the first nine months of 2017 compared to the first nine months of 2016. The price of Northern Appalachian coal was 25.4 percent higher; the price of Central Appalachian coal was 33.2 percent higher; the price of Powder River Basin coal was 17.1 percent higher; the price of eastern

natural gas was 35.9 percent higher; and the price of western natural gas was 37.0 percent higher. Figure 3-45 shows monthly average spot fuel prices.⁷¹

Figure 3-45 Spot average fuel price comparison with fuel delivery charges: January 1, 2012 through September 30, 2017 (\$/MMBtu)

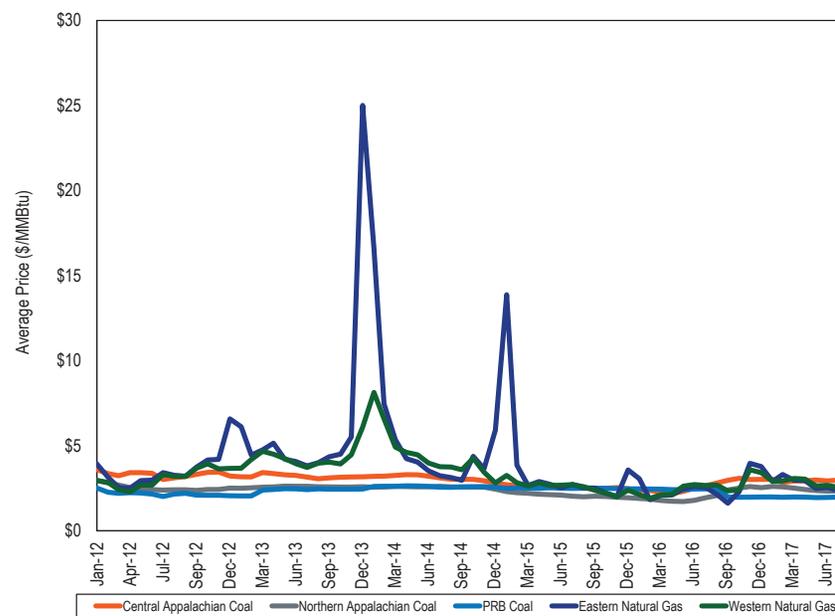


Table 3-74 compares the 2017 PJM real-time fuel-cost adjusted, load-weighted, average LMP to 2017 load-weighted, average LMP.⁷² The real-time fuel-cost adjusted, load-weighted, average LMP for the first nine months of 2017 was 21.8 percent lower than the real-time load-weighted, average LMP for the first nine months of 2017. The real-time, fuel-cost adjusted, load-weighted, average LMP for the first nine months of 2017 was 19.0 percent lower than the real-time load-weighted LMP for the first nine months of 2016. If fuel and emissions costs in the first nine months of 2017 had been the same as in

⁷¹ Eastern natural gas consists of the average of Texas M3, Transco Zone 6 non-NY, Transco Zone 6 NY and Transco Zone 5 daily fuel price indices. Western natural gas prices are the average of Dominion North Point, Columbia Appalachia and Chicago Citygate daily fuel price indices. Coal prices are the average of daily fuel prices for Central Appalachian coal, Northern Appalachian coal, and Powder River Basin coal. All fuel prices are from Platts.

⁷² The fuel-cost adjusted LMP reflects both the fuel and emissions where applicable, including NO_x, CO₂ and SO_x costs.

the first nine months of 2016, holding everything else constant, the real-time load-weighted LMP in the first nine months of 2017 would have been lower, \$23.75 per MWh, than the observed \$30.36 per MWh.

Table 3-74 PJM real-time annual, fuel-cost adjusted, load-weighted average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017

	2017 Load-Weighted LMP	2017 Fuel-Cost Adjusted, Load-Weighted LMP	Change
Average	\$30.36	\$23.75	(21.8%)
	2016 Load-Weighted LMP	2017 Fuel-Cost Adjusted, Load-Weighted LMP	Change
Average	\$29.32	\$23.75	(19.0%)
	2016 Load-Weighted LMP	2017 Load-Weighted LMP	Change
Average	\$29.32	\$30.36	3.5%

Table 3-75 shows the impact of each fuel type on the difference between the fuel-cost adjusted, load-weighted average LMP and the load-weighted LMP in the first nine months of 2017. Table 3-75 shows that higher natural gas prices and coal prices explains most of the fuel-cost related increase in the real-time annual load-weighted average LMP in the first nine months of 2017.

Table 3-75 Change in PJM real-time annual, fuel-cost adjusted, load-weighted average LMP (Dollars per MWh) by fuel type: January 1 through September 30, 2016 and 2017

Fuel Type	Share of Change in Fuel Cost Adjusted, Load-Weighted LMP	Percent
Coal	\$2.78	42.0%
Gas	\$3.73	56.4%
Municipal Waste	\$0.01	0.2%
Oil	\$0.08	1.2%
Other	\$0.00	0.0%
Uranium	(\$0.00)	-0.0%
Wind	(\$0.00)	-0.0%
Total	\$6.61	100.0%

Components of Real-Time, Load-Weighted LMP

LMPs result from the operation of a market based on security-constrained, economic (least-cost) dispatch (SCED) in which marginal units determine system LMPs, based on their offers and five minute ahead forecasts of system conditions. Those offers can be decomposed into components including fuel

costs, emission costs, variable operation and maintenance costs, markup, FMU adder and the 10 percent cost adder. As a result, it is possible to decompose LMP by the components of unit offers.

Cost offers of marginal units are separated into their component parts. The fuel related component is based on unit specific heat rates and spot fuel prices. Emission costs are calculated using spot prices for NO_x, SO₂ and CO₂ emission credits, emission rates for NO_x, emission rates for SO₂ and emission rates for CO₂. The CO₂ emission costs are applicable to PJM units in the PJM states that participate in RGGI: Delaware and Maryland.⁷³ The FMU adder is the calculated contribution of the FMU and AU adders to LMP that results when units with FMU or AU adders are marginal.

Since the implementation of scarcity pricing on October 1, 2012, PJM jointly optimizes the commitment and dispatch of energy and ancillary services. In periods of scarcity when generators providing energy have to be dispatched down from their economic operating level to meet reserve requirements, the joint optimization of energy and reserves takes into account the opportunity cost of the reduced generation and the associated incremental cost to maintain reserves. If a unit incurring such opportunity costs is a marginal resource in the energy market, this opportunity cost will contribute to LMP. In addition, in periods when generators providing energy cannot meet the reserve requirements, PJM can invoke shortage pricing. PJM invoked shortage pricing on January 6, January 7 of 2014 and September 21 of 2017.⁷⁴ During the shortage conditions, the LMPs of marginal generators reflect the cost of not meeting the reserve requirements, the scarcity adder, which is defined by the operating reserve demand curve.

LMP may, at times, be set by transmission penalty factors. When a transmission constraint is binding and there are no generation alternatives to resolve the constraint, system operators may allow the transmission limit to be violated. When this occurs, the shadow price of the constraint is set by transmission penalty factors. The shadow price directly affects the LMP. Transmission

⁷³ New Jersey withdrew from RGGI, effective January 1, 2012.

⁷⁴ PJM triggered shortage pricing on January 6, 2015, following a RTO-wide voltage reduction action. PJM triggered shortage pricing on January 7, 2014, due to a RTO-wide shortage of synchronized reserve. PJM triggered shortage pricing on September 21, 2017 due to a sudden decrease in imports from neighboring regions.

penalty factors are administratively determined and can be thought of as a form of locational scarcity pricing.

Table 3-78 shows the frequency and average shadow price of transmission constraints in PJM. In the first nine months of 2017, there were 159,081 transmission constraints in the real-time market with a non-zero shadow price. For nearly seven percent of these transmission constraints, the line limit was violated, meaning that the flow exceeded the facility limit.⁷⁵ In the first nine months of 2017, the average shadow price of transmission constraints when the line limit was violated was nearly five times higher than when transmission constraint was binding at its limit.

Transmission penalty factors should be stated explicitly and publicly and applied without discretion. Penalty factors should be set high enough so that they do not act to suppress prices based on available generator solutions. But rather than permit the transmission penalty factor to set the shadow price when line limits are violated, PJM uses a procedure called constraint relaxation logic to prevent the penalty factors from directly setting the shadow price of the constraint. The result is that the transmission penalty factor does not directly set the shadow price. The details of PJM's logic and practice are not entirely clear. But in 2016, for all transmission constraints for which the penalty factor was greater than or equal to \$2,000 per MWh, 41 percent of the constraints' shadow prices were within 10 percent of the penalty factor.

The MMU recommends that PJM explicitly state its policy on the use of transmission penalty factors including: the level of the penalty factors; the triggers for the use of the penalty factors; the appropriate line ratings to trigger the use of penalty factors; the allowed duration of the violation; the use of constraint relaxation logic; and when the transmission penalty factors will be used to set the shadow price.

The components of LMP are shown in Table 3-76, including markup using unadjusted cost offers.⁷⁶ Table 3-76 shows that in the first nine months of

2017, 30.4 percent of the load-weighted LMP was the result of coal costs, 38.3 percent was the result of gas costs and 2.12 percent was the result of the cost of emission allowances. Using adjusted cost offers, markup was 15.6 percent of the load-weighted LMP. The fuel-related components of LMP reflect the degree to which the cost of the identified fuel affects LMP and does not reflect the other components of the offers of units burning that fuel. The component NA is the unexplained portion of load-weighted LMP. Occasionally, PJM fails to provide all the data needed to accurately calculate generator sensitivity factors. As a result, the LMP for those intervals cannot be decomposed into component costs. The cumulative effect of excluding those five-minute intervals is the component NA. In the first nine months of 2017, nearly 19.54 percent of all five-minute intervals had insufficient data. The percent column is the difference in the proportion of LMP represented by each component between the first nine months of 2017 and 2016.

⁷⁵ The line limit of a facility associated with a transmission constraint is not necessarily the rated line limit. In PJM, the dispatcher has the discretion to lower the rated line limit.

⁷⁶ These components are explained in the *Technical Reference for PJM Markets*, at p 27 "Calculation and Use of Generator Sensitivity/Unit Participation Factors." <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

Table 3-76 Components of PJM real-time (Unadjusted), load-weighted, average LMP: January 1 through September 30, 2016 and 2017

Element	2016 (Jan-Sep)		2017 (Jan-Sep)		Change
	Contribution to LMP	Percent	Contribution to LMP	Percent	
Gas	\$7.29	24.9%	\$11.61	38.3%	13.4%
Coal	\$13.71	46.7%	\$9.23	30.4%	(16.3%)
Markup	(\$0.04)	(0.1%)	\$2.41	7.9%	8.1%
Ten Percent Adder	\$2.43	8.3%	\$2.32	7.7%	(0.6%)
VOM	\$2.16	7.4%	\$1.46	4.8%	(2.6%)
LPA Rounding Difference	\$0.13	0.4%	\$1.18	3.9%	3.4%
NA	\$1.79	6.1%	\$0.67	2.2%	(3.9%)
NO ₂ Cost	\$0.47	1.6%	\$0.51	1.7%	0.1%
Ancillary Service Redispatch Cost	\$0.35	1.2%	\$0.29	1.0%	(0.2%)
Oil	\$0.31	1.0%	\$0.25	0.8%	(0.2%)
Increase Generation Adder	\$0.42	1.4%	\$0.22	0.7%	(0.7%)
Scarcity Adder	\$0.00	0.0%	\$0.13	0.4%	0.4%
CO ₂ Cost	\$0.08	0.3%	\$0.09	0.3%	0.0%
Municipal Waste	\$0.05	0.2%	\$0.05	0.2%	(0.0%)
Other	\$0.19	0.7%	\$0.04	0.1%	(0.5%)
SO ₂ Cost	\$0.08	0.3%	\$0.04	0.1%	(0.1%)
Market-to-Market Adder	\$0.01	0.0%	\$0.00	0.0%	(0.0%)
Uranium	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Constraint Violation Adder	\$0.00	0.0%	\$0.00	0.0%	0.0%
LPA-SCED Differential	(\$0.01)	(0.0%)	(\$0.01)	(0.0%)	0.0%
Decrease Generation Adder	(\$0.03)	(0.1%)	(\$0.02)	(0.1%)	0.0%
Wind	(\$0.06)	(0.2%)	(\$0.13)	(0.4%)	(0.2%)
Total	\$29.32	100.0%	\$30.36	100.0%	0.0%

In order to accurately assess the markup behavior of market participants, real-time and day-ahead LMPs are decomposed using two different approaches. In the first approach (Table 3-76 and Table 3-83), markup is simply the difference between the price offer and the cost offer (unadjusted markup). In the second approach (Table 3-77 and Table 3-84), the 10 percent markup is removed from the cost offers of coal gas and oil units (adjusted markup).

The components of LMP are shown in Table 3-77, including markup using adjusted cost offers.

Table 3-77 Components of PJM real-time (Adjusted), load-weighted, average LMP: January 1 through September 30, 2016 and 2017

Element	2016 (Jan-Sep)		2017 (Jan-Sep)		Change
	Contribution to LMP	Percent	Contribution to LMP	Percent	
Gas	\$7.29	24.9%	\$11.61	38.3%	13.4%
Coal	\$13.71	46.7%	\$9.23	30.4%	(16.3%)
Markup	\$2.37	8.1%	\$4.74	15.6%	7.5%
VOM	\$2.16	7.4%	\$1.46	4.8%	(2.6%)
LPA Rounding Difference	\$0.13	0.4%	\$1.18	3.9%	3.4%
NA	\$1.79	6.1%	\$0.67	2.2%	(3.9%)
NO ₂ Cost	\$0.47	1.6%	\$0.51	1.7%	0.1%
Ancillary Service Redispatch Cost	\$0.35	1.2%	\$0.29	1.0%	(0.2%)
Oil	\$0.31	1.0%	\$0.25	0.8%	(0.2%)
Increase Generation Adder	\$0.42	1.4%	\$0.22	0.7%	(0.7%)
Scarcity Adder	\$0.00	0.0%	\$0.13	0.4%	0.4%
CO ₂ Cost	\$0.08	0.3%	\$0.09	0.3%	0.0%
Municipal Waste	\$0.05	0.2%	\$0.05	0.2%	(0.0%)
Other	\$0.19	0.7%	\$0.04	0.1%	(0.5%)
SO ₂ Cost	\$0.08	0.3%	\$0.04	0.1%	(0.1%)
Market-to-Market Adder	\$0.01	0.0%	\$0.00	0.0%	(0.0%)
Uranium	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Constraint Violation Adder	\$0.00	0.0%	\$0.00	0.0%	0.0%
Ten Percent Adder	\$0.02	0.1%	(\$0.00)	(0.0%)	(0.1%)
LPA-SCED Differential	(\$0.01)	(0.0%)	(\$0.01)	(0.0%)	0.0%
Decrease Generation Adder	(\$0.03)	(0.1%)	(\$0.02)	(0.1%)	0.0%
Wind	(\$0.06)	(0.2%)	(\$0.13)	(0.4%)	(0.2%)
Total	\$29.32	100.0%	\$30.36	100.0%	0.0%

Table 3-78 Frequency and average shadow price of transmission constraints in PJM: January 1 through September 30, 2016 and 2017

Description	Frequency		Average Shadow Price	
	2016 (Jan-Sep)	2017 (Jan-Sep)	2016 (Jan-Sep)	2017 (Jan-Sep)
PJM Internal Violated Transmission Constraints	17,724	8,637	\$610.84	\$651.68
PJM Internal Binding Transmission Constraints	100,550	73,738	\$135.28	\$115.07
Market to Market Transmission Constraints	40,807	38,354	\$272.23	\$365.06
All Transmission Constraints	159,081	120,729	\$223.40	\$232.88

Day-Ahead LMP

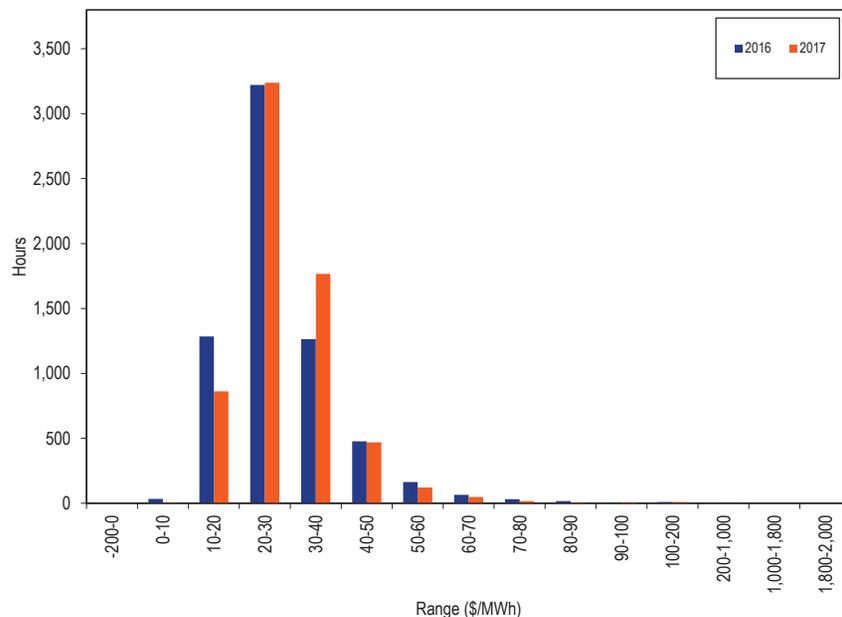
Day-ahead average LMP is the hourly average LMP for the PJM Day-Ahead Energy Market.⁷⁷

Day-Ahead Average LMP

PJM Day-Ahead Average LMP Duration

Figure 3-46 shows the hourly distribution of PJM day-ahead average LMP in the first nine months of 2016 and 2017.

Figure 3-46 Average LMP for the PJM Day-Ahead Energy Market: January 1 through September 30, 2016 and 2017



⁷⁷ See the *MMU Technical Reference for the PJM Markets*, at "Calculating Locational Marginal Price" for a detailed definition of Day-Ahead LMP. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>.

PJM Day-Ahead, Average LMP

Table 3-79 shows the PJM day-ahead, average LMP in the first nine months of the 17-year period 2001 through 2017.

Table 3-79 PJM day-ahead, average LMP (Dollars per MWh): January 1 through September 30, 2001 through 2017

Jan-Sep	Day-Ahead LMP			Year-to-Year Change		
	Average	Median	Standard Deviation	Average	Median	Standard Deviation
2001	\$36.07	\$30.02	\$34.25	NA	NA	NA
2002	\$28.29	\$22.54	\$19.09	(21.6%)	(24.9%)	(44.3%)
2003	\$41.20	\$38.24	\$22.02	45.6%	69.7%	15.4%
2004	\$42.64	\$42.07	\$17.47	3.5%	10.0%	(20.7%)
2005	\$54.48	\$46.67	\$28.83	27.8%	10.9%	65.1%
2006	\$50.45	\$46.32	\$24.93	(7.4%)	(0.8%)	(13.5%)
2007	\$54.24	\$51.40	\$24.95	7.5%	11.0%	0.1%
2008	\$71.43	\$66.38	\$33.11	31.7%	29.2%	32.7%
2009	\$37.35	\$35.29	\$14.32	(47.7%)	(46.8%)	(56.8%)
2010	\$45.81	\$41.03	\$19.59	22.7%	16.3%	36.8%
2011	\$45.14	\$40.20	\$22.68	(1.5%)	(2.0%)	15.7%
2012	\$32.16	\$30.10	\$14.54	(28.8%)	(25.1%)	(35.9%)
2013	\$37.50	\$34.70	\$16.96	16.6%	15.3%	16.6%
2014	\$53.76	\$39.92	\$58.98	43.4%	15.0%	247.8%
2015	\$36.67	\$30.56	\$25.21	(31.8%)	(23.4%)	(57.3%)
2016	\$27.90	\$25.23	\$11.37	(23.9%)	(17.4%)	(54.9%)
2017	\$28.90	\$26.60	\$10.73	3.6%	5.4%	(5.6%)

Day-Ahead, Load-Weighted, Average LMP

Day-ahead, load-weighted LMP reflects the average LMP paid for day-ahead MWh. Day-ahead, load-weighted LMP is the average of PJM day-ahead hourly LMP, each weighted by the PJM total cleared day-ahead hourly load, including day-ahead fixed load, price-sensitive load, decrement bids and up to congestion.

PJM Day-Ahead, Load-Weighted, Average LMP

Table 3-80 shows the PJM day-ahead, load-weighted, average LMP in the first nine months of the 17-year period 2001 through 2017.

Table 3-80 PJM day-ahead, load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 2001 through 2017

Day-Ahead, Load-Weighted, Average LMP			Year-to-Year Change			
Jan-Sep	Average	Median	Standard Deviation	Average	Median	Standard Deviation
2001	\$39.88	\$32.68	\$42.01	NA	NA	NA
2002	\$32.29	\$25.22	\$22.81	(19.0%)	(22.8%)	(45.7%)
2003	\$44.11	\$41.51	\$22.34	36.6%	64.6%	(2.1%)
2004	\$44.59	\$44.47	\$17.40	1.1%	7.1%	(22.1%)
2005	\$59.51	\$51.33	\$31.13	33.5%	15.4%	78.9%
2006	\$54.19	\$48.87	\$28.35	(8.9%)	(4.8%)	(8.9%)
2007	\$57.79	\$55.62	\$26.07	6.6%	13.8%	(8.0%)
2008	\$75.96	\$70.35	\$35.19	31.5%	26.5%	35.0%
2009	\$39.35	\$36.92	\$14.98	(48.2%)	(47.5%)	(57.4%)
2010	\$49.12	\$43.33	\$21.35	24.8%	17.4%	42.6%
2011	\$48.34	\$42.35	\$26.54	(1.6%)	(2.3%)	24.3%
2012	\$34.29	\$31.17	\$17.12	(29.1%)	(26.4%)	(35.5%)
2013	\$39.49	\$35.96	\$19.90	15.1%	15.4%	16.3%
2014	\$59.09	\$42.08	\$67.27	49.6%	17.0%	238.0%
2015	\$39.51	\$32.15	\$28.05	(33.1%)	(23.6%)	(58.3%)
2016	\$29.69	\$26.60	\$12.38	(24.8%)	(17.3%)	(55.8%)
2017	\$30.26	\$27.95	\$11.59	1.9%	5.1%	(6.4%)

Table 3-81 shows zonal day-ahead, and day-ahead, load-weighted, average LMP in the first nine months of 2016 and 2017.

Table 3-81 Zone day-ahead and day-ahead, load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017

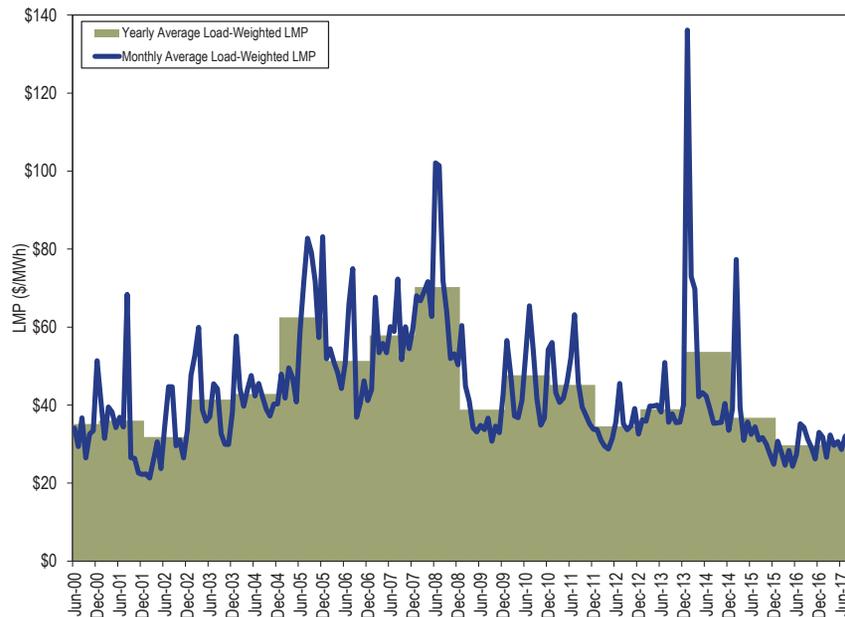
Zone	Day-Ahead Average LMP			Day-Ahead, Load-Weighted, Average LMP		
	2016 (Jan-Sep)	2017 (Jan-Sep)	Percent Change	2016 (Jan-Sep)	2017 (Jan-Sep)	Percent Change
AECO	\$25.24	\$26.90	6.6%	\$28.16	\$28.37	0.7%
AEP	\$27.76	\$29.05	4.6%	\$29.18	\$30.23	3.6%
APS	\$28.57	\$29.24	2.4%	\$30.14	\$30.47	1.1%
ATSI	\$28.08	\$29.63	5.5%	\$29.68	\$30.86	4.0%
BGE	\$36.99	\$31.95	(13.6%)	\$40.22	\$33.93	(15.6%)
ComEd	\$25.88	\$27.06	4.5%	\$27.63	\$28.50	3.2%
Day	\$27.94	\$29.69	6.2%	\$29.43	\$31.05	5.5%
DEOK	\$27.45	\$29.16	6.2%	\$29.16	\$30.70	5.3%
DLCO	\$27.37	\$29.05	6.2%	\$29.09	\$30.40	4.5%
Dominion	\$30.80	\$30.70	(0.3%)	\$33.03	\$32.49	(1.6%)
DPL	\$28.89	\$28.36	(1.8%)	\$32.28	\$30.36	(5.9%)
EKPC	\$26.70	\$28.24	5.8%	\$28.28	\$29.72	5.1%
JCPL	\$24.39	\$27.59	13.1%	\$26.90	\$29.29	8.9%
Met-Ed	\$24.63	\$28.31	14.9%	\$26.34	\$29.81	13.2%
PECO	\$24.15	\$26.85	11.2%	\$26.29	\$28.08	6.8%
PENELEC	\$26.68	\$28.15	5.5%	\$27.87	\$29.19	4.7%
Pepco	\$32.90	\$31.16	(5.3%)	\$35.02	\$32.78	(6.4%)
PPL	\$24.21	\$27.27	12.6%	\$25.74	\$28.54	10.9%
PSEG	\$24.94	\$27.90	11.9%	\$27.14	\$29.43	8.4%
RECO	\$24.91	\$28.04	12.6%	\$27.47	\$29.76	8.4%
PJM	\$27.90	\$28.90	3.6%	\$29.69	\$30.26	1.9%

PJM Day-Ahead, Monthly, Load-Weighted, Average LMP

Figure 3-47 shows the PJM day-ahead, monthly and annual, load-weighted LMP from June 2000 through September 2017.⁷⁸ The PJM day-ahead monthly load-weighted average LMP in May 2016 was \$24.32, which is the lowest day-ahead monthly load-weighted average since May 2002 at \$23.74.

⁷⁸ Since the Day-Ahead Energy Market did not start until June 1, 2000, the day-ahead data for 2000 only includes data for the last six months of that year.

Figure 3-47 Day-ahead, monthly and annual, load-weighted, average LMP: June 1, 2000 through September 30, 2017



PJM Day-Ahead, Monthly, Inflation Adjusted Load-Weighted, Average LMP

Figure 3-50 shows the PJM day-ahead monthly load-weighted average LMP and inflation adjusted monthly day-ahead load-weighted average LMP for June 2000 through September 2017.⁷⁹ The PJM day-ahead inflation adjusted monthly load-weighted average LMP in May 2016 was \$16.36, which is the lowest day-ahead monthly load-weighted average real LMP observed since PJM day-ahead markets started in 2000. Table 3-82 shows the PJM day-ahead yearly load-weighted average LMP and inflation adjusted yearly load-weighted average LMP for the first nine months of every year from 2000 through 2017.

⁷⁹ To obtain the inflation adjusted monthly load-weighted average LMP, the PJM system-wide load-weighted average LMP is deflated using US Consumer Price Index for all items, Urban Consumers (base period: January 1998), published by Bureau of Labor Statistics. <<http://download.bls.gov/pub/time.series/cu/cu.data.1.AllItems>> (Accessed October 16, 2017).

Figure 3-48 PJM day-ahead, monthly, load-weighted, average LMP and day-ahead, monthly inflation adjusted load-weighted, average LMP: June 1, 2000 through September 30, 2017

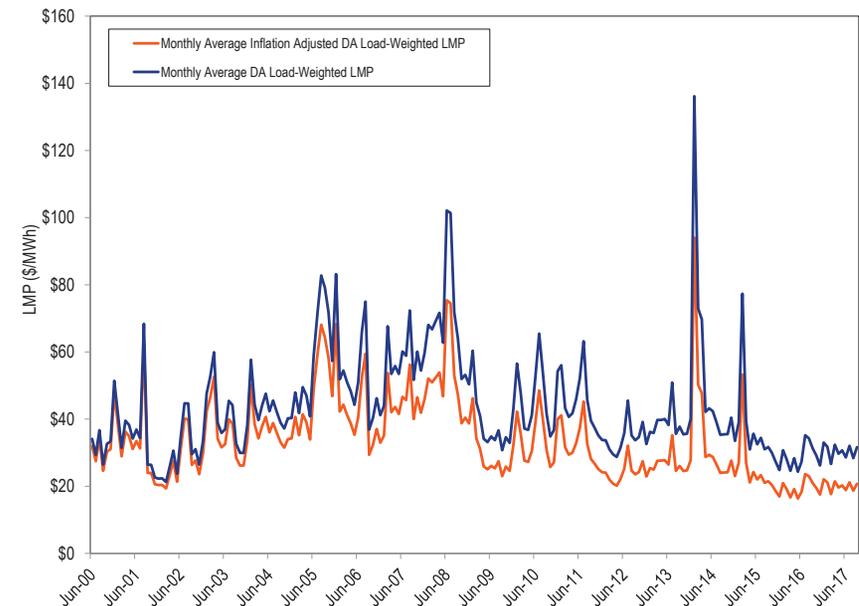


Table 3-82 PJM day-ahead, yearly, load-weighted, average LMP and day-ahead, yearly inflation adjusted load-weighted, average LMP: January 1 through September 30, 2000 through 2017

Jan-Sep	Load-Weighted, Average LMP	Inflation Adjusted Load-Weighted, Average LMP
2000	\$31.81	\$29.74
2001	\$39.88	\$36.41
2002	\$32.29	\$29.02
2003	\$44.11	\$38.81
2004	\$44.59	\$38.26
2005	\$59.51	\$49.32
2006	\$54.19	\$43.40
2007	\$57.79	\$45.19
2008	\$75.96	\$56.73
2009	\$39.35	\$29.77
2010	\$49.12	\$36.46
2011	\$48.34	\$34.79
2012	\$34.29	\$24.17
2013	\$39.49	\$27.40
2014	\$59.09	\$40.45
2015	\$39.51	\$26.99
2016	\$29.69	\$20.03
2017	\$30.26	\$19.99

Components of Day-Ahead, Load-Weighted LMP

LMPs result from the operation of a market based on security-constrained, least-cost dispatch in which marginal resources determine system LMPs, based on their offers. For physical units, those offers can be decomposed into their components including fuel costs, emission costs, variable operation and maintenance costs, markup, day-ahead scheduling reserve (DASR) adder and the 10 percent cost offer adder. INC offers, DEC bids and up to congestion transactions are dispatchable injections and withdrawals in the Day-Ahead Energy Market with an offer price that cannot be decomposed. Using identified marginal resource offers and the components of unit offers, it is possible to decompose PJM system LMP using the components of unit offers and sensitivity factors.

Cost offers of marginal units are separated into their component parts. The fuel related component is based on unit specific heat rates and spot fuel prices. Emission costs are calculated using spot prices for NO_x, SO₂ and CO₂ emission

credits, emission rates for NO_x, emission rates for SO₂ and emission rates for CO₂. CO₂ emission costs are applicable to PJM units in the PJM states that participate in RGGI: Delaware and Maryland.⁸⁰ Day-ahead scheduling reserve (DASR), lost opportunity cost (LOC) and DASR offer adders are the calculated contribution to LMP when redispatch of resources is needed in order to satisfy DASR requirements.

Table 3-83 shows the components of the PJM day-ahead, annual, load-weighted average LMP. In the first nine months of 2017, 21.2 percent of the load-weighted LMP was the result of coal costs, 18.2 percent of the load-weighted LMP was the result of gas costs, 3.0 percent was the result of the up to congestion transaction costs, 23.1 percent was the result of DEC bid costs and 23.2 percent was the result of INC bid costs.

Table 3-83 Components of PJM day-ahead, (unadjusted), load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017

Element	2016 (Jan - Sep)		2017 (Jan - Sep)		Change Percent
	Contribution to LMP	Percent	Contribution to LMP	Percent	
INC	(\$1.10)	(3.7%)	\$7.01	23.2%	26.9%
DEC	\$7.83	26.4%	\$6.99	23.1%	(3.3%)
Coal	\$12.02	40.5%	\$6.40	21.2%	(19.3%)
Gas	\$2.81	9.5%	\$5.49	18.2%	8.7%
Ten Percent Cost Adder	\$1.72	5.8%	\$1.32	4.4%	(1.4%)
Up to Congestion Transaction	\$0.55	1.9%	\$0.92	3.0%	1.2%
VOM	\$1.39	4.7%	\$0.87	2.9%	(1.8%)
Markup	(\$1.22)	(4.1%)	\$0.68	2.2%	6.3%
NO _x	\$0.34	1.2%	\$0.34	1.1%	(0.0%)
DASR LOC Adder	\$2.69	9.1%	\$0.08	0.3%	(8.8%)
CO ₂	\$0.37	1.3%	\$0.06	0.2%	(1.1%)
Dispatchable Transaction	\$2.02	6.8%	\$0.04	0.1%	(6.7%)
SO ₂	\$0.06	0.2%	\$0.03	0.1%	(0.1%)
Oil	\$0.03	0.1%	\$0.01	0.0%	(0.1%)
DASR Offer Adder	(\$0.03)	(0.1%)	\$0.01	0.0%	0.1%
Other	\$0.16	0.5%	\$0.01	0.0%	(0.5%)
Constrained Off	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Uranium	\$0.00	0.0%	(\$0.00)	(0.0%)	(0.0%)
Wind	(\$0.01)	(0.0%)	(\$0.01)	(0.0%)	0.0%
Price Sensitive Demand	\$0.04	0.1%	\$0.00	0.0%	(0.1%)
NA	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Total	\$29.69	100.0%	\$30.26	100.0%	0.0%

⁸⁰ New Jersey withdrew from RGGI, effective January 1, 2012.

Table 3-84 shows the components of the PJM day-ahead, annual, load-weighted average LMP including the adjusted markup calculated by excluding the 10 percent adder from the coal, gas or oil units.

Table 3-84 Components of PJM day-ahead, (adjusted), load-weighted, average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017

Element	2016 (Jan - Sep)		2017 (Jan - Sep)		Change Percent
	Contribution to LMP	Percent	Contribution to LMP	Percent	
INC	(\$1.10)	(3.7%)	\$7.01	23.2%	26.9%
DEC	\$7.83	26.4%	\$6.99	23.1%	(3.3%)
Coal	\$12.02	40.5%	\$6.40	21.2%	(19.3%)
Gas	\$2.81	9.5%	\$5.49	18.2%	8.7%
Markup	\$0.48	1.6%	\$1.97	6.5%	4.9%
Up to Congestion Transaction	\$0.55	1.9%	\$0.92	3.0%	1.2%
VOM	\$1.39	4.7%	\$0.87	2.9%	(1.8%)
NO _x	\$0.34	1.2%	\$0.34	1.1%	(0.0%)
DASR LOC Adder	\$2.69	9.1%	\$0.08	0.3%	(8.8%)
CO ₂	\$0.37	1.3%	\$0.06	0.2%	(1.1%)
Dispatchable Transaction	\$2.02	6.8%	\$0.04	0.1%	(6.7%)
SO ₂	\$0.06	0.2%	\$0.03	0.1%	(0.1%)
Ten Percent Cost Adder	\$0.02	0.1%	\$0.03	0.1%	0.0%
Oil	\$0.03	0.1%	\$0.01	0.0%	(0.1%)
DASR Offer Adder	(\$0.03)	(0.1%)	\$0.01	0.0%	0.1%
Other	\$0.16	0.5%	\$0.01	0.0%	(0.5%)
Constrained Off	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Uranium	\$0.00	0.0%	(\$0.00)	(0.0%)	(0.0%)
Wind	(\$0.01)	(0.0%)	(\$0.01)	(0.0%)	0.0%
Price Sensitive Demand	\$0.04	0.1%	\$0.00	0.0%	(0.1%)
NA	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Total	\$29.69	100.0%	\$30.26	100.0%	0.0%

Price Convergence

The introduction of the PJM Day-Ahead Energy Market with virtuals as part of the design created the possibility that competition, exercised through the use of virtual offers and bids, could tend to cause prices in the Day-Ahead and Real-Time Energy Markets to converge more than would be the case without virtuals. Convergence is not the goal of virtual trading, but it is a possible outcome. The degree of convergence, by itself, is not a measure of

the competitiveness or effectiveness of the Day-Ahead Energy Market. Price convergence does not necessarily mean a zero or even a very small difference in prices between Day-Ahead and Real-Time Energy Markets. There may be factors, from operating reserve charges to differences in risk that result in a competitive, market-based differential. In addition, convergence in the sense that day-ahead and real-time prices are equal at individual buses or aggregates on a day to day basis is not a realistic expectation as a result of uncertainty, lags in response time and modeling differences, such as differences in modeled contingencies and marginal loss calculations, between the Day-Ahead and Real-Time Energy Market.

Where arbitrage opportunities are created by differences between day-ahead and real-time energy market expectations, reactions by market participants may lead to more efficient market outcomes but there is no guarantee that the results of virtual bids and offers will result in more efficient market outcomes.

Where arbitrage incentives are created by systematic modeling differences, such as differences between the day-ahead and real-time modeled transmission contingencies and marginal loss calculations, virtual bids and offers cannot result in more efficient market outcomes. Such offers may be profitable but cannot change the underlying reason for the price difference. The virtual transactions will continue to profit from the activity for that reason regardless of the volume of those transactions. This is termed false arbitrage.

INCs, DECs and UTCs allow participants to profit from price differences between the Day-Ahead and Real-Time Energy Market. Absent a physical position in real time, the seller of an INC must buy energy in the Real-Time Energy Market to fulfill the financial obligation to provide energy. If the day-ahead price for energy is higher than the real-time price for energy, the INC makes a profit. Absent a physical position in real time, the buyer of a DEC must sell energy in the Real-Time Energy Market to fulfill the financial obligation to buy energy. If the day-ahead price for energy is lower than the real-time price for energy, the DEC makes a profit.

The profitability of a UTC transaction is the net of the separate profitability of the component INC and DEC. A UTC can be net profitable if the profit on one side of the UTC transaction exceeds the losses on the other side.

Table 3-85 shows the number of cleared UTC transactions, the number of profitable cleared UTCs, the number of cleared UTCs that were profitable at their source point and the number of cleared UTCs that were profitable at their sink point in the first nine months of 2016 and 2017. In the first nine months of 2017, 53.6 percent of all cleared UTC transactions were net profitable. Of cleared UTC transactions, 63.3 percent were profitable on the source side and 37.5 were profitable on the sink side but only 4.9 percent were profitable on both the source and sink side.

Table 3-85 Cleared UTC profitability by source and sink point: January 1 through September 30, 2016 and 2017⁸¹

Jan-Sep	Cleared UTCs	Profitable UTCs	UTC Profitable at Source Bus	UTC Profitable at Sink Bus	Profitable UTC	Profitable Source	Profitable Sink
2016	15,685,907	7,421,938	10,032,684	5,491,915	47.3%	64.0%	35.0%
2017	14,588,801	7,824,106	9,236,774	5,465,683	53.6%	63.3%	37.5%

Figure 3-49 shows total UTC daily gross profits and losses and net profits and losses in the first nine months of 2017.

Figure 3-49 UTC daily gross profits and losses and net profits: January 1 through September 30, 2017⁸²

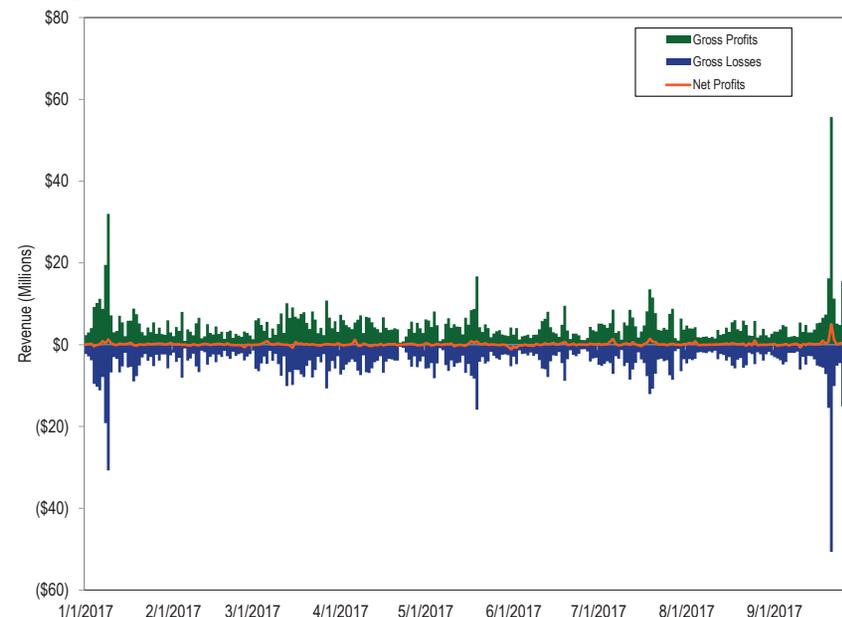


Figure 3-50 shows the cumulative UTC daily profits for the years 2013 through 2017. UTC profits during this period were primarily a result of significant unanticipated price differences between day ahead and real time LMPs. The large increases in cumulative daily UTC profits were due to PJM events that resulted in high real time LMPs. For example, the cumulative daily UTC profits in 2014 were greater than for the other three years as a result of profits from the significant and unanticipated day-ahead and real-time price differences that resulted from the polar vortex conditions in January 2014. The cumulative daily UTC profits increased during late February 2015 as a result of profits from the significant day-ahead and real-time prices differences that resulted from cold weather conditions. The cumulative daily UTC profits increased during late September 2017 as a result of profits from the significant day-

⁸¹ Calculations exclude PJM administrative charges.

⁸² Calculations exclude PJM administrative charges.

ahead and real-time price difference that resulted from the shortage event on September 21, 2017.

Figure 3-50 Cumulative daily UTC profits: January 1, 2013 through September 30, 2017

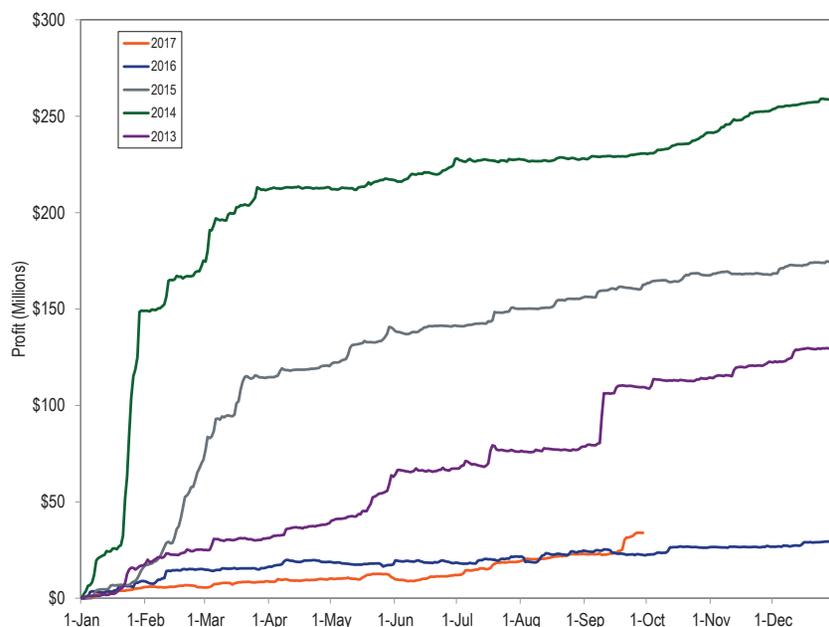


Table 3-86 UTC profits by month: January 1, 2013 through September 30, 2017

	January	February	March	April	May	June	July	August	September	October	November	December	Total
2013	\$17,048,654	\$8,304,767	\$5,629,392	\$7,560,773	\$25,219,947	\$3,484,372	\$8,781,526	\$2,327,168	\$31,160,618	\$4,393,583	\$8,730,701	\$6,793,990	\$129,435,490
2014	\$148,973,434	\$23,235,621	\$39,448,716	\$1,581,786	\$3,851,636	\$7,353,460	\$3,179,356	\$287,824	\$2,727,763	\$10,889,817	\$11,042,443	\$6,191,101	\$258,762,955
2015	\$16,132,319	\$53,830,098	\$44,309,656	\$6,392,939	\$19,793,475	\$824,817	\$8,879,275	\$5,507,608	\$6,957,012	\$4,852,454	\$392,876	\$6,620,581	\$174,493,110
2016	\$8,874,363	\$6,118,477	\$1,119,457	\$2,768,591	(\$1,333,563)	\$841,706	\$3,128,346	\$3,200,573	(\$2,518,408)	\$4,216,717	\$254,684	\$3,271,368	\$29,942,312
2017	\$5,716,757	(\$17,860)	\$3,083,173	\$944,939	\$1,245,988	\$868,412	\$7,053,390	\$4,002,063	\$10,960,012				\$33,856,874

Table 3-86 shows UTC profits by month for 2013 through September 2017. May 2016, September 2016 and February 2017 were the only months in the past five years where the total monthly profits were negative.

There are incentives to use virtual transactions to profit from price differences between the Day-Ahead and Real-Time Energy Markets, but there is no guarantee that such activity will result in price convergence and no data to support that claim. As a general matter, virtual offers and bids are based on expectations about both day-ahead and real-time energy market conditions and reflect the uncertainty about conditions in both markets and the fact that these conditions change hourly and daily. PJM markets do not provide a mechanism that could result in immediate convergence after a change in system conditions as there is at least a one day lag after any change in system conditions before offers could reflect such changes.

Substantial virtual trading activity does not guarantee that market power cannot be exercised in the Day-Ahead Energy Market. Hourly and daily price differences between the Day-Ahead and Real-Time Energy Markets fluctuate continuously and substantially from positive to negative. There may be substantial, persistent differences between day-ahead and real-time prices even on a monthly basis (Figure 3-52).

Analysis of the data from September 1, 2013, through September 30, 2015, does not support the conclusion that UTCs contribute in any measurable way to price convergence. In addition, the sudden and significant reduction in UTC activity in September of 2014 did not cause a measurable change in price convergence.

Table 3-87 shows that the difference between the average real-time price and the average day-ahead price was -\$0.47 per MWh in the first nine months of 2016, and -\$0.11 per MWh in the first nine months of 2017. The difference between average peak real-time price and the average peak day-ahead price was -\$0.60 per MWh in the first nine months of 2016 and -\$0.11 per MWh in the first nine months of 2017.

Table 3-87 Day-ahead and real-time average LMP (Dollars per MWh): January 1 through September 30, 2016 and 2017⁸³

	Jan-Sep 2016				Jan-Sep 2017			
	Day-Ahead	Real-Time	Difference	Percent of Real Time	Day-Ahead	Real-Time	Difference	Percent of Real Time
Average	\$27.90	\$27.43	(\$0.47)	(1.7%)	\$28.90	\$28.79	(\$0.11)	(0.4%)
Median	\$25.23	\$23.61	(\$1.62)	(6.9%)	\$26.60	\$25.28	(\$1.31)	(5.2%)
Standard deviation	\$11.37	\$15.73	\$4.36	27.7%	\$10.73	\$16.81	\$6.08	36.2%
Peak average	\$33.48	\$32.88	(\$0.60)	(1.8%)	\$34.01	\$33.90	(\$0.11)	(0.3%)
Peak median	\$29.92	\$26.87	(\$3.04)	(11.3%)	\$32.00	\$29.37	(\$2.63)	(9.0%)
Peak standard deviation	\$11.91	\$18.04	\$6.13	34.0%	\$11.67	\$20.89	\$9.22	44.1%
Off peak average	\$23.01	\$22.65	(\$0.36)	(1.6%)	\$24.43	\$24.32	(\$0.11)	(0.4%)
Off peak median	\$21.57	\$21.04	(\$0.53)	(2.5%)	\$22.75	\$22.40	(\$0.36)	(1.6%)
Off peak standard deviation	\$8.17	\$11.40	\$3.23	28.3%	\$7.34	\$10.27	\$2.93	28.6%

The price difference between the Real-Time and the Day-Ahead Energy Markets results in part, from conditions in the Real-Time Energy Market that are difficult, or impossible, to anticipate in the Day-Ahead Energy Market.

Table 3-88 shows the difference between the real-time and the day-ahead energy market prices for the first nine months of 2001 through 2017.

⁸³ The averages used are the annual average of the hourly average PJM prices for day-ahead and real-time.

Table 3-88 Day-ahead and real-time average LMP (Dollars per MWh): January 1 through September 30, 2001 through 2017

Jan-Sep	Day-Ahead	Real-Time	Difference	Percent of Real Time
2001	\$36.07	\$36.00	(\$0.07)	(0.2%)
2002	\$28.29	\$28.13	(\$0.16)	(0.6%)
2003	\$41.20	\$40.42	(\$0.77)	(1.9%)
2004	\$42.64	\$43.85	\$1.22	2.9%
2005	\$54.48	\$54.69	\$0.21	0.4%
2006	\$50.45	\$51.79	\$1.34	2.7%
2007	\$54.24	\$57.34	\$3.10	5.7%
2008	\$71.43	\$71.94	\$0.51	0.7%
2009	\$37.35	\$37.42	\$0.08	0.2%
2010	\$45.81	\$46.13	\$0.32	0.7%
2011	\$45.14	\$45.79	\$0.65	1.4%
2012	\$32.16	\$32.45	\$0.29	0.9%
2013	\$37.50	\$37.30	(\$0.20)	(0.5%)
2014	\$53.76	\$52.72	(\$1.04)	(1.9%)
2015	\$36.67	\$35.96	(\$0.70)	(1.9%)
2016	\$27.90	\$27.43	(\$0.47)	(1.7%)
2017	\$28.90	\$28.79	(\$0.11)	(0.4%)

Table 3-89 provides frequency distributions of the differences between PJM real-time hourly LMP and PJM day-ahead hourly LMP for the first nine months of 2007 through 2017.

Table 3-89 Frequency distribution by hours of PJM real-time LMP minus day-ahead LMP (Dollars per MWh): January 1 through September 30, 2007 through 2017

LMP	2007		2008		2009		2010		2011		2012		2013	
	Frequency	Cumulative Percent												
< (\$1,000)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$1,000) to (\$750)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$750) to (\$500)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$500) to (\$450)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$450) to (\$400)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$400) to (\$350)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$350) to (\$300)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$300) to (\$250)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$250) to (\$200)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	1	0.02%	1	0.02%
(\$200) to (\$150)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	1	0.02%	4	0.08%	3	0.06%
(\$150) to (\$100)	0	0.00%	1	0.02%	0	0.00%	0	0.00%	2	0.05%	6	0.17%	5	0.14%
(\$100) to (\$50)	26	0.40%	88	1.35%	3	0.05%	13	0.20%	49	0.79%	17	0.43%	9	0.27%
(\$50) to \$0	3,385	52.07%	3,730	58.08%	3,776	57.69%	4,091	62.65%	4,011	62.02%	4,112	62.97%	4,338	66.49%
\$0 to \$50	2,914	96.55%	2,448	95.32%	2,736	99.45%	2,288	97.57%	2,290	96.98%	2,343	98.60%	2,112	98.73%
\$50 to \$100	193	99.50%	264	99.33%	34	99.97%	130	99.56%	169	99.56%	61	99.53%	58	99.62%
\$100 to \$150	21	99.82%	37	99.89%	2	100.00%	20	99.86%	21	99.88%	14	99.74%	12	99.80%
\$150 to \$200	4	99.88%	4	99.95%	0	100.00%	8	99.98%	2	99.91%	10	99.89%	10	99.95%
\$200 to \$250	1	99.89%	2	99.98%	0	100.00%	1	100.00%	3	99.95%	4	99.95%	1	99.97%
\$250 to \$300	3	99.94%	0	99.98%	0	100.00%	0	100.00%	0	99.95%	1	99.97%	2	100.00%
\$300 to \$350	2	99.97%	1	100.00%	0	100.00%	0	100.00%	0	99.95%	2	100.00%	0	100.00%
\$350 to \$400	0	99.97%	0	100.00%	0	100.00%	0	100.00%	0	99.95%	0	100.00%	0	100.00%
\$400 to \$450	1	99.98%	0	100.00%	0	100.00%	0	100.00%	0	99.95%	0	100.00%	0	100.00%
\$450 to \$500	1	100.00%	0	100.00%	0	100.00%	0	100.00%	0	99.95%	0	100.00%	0	100.00%
\$500 to \$750	0	100.00%	0	100.00%	0	100.00%	0	100.00%	3	100.00%	0	100.00%	0	100.00%
\$750 to \$1,000	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%
\$1,000 to \$1,250	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%
>= \$1,250	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%	0	100.00%

Jan-Sep	2014		2015		2016		2017	
	Frequency	Cumulative Percent						
LMP								
< (\$1,000)	0	0.00%	0	0.00%	0	0.00%	0	0.00%
(\$1,000) to (\$750)	2	0.03%	0	0.00%	0	0.00%	0	0.00%
(\$750) to (\$500)	3	0.08%	0	0.00%	0	0.00%	0	0.00%
(\$500) to (\$450)	1	0.09%	0	0.00%	0	0.00%	0	0.00%
(\$450) to (\$400)	6	0.18%	0	0.00%	0	0.00%	0	0.00%
(\$400) to (\$350)	5	0.26%	0	0.00%	0	0.00%	0	0.00%
(\$350) to (\$300)	5	0.34%	0	0.00%	0	0.00%	0	0.00%
(\$300) to (\$250)	6	0.43%	0	0.00%	0	0.00%	0	0.00%
(\$250) to (\$200)	14	0.64%	1	0.02%	0	0.00%	0	0.00%
(\$200) to (\$150)	14	0.85%	4	0.08%	0	0.00%	0	0.00%
(\$150) to (\$100)	45	1.54%	17	0.34%	0	0.00%	2	0.03%
(\$100) to (\$50)	89	2.90%	65	1.33%	13	0.20%	3	0.08%
(\$50) to \$0	4,301	68.55%	4,417	68.75%	4,299	65.58%	4,098	62.63%
\$0 to \$50	1,871	97.11%	1,901	97.77%	2,201	99.06%	2,414	99.48%
\$50 to \$100	97	98.60%	101	99.31%	49	99.80%	26	99.88%
\$100 to \$150	37	99.16%	33	99.82%	13	100.00%	5	99.95%
\$150 to \$200	18	99.44%	7	99.92%	0	100.00%	1	99.97%
\$200 to \$250	9	99.57%	3	99.97%	0	100.00%	0	99.97%
\$250 to \$300	8	99.69%	1	99.98%	0	100.00%	0	99.97%
\$300 to \$350	3	99.74%	1	100.00%	0	100.00%	0	99.97%
\$350 to \$400	3	99.79%	0	100.00%	0	100.00%	0	99.97%
\$400 to \$450	2	99.82%	0	100.00%	0	100.00%	1	99.98%
\$450 to \$500	0	99.82%	0	100.00%	0	100.00%	0	99.98%
\$500 to \$750	7	99.92%	0	100.00%	0	100.00%	1	100.00%
\$750 to \$1,000	0	99.92%	0	100.00%	0	100.00%	0	100.00%
\$1,000 to \$1,250	1	99.94%	0	100.00%	0	100.00%	0	100.00%
>= \$1,250	4	100.00%	0	100.00%	0	100.00%	0	100.00%

Figure 3-51 shows the hourly differences between day-ahead and real-time hourly LMP in the first nine months of 2017.

Figure 3-51 Real-time hourly LMP minus day-ahead hourly LMP: January 1 through September 30, 2017

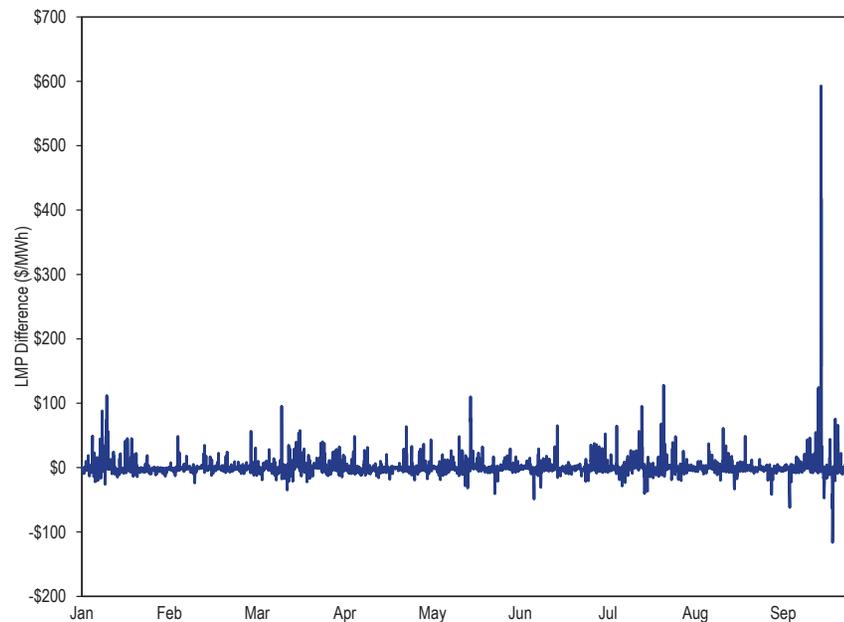


Figure 3-52 shows the monthly average of the differences between the day-ahead and real-time PJM average LMPs from January 2013, through September 2017.

Figure 3-52 Monthly average of real-time minus day-ahead LMP: January 1, 2013 through September 30, 2017

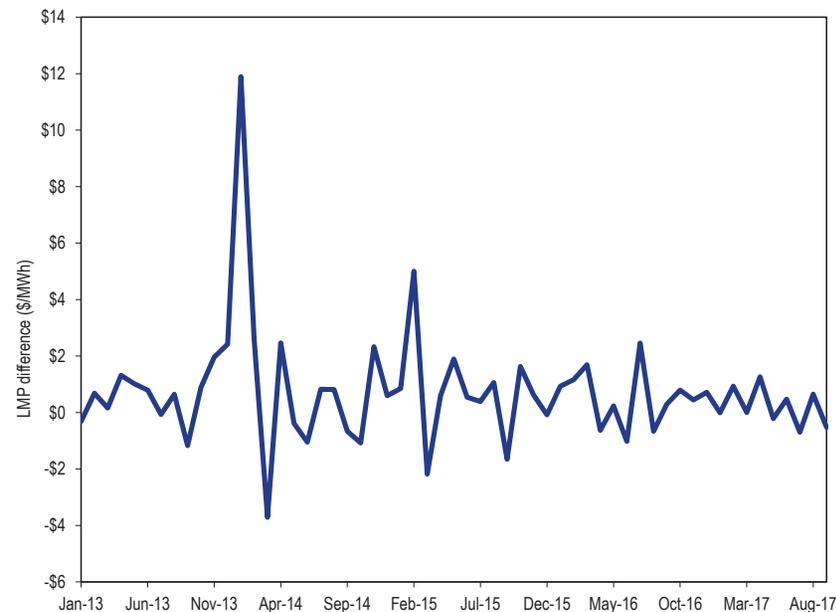


Figure 3-53 shows the monthly average of the absolute value of the differences between the day-ahead and real-time hourly, nodal LMPs from January 2013, through September 2017.

Figure 3-53 Monthly average of the absolute value of real-time minus day-ahead LMP by node: January 1, 2013 through September 30, 2017

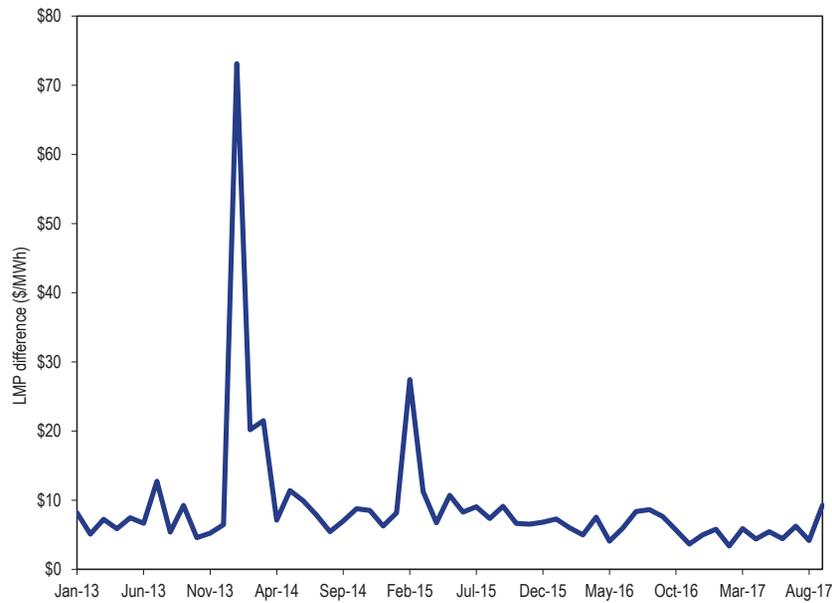
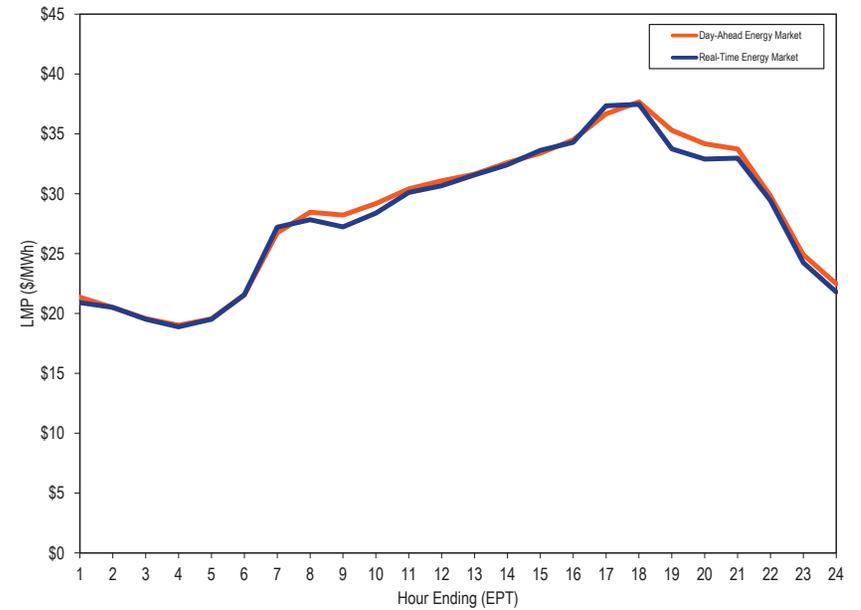


Figure 3-54 shows day-ahead and real-time LMP on an average hourly basis for the first nine months of 2017.

Figure 3-54 PJM system hourly average LMP: January 1 through September 30, 2017



Scarcity

PJM’s energy market experienced shortage pricing on one day (September 21) in the first nine months of 2017. Table 3-90 shows a summary of the number of days emergency alerts, warnings and actions were declared in PJM in the first nine months of 2016 and 2017.

Table 3-90 Summary of emergency events declared: January 1 through September 30, 2016 and 2017

Event Type	Number of days events declared	
	Jan - Sep, 2016	Jan - Sep, 2017
Cold Weather Alert	4	0
Hot Weather Alert	22	17
Maximum Emergency Generation Alert	0	0
Primary Reserve Alert	0	0
Voltage Reduction Alert	0	0
Primary Reserve Warning	0	0
Voltage Reduction Warning	0	0
Pre Emergency Mandatory Load Management Reduction Action	0	0
Emergency Mandatory Load Management Reduction Action (30, 60 or 120 minute lead time)	0	0
Maximum Emergency Action	0	0
Emergency Energy Bids Requested	0	0
Voltage Reduction Action	0	0
Shortage Pricing	0	1
Energy export recalls from PJM capacity resources	0	0

Figure 3-55 shows the number of days that weather and capacity emergency alerts were issued in PJM in the first nine months of 2013 through 2017. Figure 3-56 shows the number of days emergency warnings were issued and actions were taken in PJM in the first nine months of 2013 through 2017.

Figure 3-55 PJM declared emergency alerts: January 1 through September 30, 2013 to 2017

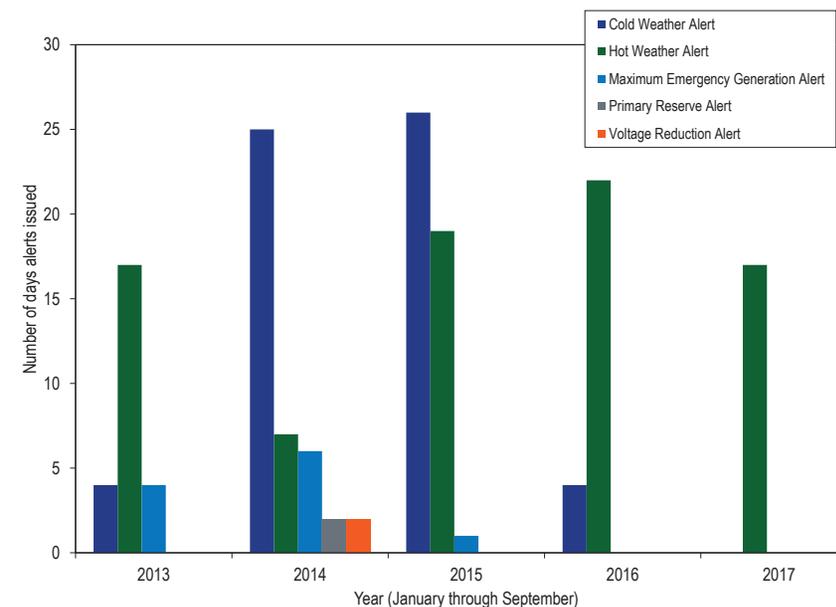
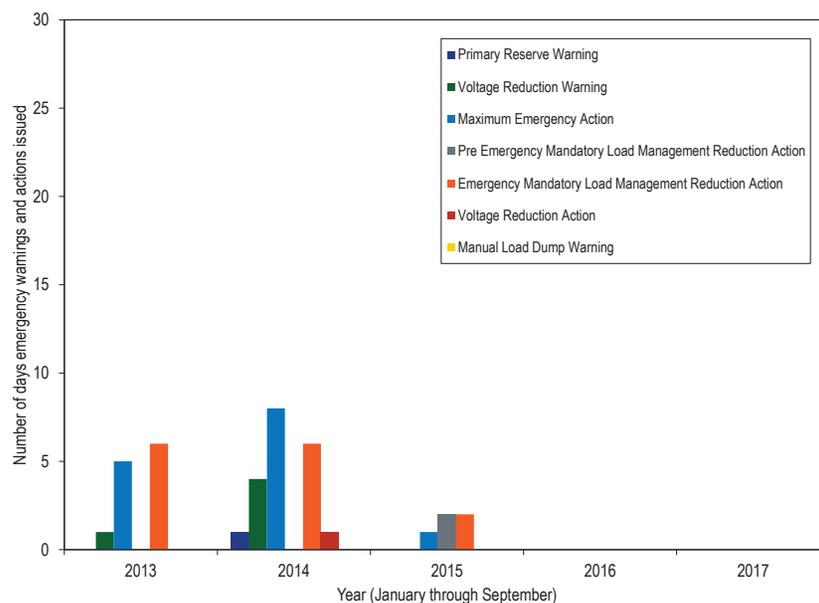


Figure 3–56 PJM declared emergency warnings and actions: January 1 through September 30, 2013 to 2017



Emergency Procedures

PJM declares alerts at least a day prior to the operating day to warn members of possible emergency actions that could be taken during the operating day. In real time, on the operating day, PJM issues warnings notifying members of system conditions that could result in emergency actions during the operating day.

PJM did not declare any cold weather alerts in the first nine months of 2017 compared to four days in the first nine months of 2016.⁸⁴ The purpose of a cold weather alert is to prepare personnel and facilities for expected extreme cold weather conditions, generally when temperatures are forecast to approach minimums or fall below 10 degrees Fahrenheit.

⁸⁴ See PJM, "Manual 13: Emergency Operations," Rev. 64 (June 1, 2017), Section 3.3 Cold Weather Alert, p. 59.

PJM declared hot weather alerts on 17 days in the first nine months of 2017 compared to 22 days in the first nine months of 2016.⁸⁵ The purpose of a hot weather alert is to prepare personnel and facilities for expected extreme hot and humid weather conditions, generally when temperatures are forecast to exceed 90 degrees Fahrenheit with high humidity.

PJM did not declare any maximum emergency generation alerts in the first nine months of 2017 and 2016. The purpose of a maximum emergency generation alert is to provide an alert at least one day prior to the operating day that system conditions may require use of PJM emergency actions. It is called to alert PJM members that maximum emergency generation may be requested in the operating capacity.⁸⁶ This means that if PJM directs members to load maximum emergency generation during the operating day, the resources must be able to increase generation above the maximum economic level of their offer.

PJM did not declare any primary reserve alerts in the first nine months of 2017 and 2016. The purpose of a primary reserve alert is to alert members at least one day prior to the operating day that available primary reserves are anticipated to be short of the primary reserve requirement on the operating day. It is issued when the estimated primary reserves are less than the forecast primary reserve requirement.

PJM did not declare any voltage reduction alert in the first nine months of 2017 and 2016. The purpose of a voltage reduction alert is to alert members at least one day prior to the operating day that a voltage reduction may be required on the operating day. It is issued when the estimated operating reserve is less than the forecast synchronized reserve requirement.

PJM did not declare any primary reserve warning in the first nine months of 2017 and 2016. The purpose of a primary reserve warning is to warn members that available primary reserves are less than the primary reserve requirement but greater than the synchronized reserve requirement.

⁸⁵ See PJM, "Manual 13: Emergency Operations," Rev. 64 (June 1, 2017), Section 3.4 Hot Weather Alert, p. 64.
⁸⁶ *Id.* at 20.

PJM did not declare any voltage reduction warnings and reductions of noncritical plant load in the first nine months of 2017 and 2016. The purpose of a voltage reduction warning and reduction of noncritical plant load is to warn members that available synchronized reserves are less than the synchronized reserve requirement and that a voltage reduction may be required. It can be issued for the RTO or for specific control zones.

PJM did not declare any emergency mandatory load management reductions in the first nine months of 2017 and 2016. The purpose of emergency mandatory load management is to request curtailment service providers (CSP) to implement load reductions from demand resources registered in PJM demand response programs that have a lead time of between one and two hours (long lead time) and a lead time of up to one hour (short lead time). Starting in June 2014, PJM combined the long lead and short lead emergency load management action procedures into Emergency Mandatory Load Management Reduction Action (30, 60 or 120 minute lead time). PJM dispatch declares NERC Energy Emergency Alert level 2 (EEA2) concurrent with Emergency Mandatory load Management Reductions. PJM also added a Pre-Emergency Mandatory Load Management Reduction Action (30, 60 or 120 minute lead time) step to request load reductions before declaring emergency load management reductions.

PJM did not declare any maximum emergency generation actions in the first nine months of 2017 and 2016. The purpose of a maximum emergency generation action is to request generators to increase output to the maximum emergency level which unit owners may define at a level above the maximum economic level. A maximum emergency generation action can be issued for the RTO, for specific control zones or for parts of control zones.

PJM did not request any offers for emergency energy purchases in the first nine months of 2017 and 2016.

PJM did not declare any voltage reduction actions in the first nine months of 2017 and 2016. The purpose of a voltage reduction is to reduce load to provide sufficient reserves, to maintain tie flow schedules, and to preserve

limited energy sources. When a voltage reduction action is issued for a reserve zone or subzone, the primary reserve penalty factor and synchronized reserve penalty factor are incorporated into the synchronized and nonsynchronized reserve market clearing prices and locational marginal prices until the voltage reduction action has been terminated.

PJM declared sixteen synchronized reserve events in the first nine months of 2017 compared to eleven synchronized reserve events in the first nine months of 2016.⁸⁷ Synchronized reserve events may occur at any time of the year due to sudden loss of generation or transmission facilities and do not necessarily coincide with capacity emergency conditions such as maximum generation emergency events or emergency load management events.

Table 3-91 provides a description of PJM declared emergency procedures.

⁸⁷ See 2017 Quarterly State of the Market Report for PJM: January through September, Section 10: Ancillary Service Markets for details on the spinning events.

Table 3-91 Description of emergency procedures

Emergency Procedure	Purpose
Cold Weather Alert	To prepare personnel and facilities for extreme cold weather conditions, generally when forecast weather conditions approach minimum or temperatures fall below ten degrees Fahrenheit.
Hot Weather Alert	To prepare personnel and facilities for extreme hot and/or humid weather conditions, generally when forecast temperatures exceed 90 degrees with high humidity.
Maximum Emergency Generation Alert	To provide an early alert at least one day prior to the operating day that system conditions may require the use of the PJM emergency procedures and resources must be able to increase generation above the maximum economic level of their offers.
Primary Reserve Alert	To alert members of a projected shortage of primary reserve for a future period. It is implemented when estimated primary reserve is less than the forecast requirement.
Voltage Reduction Alert	To alert members that a voltage reduction may be required during a future critical period. It is implemented when estimated reserve capacity is less than forecasted synchronized reserve requirement.
Pre-Emergency Load Management Reduction Action	To request load reductions from customers registered in the PJM Demand Response program that need 30, 60, or 120 minute lead time before declaring emergency load management reductions
Emergency Mandatory Load Management Reduction Action	To request load reductions from customers registered in the PJM Demand Response program that need 30, 60, or 120 minute lead time to provide additional load relief, generally declared simultaneously with NERC Energy Emergency Alert Level 2 (EEA2)
Primary Reserve Warning	To warn members that available primary reserve is less than required and present operations are becoming critical. It is implemented when available primary reserve is less than the primary reserve requirement but greater than the synchronized reserve requirement.
Maximum Emergency Generation Action	To provide real time notice to increase generation above the maximum economic level. It is implemented whenever generation is needed that is greater than the maximum economic level.
Voltage Reduction Warning & Reduction of Non-Critical Plant Load	To warn members that actual synchronized reserves are less than the synchronized reserve requirement and that voltage reduction may be required.
Deploy All Resources Action	For emergency events that do not evolve over time, but rather develop rapidly and without prior warning, PJM issues this action to instruct all generation resources to be online immediately and to all load management resources to reduce load immediately.
Manual Load Dump Warning	To warn members of the critical condition of present operations that may require manually dumping load. Issued when available primary reserve capacity is less than the largest operating generator or the loss of a transmission facility jeopardizes reliable operations after all other possible measures are taken to increase reserve.
Voltage Reduction Action	To reduce load to provide sufficient reserve capacity to maintain tie flow schedules and preserve limited energy sources. It is implemented when load relief is needed to maintain tie schedules.
Manual Load Dump Action	To provide load relief when all other possible means of supplying internal PJM RTO load have been used to prevent a catastrophe within the PJM RTO or to maintain tie schedules so as not to jeopardize the reliability of the other interconnected regions.

Table 3-92 shows the dates when emergency alerts and warnings were declared and when emergency actions were implemented in the first nine months of 2017.

Table 3-92 PJM declared emergency alerts, warnings and actions: January 1 through September 30, 2017

Date	Cold Weather Alert	Hot Weather Alert	Maximum Emergency Generation Alert	Primary Reserve Alert	Voltage Reduction Alert	Primary Reserve Warning	Voltage Reduction Warning and Reduction of Non-Critical Plant Load	Maximum Emergency Generation Action	Pre-Emergency Mandatory Load Management Reduction	Emergency Mandatory Load Management Reduction	Voltage Reduction	Manual Load Dump Warning
5/17/2017		PJM RTO										
5/18/2017		PJM RTO										
6/11/2017		PJM RTO										
6/12/2017		PJM RTO										
6/13/2017		PJM RTO										
6/30/2017		Mid Atlantic										
7/11/2017		Mid Atlantic and Dominion										
7/12/2017		PJM RTO										
7/13/2017		Mid Atlantic and Dominion										
7/14/2017		Dominion										
7/19/2017		Dominion and EKPC										
7/20/2017		PJM RTO										
7/21/2017		PJM RTO										
7/22/2017		Mid Atlantic and Dominion										
8/22/2017		Mid Atlantic and Dominion										
9/25/2017		PJM RTO										
9/26/2017		PJM RTO										

Scarcity and Scarcity Pricing

In electricity markets, scarcity means that demand, including reserve requirements, is nearing the limits of the available capacity of the system. Under the PJM rules that were in place through September 30, 2012, high prices, or scarcity pricing, resulted from high offers by individual generation owners for specific units when the system was close to its available capacity. But this was not an efficient way to manage scarcity pricing and made it difficult to distinguish between market power and scarcity pricing.

On October 1, 2012, PJM introduced a new administrative scarcity pricing regime. Under these market rules, shortage pricing conditions are triggered when there is a shortage of synchronized or primary reserves in the RTO or in the Mid-Atlantic and Dominion (MAD) Subzone. In times of reserve shortage, the value of reserves is included as a penalty factor in the optimization and in the price of energy.⁸⁸ Shortage pricing is also triggered when PJM issues a voltage reduction action or a manual load dump action for a reserve zone or a reserve subzone. When shortage pricing is triggered, the primary reserve penalty factor and the synchronized reserve penalty factor are incorporated in the calculation of the synchronized and nonsynchronized reserve market clearing prices and

⁸⁸ See OA Schedule 1 § 2.2(d).

the locational marginal price. The market clearing prices for reserves during reserve shortages in real time were determined based on vertical demand curves for synchronized and primary reserves, defined for the Mid-Atlantic Region and for the entire RTO, called the Operating Reserve Demand Curves (ORDC). The penalty factors for the reserve products in the ORDC started at \$250 per MWh for the 2012/2013 delivery year and gradually increased to \$850 per MWh for the 2015/2016 delivery year.

In 2015, PJM revised the rules to add a conditional second step to the operating reserve demand curves, that would only be in effect during hot weather alerts, cold weather alerts and other emergency conditions, to allow PJM to procure additional reserves at a lower clearing price of \$300 per MWh.⁸⁹ When there are no emergency conditions in place, the ORDC remained a single-step curve.

On May 11, 2017, PJM made revisions to the triggers for shortage pricing and implemented five minute shortage pricing in response to Order No. 825. These revisions did not change the operating reserve demand curves.

On July 12, 2017, PJM implemented updates to the Operating Reserve Demand Curves that determine the value of the penalty factors that are incorporated in the calculation of the synchronized and primary reserve market clearing prices and the locational marginal price for energy. PJM added an extended reserve requirement to the operating reserve demand curves. The extended synchronized reserve requirement is defined as the synchronized reserve requirement plus 190 MW. The extended primary reserve requirement is defined as the primary reserve requirement plus 190 MW. PJM retains the ability to add a conditional extended reserve requirement during hot weather alerts, cold weather alerts or other emergencies that would increase the extended reserve requirement beyond 190 MW.

In the first nine months of 2017, shortage pricing was triggered on one day in PJM.

⁸⁹ 151 FERC ¶ 61,017 (2015).

Final Rule on Shortage Pricing and Settlement Intervals (Order No. 825)

On September 17, 2015, the Commission issued a Notice of Proposed Rulemaking (NOPR) in which the Commission proposed to address price formation issues in RTOs/ISOs (“price formation NOPR”).⁹⁰ In particular, the price formation NOPR proposed (i) to require the alignment of settlement and dispatch intervals for energy and operating reserves; and (ii) to require that each RTO/ISO trigger shortage pricing for any dispatch interval during which a shortage of energy or operating reserves occurs. These proposed reforms are intended to ensure that resources have price signals that provide incentives to conform their output to dispatch instructions, and that prices reflect operating needs at each dispatch interval.⁹¹

On June 16, 2016, the Commission issued a Final Rule in which it required each RTO/ISO to settle energy, operating reserves and intertie transactions using the same time intervals that it uses for to dispatch units or schedule these transactions (Order No. 825).⁹² In PJM, the energy market dispatch and pricing interval is five minutes, and the order requires PJM to settle energy transactions on a five minute basis. In PJM, the synchronized reserve and regulation market dispatch and pricing interval is five minutes, and the order requires PJM to settle these reserves on a five minute basis. In PJM, intertie transactions are scheduled on 15 minute intervals, and the order requires PJM to settle intertie transactions on a 15 minute basis. However, the Commission allowed PJM to propose a shorter time interval for settling intertie transactions.⁹³

The Commission also required each RTO/ISO to trigger shortage pricing for any dispatch and pricing interval in which a shortage of energy or operating reserves is indicated by the RTO/ISO’s software.⁹⁴ In PJM, the rule would require PJM to trigger shortage pricing for any five minute interval when the Real-Time SCED (Security Constrained Economic Dispatch) indicates a shortage of synchronized reserves or primary reserves. Currently in PJM, if

⁹⁰ 152 FERC ¶ 61,218 (2015).

⁹¹ *Id.* at P 5.

⁹² 155 FERC ¶ 61,276 (2016).

⁹³ *Id.* at P 90.

⁹⁴ *Id.* at P 162.

the dispatch tools (Intermediate-Term and Real-Time SCED) reflect a shortage of reserves (primary or synchronized) for a time period shorter than a defined threshold (30 minutes) due to ramp limitations or unit startup delays, it is considered a transient shortage, a shortage event is not declared, and shortage pricing is not implemented. Currently, both Real-Time SCED and Intermediate-Term SCED have to consistently identify that a shortage of a particular reserve product exists for a period of at least 30 minutes to trigger the shortage pricing penalty factor for that reserve product. For example, if Real-Time SCED indicates a shortage of RTO wide primary reserve for an interval but the Intermediate-Term SCED forecasts that the reserve shortage does not extend beyond its first look ahead interval (15 minutes ahead of the Real-Time SCED interval), it is considered a transient shortage, and shortage pricing is not implemented. If Real-Time SCED indicates a shortage of RTO wide primary reserve for an interval and the Intermediate-Term SCED forecasts that the reserve shortage extends for at least two look ahead intervals (30 minutes ahead of the Real-Time SCED interval), shortage pricing is implemented. The rationale for including voltage reduction actions and manual load dump actions as triggers for shortage pricing is to reflect the fact that when dispatchers need to take these emergency actions to maintain reliability, the system is short reserves and prices should reflect that condition, even if the data does not show a shortage of reserves.⁹⁵

PJM Compliance Filing on Shortage Pricing

On January 11, 2017, PJM filed proposed tariff revisions to comply with Order No. 825 and requested a simultaneous implementation date of February 1, 2018, for the settlement interval reforms and shortage pricing reforms.⁹⁶ In the January 11th Compliance Filing, PJM proposed to implement shortage pricing through the inclusion of the Reserve Penalty Factors in real-time LMPs when the real-time security constrained economic dispatch software determines that a primary reserve or synchronized reserve shortage exists on a five minute basis.

⁹⁵ See, e.g., Scarcity and Shortage Pricing, Offer Mitigation and Offer Caps Workshop, Docket No. AD14-14-000, Transcript 29:21-30:14 (Oct. 28, 2014).

⁹⁶ See *PJM Interconnection LLC*, Order No. 825 Compliance Filing, Docket No. ER17-775 (January 11, 2017) (“January 11th Compliance Filing”).

On February 1, 2017, the MMU filed comments generally supporting the January 11th Compliance Filing but seeking a number of refinements.⁹⁷ The MMU recommended that: (i) the PJM rules require that dispatchable resources have five minute meters so that there can be accurate five minute settlements; (ii) the rules clarify the settlement interval applicable to withdrawals by generators; (iii) the exemption of DR from the five minute settlements requirement be removed; (iv) the rules consistently provide for division by 12; (v) that the rules include a precise mathematical formulation of deviation charges with clear definitions of withdrawals and injections, units of measurement, and time periods; and (vi) that the rules require PJM to document biasing practices that affect market outcomes, as used in SCED (Security Constrained Economic Dispatch) and ASO (Ancillary Services Optimizer) and to report its application of biasing.⁹⁸

On May 11, 2017, PJM implemented five minute shortage pricing. From May 11 through September 30, there were 21 intervals when five minute shortage pricing was triggered, all on the same day, September 21.

PJM Tariff Revisions to Operating Reserve Demand Curves

On May 12, 2017, PJM submitted tariff revisions to reflect changes to the Operating Reserve Demand Curves (ORDC) used in the Real-Time Energy Market to price shortage of primary reserves and synchronized reserves.⁹⁹ The updates to the ORDC went into effect on July 12, 2017.

PJM revised the synchronized reserve requirement in a reserve zone or a subzone from the economic maximum of the largest unit on the system to 100 percent of the actual output of the single largest online unit in that reserve zone or subzone. PJM revised the primary reserve requirement in a reserve zone or a subzone from 150 percent of the economic maximum of the largest unit on the system to 150 percent of the actual output of the single largest online unit in that reserve zone or subzone. The first step of the demand curves for primary and synchronized reserves are set at the primary and synchronized reserve requirement. Since the primary and synchronized

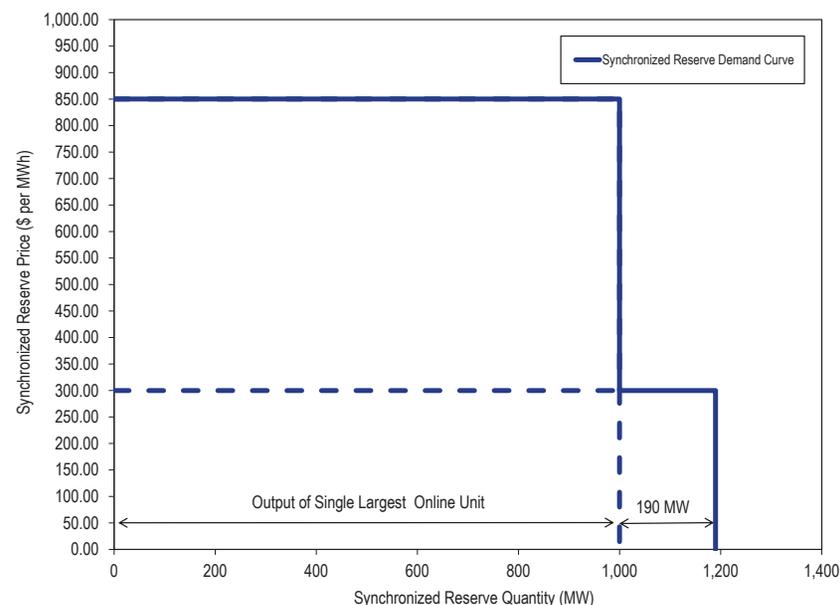
⁹⁷ Comments of the Independent Market Monitor for PJM, Docket No. ER17-775.

⁹⁸ *Id.*

⁹⁹ See PJM Filing, FERC Docket No. ER17-1590-000 (May 12, 2017).

reserve requirements are based on the actual output of the largest resource, the MW value of the first step changes in real time based on the real-time dispatch solution. The first step continues to be priced at \$850 per MWh. PJM also added a permanent second step to the primary and synchronized reserve demand curves, set at the extended primary and synchronized reserve requirements. The extended primary and synchronized reserve requirements are defined as the primary and synchronized reserve requirements, plus 190 MW. This 190 MW second step is priced at \$300 per MWh. Figure 3-57 shows an example of the updated synchronized reserve demand curve when the output of the single largest unit in the region equals 1,000 MW.

Figure 3-57 Updated synchronized reserve demand curve showing the permanent second step



Shortage Pricing on September 21, 2017

The MMU analyzed intervals when shortage pricing was triggered on September 21, 2017. During all 21 intervals, the quantity of reserves was greater than the Synchronized Reserve Requirement and the Primary Reserve Requirement, and therefore the \$850/MWh penalty factors for violating these requirements were not incorporated in LMPs.

During the two 5 minute intervals beginning 1415 EPT and 1420 EPT, the synchronized reserves in the RTO Region were lower than the extended synchronized reserve requirement by 16.1 MW. Table 3-93 shows the RTO synchronized reserve MW and the extended synchronized reserve requirement during the period from 1415 to 1425 EPT.

Table 3-93 RTO synchronized reserve MW and extended synchronized reserve requirement during synchronized reserve shortage

Interval	RTO Extended Synchronized Reserve Requirement (MW)	RTO Total Synchronized Reserves (MW)	RTO Synchronized Reserve Shortage (MW)
21-Sep-17 14:15	1,576.5	1,560.4	16.1
21-Sep-17 14:20	1,576.5	1,560.4	16.1

During the seven 5 minute intervals beginning 1425 EPT through 1500 EPT, and the twelve 5 minute intervals beginning 1555 EPT through 1655 EPT, the primary reserves in the RTO Region were lower than the extended primary reserve requirement. Table 3-94 shows the RTO primary reserve MW and the extended primary reserve requirement during the period from 1425 EPT through 1500 EPT and from 1555 EPT through 1655 EPT.

Table 3-94 RTO primary reserve MW and extended primary reserve requirement during primary reserve shortage

Interval	RTO Extended Primary Reserve Requirement (MW)	RTO Total Primary Reserves (MW)	RTO Primary Reserve Shortage (MW)
21-Sep-17 14:25	2,260	2,241	19
21-Sep-17 14:30	2,260	2,241	19
21-Sep-17 14:35	2,260	2,241	19
21-Sep-17 14:40	2,270	2,138	132
21-Sep-17 14:45	2,270	2,138	132
21-Sep-17 14:50	2,279	2,211	68
21-Sep-17 14:55	2,279	2,211	68
21-Sep-17 15:55	2,360	2,245	115
21-Sep-17 16:00	2,370	2,245	126
21-Sep-17 16:05	2,375	2,230	145
21-Sep-17 16:10	2,384	2,228	156
21-Sep-17 16:15	2,384	2,228	156
21-Sep-17 16:20	2,392	2,232	161
21-Sep-17 16:25	2,385	2,224	161
21-Sep-17 16:30	2,385	2,224	161
21-Sep-17 16:35	2,380	2,227	153
21-Sep-17 16:40	2,380	2,227	153
21-Sep-17 16:45	2,380	2,227	153
21-Sep-17 16:50	2,388	2,277	111

During the four 5 minute intervals beginning 1440 EPT through 1500 EPT, the primary reserves in the MAD Region were lower than the MAD extended primary reserve requirement. Table 3-95 shows the MAD primary reserve MW and the MAD extended primary reserve requirement during the period from 1440 to 1500 EPT. From 1440 EPT to 1500 EPT, the market clearing price for synchronized and primary reserves for units located in the MAD reserve zone included the \$300/MWh penalty factor from the second step of the MAD primary reserve demand curve and the \$300/MWh penalty factor from the second step of the RTO primary reserve demand curve.

Table 3-95 MAD primary reserve MW and extended primary reserve requirement during primary reserve shortage

Interval	MAD Extended Primary Reserve Requirement (MW)	MAD Total Primary Reserves (MW)	MAD Primary Reserve Shortage (MW)
21-Sep-17 14:40	2,236	2,125	112
21-Sep-17 14:45	2,236	2,125	112
21-Sep-17 14:50	2,233	2,197	36
21-Sep-17 14:55	2,233	2,197	36

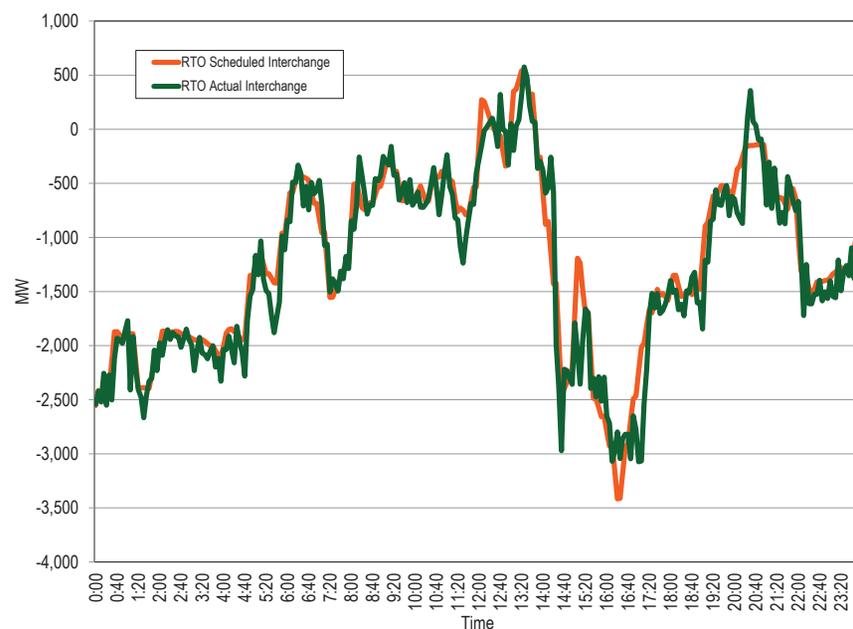
There were a number of factors that affected the periods when shortage pricing was triggered on September 21, 2017, including interchange transactions, available and scheduled generation capacity in real time, operator inputs to SCED, and the performance of regulation resources. The PJM Area Control Error (ACE) dropped by more than 1,000 MW from 1400 to 1415 and this resulted in PJM declaring a spinning event at 1415. The MMU is analyzing the behavior and performance of reg A and reg D regulation resources during this period.

Interchange on September 21, 2017

There were significant changes in the net RTO scheduled and actual interchange leading up to, and during the scarcity pricing event on September 21, 2017. The primary reason for these large changes the curtailment of transactions scheduled into and out of PJM resulting from TLRs, and the response to market signals. As Figure 3-58 shows, between 1100 and 1130, PJM had a change in net interchange of approximately 1,000 MW. This change was the result of the curtailment of 1,014 MW of net import transactions as a result of the TLR level 3B called by TVA for relief on the Volunteer-Philipps Bend 500 for the loss of Conasauga-Mosteller 500 constraint (Flowgate 1024). The same TLR resulted in additional curtailments effective at the top of each hour from 1300 through 1900. Other factors that affected interchange during the shortage pricing intervals included a TLR level 3A called by Ontario for relief on the Ontario-ITC constraint (Flowgate 9159), which resulted in additional net import curtailments starting at 1400, as well as market response to price signals between RTOs.

At 1400, the NYISO NYIS/PJM interface price was \$490.98 and the PJM PJM/NYIS interface price was \$143.38. This difference in interface prices resulted in additional exports from PJM to NYISO, approximately 800 additional MW of exports in hours 1400 and 1500. At 1400, the MISO MISO/PJM interface price was \$310.39, and the PJM PJM/MISO interface price was \$180.52. This difference in interface prices resulted in additional exports from PJM to MISO, approximately 800 additional MW of exports in hours 1400 and 1500.

Figure 3-58 Net RTO scheduled and actual interchange on September 21, 2017



CT Scheduling and Real Time Performance on September 21, 2017

PJM attempted to procure 5,236 MW of economically available generation from combustion turbine units between 1400 and 1700. Among the total economically available generation that PJM scheduled, 54 percent performed as offered, 27 percent ramped slower than the offered ramp rate and 18 percent did not reach their full output offered as economically available.

Operator load forecast bias on September 21, 2017

PJM dispatchers are allowed to increase or decrease (bias) the load forecast from SCED for the next ten minutes in the real time SCED software in order to correct for short term load forecast error.¹⁰⁰ Between 1400 and 1700, PJM's dispatchers lowered the forecast on average by 475 MW. For a few intervals, the load forecast was lowered by 1,300 MW. This reduced load forecast, in combination with curtailments in imports, could have resulted in SCED not dispatching enough units to meet load, and could have resulted in an overestimate of reserves during the peak hours on September 21, 2017. MMU analysis continues.

Accuracy of Reserve Measurement

Under the new shortage pricing mechanism, the determination of shortage of synchronized and primary reserves by the real-time SCED software is based on the measured and estimated levels of load, generation, interchange, demand response, and reserves. It also includes discretionary operator inputs to the ASO (Ancillary Service Optimizer) or SCED software. For the new shortage pricing mechanism to accurately reflect reserve shortage conditions, there needs to be accurate measurement of real-time reserves. That does not appear to be the case at present in PJM, but there does not appear to be any reason that PJM cannot implement that capability. Without very accurate measurement of reserves at minute by minute granularity, system operators cannot know with certainty that there is a shortage condition and therefore an appropriate trigger for five minute shortage pricing does not exist. The advantages of five minute shortage pricing are all implicitly based on the

¹⁰⁰ Prior to July 17, 2017, the load forecast in the SCED software was for 15 minutes.

premise that the RTO knows accurately whether it is in a shortage condition. If PJM cannot demonstrate that it can accurately measure reserves at minute by minute granularity, it should not implement or continue five minute shortage pricing until it can demonstrate that capability.¹⁰¹

The Commission directed in the Final Rule that, to the extent an RTO/ISO needs to enhance its measurement capabilities to implement the shortage pricing requirement, it should propose to do so in its compliance filing.¹⁰² PJM did not propose any enhancements to reserve measurement in the January 11th compliance filing.

In the period between May 11, 2017 and September 30, 2017, there were instances when the real time reserve data displayed on the PJM website showed synchronized reserves being short of the reserve requirement MW without shortage pricing being triggered. The real-time reserve data that is shown on the PJM website may not equal the RT SCED reserve estimate. This is because RT SCED estimates of reserve quantities were based on generation dispatch with a 15 minute look ahead interval, until July 16, 2017. On July 17, PJM reduced the RT SCED look-ahead interval from 15 minutes to 10 minutes, but the reserve quantities continue to be look-ahead estimates based on generation dispatch. The actual generation performance during that interval may not align with RT SCED and may result in a different calculated reserve quantity. However, PJM's implementation of five minute shortage pricing uses RT SCED estimate of reserves and not the real-time reserves as calculated and displayed on the PJM website. As a result, PJM's scarcity pricing does not reflect actual current scarcity conditions, but reflects the expected response of generation and load 10 minutes in the future.¹⁰³

The accuracy of reserve measurement in PJM can be evaluated using historical data on performance during spinning events. The level of tier 1 biasing also reflects PJM dispatchers' estimate of the error in the measurement of tier 1 synchronized reserve. Both of these data sources provide insight into the accuracy of reserve measurement based on actual historical data.

¹⁰¹ See Comments of the Independent Market Monitor for PJM, Docket No. RM15-24-000 (December 1, 2015) at 9.

¹⁰² 155 FERC ¶ 61,276 at P 177 (June 16, 2016).

¹⁰³ Prior to July 17, 2017, PJM's scarcity pricing reflected the expected response of generation and load fifteen minutes in the future.

Historical Performance During Spinning Events

Historical data on response from synchronized reserves during spinning events shows the accuracy of PJM reserve estimates. Synchronized reserves consist of tier 1 and tier 2 synchronized reserves that are procured to meet the RTO and Mid-Atlantic reserve requirements. Tier 1 synchronized reserve is comprised of all online resources following economic dispatch and able to ramp up from their current output in response to a synchronized reserve event.¹⁰⁴

All resources that respond to spinning events are paid for their response. Table 3-96 shows the performance of tier 1 and tier 2 synchronized reserves during spinning events, declared in 2015, 2016, and the first nine months of 2017 that lasted at least 10 minutes. In 2015, tier 1 response MW shown in Table 3-96 were measured as the increase in MW from all resources as a response to the spinning event declaration, regardless of whether the units were part of the tier 1 MW estimate. Since the tier 1 response MW to spinning events included resources that were not part of the tier 1 MW estimate, the 2015 estimates for tier 1 response were greater than 100 percent.

Beginning in 2016, PJM started reporting the response to spinning events only from the units that were part of its tier 1 estimate MW. Table 3-96 shows that, in 2016, the tier 1 MW response percent was never greater than 85 percent, with an average tier 1 response of 75 percent. In the first nine months of 2017, the tier 1 response was never greater than 75 percent, with an average tier 1 response of 60 percent.

If PJM is going to trigger shortage pricing based on shortage of synchronized reserves that is calculated based on current estimates, system operators will be relying on estimates of synchronized reserve MW that have historically been inaccurate.

¹⁰⁴ See 2017 Quarterly State of the Market Report for PJM: January through September, Section 10: Ancillary Service Markets at "Tier 1 Synchronized Reserve" for details on Tier 1 synchronized reserves.

Table 3-96 Performance of synchronized reserves during spinning events: January 1, 2015 through September 30, 2017¹⁰⁵

Spin Event (Date, Hour)	Duration (Minutes)	Tier 1 Estimate MW (Adjusted by DGP)	Tier 1 Response MW	Tier 2 Scheduled MW	Tier 2 Response MW	Tier 1 Response Percent	Tier 2 Response Percent
Mar 3, 2015 12	11	1,079.0	1,365.1	484.4	272.3	126.5%	56.2%
Mar 16, 2015 06	24	541.5	576.4	248.0	180.2	106.4%	72.7%
Mar 17, 2015 19	17	1,428.9	1,693.1	247.2	232.8	118.5%	94.2%
Mar 23, 2015 19	15	851.3	1,420.0	273.5	205.8	166.8%	75.2%
Jul 30, 2015 10	10	1,458.4	2,145.7	79.7	24.0	147.1%	30.1%
Jan 18, 2016 17	12	861.0	733.5	616.7	508.8	85.2%	82.5%
Feb 8, 2016 15	10	1,750.2	1,338.2	228.4	200.1	76.5%	87.6%
Apr 14, 2016 20	10	1,182.8	1,000.6	346.3	304.8	84.6%	88.0%
Jul 28, 2016 13	15	649.4	500.4	822.9	655.8	77.1%	79.7%
Nov 4, 2016 17	11	744.5	497.1	758.0	709.2	66.8%	93.6%
Dec 31, 2016 05	12	971.2	585.0	594.4	485.7	60.2%	81.7%
Mar 23, 2017 06	24	926.8	566.7	742.8	559.1	61.1%	75.3%
Apr 08, 2017 11	10	1,222.6	827.2	879.3	828.7	67.7%	94.2%
May 08, 2017 04	10	1,325.6	976.3	335.1	298.5	73.6%	89.1%
Jun 08, 2017 03	10	974.4	726.7	575.7	522.4	74.6%	90.7%
Sep 04, 2017 20	15	476.3	68.1	601.0	563.8	14.3%	93.8%
Sep 21, 2017 14	16	305.8	217.4	1,253.9	1,037.3	71.1%	82.7%

Tier 1 Synchronized Reserve Estimate Bias

The tier 1 synchronized reserve for a unit is measured as the lower of the available 10 minute ramp and the difference between the economic dispatch point and the economic maximum output. The total supply of tier 1 synchronized reserve MW available to the market solution is calculated as the sum of the individual units' tier 1 MW, with further adjustments. These adjustments include eliminating tier 1 MW from nuclear, wind, solar, energy storage, and hydro units, adjusting the available tier 1 MW from remaining units using a metric called Degree of Generator Performance (DGP) and using tier 1 estimate bias.¹⁰⁶ Tier 1 biasing occurs when PJM market operations manually modifies (increasing or decreasing) the tier 1 synchronized reserve estimate of the market solution. This forces the market clearing engine to clear more or less tier 2 synchronized reserve and nonsynchronized reserve to satisfy the synchronized reserve and primary reserve requirements. Tier 1

¹⁰⁵ Beginning January 2015, Degree of Generator Performance (DGP) was introduced as a metric to improve the accuracy of the tier 1 MW estimate used by the market solution.

¹⁰⁶ DGP measures how closely the unit has been following economic dispatch for the past 30 minutes.

biasing reflects the operators' view on the available tier 1 MW in the system and a lack of confidence on the calculated estimates of tier 1 MW, thus forcing the market clearing engine to procure more or less synchronized reserves. Table 10-14 shows the average monthly biasing of tier 1 estimates in the Ancillary Service Optimizer (ASO), the tool used to procure reserves on an hourly basis, in 2015 and 2016.

The existence of tier MW biasing raises the possibility that under a five minute shortage pricing construct, shortage pricing penalty factors may be triggered or avoided not due to actual reserve levels, but by operators' discretionary decisions on the amount of available reserves. It is possible that the market engine's estimate of tier 1 MW, even after unit level adjustments such as DGP, may be enough to satisfy the reserve requirement, but an operator's biasing of the market engine's estimate may lead to triggering shortage pricing penalty factors. There are no rules in the PJM tariff or manuals regarding the use of tier 1 MW biasing. In a five minute shortage pricing construct, the need for explicit rules governing operator discretion regarding reserve estimates becomes critical. The MMU has recommended since 2012 that PJM explicitly define the rules for using tier 1 biasing and identify which rule permits it every time tier 1 synchronized reserve estimate biasing is used.

Generator Data used for Reserve Estimates

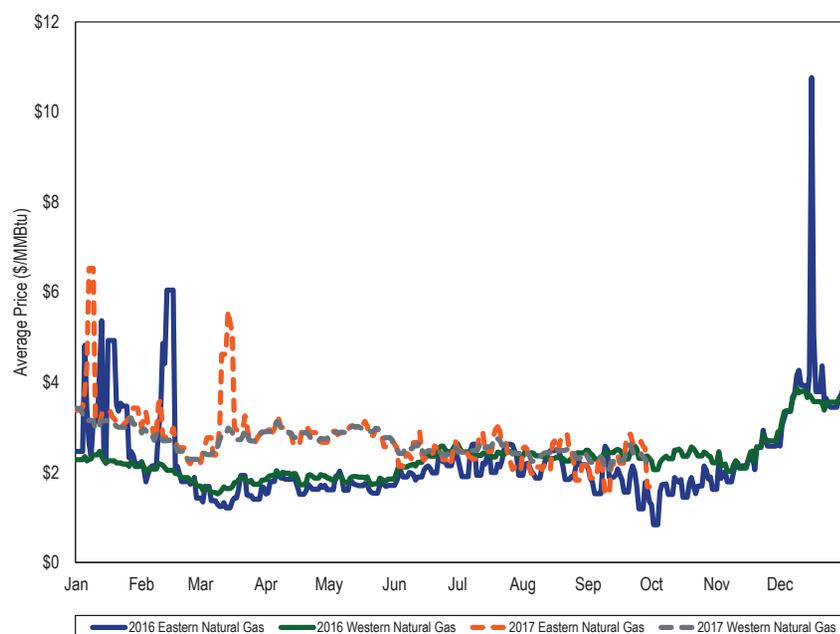
A potential source for the error in tier 1 MW is the use of economic dispatch point to calculate the available ramp limited MW in 10 minutes as opposed to the actual output from the generator for any 5 minute interval. The amount of tier 1 MW available from a resource may differ due to using the metered output from a unit versus the market clearing engine's estimate of the resource's output. PJM addressed this issue partially in 2015 by adjusting a resource's available 10 minute ramp with its DGP. The available tier 1 MW estimated by the market solution for each resource is adjusted by its DGP percent. PJM communicates to generation operators whose tier 1 MW is part of the market solution the latest estimate of units' tier 1 MW and units' current resource specific DGP.

PJM Cold Weather Operations 2017

Natural Gas Supply and Prices

As of September 30, 2017, gas fired generation was 36.4 percent (66,335.9 MW) of the total installed PJM capacity (182,459.2 MW).¹⁰⁷ Figure 3-59 shows the average daily price of delivered natural gas for eastern and western parts of PJM service territory in 2017 and 2016.¹⁰⁸

Figure 3-59 Average daily delivered price for natural gas: January 1, 2016 through September 30, 2017 (\$/MMBtu)



¹⁰⁷ 2017 Quarterly State of the Market Report for PJM: January through June, Section 5: Capacity Market, at Installed Capacity.

¹⁰⁸ Eastern natural gas consists of the average of Texas Eastern M3, Transco Zone 6 non-NY, Transco Zone 6 NY and Transco Zone 5 daily fuel price indices. Western natural gas prices are the average of Dominion North Point, Columbia Appalachia and Chicago City gate daily fuel price indices.

During the first nine months of 2015, 2016 and 2017, a number of interstate gas pipelines that supply fuel for generators in the PJM service territory issued restriction notices limiting the availability of nonfirm transportation services. These notices include warnings of operational flow orders (OFO) and actual OFOs. OFOs may, depending on the nature of the transportation service purchased, permit the pipelines to restrict the provision of gas to 24 hour ratable takes which means that hourly nominations must be the same for each of the 24 hours in the gas day, with penalties for deviating from the nominated quantities. Pipelines may also enforce strict balancing constraints which limit the ability of gas users, depending on the nature of the transportation service purchased, to deviate from the 24 hour ratable take and which may limit the ability of users to have access to unused gas.

Pipeline operators use restrictive and inflexible rules to manage the balance of supply and demand during extreme operating conditions. The independent operations of geographically overlapping pipelines during extreme conditions highlights the potential shortcomings of a gas pipeline network that relies on individual pipelines to manage the balancing of supply and demand. The independent operational restrictions imposed by pipelines and the impact on electric generators during extreme conditions suggests there may be potential benefits to creating an ISO/RTO structure to coordinate the supply of gas across pipelines and with the electric RTOs, or the creation of a gas supply coordination framework under existing electric ISO/RTOs.

Energy Uplift (Operating Reserves)

Energy uplift is paid to market participants under specified conditions in order to ensure that resources are not required to operate for the PJM system at a loss.¹ Referred to in PJM as operating reserve credits, lost opportunity cost credits, reactive services credits, synchronous condensing credits or black start services credits, these payments are intended to be one of the incentives to generation owners to offer their energy to the PJM energy market for dispatch based on short run marginal costs and to operate their units at the direction of PJM dispatchers. These credits are paid by PJM market participants as operating reserve charges, reactive services charges, synchronous condensing charges or black start services charges.

In PJM all energy payments to demand response resources are also uplift payments. The energy payments to these resources are not part of the supply and demand balance, they are not paid by LMP revenues and therefore the energy payments to demand response resources have to be paid as out of market uplift. The energy payments to economic DR are funded by real-time load and real-time exports. The energy payments to emergency DR are funded by participants with net energy purchases in the Real-Time Energy Market.

Uplift is an inherent part of the PJM market design. Uplift payments should nonetheless be limited to the efficient level. In wholesale power market design, a choice must be made between efficient prices and prices that fully compensate costs. Economists recognize that no single price achieves both goals in markets with nonconvex production costs, like the costs of producing electric power.^{2 3} In wholesale power markets like PJM, efficient prices equal the short run marginal cost of production by location. The dispatch of generators in accordance with these efficient price signals minimizes the total market cost of production. For generators with nonconvex costs, marginal

cost prices may not cover the total cost of starting the generator and running at the efficient output level. Uplift payments cover the difference.

Overview

Energy Uplift Results

- **Energy Uplift Charges.** Total energy uplift charges decreased by \$16.0 million, or 15.7 percent, in the first nine months of 2017 compared to the first nine months of 2016, from \$102.3 million to \$86.3 million.
- **Energy Uplift Charges Categories.** The decrease of \$16.0 million in the first nine months of 2017 is comprised of a \$23.9 million decrease in day-ahead operating reserve charges, a \$5.4 million decrease in balancing operating reserve charges and a \$13.2 million increase in reactive services charges.
- **Average Effective Operating Reserve Rates in the Eastern Region.** Day-ahead load paid \$0.027 per MWh, real-time load paid \$0.029 per MWh, a DEC paid \$0.338 per MWh and an INC and any load, generation or interchange transaction deviation paid \$0.311 per MWh.
- **Average Effective Operating Reserve Rates in the Western Region.** Day-ahead load paid \$0.027 per MWh, real-time load paid \$0.025 per MWh, a DEC paid \$0.330 per MWh and an INC and any load, generation or interchange transaction deviation paid \$0.303 per MWh.
- **Reactive Services Rates.** The PENELEC, ComEd and BGE control zones had the three highest local voltage support rates: \$0.130, \$0.104 and \$0.073 per MWh.

Characteristics of Credits

- **Types of units.** Coal units received 88.5 percent of all day-ahead generator credits. Combustion turbines received 74.4 percent of all balancing generator credits. Combustion turbines and diesels received 66.1 percent of the lost opportunity cost credits.
- **Concentration of Energy Uplift Credits.** The top 10 units receiving energy uplift credits received 35.0 percent of all credits. The top 10

¹ Loss exists when gross energy and ancillary services market revenues are less than short run marginal costs, including all elements of the energy offer, which are startup, no load and incremental offers.

² See Stoft, *Power System Economics: Designing Markets for Electricity*, New York: Wiley (2002) at 272; Mas-Colell, Whinston, and Green, *Microeconomic Theory*, New York: Oxford University Press (1995) at 570; and Quinzii, *Increasing Returns and Efficiency*, New York: Oxford University Press (1992).

³ The production of output is convex if the production function has constant or decreasing returns to scale, which result in constant or rising average costs with increases in output. Production is nonconvex with increasing returns to scale, which is the case when generating units have start or no load costs that are large relative to marginal costs. See Mas-Colell, Whinston, and Green at 132.

organizations received 79.8 percent of all credits. Concentration indexes for energy uplift categories classify them as highly concentrated. Day-ahead operating reserves HHI was 7434, balancing operating reserves HHI was 3356 and lost opportunity cost HHI was 5366.

- **Economic and Noneconomic Generation.** In the first nine months of 2017, 85.1 percent of the day-ahead generation eligible for operating reserve credits was economic and 79.0 percent of the real-time generation eligible for operating reserve credits was economic.
- **Day-Ahead Unit Commitment for Reliability.** In the first nine months of 2017, 1.2 percent of the total day-ahead generation MWh was scheduled as must run by PJM, of which 54.5 percent received energy uplift payments.

Geography of Charges and Credits

- In the first nine months of 2017, 89.0 percent of all uplift charges allocated regionally (day-ahead operating reserves and balancing operating reserves) were paid by transactions (at control zones or buses within a control zone), demand and generation, 4.4 percent by transactions at hubs and aggregates and 6.7 percent by interchange transactions at interfaces.
- Generators in the Eastern Region received 48.4 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.
- Generators in the Western Region received 49.0 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.
- External generators received 2.6 percent of all balancing generator credits, including lost opportunity cost and canceled resources credits.

Recommendations

The MMU recognizes that many of the issues addressed in the recommendations are being discussed in PJM stakeholder processes. Until new rules are in place, the MMU's recommendations and the reported status of those recommendations are based on the existing market rules.

- The MMU recommends that PJM not use closed loop interface constraints to artificially override the nodal prices that are based on fundamental LMP logic in order to: accommodate rather than resolve the inadequacies of the demand side resource capacity product; address the inability of the power flow model to incorporate the need for reactive power; accommodate rather than resolve the flaws in PJM's approach to scarcity pricing; or for any other reason. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM not use price setting logic to artificially override the nodal prices that are based on fundamental LMP logic in order to reduce uplift. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that if PJM believes it appropriate to modify the LMP price setting logic, PJM initiate a stakeholder process to create transparent and consistent modifications to the rules and incorporate the modifications in the PJM tariff. (Priority: Medium. First Reported 2016. Status: Not adopted.)
- The MMU recommends that PJM initiate an analysis of the reasons why some combustion turbines and diesels scheduled in the Day-Ahead Energy Market are not called in real time when they are economic. (Priority: Medium. First Reported 2012. Status: Not adopted.)
- The MMU recommends the elimination of the day-ahead operating reserve category to ensure that units receive an energy uplift payment based on their real-time output and not their day-ahead scheduled output. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends reincorporating the use of net regulation revenues as an offset in the calculation of balancing operating reserve credits. (Priority: Medium. First reported 2009. Status: Not adopted. Stakeholder process.)
- The MMU recommends not compensating self scheduled units for their startup cost when the units are scheduled by PJM to start before the self scheduled hours. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)

- The MMU recommends four additional modifications to the energy lost opportunity cost calculations:
 - The MMU recommends calculating LOC based on 24 hour daily periods or multi-hour segments of hours for combustion turbines and diesels scheduled in the Day-Ahead Energy Market, but not committed in real time. (Priority: Medium. First reported 2014. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time should be compensated for LOC based on their real-time desired and achievable output, not their scheduled day-ahead output. (Priority: Medium. First reported 2015. Status: Not adopted.)
 - The MMU recommends that units scheduled in the Day-Ahead Energy Market and not committed in real time be compensated for LOC incurred within an hour. (Priority: Medium. First reported 2013. Status: Not adopted.)
 - The MMU recommends that only flexible fast start units (startup plus notification times of 30 minutes or less) and short minimum run times (one hour or less) be eligible by default for the LOC compensation to units scheduled in the Day-Ahead Energy Market and not committed in real time. Other units should be eligible for LOC compensation only if PJM explicitly cancels their day-ahead commitment. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that up to congestion transactions be required to pay energy uplift charges for both the injection and the withdrawal sides of the UTC. (Priority: High. First reported 2011. Status: Not adopted. Pending before FERC.)
- The MMU recommends eliminating the use of internal bilateral transactions (IBTs) in the calculation of deviations used to allocate balancing operating reserve charges. (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)
- The MMU recommends allocating the energy uplift payments to units scheduled as must run in the Day-Ahead Energy Market for reasons other than voltage/reactive or black start services as a reliability charge to real-time load, real-time exports and real-time wheels. (Priority: Medium. First reported 2014. Status: Not adopted. Stakeholder process.)
- The MMU recommends reallocating the operating reserve credits paid to units supporting the Con Edison – PJM Transmission Service Agreements. (Priority: Medium. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends that the total cost of providing reactive support be categorized and allocated as reactive services. Reactive services credits should be calculated consistent with the operating reserve credits calculation. (Priority: Medium. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends including real-time exports and real-time wheels in the allocation of the cost of providing reactive support to the 500 kV system or above, which is currently allocated solely to real-time RTO load. (Priority: Low. First reported 2013. Status: Not adopted. Stakeholder process.)
- The MMU recommends enhancing the current energy uplift allocation rules to reflect the elimination of day-ahead operating reserves, the timing of commitment decisions and the commitment reasons. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends modifications to the calculation of lost opportunity costs credits paid to wind units. The lost opportunity costs credits paid to wind units should be based on the lesser of the desired output, the estimated output based on actual wind conditions and the capacity interconnection rights (CIRs). In addition, the MMU recommends that PJM allow and wind units submit CIRs that reflect the maximum output wind units want to inject into the transmission system at any time. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM revise Manual 11 attachment C consistent with the tariff to limit compensation to offered costs. The Manual 11 attachment C procedure should describe the steps market participants must take to change the availability of cost-based energy offers that have been submitted day ahead. The MMU recommends that PJM eliminate the

Manual 11 attachment C procedure with the implementation of hourly offers (ER16-372-000). (Priority: Medium. First reported 2016. Status: Not adopted.)

- The MMU recommends that PJM clearly identify and classify all reasons for incurring operating reserves in the Day-Ahead and the Real-Time Energy Markets and the associated operating reserve charges in order to make all market participants aware of the reasons for these costs and to help ensure a long term solution to the issue of how to allocate the costs of operating reserves. (Priority: Medium. First reported 2011. Status: Adopted 2015.)
- The MMU recommends that PJM revise the current operating reserve confidentiality rules in order to allow the disclosure of complete information about the level of operating reserve charges by unit and the detailed reasons for the level of operating reserve credits by unit in the PJM region. (Priority: High. First reported 2013. Status: Partially adopted.)
- The MMU recommends that the lost opportunity cost in the energy market be calculated using the schedule on which the unit was scheduled to run in the energy market. (Priority: High. First reported 2012. Status: Adopted 2015.)
- The MMU recommends including no load and startup costs as part of the total avoided costs in the calculation of lost opportunity cost credits paid to combustion turbines and diesels scheduled in the Day-Ahead Energy Market but not committed in real time. (Priority: Medium. First reported 2012. Status: Adopted 2015.)
- The MMU recommends using the entire offer curve and not a single point on the offer curve to calculate energy lost opportunity cost. (Priority: Medium. First reported 2012. Status: Adopted 2015.)

Conclusion

Energy uplift is paid to market participants under specified conditions in order to ensure that resources are not required to operate for the PJM system at a loss incurred when LMP is greater than or equal to the incremental offer but does not cover start up and no load costs. Loss is defined to be receiving

revenue less than the short run marginal costs incurred in order to generate energy. Referred to in PJM as day-ahead operating reserves, balancing operating reserves, energy lost opportunity cost credits, reactive services credits, synchronous condensing credits or black start services credits, these payments are intended to be one of the incentives to generation owners to offer their energy to the PJM energy market at short run marginal cost and to operate their units at the direction of PJM dispatchers. These credits are paid by PJM market participants as operating reserve charges, reactive services charges, synchronous condensing charges or black start charges.

Competitive market outcomes result from energy offers equal to short run marginal costs and that incorporate flexible operating parameters. But when PJM permits a unit to include inflexible operating parameters in its offer and pays uplift based on those inflexible parameters, there is an incentive for the unit to remain inflexible. The rules regarding operating parameters should be implemented in a way that creates incentives for flexible operations rather than inflexible operations. PJM has failed to hold coal, gas and oil steam turbines to the standard used for combined cycles, combustion turbines and diesels. The standard should be the maximum achievable flexibility, based on OEM standards. Applying a weaker standard to steam units effectively subsidizes inflexible units by paying them based on inflexible parameters that result from lack of investment and that could be made more flexible. The result both inflates uplift costs and suppresses energy prices.

In PJM, all energy payments to demand response resources are uplift payments. The energy payments to these resources are not part of the supply and demand balance, they are not paid by LMP revenues and therefore the energy payments to demand response resources have to be paid as out of market uplift. The energy payments to economic DR are funded by real-time load and real-time exports. The energy payments to emergency DR are funded by participants with net energy purchases in the Real-Time Energy Market.

From the perspective of those participants paying energy uplift charges, these costs are an unpredictable and unhedgeable component of participants' costs in PJM. While energy uplift charges are an appropriate part of the cost of

energy, market efficiency would be improved by ensuring that the level and variability of these charges are as low as possible consistent with the reliable operation of the system and that the allocation of these charges reflects the reasons that the costs are incurred to the extent possible.

The goal should be to reflect the impact of physical constraints in market prices to the maximum extent possible and thus to reduce the necessity for out of market energy uplift payments. When units receive substantial revenues through energy uplift payments, these payments are not transparent to the market because of the current confidentiality rules. As a result, other market participants, including generation and transmission developers, do not have the opportunity to compete to displace them. As a result, substantial energy uplift payments to a concentrated group of units and organizations have persisted for more than ten years.

One part of addressing the level and allocation of uplift payments is to eliminate all day-ahead operating reserve credits. It is illogical and unnecessary to pay units day-ahead operating reserve credits because units do not incur any costs to run and any revenue shortfalls are addressed by balancing operating reserve credits.

The level of energy uplift paid to specific units depends on the level of the unit's energy offer, the unit's operating parameters, the details of the rules which define payments and the decisions of PJM operators. Energy uplift payments result in part from decisions by PJM operators, who follow reliability requirements and market rules, to start units or to keep units operating even when hourly LMP is less than the offer price including energy, no load and startup costs. Energy uplift payments also result from units' operational parameters that may require PJM to schedule or commit resources during noneconomic hours. The balance of these costs not covered by energy revenues are collected as energy uplift rather than reflected in price as a result of the rules governing the determination of LMP.

PJM's goal should be to minimize the total level of energy uplift paid and to ensure that the associated charges are paid by all those whose market actions

result in the incurrence of such charges. For example, up to congestion transactions continue to pay no energy uplift charges, which means that all others who pay these charges are paying too much. In addition, the netting of transactions against internal bilateral transactions should be eliminated.⁴ Some uplift payments are the result of inflexible operating parameters included in offers by generating units. Operating parameters should reflect the flexibility of the benchmark new entrant unit in the PJM Capacity Market if the unit is to receive uplift payments from other market participants. The goal should be to minimize the total incurred energy uplift charges and to increase the transactions over which those charges are spread in order to reduce the impact of energy uplift charges on markets. The result would be to reduce the level of per MWh charges, to reduce the uncertainty associated with uplift charges and to reduce the impact of energy uplift charges on decisions about how and when to participate in PJM markets.

But it is also important that the reduction of uplift payments not be a goal to be achieved at the expense of the fundamental logic of an LMP system. For example, the use of closed loop interfaces to reduce uplift should be eliminated because it is not consistent with LMP fundamentals and constitutes a form of subjective price setting. The same is true of what PJM terms its price setting logic.

Energy Uplift

The level of energy uplift credits paid to specific units depends on the level of the resource's energy offer, the LMP, the resource's operating parameters and the decisions of PJM operators. Energy uplift credits result in part from decisions by PJM operators, who follow reliability requirements and market rules, to start resources or to keep resources operating even when hourly LMP is less than the offer price including incremental, no load and startup costs.

Credits and Charges Categories

Energy uplift charges include day-ahead and balancing operating reserves, reactive services, synchronous condensing and black start services categories.

⁴ On October 17, 2017, PJM filed with FERC to begin charging uplift to UTC transactions and eliminating the netting of deviations with internal bilateral transactions. See FERC Docket No. ER18-86-000.

Total energy uplift credits paid to PJM participants equal the total energy uplift charges paid by PJM participants. Table 4-1 and Table 4-2 show the categories of credits and charges and their relationship. These tables show how the charges are allocated.

Table 4-1 Day-ahead and balancing operating reserve credits and charges

Credits Received For:	Credits Category:		Charges Category:	Charges Paid By:
Day-Ahead				
Day-Ahead Import Transactions and Generation Resources	Day-Ahead Operating Reserve Transaction Day-Ahead Operating Reserve Generator	→	Day-Ahead Operating Reserve	Day-Ahead Load Day-Ahead Export Transactions in RTO Region Decrement Bids
Economic Load Response Resources	Day-Ahead Operating Reserves for Load Response	→	Day-Ahead Operating Reserve for Load Response	Day-Ahead Load Day-Ahead Export Transactions in RTO Region Decrement Bids
Unallocated Negative Load Congestion Charges Unallocated Positive Generation Congestion Credits		→	Unallocated Congestion	Day-Ahead Load Day-Ahead Export Transactions in RTO Region Decrement Bids
Balancing				
Generation Resources	Balancing Operating Reserve Generator	→	Balancing Operating Reserve for Reliability Balancing Operating Reserve for Deviations Balancing Local Constraint	Real-Time Load plus Real-Time Export Transactions in RTO, Eastern or Western Region Deviations Applicable Requesting Party
Canceled Resources Lost Opportunity Cost (LOC) Real-Time Import Transactions	Balancing Operating Reserve Startup Cancellation Balancing Operating Reserve LOC Balancing Operating Reserve Transaction	→	Balancing Operating Reserve for Deviations	Deviations in RTO Region
Economic Load Response Resources	Balancing Operating Reserves for Load Response	→	Balancing Operating Reserve for Load Response	Deviations in RTO Region

Table 4-2 Reactive services, synchronous condensing and black start services credits and charges

Credits Received For:	Credits Category:		Charges Category:	Charges Paid By:
		Reactive		
Resources Providing Reactive Service	Day-Ahead Operating Reserve	→	Reactive Services Charge	Zonal Real-Time Load
	Reactive Services Generator			
	Reactive Services LOC			
	Reactive Services Condensing			
	Reactive Services Synchronous Condensing LOC		Reactive Services Local Constraint	Applicable Requesting Party
		Synchronous Condensing		
Resources Providing Synchronous Condensing	Synchronous Condensing Synchronous Condensing LOC	→	Synchronous Condensing	Real-Time Load Real-Time Export Transactions
		Black Start		
Resources Providing Black Start Service	Day-Ahead Operating Reserve	→	Black Start Service Charge	Zone/Non-zone Peak Transmission Use and Point to Point Transmission Reservations
	Balancing Operating Reserve			
	Black Start Testing			

Energy Uplift Results

Energy Uplift Charges

Total energy uplift charges decreased by \$16.0 million or 15.7 percent in the first nine months of 2017 compared to the first nine months of 2016. Table 4-3 shows total energy uplift charges in the first nine months of 2016 and 2017.⁵

Table 4-3 Total energy uplift charges: January 1 through September 30, 2016 and 2017

	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change	Percent Change
Total Energy Uplift	\$102.3	\$86.3	(\$16.0)	(15.7%)
Energy Uplift as a Percent of Total PJM Billing	0.3%	0.3%	(0.1%)	(15.7%)

Table 4-4 compares energy uplift charges by category for the first nine months of 2016 and 2017. The decrease of \$16.0 million in the first nine months of 2017 is comprised of a decrease of \$23.9 million in day-ahead operating reserve charges, a decrease of \$5.4 million in balancing operating reserve charges and an increase of \$13.2 million in reactive service charges.

⁵ Table 4-3 includes all categories of charges as defined in Table 4-1 and Table 4-2 and includes all PJM Settlements billing adjustments. Billing data can be modified by PJM Settlements at any time to reflect changes in the evaluation of energy uplift. The billing data reflected in this report were current on October 11, 2017.

Table 4-4 Energy uplift charges by category: January 1 through September 30, 2016 and 2017

Category	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change (Millions)	Percent Change
Day-Ahead Operating Reserves	\$40.8	\$16.9	(\$23.9)	(58.5%)
Balancing Operating Reserves	\$60.5	\$55.1	(\$5.4)	(8.9%)
Reactive Services	\$0.8	\$14.0	\$13.2	1,596.4%
Synchronous Condensing	\$0.0	\$0.0	(\$0.0)	
Black Start Services	\$0.2	\$0.2	\$0.0	3.6%
Total	\$102.3	\$86.3	(\$16.0)	(15.7%)

Table 4-5 compares monthly energy uplift charges by category for 2016 and the first nine months of 2017.

Table 4-5 Monthly energy uplift charges: January 1, 2016 through September 30, 2017

	2016 Charges (Millions)						2017 Charges (Millions)					
	Day- Ahead	Balancing	Reactive Services	Synchronous Condensing	Black Start Services	Total	Day- Ahead	Balancing	Reactive Services	Synchronous Condensing	Black Start Services	Total
Jan	\$7.4	\$7.5	\$0.0	\$0.0	\$0.0	\$14.9	\$2.6	\$7.5	\$1.25	\$0.0	\$0.0	\$11.4
Feb	\$7.6	\$6.5	\$0.0	\$0.0	\$0.0	\$14.2	\$2.0	\$1.3	\$3.3	\$0.0	\$0.0	\$6.6
Mar	\$6.4	\$3.9	\$0.2	\$0.0	\$0.0	\$10.5	\$0.6	\$5.4	\$1.4	\$0.0	\$0.0	\$7.4
Apr	\$3.0	\$4.8	\$0.2	\$0.0	\$0.0	\$8.0	\$0.5	\$3.3	\$1.3	\$0.0	\$0.0	\$5.0
May	\$2.8	\$3.3	\$0.1	\$0.0	\$0.0	\$6.3	\$0.9	\$7.4	\$1.3	\$0.0	\$0.0	\$9.7
Jun	\$4.6	\$5.3	\$0.1	\$0.0	\$0.1	\$10.1	\$1.8	\$6.8	\$0.9	\$0.0	\$0.0	\$9.5
Jul	\$3.6	\$10.9	\$0.1	\$0.0	\$0.0	\$14.6	\$2.5	\$7.9	\$0.9	\$0.0	\$0.0	\$11.4
Aug	\$2.4	\$11.5	\$0.0	\$0.0	\$0.0	\$13.9	\$2.9	\$5.3	\$1.5	\$0.0	\$0.0	\$9.8
Sep	\$2.9	\$6.9	\$0.1	\$0.0	\$0.0	\$9.9	\$3.0	\$10.2	\$2.3	\$0.0	\$0.0	\$15.5
Oct	\$3.6	\$8.7	\$0.3	\$0.0	\$0.0	\$12.6						
Nov	\$5.7	\$2.8	\$1.0	\$0.0	\$0.1	\$9.5						
Dec	\$7.3	\$4.5	\$0.4	\$0.0	\$0.0	\$12.2						
Total (Jan - Sep)	\$40.8	\$60.5	\$0.8	\$0.0	\$0.2	\$102.3	\$16.9	\$55.1	\$14.0	\$0.0	\$0.2	\$86.3
Share (Jan - Sep)	39.9%	59.1%	0.8%	0.0%	0.2%	100.0%	19.6%	63.9%	16.3%	0.0%	0.2%	100.0%
Total	\$57.3	\$76.5	\$2.5	\$0.0	\$0.3	\$136.6	\$16.9	\$55.1	\$14.0	\$0.0	\$0.2	\$86.3
Share	42.0%	56.0%	1.8%	0.0%	0.2%	100.0%	19.6%	63.9%	16.3%	0.0%	0.2%	100.0%

Table 4-6 shows the composition of the day-ahead operating reserve charges. Day-ahead operating reserve charges consist of day-ahead operating reserve charges that pay for credits to generators and import transactions, day-ahead operating reserve charges for economic load response resources and day-ahead operating reserve charges from unallocated congestion charges.⁶ Day-ahead operating reserve charges decreased by \$23.9 million or 58.5 percent in the first nine months of 2017 compared to the first nine months of 2016. Day-ahead operating reserve charges have decreased in 2017 due to transmission upgrades in the BGE and Pepco control zones that were completed in the first quarter of 2017. These upgrades have reduced the need to commit noneconomic coal fired generation in the BGE and Pepco control zones to meet local load. These upgrades have increased the transfer capability from other control zones into BGE and Pepco.

⁶ See OA Schedule 1 § 3.2.3(c). Unallocated congestion charges are added to the total costs of day-ahead operating reserves. Congestion charges have been allocated to day-ahead operating reserves 10 times, totaling \$26.9 million.

Table 4-6 Day-ahead operating reserve charges: January 1 through September 30, 2016 and 2017

Type	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change (Millions)	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Day-Ahead Operating Reserve Charges	\$40.8	\$16.9	(\$23.9)	100.0%	100.0%
Day-Ahead Operating Reserve Charges for Load Response	\$0.0	\$0.0	\$0.0	0.0%	0.0%
Unallocated Congestion Charges	\$0.0	\$0.0	\$0.0	0.0%	0.0%
Total	\$40.8	\$16.9	(\$23.9)	100.0%	100.0%

Table 4-7 shows the composition of the balancing operating reserve charges. Balancing operating reserve charges consist of balancing operating reserve reliability charges (credits to generators), balancing operating reserve deviation charges (credits to generators and import transactions), balancing operating reserve charges for economic load response and balancing local constraint charges. Balancing operating reserve charges decreased by \$5.4 million in the first nine months of 2017 compared to the first nine months of 2016.

Table 4-7 Balancing operating reserve charges: January 1 through September 30, 2016 and 2017

Type	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change (Millions)	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Balancing Operating Reserve Reliability Charges	\$16.9	\$17.3	\$0.4	28.0%	31.5%
Balancing Operating Reserve Deviation Charges	\$43.1	\$37.1	(\$6.0)	71.3%	67.3%
Balancing Operating Reserve Charges for Load Response	\$0.1	\$0.2	\$0.1	0.1%	0.4%
Balancing Local Constraint Charges	\$0.4	\$0.5	\$0.1	0.6%	0.9%
Total	\$60.5	\$55.1	(\$5.4)	100.0%	100.0%

Table 4-8 shows the composition of the balancing operating reserve deviation charges. Balancing operating reserve deviation charges equal make whole credits paid to generators and import transactions, energy lost opportunity costs paid to generators and payments to resources canceled by PJM before coming online. In the first nine months of 2017, 73.0 percent of balancing operating reserve deviation charges were for make whole credits paid to generators and import transactions, an increase of 11.0 percentage points compared to the share in the first nine months of 2016. The increase in the share of make whole credits was not the result of an increase in make whole credits, but rather a decrease in energy lost opportunity cost credits, which decreased by \$6.3 million or 38.7 percent.

Table 4-8 Balancing operating reserve deviation charges: January 1 through September 30, 2016 and 2017

Charge Attributable To	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change (Millions)	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Make Whole Payments to Generators and Imports	\$26.8	\$27.1	\$0.3	62.0%	73.0%
Energy Lost Opportunity Cost	\$16.3	\$10.0	(\$6.3)	37.8%	26.9%
Canceled Resources	\$0.1	\$0.0	(\$0.0)	0.1%	0.0%
Total	\$43.1	\$37.1	(\$6.0)	100.0%	100.0%

Table 4-9 shows reactive services, synchronous condensing and black start services charges. Reactive services charges increased by \$13.2 million in the first nine months of 2017 compared to the first nine months of 2016. Reactive services charges increased in 2017 due to high voltage issues caused by light loads in the ComEd and DPL control zones, and low voltage issues caused by transmission outages in the BGE, Pepco and PENELEC control zones.

Table 4-9 Additional energy uplift charges: January 1 through September 30, 2016 and 2017

Type	(Jan - Sep) 2016 Charges (Millions)	(Jan - Sep) 2017 Charges (Millions)	Change (Millions)	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Reactive Services Charges	\$0.8	\$14.0	\$13.2	82.1%	98.7%
Synchronous Condensing Charges	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%
Black Start Services Charges	\$0.2	\$0.2	\$0.0	17.9%	1.3%
Total	\$1.0	\$14.2	\$13.2	100.0%	100.0%

Table 4-10 and Table 4-11 show the amount and percent shares of regional balancing charges in the first nine months of 2016 and 2017. Regional balancing operating reserve charges consist of balancing operating reserve reliability and deviation charges. These charges are allocated regionally across PJM. The largest share of regional charges was paid by demand deviations. The regional balancing charges allocation table does not include charges attributed for resources controlling local constraints.

In the first nine months of 2017, regional balancing operating reserve charges decreased by \$5.6 million compared to the first nine months of 2016. Balancing operating reserve reliability charges increased by \$0.4 million or 2.3 percent and balancing operating reserve deviation charges decreased by \$6.0 million or 14.0 percent.

Table 4-10 Regional balancing charges allocation (Millions): January 1 through September 30, 2016

Charge	Allocation	RTO		East		West		Total	
Reliability Charges	Real-Time Load	\$13.1	21.9%	\$2.9	4.8%	\$0.4	0.7%	\$16.4	27.3%
	Real-Time Exports	\$0.4	0.7%	\$0.1	0.1%	\$0.0	0.0%	\$0.5	0.9%
	Total	\$13.6	22.6%	\$3.0	5.0%	\$0.4	0.7%	\$16.9	28.2%
Deviation Charges	Demand	\$22.5	37.5%	\$2.8	4.6%	\$0.4	0.6%	\$25.7	42.7%
	Supply	\$7.1	11.9%	\$0.8	1.3%	\$0.1	0.2%	\$8.0	13.3%
	Generator	\$8.2	13.7%	\$1.1	1.8%	\$0.1	0.2%	\$9.5	15.7%
	Total	\$37.9	63.1%	\$4.6	7.7%	\$0.6	1.0%	\$43.1	71.8%
Total Regional Balancing Charges		\$51.4	85.6%	\$7.6	12.7%	\$1.0	1.7%	\$60.1	100%

Table 4-11 Regional balancing charges allocation (Millions): January 1 through September 30, 2017

Charge	Allocation	RTO		East		West		Total	
Reliability Charges	Real-Time Load	\$15.0	27.5%	\$1.4	2.6%	\$0.3	0.6%	\$16.7	30.7%
	Real-Time Exports	\$0.6	1.0%	\$0.0	0.1%	\$0.0	0.0%	\$0.6	1.1%
	Total	\$15.5	28.5%	\$1.5	2.7%	\$0.3	0.6%	\$17.3	31.9%
Deviation Charges	Demand	\$21.7	39.8%	\$0.8	1.4%	\$0.4	0.8%	\$22.9	42.0%
	Supply	\$6.7	12.3%	\$0.3	0.5%	\$0.1	0.2%	\$7.1	13.0%
	Generator	\$6.8	12.5%	\$0.2	0.4%	\$0.1	0.2%	\$7.1	13.1%
	Total	\$35.2	64.6%	\$1.3	2.3%	\$0.6	1.2%	\$37.1	68.1%
Total Regional Balancing Charges		\$50.7	93.2%	\$2.7	5.0%	\$1.0	1.8%	\$54.4	100%

Operating Reserve Rates

Under the operating reserves cost allocation rules, PJM calculates nine separate rates, a day-ahead operating reserve rate, a reliability rate for each region, a deviation rate for each region, a lost opportunity cost rate and a canceled resources rate for the entire RTO region. Table 4-1 shows how these charges are allocated.⁷

Figure 4-1 shows the daily day-ahead operating reserve rate for 2016 and the first nine months of 2017. The average rate in the first nine months of 2017 was \$0.027 per MWh, \$0.037 per MWh lower than the average in the first nine months of 2016. The highest rate in the first nine months of 2017 occurred on February 12, when the rate reached \$0.172 per MWh, \$0.230 per MWh lower than the \$0.402 per MWh reached in the first nine months of 2016, on

⁷ The lost opportunity cost and canceled resources rates are not posted separately by PJM. PJM adds the lost opportunity cost and the canceled resources rates to the deviation rate for the RTO Region since these three charges are allocated following the same rules.

February 16. Figure 4-1 also shows the daily day-ahead operating reserve rate including the congestion charges allocated to day-ahead operating reserves. There were no congestion charges allocated to day-ahead operating reserves in 2016 or in the first nine months of 2017.

Figure 4-1 Daily day-ahead operating reserve rate (\$/MWh): January 1, 2016 through September 30, 2017

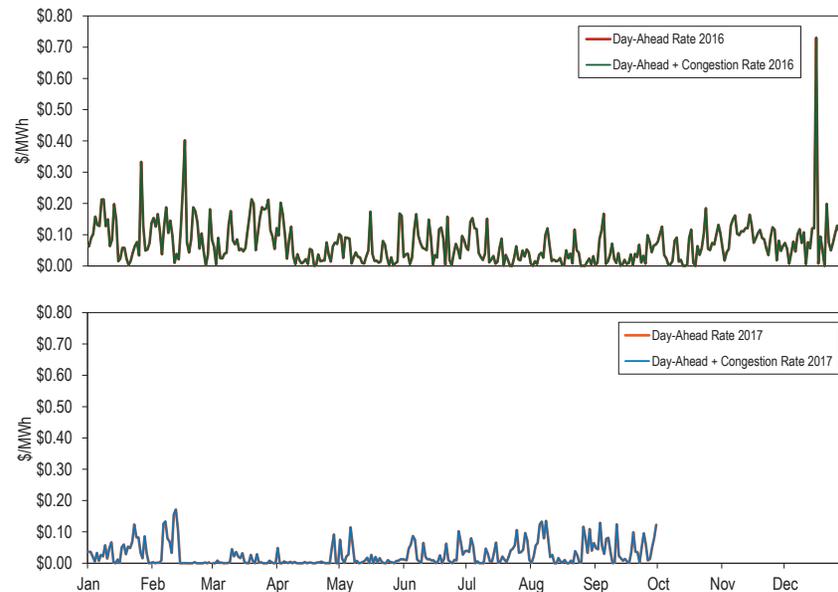


Figure 4-2 shows the RTO and the regional reliability rates for 2016 and the first nine months of 2017. The average daily RTO reliability rate was \$0.026 per MWh. The highest RTO reliability rate in the first nine months of 2017 occurred on January 8, when the rate reached \$0.390 per MWh, \$0.155 per MWh higher than the \$0.234 per MWh rate reached in the first nine months of 2016, on August 12.

Figure 4-2 Daily balancing operating reserve reliability rates (\$/MWh): January 1, 2016 through June 30, 2017

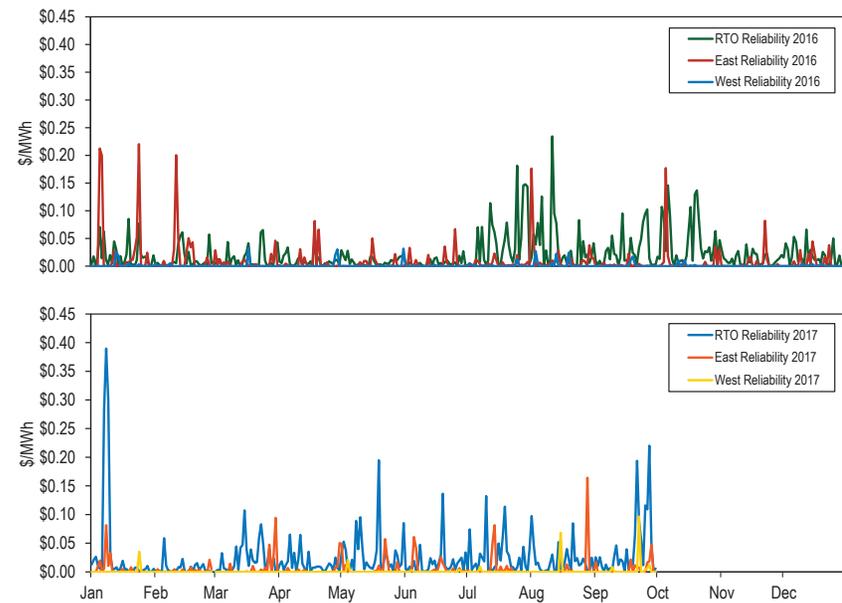


Figure 4-3 shows the RTO and regional deviation rates for 2016 and the first nine months of 2017. The average daily RTO deviation rate was \$0.221 per MWh. The highest daily rate in the first nine months of 2017 occurred on January 9, when the RTO deviation rate reached \$2.177 per MWh, \$0.135 per MWh higher than the \$2.042 per MWh rate reached in 2016, on October 19, 2016.

Figure 4-3 Daily balancing operating reserve deviation rates (\$/MWh): January 1, 2016 through September 30, 2017

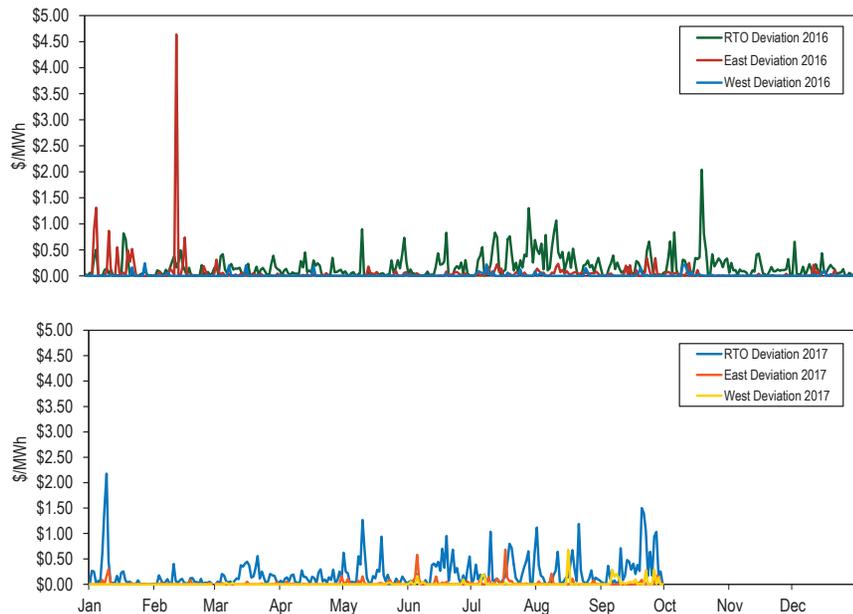


Figure 4-4 shows the daily lost opportunity cost rate and the daily canceled resources rate for 2016 and the first nine months of 2017. The lost opportunity cost rate averaged \$0.088 per MWh. The highest lost opportunity cost rate occurred on September 20, when it reached \$1.375 per MWh, \$0.017 per MWh lower than the \$1.391 per MWh rate reached in the first nine months of 2016, on April 14.

Figure 4-4 Daily lost opportunity cost and canceled resources rates (\$/MWh): January 1, 2016 through September 30, 2017

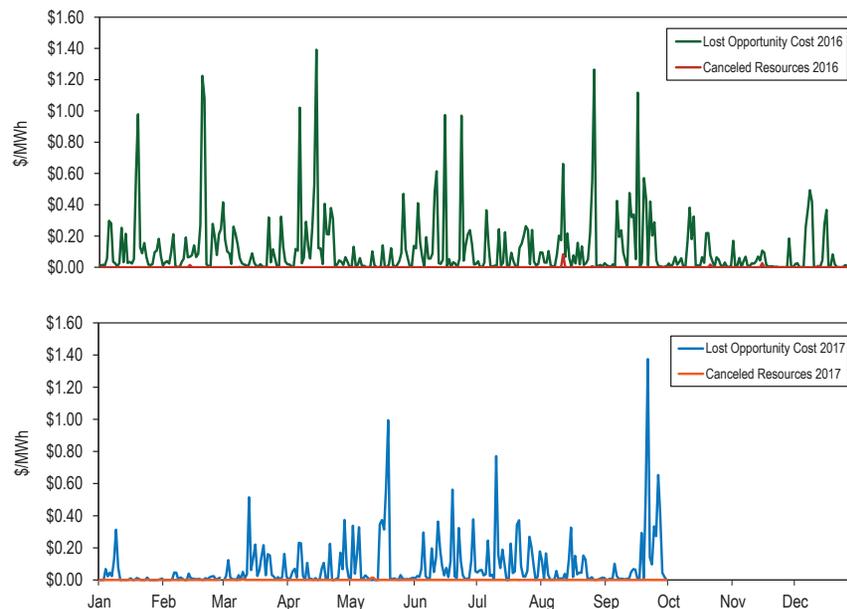


Table 4-12 shows the average rates for each region in each category in the first nine months of 2016 and 2017.

Table 4-12 Operating reserve rates (\$/MWh): January 1 through September 30, 2016 and 2017

Rate	(Jan - Sep) 2016 (\$/MWh)	(Jan - Sep) 2017 (\$/MWh)	Difference (\$/MWh)	Percent Difference
Day-Ahead	0.064	0.027	(0.037)	(57.3%)
Day-Ahead with Unallocated Congestion	0.064	0.027	(0.037)	(57.3%)
RTO Reliability	0.022	0.026	0.004	18.0%
East Reliability	0.010	0.005	(0.005)	(48.9%)
West Reliability	0.001	0.001	(0.000)	(11.6%)
RTO Deviation	0.182	0.221	0.039	21.7%
East Deviation	0.074	0.022	(0.052)	(70.8%)
West Deviation	0.011	0.012	0.000	4.1%
Lost Opportunity Cost	0.138	0.088	(0.050)	(36.3%)
Canceled Resources	0.000	0.000	(0.000)	(72.6%)

Table 4-13 shows the operating reserve cost of a one MW transaction in the first nine months of 2017. For example, a decrement bid in the Eastern Region (if not offset by other transactions) paid an average rate of \$0.338 per MWh with a maximum rate of \$2.805 per MWh, a minimum rate of \$0.002 per MWh and a standard deviation of \$0.415 per MWh. The rates in Table 4-13 include all operating reserve charges including RTO deviation charges. Table 4-13 illustrates both the average level of operating reserve charges by transaction types and the uncertainty reflected in the maximum, minimum and standard deviation levels.

Table 4-13 Operating reserve rates statistics (\$/MWh): January 1 through September 30, 2017

Region	Transaction	Rates Charged (\$/MWh)			Standard Deviation
		Maximum	Average	Minimum	
East	INC	2.770	0.311	0.000	0.417
	DEC	2.805	0.338	0.002	0.415
	DA Load	0.172	0.027	0.000	0.036
	RT Load	0.471	0.029	0.000	0.050
	Deviation	2.770	0.311	0.000	0.417
West	INC	2.770	0.303	0.000	0.407
	DEC	2.805	0.330	0.002	0.405
	DA Load	0.172	0.027	0.000	0.036
	RT Load	0.390	0.025	0.000	0.046
	Deviation	2.770	0.303	0.000	0.407

Reactive Services Rates

Reactive services charges associated with local voltage support are allocated to real-time load in the control zone or zones where the service is provided. These charges result from uplift payments to units committed by PJM to support reactive/voltage requirements that do not recover their energy offer through LMP payments. These charges are separate from the reactive service revenue requirement charges which are a fixed annual charge based on approved FERC filings. Reactive services charges associated with supporting reactive transfer interfaces above 345 kV are allocated daily to real-time load across the entire RTO based on the real-time load ratio share of each network customer.

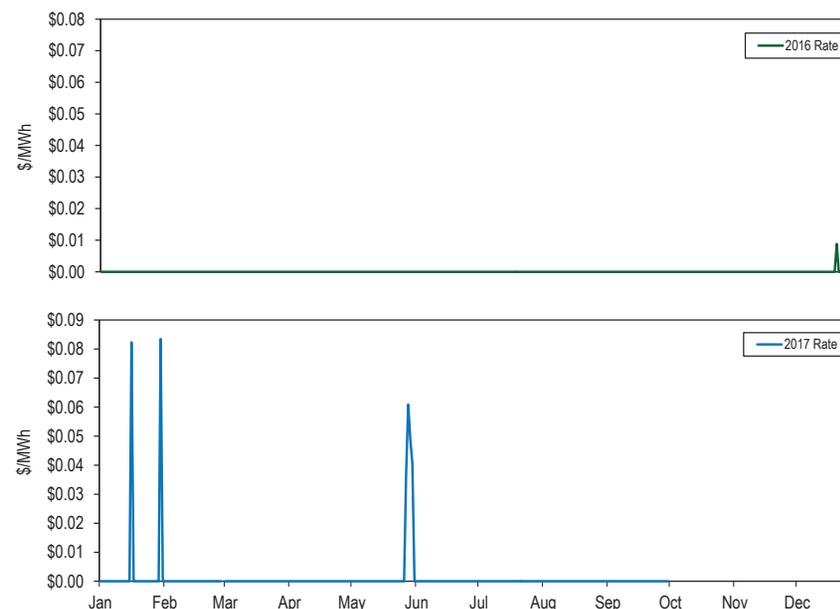
While reactive services rates are not posted by PJM, a local voltage support rate for each control zone can be calculated and a reactive transfer interface support rate can be calculated for the entire RTO. Table 4-14 shows the reactive services rates associated with local voltage support in the first nine months of 2016 and 2017. Table 4-14 shows that in the first nine months of 2017 the PENELEC Control Zone had the highest rate. Real-time load in the PENELEC Control Zone paid an average of \$0.130 per MWh for reactive services associated with local voltage support, \$0.128 or 5,051.4 percent higher than the average rate paid in the first nine months of 2016.

Table 4-14 Local voltage support rates: January 1 through September 30, 2016 and 2017

Control Zone	(Jan - Sep) 2016 (\$/MWh)	(Jan - Sep) 2017 (\$/MWh)	Difference (\$/MWh)
AECO	0.000	0.000	0.000
AEP	0.000	0.001	0.000
APS	0.000	0.003	0.003
ATSI	0.000	0.000	0.000
BGE	0.000	0.073	0.073
ComEd	0.000	0.104	0.104
DAY	0.000	0.000	0.000
DEOK	0.000	0.000	0.000
DLCO	0.000	0.000	0.000
Dominion	0.000	0.000	0.000
DPL	0.051	0.054	0.004
EKPC	0.000	0.000	0.000
JCPL	0.000	0.000	0.000
Met-Ed	0.001	0.005	0.004
PECO	0.000	0.002	0.002
PENELEC	0.003	0.130	0.128
Pepco	0.000	0.071	0.071
PPL	0.000	0.000	(0.000)
PSEG	0.000	0.000	0.000
RECO	0.000	0.000	0.000

Figure 4-5 shows the daily RTO wide reactive transfer interface rate in 2016 and the first nine months of 2017. RTO wide reactive charges were incurred only once in 2016 (December) and three times in the first nine months of 2017. Those are the only instances in which PJM scheduled resources to provide reactive support to reactive interfaces and the resources required make whole payments.

Figure 4-5 Daily reactive transfer interface support rates (\$/MWh): January 1, 2016 through September 30, 2017



Balancing Operating Reserve Determinants

Table 4-15 shows the determinants used to allocate the regional balancing operating reserve charges in the first nine months of 2016 and 2017. Total real-time load and real-time exports were 20,266,491MWh, 3.3 percent lower in the first nine months of 2017 compared to the first nine months of 2016. Total deviations summed across the demand, supply, and generator categories were 4,884,276 MWh, 4.1 percent lower in the first nine months of 2017 compared to the first nine months of 2016.

Table 4-15 Balancing operating reserve determinants (MWh): January 1 through September 30, 2016 and 2017

		Reliability Charge Determinants (MWh)			Deviation Charge Determinants (MWh)			
		Real-Time Load	Real-Time Exports	Reliability Total	Demand Deviations (MWh)	Supply Deviations (MWh)	Generator Deviations (MWh)	Deviations Total
(Jan - Sep) 2016	RTO	597,400,936	18,659,370	616,060,306	69,228,229	23,074,483	26,385,976	118,688,688
	East	282,979,481	8,416,523	291,396,004	34,935,836	13,261,882	14,623,858	62,821,576
	West	314,421,455	10,242,847	324,664,302	33,867,452	9,579,961	11,762,118	55,209,532
(Jan - Sep) 2017	RTO	571,775,428	24,018,387	595,793,815	68,670,597	23,785,666	21,348,149	113,804,412
	East	271,690,505	8,084,625	279,775,130	34,374,864	14,040,601	10,370,426	58,785,891
	West	300,084,922	15,933,762	316,018,684	33,912,951	9,504,084	10,977,723	54,394,758
Difference	RTO	(25,625,508)	5,359,017	(20,266,491)	(557,632)	711,183	(5,037,827)	(4,884,276)
	East	(11,288,976)	(331,898)	(11,620,874)	(560,973)	778,719	(4,253,432)	(4,035,685)
	West	(14,336,533)	5,690,915	(8,645,618)	45,499	(75,877)	(784,395)	(814,773)

Deviations fall into three categories, demand, supply and generator deviations. Table 4-16 shows the different categories by the type of transactions that incurred deviations. In the first nine months of 2017, 30.5 percent of all RTO deviations were incurred by participants that deviated due to INCs and DECs or due to combinations of INCs and DECs with other transactions, the remaining 69.5 percent of all RTO deviations were incurred by participants that deviated due to other transaction types or due to combinations of other transaction types.

Table 4-16 Deviations by transaction type: January 1 through September 30, 2017

Deviation Category	Transaction	Deviation (MWh)			Share		
		RTO	East	West	RTO	East	West
Demand	Bilateral Sales Only	1,234,722	1,173,485	61,237	1.1%	2.0%	0.1%
	DECs Only	11,627,534	4,876,208	6,368,544	10.2%	8.3%	11.7%
	Exports Only	4,945,195	2,316,826	2,628,368	4.3%	3.9%	4.8%
	Load Only	46,810,999	23,743,246	23,067,754	41.1%	40.4%	42.4%
	Combination with DECs	2,957,308	1,610,005	1,347,303	2.6%	2.7%	2.5%
	Combination without DECs	1,094,838	655,094	439,744	1.0%	1.1%	0.8%
Supply	Bilateral Purchases Only	301,300	239,935	61,365	0.3%	0.4%	0.1%
	Imports Only	3,264,655	2,551,655	713,000	2.9%	4.3%	1.3%
	INCs Only	17,508,929	9,667,562	7,600,387	15.4%	16.4%	14.0%
	Combination with INCs	2,654,222	1,534,357	1,119,865	2.3%	2.6%	2.1%
	Combination without INCs	56,560	47,092	9,468	0.0%	0.1%	0.0%
Generators		21,348,149	10,370,426	10,977,723	18.8%	17.6%	20.2%
Total		113,804,412	58,785,891	54,394,758	100.0%	100.0%	100.0%

Energy Uplift Credits

Table 4-17 shows the totals for each credit category in the first nine months of 2016 and 2017. During the first nine months of 2017, 63.9 percent of total energy uplift credits were in the balancing operating reserve category, an increase of 4.8 percentage points from 59.1 in the first nine months of 2016.

Table 4-17 Energy uplift credits by category: January 1 through September 30, 2016 and 2017

Category	Type	(Jan - Sep) 2016 Credits (Millions)	(Jan - Sep) 2017 Credits (Millions)	Change	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Day-Ahead Operating Reserve	Generators	\$40.8	\$16.9	(\$23.9)	39.9%	19.6%
	Imports	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%
	Load Response	\$0.0	\$0.0	\$0.0	0.0%	0.0%
	Canceled Resources	\$0.1	\$0.0	(\$0.0)	0.1%	0.0%
Balancing Operating Reserve	Generators	\$43.7	\$44.4	\$0.7	42.7%	51.5%
	Imports	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%
	Load Response	\$0.1	\$0.2	\$0.1	0.1%	0.2%
	Local Constraints Control	\$0.4	\$0.5	\$0.1	0.4%	0.6%
	Lost Opportunity Cost	\$16.2	\$10.0	(\$6.3)	15.9%	11.5%
Reactive Services	Day-Ahead	\$0.0	\$13.3	\$13.3	0.0%	15.5%
	Local Constraints Control	\$0.0	\$0.0	\$0.0	0.0%	0.0%
	Lost Opportunity Cost	\$0.0	\$0.1	\$0.1	0.0%	0.1%
	Reactive Services	\$0.8	\$0.6	(\$0.2)	0.8%	0.7%
	Synchronous Condensing	\$0.0	\$0.0	\$0.0	0.0%	0.0%
Black Start Services	Day-Ahead	\$0.0	\$0.0	\$0.0	0.0%	0.0%
	Balancing	\$0.0	\$0.0	\$0.0	0.0%	0.0%
	Testing	\$0.2	\$0.2	(\$0.0)	0.2%	0.2%
Total		\$102.2	\$86.2	(\$16.0)	100.0%	100.0%

Characteristics of Credits

Types of Units

Table 4-18 shows the distribution of total energy uplift credits by unit type in the first nine months of 2016 and 2017. The decrease in energy uplift in the first nine months of 2017 compared to the first nine months of 2016 was the result of lower credits paid to coal fired steam turbines, combustion turbines, and combined cycle units. Credits to these units decreased by \$17.3 million or 21.8 percent.

Table 4-18 Energy uplift credits by unit type: January 1 through September 30, 2016 and 2017

Unit Type	(Jan - Sep) 2016 Credits (Millions)	(Jan - Sep) 2017 Credits (Millions)	Change	Percent Change	(Jan - Sep) 2016 Share	(Jan - Sep) 2017 Share
Combined Cycle	\$10.1	\$5.7	(\$4.4)	(43.6%)	9.9%	6.7%
Combustion Turbine	\$45.9	\$40.5	(\$5.5)	(11.9%)	44.9%	47.0%
Diesel	\$0.5	\$0.5	\$0.1	12.7%	0.5%	0.6%
Hydro	\$0.1	\$0.0	(\$0.0)	(69.8%)	0.1%	0.0%
Nuclear	\$1.1	\$0.1	(\$1.1)	(93.1%)	1.1%	0.1%
Solar	\$0.0	\$0.0	\$0.0	0.0%	0.0%	0.0%
Steam - Coal	\$40.7	\$33.3	(\$7.4)	(18.2%)	39.9%	38.7%
Steam - Other	\$2.7	\$3.9	\$1.2	45.4%	2.6%	4.5%
Wind	\$1.0	\$2.0	\$0.9	94.5%	1.0%	2.3%
Total	\$102.1	\$86.0	(\$16.1)	(15.8%)	100.0%	100.0%

Table 4-19 shows the distribution of energy uplift credits by category and by unit type in the first nine months of 2017. Coal fired steam turbines received 88.5 percent of the day-ahead generator credits in the first nine months of 2017, 3.7 percentage points higher than the share received in the first nine months of 2016. Combustion turbines received 74.4 percent of the balancing operating reserve generator credits in the first nine months of 2017, 2.3 percentage points higher than the share received in the first nine months of 2016. Combustion turbines received 63.5 percent of the lost opportunity cost credits in the first nine months of 2017, 15.1 percentage points lower than the share received in the first nine months of 2016.

Table 4-19 Energy uplift credits by unit type: January 1 through September 30, 2017

Unit Type	Day-Ahead Operating Reserve	Balancing Operating Reserve	Canceled Resources	Local Constraints Control	Lost Opportunity Cost	Reactive Services	Synchronous Condensing	Black Start Services
Combined Cycle	5.5%	7.5%	0.0%	0.0%	9.5%	3.4%	0.0%	22.3%
Combustion Turbine	1.8%	74.4%	2.7%	72.4%	63.5%	2.1%	0.0%	77.7%
Diesel	0.0%	0.5%	0.0%	5.7%	2.5%	0.1%	0.0%	0.0%
Hydro	0.0%	0.0%	97.3%	0.0%	0.0%	0.0%	0.0%	0.0%
Nuclear	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%
Solar	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Steam - Coal	88.5%	13.6%	0.0%	21.9%	5.9%	82.5%	0.0%	0.0%
Steam - Others	4.2%	3.4%	0.0%	0.0%	0.1%	11.9%	0.0%	0.0%
Wind	0.0%	0.5%	0.0%	0.0%	17.6%	0.0%	0.0%	0.0%
Total (Millions)	\$16.9	\$44.4	\$0.0	\$0.5	\$10.0	\$14.0	\$0.0	\$0.2

Table 4-19 also shows the distribution of reactive service credits and black start services credits by unit type. In the first nine months of 2017, coal units received 82.5 of all reactive services credits.

Concentration of Energy Uplift Credits

There continues to be a high level of concentration in the units and companies receiving energy uplift credits. This concentration results from a combination of unit operating parameters, PJM's persistent need to commit specific units out of merit in particular locations and the fact that the lack of transparency makes it almost impossible for competition to affect these payments.

Figure 4-6 shows the concentration of energy uplift credits. The top 10 units received 35.0 percent of total energy uplift credits in the first nine months of 2017, compared to 35.6 percent in the first nine months of 2016. In the first nine months of 2017, 259 units received 90 percent of all energy uplift credits, compared to 267 units in the first nine months of 2016.

Figure 4-6 Cumulative share of energy uplift credits: January 1 through September 30, 2016 and 2017 by unit

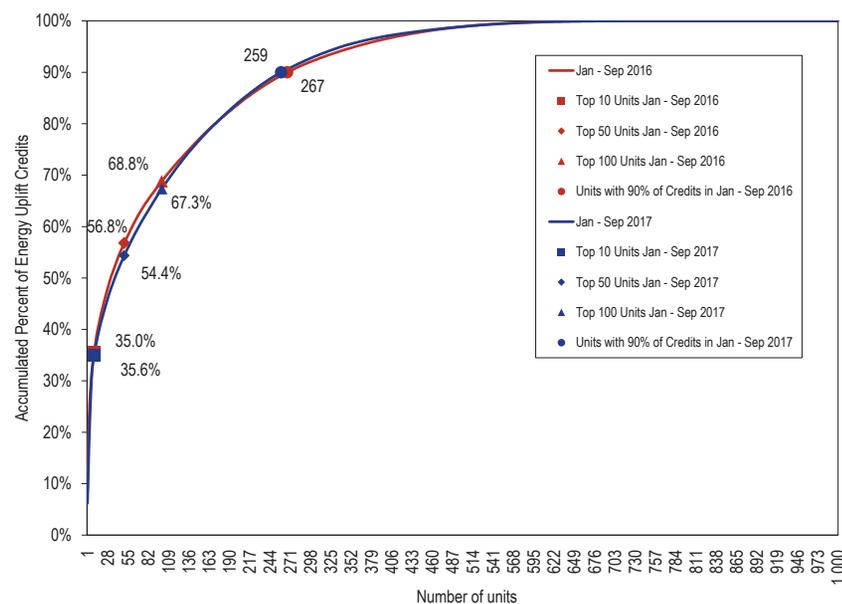


Table 4-20 shows the credits received by the top 10 units and top 10 organizations in each of the energy uplift categories paid to generators.

Table 4-20 Top 10 units and organizations energy uplift credits: January 1 through September 30, 2017

Category	Type	Top 10 Units		Top 10 Organizations	
		Credits (Millions)	Credits Share	Credits (Millions)	Credits Share
Day-Ahead Operating Reserve	Generators	\$14.0	82.8%	\$16.6	97.9%
	Canceled Resources	\$0.0	100.0%	\$0.0	100.0%
Balancing Operating Reserve	Generators	\$6.1	13.8%	\$32.9	74.0%
	Local Constraints Control	\$0.4	79.5%	\$0.5	100.0%
	Lost Opportunity Cost	\$2.3	23.2%	\$7.0	70.7%
Reactive Services		\$13.0	92.5%	\$14.0	100.0%
Synchronous Condensing		\$0.0	0.0%	\$0.0	0.0%
Black Start Services		\$0.1	44.1%	\$0.2	92.2%
Total		\$30.1	35.0%	\$68.6	79.8%

Table 4-21 shows balancing operating reserve credits received by the top 10 units identified for reliability or for deviations in each region. In the first nine months of 2017, 64.3 percent of all credits paid to these units were allocated to deviations while the remaining 35.7 percent were paid for reliability reasons.

Table 4-21 Identification of balancing operating reserve credits received by the top 10 units by category and region: January 1 through September 30, 2017

	Reliability			Deviations			Total
	RTO	East	West	RTO	East	West	
Credits (Millions)	\$2.0	\$0.2	\$0.0	\$3.7	\$0.3	\$0.0	\$6.1
Share	32.7%	3.0%	0.0%	60.0%	4.3%	0.0%	100.0%

In the first nine months of 2017, concentration in all energy uplift credit categories was high.^{8 9} The HHI for energy uplift credits was calculated based on each organization’s share of daily credits for each category. Table 4-22 shows the average HHI for each category. HHI for day-ahead operating reserve credits to generators was 7434, for balancing operating reserve credits to generators was 3356, for lost opportunity cost credits was 5366 and for reactive services credits was 9021.

⁸ See 2016 State of the Market Report for PJM, Volume 2: Section 3: "Energy Market" at "Market Concentration" for a discussion of concentration ratios and the Herfindahl-Hirschman Index (HHI).
⁹ Table 4-22 excludes local constraints control categories.

Table 4-22 Daily energy uplift credits HHI: January 1 through September 30, 2017

Category	Type	Average	Minimum	Maximum	Highest Market Share (One day)	Highest Market Share (All days)
Day-Ahead Operating Reserve	Generators	7434	2229	10000	100.0%	57.7%
	Imports	NA	NA	NA	NA	NA
	Load Response	10000	10000	10000	100.0%	100.0%
Balancing Operating Reserve	Canceled Resources	10000	10000	10000	100.0%	100.0%
	Generators	3356	965	10000	100.0%	14.0%
	Imports	10000	10000	10000	100.0%	100.0%
	Load Response	9749	5281	10000	100.0%	87.2%
Reactive Services	Lost Opportunity Cost	5366	1459	10000	100.0%	13.0%
		9021	3537	10000	100.0%	75.8%
Synchronous Condensing		NA	NA	NA	NA	NA
Black Start Services		9556	4997	10000	100.0%	31.3%
Total		3381	878	9824	99.1%	30.7%

Pool Scheduled and Self Scheduled Generation

In PJM, units can have either a pool scheduled or self scheduled commitment status. Pool scheduled units are committed by PJM while self scheduled units are committed by the generation owners. Self scheduled units specify an output level (MW) at which they must run. A self scheduled unit can specify to PJM that the economic minimum is must run or that the entire output of the unit is must run. Pool scheduled units can also specify to PJM that if committed, PJM must take the entire output of the unit. Table 4-23 shows the categories of PJM day-ahead and real-time generation commitment status:

- **Self Scheduled (Must Run):** MWh from self scheduled units that run regardless of dispatch signal.
- **Self Scheduled (Dispatchable):** MWh from self scheduled units that offer a dispatchable range to PJM.
- **Pool Scheduled (Block Loaded):** MWh from pool scheduled units that are offered to PJM as a single MWh block which is not dispatchable.
- **Pool Scheduled (Dispatchable):** MWh from pool scheduled units that are offered to PJM with a dispatchable range.
- **Not Defined Status:** MWh from units that did not specify their commitment status in their offer or did not have an offer.

Table 4-23 shows that in the first nine months of 2017, 64.4 percent of total generation in the day ahead market was self scheduled and 63.2 percent of total generation in the real time market was self scheduled. In the Day-Ahead Energy Market, 30.5 percent of the self scheduled generation was must run while 33.9 percent was dispatchable. In the Real-Time Energy Market 33.8 percent of self scheduled generation was must run while 29.4 percent was dispatchable. The results in Table 4-23 reflect the status of units that are committed while data for the same categories in the Energy Section is for unit offers.¹⁰ The proportion of self scheduled units is significantly higher for committed units than for unit offers.

Table 4-23 Day-ahead and real-time generation commitment status percent: January through September 2017

Energy Market	Self Scheduled (Must Run)	Self Scheduled (Dispatchable)	Pool Scheduled (Block Loaded)	Pool Scheduled (Dispatchable)	No Defined Status
Day Ahead	30.5%	33.9%	3.3%	32.2%	0.0%
Real Time	33.8%	29.4%	4.3%	32.4%	0.2%

Economic and Noneconomic Generation¹¹

Economic generation includes units scheduled day ahead or producing energy in real time at an incremental offer less than or equal to the LMP at the unit's bus. Noneconomic generation includes units that are scheduled or producing energy at an incremental offer higher than the LMP at the unit's bus. Units are paid day-ahead operating reserve credits based on their scheduled operation for the entire day. Balancing generator operating reserve credits are paid on a segmented basis for each period defined by the greater of the day-ahead schedule and minimum run time. Table 4-24 shows PJM's day-ahead and real-time total generation and the amount of generation eligible for operating reserve credits. In the Day-Ahead Energy Market only pool-scheduled resources are eligible for day-ahead operating reserve credits. In the Real-Time Energy Market, only pool-scheduled resources that follow PJM's dispatch instructions are eligible for balancing operating reserve credits.

¹⁰ See the 2017 State of the Market Report for PJM: January through September, Section 3

¹¹ The analysis of economic and noneconomic generation is based on units' incremental offers, the value used by PJM to calculate LMP. The analysis does not include no load or startup costs.

The MMU analyzed PJM's day-ahead and real-time generation eligible for operating reserve credits to determine the shares of economic and noneconomic generation. Each unit's hourly generation was determined to be economic or noneconomic based on the unit's hourly incremental offer, excluding the hourly no load cost and any applicable startup cost. A unit could be economic for every hour during a day or segment, but still receive operating reserve credits because the energy revenues did not cover the hourly no load costs and startup costs. A unit could be noneconomic for an hour or multiple hours and not receive operating reserve credits whenever the total energy revenues covered the total offer (including no load and startup costs) for the entire day or segment. In the first nine months of 2017, 35.5 percent of the day-ahead generation was eligible for day-ahead operating reserve credits and 33.5 percent of the real-time generation was eligible for balancing operating reserve credits.¹²

Table 4-24 Day-ahead and real-time generation (GWh): January 1 through September 30, 2017

Energy Market	Total Generation	Generation Eligible for Operating Reserve Credits	Generation Eligible for Operating Reserve Credits Percent
Day-Ahead	608,246	216,046	35.5%
Real-Time	610,802	204,624	33.5%

Table 4-25 shows PJM's economic and noneconomic generation by hour eligible for operating reserve credits. In the first nine months of 2017, 85.1 percent of the day-ahead generation eligible for operating reserve credits was economic and 79.0 percent of the real-time generation eligible for operating reserve credits was economic. A unit's generation may be noneconomic for a portion of their daily generation and economic for the rest. Table 4-25 shows the separate amounts of economic and noneconomic generation even if the daily generation was economic.

¹² In the Day-Ahead Energy Market, only pool-scheduled resources are eligible for day-ahead operating reserve credits. In the Real-Time Energy Market, only pool-scheduled resources that operate as requested by PJM are eligible for balancing operating reserve credits.

Table 4-25 Day-ahead and real-time economic and noneconomic generation from units eligible for operating reserve credits (GWh): January 1 through September 30, 2017

Energy Market	Economic Generation	Noneconomic Generation	Economic Generation Percent	Noneconomic Generation Percent
Day-Ahead	183,753	32,293	85.1%	14.9%
Real-Time	161,648	42,976	79.0%	21.0%

Noneconomic generation only leads to operating reserve credits when units' generation for the day or segment, scheduled or committed, is noneconomic, including no load and startup costs. Table 4-26 shows the generation receiving day-ahead and balancing operating reserve credits. In the first nine months of 2017, 2.6 percent of the day-ahead generation eligible for operating reserve credits received credits and 2.2 percent of the real-time generation eligible for operating reserve credits received credits.

Table 4-26 Day-ahead and real-time generation receiving operating reserve credits (GWh): January 1 through September 30, 2017

Energy Market	Generation Eligible for Operating Reserve Credits	Generation Receiving Operating Reserve Credits	Generation Receiving Operating Reserve Credits Percent
Day-Ahead	216,046	5,650	2.6%
Real-Time	204,624	4,520	2.2%

Day-Ahead Unit Commitment for Reliability

PJM may schedule units as must run in the Day-Ahead Energy Market when needed in real time to address reliability issues of various types. PJM puts such reliability issues in four categories: voltage issues (high and low); black start requirements (from automatic load rejection (ALR) units); local contingencies not modeled in the Day-Ahead Energy Market; and long lead time units not able to be scheduled in the Day-Ahead Energy Market.¹³ Participants can submit units as self-scheduled (must run), meaning that the unit must be committed, but a unit submitted as must run by a participant is not eligible for day-ahead operating reserve credits.¹⁴ Units scheduled as must run by

¹³ See PJM. "Item 12 - October 2012 MIC DAM Cost Allocation," PJM Presentation to the Market Implementation Committee (October 12, 2012) <<http://www.pjm.com/~media/committees-groups/committees/mic/20121010/20121010-minutes.ashx>>.

¹⁴ See PJM. "PJM Markets Gateway User Guide," Section Managing Unit Data (version July 18, 2017) p. 32, <<http://www.pjm.com/~media/etools/markets-gateway/markets-gateway-user-guide.ashx?a=en>>.

PJM may set LMP if raised above economic minimum and following the dispatch signal and are eligible for day-ahead operating reserve credits. Table 4-27 shows the total day-ahead generation and the subset of that generation scheduled as must run by PJM. In the first nine months of 2017, 1.2 percent of the total day-ahead generation was scheduled as must run by PJM, 0.3 percentage points lower than the first nine months of 2016.

Table 4-27 Day-ahead generation scheduled as must run by PJM (GWh): January 1, 2016 through September 30, 2017

	2016			2017		
	Total Day-Ahead Generation	Day-Ahead PJM Must Run Generation	Share	Total Day-Ahead Generation	Day-Ahead PJM Must Run Generation	Share
Jan	73,821	935	1.3%	71,967	1,051	1.5%
Feb	66,367	979	1.5%	61,356	725	1.2%
Mar	60,431	1,047	1.7%	66,657	523	0.8%
Apr	56,338	514	0.9%	58,457	334	0.6%
May	59,078	429	0.7%	61,170	952	1.6%
Jun	70,573	772	1.1%	69,964	634	0.9%
Jul	81,801	981	1.2%	79,334	1,157	1.5%
Aug	83,021	1,694	2.0%	74,129	876	1.2%
Sep	69,962	1,682	2.4%	65,211	1,047	1.6%
Oct	60,950	1,066	1.7%			
Nov	59,983	819	1.4%			
Dec	72,478	1,112	1.5%			
Total (Jan - Sep)	621,392	9,034	1.5%	608,246	7,298	1.2%
Total	814,803	12,031	1.5%	608,246	7,298	1.2%

Pool-scheduled units are made whole in the Day-Ahead Energy Market if their total offer (including no load and startup costs) is greater than the revenues from the Day-Ahead Energy Market. Such units are paid day-ahead operating reserve credits. Pool-scheduled units scheduled as must run by PJM are only paid day-ahead operating reserve credits when their total offer is greater than the revenues from the Day-Ahead Energy Market.

It is illogical and unnecessary to pay units day-ahead operating reserves because units do not incur any costs to run and any revenue shortfalls are addressed by balancing operating reserve payments.

Table 4-28 shows the total day-ahead generation scheduled as must run by PJM by category. In the first nine months of 2017, 54.5 percent of the day-ahead generation scheduled as must run by PJM received operating reserve credits, 24.7 percent paid as day-ahead operating reserve credits and 29.8 percent paid as reactive services. The remaining 45.5 percent of the day-ahead generation scheduled as must run by PJM did not need to be made whole.

Table 4-28 Day-ahead generation scheduled as must run by PJM by category (GWh): January 1 through September 30, 2017

	Reactive Services	Day-Ahead Operating		Total
		Reserves	Economic	
Jan	318	256	477	1,051
Feb	411	172	141	725
Mar	215	2	306	523
Apr	106	31	197	334
May	213	166	573	952
Jun	162	157	315	634
Jul	226	300	630	1,157
Aug	266	385	224	876
Sep	257	330	459	1,047
Total (Jan - Sep)	2,175	1,799	3,324	7,298
Share	29.8%	24.7%	45.5%	100.0%

Total day-ahead operating reserve credits in the first nine months of 2017 were \$16.9 million, of which \$13.2 million or 78.2 percent was paid to units scheduled as must run by PJM, and not scheduled to provide black start or reactive services.

Geography of Charges and Credits

Table 4-29 shows the geography of charges and credits in the first nine months of 2017. Table 4-29 includes only day-ahead operating reserve charges and balancing operating reserve reliability and deviation charges since these categories are allocated regionally, while other charges, such as reactive services, synchronous condensing and black start services are allocated by control zone, and balancing local constraint charges are charged to the requesting party.

Charges are categorized by the location (control zone, hub, aggregate or interface) where they are allocated according to PJM's operating reserve rules. Credits are categorized by the location where the resources are located. The shares columns reflect the operating reserve credits and charges balance for each location. For example, transactions in the ATSI Control Zone paid 7.3 percent of all operating reserve charges allocated regionally, and resources in the ATSI Control Zone were paid 3.1 percent of the corresponding credits. The ATSI Control Zone received less operating reserve credits than operating reserve charges paid and had 11.5 percent of the deficit. The deficit is the sum of the negative entries in the balance column. Transactions in the BGE Control Zone paid 4.0 percent of all operating reserve charges allocated regionally, and resources in the BGE Control Zone were paid 13.0 percent of the corresponding credits. The BGE Control Zone received more operating reserve credits than operating reserve charges paid and had 24.8 percent of the surplus. The surplus is the sum of the positive entries in the balance column. Table 4-29 also shows that 89.0 percent of all charges were allocated in control zones, 4.4 percent in hubs and aggregates and 6.7 percent in interfaces.

Table 4-29 Geography of regional charges and credits: January 1 through September 30, 2017

Location	Charges (Millions)	Credits (Millions)	Balance	Total Charges	Shares			
					Total Credits	Deficit	Surplus	
Zones								
AECO	\$1.0	\$0.5	(\$0.4)	1.3%	0.8%	1.6%	0.0%	
AEP	\$9.4	\$7.1	(\$2.2)	13.1%	10.0%	8.7%	0.0%	
APS	\$4.0	\$2.6	(\$1.4)	5.6%	3.7%	5.3%	0.0%	
ATSI	\$5.2	\$2.2	(\$2.9)	7.3%	3.1%	11.5%	0.0%	
BGE	\$2.9	\$9.2	\$6.4	4.0%	13.0%	0.0%	24.8%	
ComEd	\$8.1	\$11.3	\$3.3	11.3%	15.9%	0.0%	12.8%	
DAY	\$1.3	\$1.9	\$0.6	1.8%	2.6%	0.0%	2.3%	
DEOK	\$2.2	\$1.0	(\$1.2)	3.1%	1.4%	4.8%	0.0%	
DLCO	\$1.0	\$0.3	(\$0.7)	1.4%	0.4%	2.9%	0.0%	
Dominion	\$6.8	\$9.1	\$2.3	9.5%	12.7%	0.0%	9.1%	
DPL	\$1.7	\$4.7	\$3.0	2.4%	6.6%	0.0%	11.7%	
EKPC	\$1.1	\$1.3	\$0.2	1.5%	1.8%	0.0%	0.9%	
External	\$0.0	\$1.4	\$1.4	0.0%	2.0%	0.0%	5.6%	
JCPL	\$1.9	\$0.6	(\$1.3)	2.7%	0.9%	5.2%	0.0%	
Met-Ed	\$1.4	\$0.7	(\$0.7)	2.0%	1.0%	2.7%	0.0%	
PECO	\$3.4	\$0.8	(\$2.7)	4.8%	1.1%	10.3%	0.0%	
PENELEC	\$2.5	\$1.6	(\$0.9)	3.5%	2.2%	3.5%	0.0%	
Pepco	\$2.6	\$11.1	\$8.4	3.7%	15.5%	0.0%	32.9%	
PPL	\$3.3	\$1.0	(\$2.4)	4.7%	1.4%	9.2%	0.0%	
PSEG	\$3.6	\$2.8	(\$0.8)	5.1%	4.0%	3.1%	0.0%	
RECO	\$0.2	\$0.0	(\$0.2)	0.2%	0.0%	0.6%	0.0%	
All Zones	\$63.4	\$71.3	\$7.9	89.0%	100.0%	69.3%	100.0%	
Hubs and Aggregates								
AEP - Dayton	\$0.3	\$0.0	(\$0.3)	0.4%	0.0%	1.2%	0.0%	
Dominion	\$0.2	\$0.0	(\$0.2)	0.2%	0.0%	0.6%	0.0%	
Eastern	\$0.1	\$0.0	(\$0.1)	0.2%	0.0%	0.5%	0.0%	
New Jersey	\$0.1	\$0.0	(\$0.1)	0.2%	0.0%	0.4%	0.0%	
Ohio	\$0.0	\$0.0	(\$0.0)	0.1%	0.0%	0.2%	0.0%	
Western Interface	\$0.1	\$0.0	(\$0.1)	0.1%	0.0%	0.2%	0.0%	
Western	\$2.3	\$0.0	(\$2.3)	3.2%	0.0%	9.0%	0.0%	
RTEP B0328 Source	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%	0.0%	0.0%	
All Hubs and Aggregates	\$3.1	\$0.0	(\$3.1)	4.4%	0.0%	12.2%	0.0%	
Interfaces								
CPL Imp	\$0.0	\$0.0	\$0.0	0.0%	0.0%	0.0%	0.0%	
Hudson	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%	0.0%	0.0%	
IMO	\$0.2	\$0.0	(\$0.2)	0.3%	0.0%	0.8%	0.0%	
Linden	\$0.2	\$0.0	(\$0.2)	0.3%	0.0%	0.8%	0.0%	
MISO	\$2.0	\$0.0	(\$2.0)	2.8%	0.0%	7.7%	0.0%	
Neptune	\$0.2	\$0.0	(\$0.2)	0.3%	0.0%	0.9%	0.0%	
NIPSCO	\$0.0	\$0.0	(\$0.0)	0.1%	0.0%	0.1%	0.0%	
Northwest	\$0.1	\$0.0	(\$0.1)	0.1%	0.0%	0.3%	0.0%	
NYIS	\$0.6	\$0.0	(\$0.6)	0.8%	0.0%	2.3%	0.0%	
OVEC	\$0.0	\$0.0	(\$0.0)	0.0%	0.0%	0.1%	0.0%	
South Exp	\$0.4	\$0.0	(\$0.4)	0.6%	0.0%	1.7%	0.0%	
South Imp	\$1.0	\$0.0	(\$1.0)	1.4%	0.0%	3.8%	0.0%	
All Interfaces	\$4.7	\$0.0	(\$4.7)	6.7%	0.0%	18.5%	0.0%	
Total	\$71.3	\$71.3	\$0.0	100.0%	100.0%	100.0%	100.0%	

Capacity Market

Each organization serving PJM load must meet its capacity obligations through the PJM Capacity Market, where load serving entities (LSEs) must pay the locational capacity price for their zone. LSEs can also construct generation and offer it into the capacity market, enter into bilateral contracts, develop demand resources and energy efficiency (EE) resources and offer them into the capacity market, or construct transmission upgrades and offer them into the capacity market.

The Market Monitoring Unit (MMU) analyzed market structure, participant conduct and market performance in the PJM Capacity Market for the first nine months of 2017, including supply, demand, concentration ratios, pivotal suppliers, volumes, prices, outage rates and reliability.¹

Table 5-1 The capacity market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Aggregate Market	Not Competitive	
Market Structure: Local Market	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Mixed

- The aggregate market structure was evaluated as not competitive. For almost all auctions held from 2007 to the present, the PJM region failed the three pivotal supplier test (TPS), which is conducted at the time of the auction.²
- The local market structure was evaluated as not competitive. For almost every auction held, all LDAs have failed the TPS test, which is conducted at the time of the auction.³
- Participant behavior was evaluated as competitive. Market power mitigation measures were applied when the Capacity Market Seller failed the market power test for the auction, the submitted sell offer exceeded

¹ The values stated in this report for the RTO and LDAs refer to the aggregate level including all nested LDAs unless otherwise specified. For example, RTO values include the entire PJM market and all LDAs. Rest of RTO values are RTO values net of nested LDA values.

² In the 2008/2009 RPM Third Incremental Auction, 18 participants in the RTO market passed the TPS test. In the 2018/2019 RPM Second Incremental Auction, 35 participants in the RTO market passed the test.

³ In the 2012/2013 RPM Base Residual Auction, six participants included in the incremental supply of EMAAC passed the TPS test. In the 2014/2015 RPM Base Residual Auction, seven participants in the incremental supply in MAAC passed the TPS test.

the defined offer cap, and the submitted sell offer, absent mitigation, would increase the market clearing price. Market power mitigation rules were also applied when the Capacity Market Seller submitted a sell offer for a new resource or uprate that was below the Minimum Offer Price Rule (MOPR) threshold.

- Market performance was evaluated as competitive. Although structural market power exists in the Capacity Market, a competitive outcome resulted from the application of market power mitigation rules.
- Market design was evaluated as mixed because while there are many positive features of the Reliability Pricing Model (RPM) design and the capacity performance modifications to RPM, there are several features of the RPM design which still threaten competitive outcomes. These include the definition of DR which permits inferior products to substitute for capacity, the replacement capacity issue, the definition of unit offer parameters and the inclusion of imports which are not substitutes for internal capacity resources.

Overview

RPM Capacity Market

Market Design

The Reliability Pricing Model (RPM) Capacity Market is a forward-looking, annual, locational market, with a must offer requirement for Existing Generation Capacity Resources and mandatory participation by load, with performance incentives, that includes clear market power mitigation rules and that permits the direct participation of demand-side resources.⁴

Under RPM, capacity obligations are annual. Base Residual Auctions (BRA) are held for Delivery Years that are three years in the future. Effective with the 2012/2013 Delivery Year, First, Second and Third Incremental Auctions (IA) are held for each Delivery Year.⁵ Prior to the 2012/2013 Delivery Year, the Second Incremental Auction was conducted if PJM determined that an

⁴ The terms *PJM Region*, *RTO Region* and *RTO* are synonymous in this report and include all capacity within the PJM footprint.

⁵ See 126 FERC ¶ 61,275 (2009) at P 86.

unforced capacity resource shortage exceeded 100 MW of unforced capacity due to a load forecast increase. Effective January 31, 2010, First, Second, and Third Incremental Auctions are conducted 20, 10, and three months prior to the Delivery Year.⁶ Also effective for the 2012/2013 Delivery Year, a Conditional Incremental Auction may be held if there is a need to procure additional capacity resulting from a delay in a planned large transmission upgrade that was modeled in the BRA for the relevant Delivery Year.⁷

The 2018/2019 RPM Second Incremental Auction and the 2019/2020 RPM First Incremental Auction were conducted in the third quarter of 2017.

On June 9, 2015, FERC accepted changes to the PJM capacity market rules proposed in PJM's Capacity Performance (CP) filing.⁸ For a transition period during the 2018/2019 and 2019/2020 Delivery Years, PJM will procure two product types, Capacity Performance and Base Capacity. PJM also procured Capacity Performance resources in two transition auctions for the 2016/2017 and 2017/2018 Delivery Years. Effective with the 2020/2021 Delivery Year, PJM will procure a single capacity product, Capacity Performance. CP Resources are expected to be available and capable of providing energy and reserves when needed at any time during the Delivery Year.⁹ Effective for the 2018/2019 through the 2019/2020 Delivery Years, a Base Capacity Demand Resource Constraint and a Base Capacity Resource Constraint are established for each modeled LDA. These maximum quantities are set for reliability purpose to limit the quantity procured of the less available products, including Base Capacity Generation Resources, Base Capacity Demand Resources, and Base Capacity Energy Efficiency Resources. The Capacity Performance (CP) Transition Incremental Auctions (IAs) were held as part of a five year transition to a single capacity product type in the 2020/2021 Delivery Year. Participation in the CP Transition IAs was voluntary. If a resource cleared a CP Transition IA and had a prior commitment for the relevant Delivery Year, the existing commitment was converted to a CP commitment, which is subject to the CP performance requirements and nonperformance charges. The Transition IAs were not designed to minimize the cost of purchasing Capacity

⁶ See Letter Order, FERC Docket No. ER10-366-000 (January 22, 2010).

⁷ See 126 FERC ¶ 61,275 (2009) at P 88.

⁸ See 151 FERC ¶ 61,208 (2015).

⁹ See PJM "Manual 18: PJM Capacity Market," Rev. 38 (July 27, 2017) at 9.

Performance resources for the two delivery years and were not designed to maximize economic welfare for the two delivery years.

RPM prices are locational and may vary depending on transmission constraints.¹⁰ Existing generation capable of qualifying as a capacity resource must be offered into RPM auctions, except for resources owned by entities that elect the fixed resource requirement (FRR) option. Participation by LSEs is mandatory, except for those entities that elect the FRR option. There is an administratively determined demand curve that defines scarcity pricing levels and that, with the supply curve derived from capacity offers, determines market prices in each BRA. RPM rules provide performance incentives for generation, including the requirement to submit generator outage data and the linking of capacity payments to the level of unforced capacity, and the performance incentives have been strengthened significantly under the Capacity Performance modifications to RPM. Under RPM there are explicit market power mitigation rules that define the must offer requirement, that define structural market power based on the marginal cost of capacity, that define offer caps, that define the minimum offer price, and that have flexible criteria for competitive offers by new entrants. Demand Resources and Energy Efficiency Resources may be offered directly into RPM auctions and receive the clearing price without mitigation.

Market Structure

- **PJM Installed Capacity.** During the first nine months of 2017, PJM installed capacity increased 48.5 MW or 0.0 percent, from 182,410.7 MW on January 1 to 182,459.2 MW on September 30. Installed capacity includes net capacity imports and exports and can vary on a daily basis.
- **PJM Installed Capacity by Fuel Type.** Of the total installed capacity on September 30, 2017, 35.7 percent was coal; 36.4 percent was gas; 18.2 percent was nuclear; 3.7 percent was oil; 4.9 percent was hydroelectric; 0.6 percent was wind; 0.4 percent was solid waste; and 0.2 percent was solar.

¹⁰ Transmission constraints are local capacity import capability limitations (low capacity emergency transfer limit (CETL) margin over capacity emergency transfer objective (CETO)) caused by transmission facility limitations, voltage limitations or stability limitations.

- **Market Concentration.** In the 2018/2019 RPM Second Incremental Auction, 35 participants in the RTO passed the three pivotal supplier (TPS) test. In the 2019/2020 RPM First Incremental Auction all participants in the total PJM market as well as the LDA RPM markets failed the three pivotal supplier (TPS) test.¹¹ Offer caps were applied to all sell offers for resources which were subject to mitigation when the Capacity Market Seller did not pass the test, the submitted sell offer exceeded the defined offer cap, and the submitted sell offer, absent mitigation, increased the market clearing price.^{12 13 14}
- **Imports and Exports.** Of the 4,961.8 MW of imports in the 2020/2021 RPM Base Residual Auction, 3,997.2 MW cleared. Of the cleared imports, 1,671.2 MW (41.8 percent) were from MISO.
- **Demand-Side and Energy Efficiency Resources.** Capacity in the RPM load management programs was 10,117.8 MW for June 1, 2017, as a result of cleared capacity for Demand Resources and Energy Efficiency Resources in RPM Auctions for the 2017/2018 Delivery Year (13,793.0 MW) less replacement capacity from sources other than Demand Resources and Energy Efficiency (3,675.2 MW).

Market Conduct

- **2018/2019 RPM Second Incremental Auction.** Of the 68 generation resources that submitted Base Capacity offers, the MMU calculated offer caps for 23 generation resources (33.8 percent), of which 12 (17.6 percent) were based on the technology specific default (proxy) ACR values and 11 (16.2 percent) were unit-specific offer caps. Of the 344 generation resources that submitted Capacity Performance offers, the MMU calculated unit specific offer caps for five generation resources (1.5 percent).

¹¹ There are 27 Locational Deliverability Areas (LDAs) identified to recognize locational constraints as defined in "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region", Schedule 10.1. PJM determines, in advance of each BRA, whether the defined LDAs will be modeled in the given delivery year using the rules defined in OATT Attachment DD § 5.10(a)(ii).

¹² See OATT Attachment DD § 6.5.

¹³ Prior to November 1, 2009, existing DR and EE resources were subject to market power mitigation in RPM Auctions. See 129 FERC ¶ 61,081 at P 30 (2009).

¹⁴ Effective January 31, 2011, the RPM rules related to market power mitigation were changed, including revising the definition for Planned Generation Capacity Resource and creating a new definition for Existing Generation Capacity Resource for purposes of the must-offer requirement and market power mitigation, and treating a proposed increase in the capability of a generation capacity resource the same in terms of mitigation as a Planned Generation Capacity Resource. See 134 FERC ¶ 61,065 (2011).

- **2019/2020 RPM First Incremental Auction.** Of the 81 generation resources that submitted Base Capacity offers, the MMU calculated offer caps for 28 generation resources (34.6 percent), of which 17 (21.0 percent) were based on the technology specific default (proxy) ACR values and 11 (13.6 percent) were unit-specific offer caps. Of the 382 generation resources that submitted Capacity Performance offers, the MMU calculated unit specific offer caps for six generation resources (1.6 percent).

Market Performance

- The 2020/2021 RPM Base Residual Auction was conducted in the first nine months of 2017. The weighted average capacity price for the 2017/2018 Delivery Year is \$141.19 per MW-day, including all RPM Auctions for the 2017/2018 Delivery Year held through the first nine months of 2017. The weighted average capacity price for the 2018/2019 Delivery Year is \$175.58, including all RPM Auctions for the 2018/2019 Delivery Year held through the first nine months of 2017. The weighted average capacity price for the 2019/2020 Delivery Year is \$113.41, including all RPM Auctions for the 2019/2020 Delivery Year held through the first nine months of 2017.
- For the 2016/2017 Delivery Year, RPM annual charges to load are \$7.7 billion.
- The delivery year weighted average capacity price was \$121.84 per MW-day in 2016/2017 and \$141.19 per MW-day in 2017/2018.

Generator Performance

- **Forced Outage Rates.** The average PJM EFORd for the first nine months of 2017 was 6.9 percent, an increase from 6.6 percent for the first nine months of 2016.¹⁵

¹⁵ The generator performance analysis includes all PJM capacity resources for which there are data in the PJM generator availability data systems (GADS) database. This set of capacity resources may include generators in addition to those in the set of generators committed as capacity resources in RPM. Data was downloaded from the PJM GADS database on October 31, 2017. EFORd data presented in state of the market reports may be revised based on data submitted after the publication of the reports as generation owners may submit corrections at any time with permission from PJM GADS administrators.

- **Generator Performance Factors.** The PJM aggregate equivalent availability factor for the first nine months of 2017 was 85.6 percent, an increase from 84.6 percent for the first nine months of 2016.
- **Outages Deemed Outside Management Control (OMC).** In the first nine months of 2017, 2.6 percent of forced outages were classified as OMC outages.

Recommendations¹⁶

The MMU recognizes that PJM has implemented the Capacity Performance Construct to replace some of the existing core market rules and to address fundamental performance incentive issues. The MMU recognizes that the Capacity Performance Construct addresses many of the MMU's recommendations. The MMU's recommendations are based on the existing capacity market rules. The status is reported as adopted if the recommendation was included in FERC's order approving PJM's Capacity Performance filing.¹⁷

Definition of Capacity

- The MMU recommends the enforcement of a consistent definition of capacity resource. The MMU recommends that the requirement to be a physical resource be enforced and enhanced. The requirement to be a physical resource should apply at the time of auctions and should also constitute a commitment to be physical in the relevant Delivery Year. The requirement to be a physical resource should be applied to all resource types, including planned generation, demand resources and imports.^{18 19} (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)
- The MMU recommends that the definition of demand side resources be modified to ensure that such resources be fully substitutable for other generation capacity resources. Both the Limited and the Extended Summer DR products should be eliminated in order to ensure that the DR

product has the same unlimited obligation to provide capacity year round as generation capacity resources. (Priority: High. First reported 2012. Status: Adopted 2015.)

Market Design and Parameters

- The MMU recommends that the test for determining modeled Locational Deliverability Areas (LDAs) in RPM be redefined. A detailed reliability analysis of all at risk units should be included in the redefined model. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that the net revenue calculation used by PJM to calculate the net Cost of New Entry (CONE) VRR parameter reflect the actual flexibility of units in responding to price signals rather than using assumed fixed operating blocks that are not a result of actual unit limitations.^{20 21} The result of reflecting the actual flexibility is higher net revenues, which affect the parameters of the RPM demand curve and market outcomes. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that Energy Efficiency Resources (EE) not be included on the supply side of the capacity market, because PJM's load forecasts now account for future EE, unlike the situation when EE was first added to the capacity market. However, the MMU recommends that the PJM load forecast method should be modified so that EE impacts immediately affect the forecast without the long lag times incorporated in the current forecast method. If EE is not included on the supply side, there is no reason to have an add back mechanism. If EE remains on the supply side, the implementation of the EE add back mechanism should be modified to ensure that market clearing prices are not affected. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that PJM reduce the number of incremental auctions to a single incremental auction held three months prior to the start of the delivery year and reevaluate the triggers for holding conditional incremental auctions. (Priority: Medium. First reported 2013. Modified Q1 2017. Status: Not adopted.)

¹⁶ The MMU has identified serious market design issues with RPM and the MMU has made specific recommendations to address those issues. These recommendations have been made in public reports. See Table 5-2.

¹⁷ 151 FERC ¶ 61,208 (June 9, 2015).

¹⁸ See also Comments of the Independent Market Monitor for PJM, Docket No. ER14-503-000 (December 20, 2013).

¹⁹ See "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf> (December 27, 2016).

²⁰ See PJM Interconnection, LLC, Docket No. ER12-513-000 (December 1, 2011) ("Triennial Review").

²¹ See the 2012 State of the Market Report for PJM, Volume 2, Section 6, Net Revenue.

- The MMU recommends that PJM offer to sell back capacity in incremental auctions only at the BRA clearing price for the relevant delivery year. (Priority: Medium. First reported Q1, 2017. Status: Not adopted.)
- The MMU recommends that the use of the 2.5 percent demand adjustment (Short Term Resource Procurement Target) be terminated immediately. The 2.5 percent should be added back to the overall market demand curve. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends changing the RPM solution method to explicitly incorporate the cost of make whole payments in the objective function. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM clear the capacity market based on nodal capacity resource locations and the characteristics of the transmission system consistent with the actual electrical facts of the grid. The current nested LDA structure used in the capacity market does not adequately represent all the capacity transfers that are feasible among LDAs. Absent a fully nodal capacity market clearing process, the MMU recommends that PJM use a nonnested model for all LDAs and specify a VRR curve for each LDA separately. Each LDA requirement should be met with the capacity resources located within the LDA and exchanges from neighboring LDAs up to the transmission limit. LDAs should price separate if that is the result of the LDA supply curves and the transmission constraints. (Priority: Medium. New recommendation. Status: Not adopted.)

Offer Caps and Offer Floors

- The MMU recommends the extension of the minimum offer price rule (MOPR) to all existing and proposed units in order to protect competition in the capacity market from external subsidies. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that, as part of the MOPR unit specific standard of review, all projects be required to use the same basic modeling assumptions. That is the only way to ensure that projects compete on the

basis of actual costs rather than on the basis of modeling assumptions.²² (Priority: High. First reported 2013. Status: Not adopted.)

- The MMU recommends that modifications to existing resources not be treated as new resources for purposes of market power related offer caps or MOPR offer floors. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the RPM market power mitigation rule be modified to apply offer caps in all cases when the three pivotal supplier test is failed and the sell offer is greater than the offer cap. This will ensure that market power does not result in an increase in make whole payments. (Priority: Medium. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM develop a forward looking estimate for the expected number of Performance Assessment Hours (H) to use in calculating the Non-Performance Charge Rate. The MMU recommends that PJM develop a forward looking estimate for the Balancing Ratio (B) during Performance Assessment Hours to use in calculating the default offer cap. Both H and B parameters should be included in the annual review of planning parameters for the Base Residual Auction. (Priority: High. New recommendation. Status: Not adopted.)

Performance Incentive Requirements of RPM

- The MMU recommends that a unit which is not capable of supplying energy consistent with its day-ahead offer reflect an appropriate outage. (Priority: Medium. First reported 2009. Status: Not adopted. Pending before FERC.)
- The MMU recommends that retroactive replacement capacity transactions not be permitted. (Priority: Medium. First reported 2016. Status: Not adopted.)

²² See 143 FERC ¶ 61,090 (2013) ("We encourage PJM and its stakeholders to consider, for example, whether the unit-specific review process would be more effective if PJM requires the use of common modeling assumptions for establishing unit-specific offer floors while, at the same time, allowing sellers to provide support for objective, individual cost advantages. Moreover, we encourage PJM and its stakeholders to consider these modifications to the unit-specific review process together with possible enhancements to the calculation of Net CONE."); see also, Comments of the Independent Market Monitor for PJM, Docket No. ER13-535-001 (March 25, 2013); Complaint of the Independent Market Monitor for PJM v. Unnamed Participant, Docket No. EL12-63-000 (May 1, 2012); Motion for Clarification of the Independent Market Monitor for PJM, Docket No. ER11-2875-000, et al. (February 17, 2012); Protest of the Independent Market Monitor for PJM, Docket No. ER11-2875-002 (June 2, 2011); Comments of the Independent Market Monitor for PJM, Docket Nos. EL11-20 and ER11-2875 (March 4, 2011).

- The MMU recommends that Generation Capacity Resources be paid on the basis of whether they produce energy when called upon during any of the hours defined as critical. One hundred percent of capacity market revenue should be at risk rather than only fifty percent. (Priority: High. First reported 2012. Status: Adopted 2015.)
- The MMU recommends that PJM eliminate all OMC outages from the calculation of forced outage rates used for any purpose in the PJM Capacity Market. (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that PJM eliminate the broad exception related to lack of gas during the winter period for single-fuel, natural gas-fired units.²³ (Priority: Medium. First reported 2013. Status: Adopted 2015.)
- The MMU recommends that there be an explicit requirement that capacity resource offers in the Day-Ahead Energy Market be competitive, where competitive is defined to be the short run marginal cost of the units. (Priority: Low. First reported 2013. Status: Not adopted.)

Capacity Imports and Exports

- The MMU recommends that all capacity imports be required to be pseudo tied prior to the relevant Delivery Year in order to ensure that imports are as close to full substitutes for internal, physical capacity resources as possible. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends that all capacity imports be required to be deliverable to PJM load prior to the relevant delivery year to ensure that they are as close to full substitutes for internal, physical capacity resources as possible. Pseudo ties alone are not adequate to ensure deliverability. (Priority: High. First reported 2016. Status: Not adopted.)
- The MMU recommends that all costs incurred as a result of a pseudo tied unit be borne by the unit itself and included as appropriate in unit offers in the capacity market. (Priority: High. First reported 2016. Status: Not adopted.)

- The MMU recommends that all capacity imports have firm transmission to the PJM border prior to offering in an RPM auction. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends that all resources importing capacity into PJM accept a must offer requirement. (Priority: High. First reported 2014. Status: Adopted 2015.)
- The MMU recommends clear, explicit and detailed rules that define the conditions under which PJM will and will not recall energy from PJM capacity resources and prohibit new energy exports from PJM capacity resources. The MMU recommends that those rules define the conditions under which PJM will purchase emergency energy while at the same time not recalling energy exports from PJM capacity resources. PJM has modified these rules, but the rules need additional clarification and operational details. (Priority: Low. First reported 2010. Status: Partially adopted.)

Deactivations/Retirements

- The MMU recommends that the notification requirement for deactivations be extended from 90 days prior to the date of deactivation to 12 months prior to the date of deactivation and that PJM and the MMU be provided 60 days rather than 30 days to complete their reliability and market power analyses. (Priority: Low. First reported 2012. Status: Partially adopted.)
- The MMU recommends that RMR units recover all and only the incremental costs, including incremental investment costs, required by the RMR service that the unit owner would not have incurred if the unit owner had deactivated its unit as it proposed. Generation owners should bear all other costs. Customers should bear no responsibility for paying previously incurred costs, including a return on or of prior investments. (Priority: Low. First reported 2010. Status: Not adopted.)

²³ See OATT Attachment DD § 10(e). For more on this issue and related incentive issues, see the MMU's White Paper included in: Monitoring Analytics, LLC and PJM Interconnection, LLC, joint report, "Capacity in the PJM Market," (August 20, 2012). <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_And_PJM_Capacity_White_Papers_On_OPSI_Issues_20120820.pdf>.

Conclusion

The analysis of PJM Capacity Markets begins with market structure, which provides the framework for the actual behavior or conduct of market participants. The analysis examines participant behavior within that market structure. In a competitive market structure, market participants are constrained to behave competitively. The analysis examines market performance, measured by price and the relationship between price and marginal cost, that results from the interaction of market structure and participant behavior.

The MMU found serious market structure issues, measured by the three pivotal supplier test results in the PJM Capacity Market in the first nine months of 2017. Explicit market power mitigation rules in the RPM construct offset the underlying market structure issues in the PJM Capacity Market under RPM. The exception was that some seasonal resources were paid additional make whole based on a failure of the market power rules to apply offer capping. The PJM capacity market results were competitive in the first nine months of 2017.

The MMU has identified serious market design issues with RPM and the MMU has made specific recommendations to address those issues.^{24 25 26 27 28} In 2016 and 2017, the MMU prepared a number of RPM-related reports and testimony, shown in Table 5-2. The capacity performance modifications to the RPM construct have significantly improved the capacity market and addressed many of the issues identified by the MMU. The MMU will publish more detailed reports on the CP Auctions which include more specific issues and suggestions for improvements.

The issue of external subsidies emerged more fully in 2017. The subsidies are not part of the PJM market design but nonetheless threaten the foundations

²⁴ See "Analysis of the 2016/2017 RPM Base Residual Auction," <http://www.monitoringanalytics.com/reports/Reports/2014/IMM_Analysis_of_the_20162017_RPM_Base_Residual_Auction_20140418.pdf> (April 18, 2014).

²⁵ See "Analysis of the 2017/2018 RPM Base Residual Auction," <http://www.monitoringanalytics.com/reports/Reports/2014/IMM_Analysis_of_the_2017_2018_RPM_Base_Residual_Auction_20141006.pdf> (October 6, 2014).

²⁶ See "Analysis of the 2018/2019 RPM Base Residual Auction Revised," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20182019_RPM_Base_Residual_Auction_20160706.pdf> (July 6, 2016).

²⁷ See "Analysis of the 2019/2020 RPM Base Residual Auction Revised," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20192020_RPM_BRA_20160831-Revised.pdf> (August 31, 2016).

²⁸ See "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf> (December 27, 2016).

of the PJM capacity market as well as the competitiveness of PJM markets overall.

The Ohio subsidy proceedings and the Illinois ZEC subsidy proceeding and the request in Pennsylvania to subsidize the TMI nuclear power plant and the DOE NOPR, all originate from the fact that competitive markets result in the exit of uneconomic and uncompetitive generating units. Regardless of the specific rationales offered by unit owners, the proposed solution for all such generating units has been to provide out of market subsidies in order to retain such units. The proposed solution in all cases ignores the opportunity cost of subsidizing uneconomic units, which is the displacement of new resources and technologies that would otherwise be economic. These subsidies are not accurately characterized as state subsidies. These subsidies were all requested by the owners of specific uneconomic generating units in order to improve the profitability of those specific units. These subsidies were not requested to accomplish broader social goals. Broader social goals can all be met with market-based mechanisms available to all market participants on a competitive basis and without discrimination.

Subsidies are contagious. Competition in the markets could be replaced by competition to receive subsidies. Similar threats to competitive markets are being discussed by unit owners in other states and the potentially precedential nature of these actions enhances the urgency of creating an effective rule to maintain competitive markets by modifying market rules to address these subsidies. Fortunately, this can be accomplished quickly by expanding the coverage of an existing rule that already reflects stakeholder compromises.

PJM markets have no protection against this emergent threat. Accurate signals for entry and exit are necessary for well functioning and competitive markets. Competitive investors rely on accurate signals to make decisions. The current MOPR only addresses subsidies for new entry. The current subsidies demonstrate that the markets need protection against subsidized, noncompetitive offers from existing as well as new resources. The MOPR should be expanded (MOPR-Ex) to address subsidies for existing units, and this should be done expeditiously. This issue will not become moot unless

and until the MOPR is reformed. Action is needed to correct the MOPR immediately. An existing unit MOPR is the best means to defend the PJM markets from the threat posed by subsidies intended to forestall retirement of financially distressed assets. The role of subsidies to renewables should also be clearly defined and be incorporated in this rule.

While the existing unit MOPR would protect markets in the short run, the underlying issues that have resulted in the pressure on markets should also be examined. Unit owners are seeking subsidies because gas prices are low resulting in low energy market margins and because flaws in the PJM capacity design have led to very substantial price suppression over the past 10 years.

To the extent that there are shared broader goals related to PJM markets, they should also be addressed, but this can happen with a slightly longer lead time. If a shared goal is to reduce carbon output, a price on carbon is the market based solution. If a shared goal is increased renewables in addition to their carbon attributes, a common approach to RECs would be a market based solution. Fuel diversity has also been mentioned as an issue. Current fuel diversity is higher than ever in PJM. If there is an issue, the real issue is fuel security and not fuel diversity. Significant reliance on specific fuels, including nuclear, coal and gas means that markets are at risk from a significant disruption in any one fuel. If fuel security for gas is a concern, a number of issues should be considered including the reliability of the pipelines, the compatibility of the gas pipeline and the merchant generator business models, the degree to which electric generators have truly firm gas service and the need for a gas RTO to help ensure reliability.

As a result of the fact that demand side resources have contributed to price suppression in PJM capacity markets, the place of demand side in PJM should be reexamined. There are ways to ensure and enhance the vibrancy of demand side without negatively affecting markets for generation. There are other price formation issues in the capacity market that should also be examined and addressed.

Table 5-2 RPM related MMU reports, January 2016 through September 2017

Date	Name
January 13, 2016	IMM Response re Capacity Performance Docket No. ER15-623-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Response_ER15-623-000_20160113.pdf
February 1, 2016	IMM Post-Hearing Brief re AEP Ohio Case Nos. 14-1693 EL-RDR and 14-1694 EL-AAM http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Post_Hearing_Brief_Case_No_14-1693_and_14-1694_20160201.pdf
February 8, 2016	IMM Post-Hearing Reply Brief re AEP Ohio Case Nos. 14-1693-EL-RDR and 14-1694-EL-AAM http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Post_Hearing_Reply_Brief_Case_No_14-1693-14-1694_20160208.pdf
February 11, 2016	PJM IMM Joint Statement re Capacity Performance Docket Nos. ER15-623-000, -004 and EL15-29-000, and -003 http://www.monitoringanalytics.com/reports/Reports/2016/PJM_IMM_Joint_Statement_Docket_Nos_ER15-623-000_004_EL15-29-000_003_20160211.pdf
February 16, 2016	IMM Post-Hearing Brief re FE Ohio Case No. 14-1297-EL-SSO http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Post_Hearing_Brief_Case_No_14-1297_20160216.pdf
February 24, 2016	IMM Comments re DR CBL Testing http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Comments_Docket_Nos_ER16-873_20160223.pdf
February 25, 2016	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2016/2017, 2017/2018 and 2018/2019 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Must_Offer_Obligation_20160225.pdf
February 26, 2016	IMM Post-Hearing Reply Brief re FE Ohio Case No. 14-1297-EL-SSO http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Post_Hearing_Reply_Brief_Case_No_14-1297-EL-SSO_20160226.pdf
March 22, 2016	IMM Answer re DR CBL Docket No. ER16-873-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Answer_Docket_No_ER16-873-000_20160322.pdf
March 28, 2016	IMM Motion for Clarification or Rehearing re Net Revenue Docket No. EL14-94-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Request_for_Rehearing_EL14-94-000_20160328.pdf
April 11, 2016	IMM Comments re Calpine MOPR Complaint Docket No. EL16-49-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Comments_Docket_No_EL16-49-000_20160411.pdf
April 22, 2016	IMM Comments re Ramp Rate Capacity Performance Docket No. ER16-1336-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Comments_Docket_No_ER16-1336_20160422.pdf
April 28, 2016	IMM Answer re Calpine Complaint Docket No. EL16-49-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Answer_Docket_No_EL16-49-000_20160428.pdf
May 4, 2016	New Generation in the PJM Capacity Market: MW and Funding Sources for Delivery Years 2007/2008 through 2018/2019 http://www.monitoringanalytics.com/reports/Reports/2016/New_Generation_in_the_PJM_Capacity_Market_20160504.pdf
May 9, 2016	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2017/2018, 2018/2019 and 2019/2020 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Material/RPM_Must_Offer_Obligation_20160509.pdf
May 11, 2016	IMM Answer re Capacity Performance PAH Ramp Rate Docket No. ER16-1336-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Answer_Docket_No_ER16-1336-000_20160511.pdf
June 13, 2016	IMM Answer and Motion for Leave to Answer re Calpine MOPR Complaint Docket No. EL16-49-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Answer_Docket_No_EL16-49-000_20160613.pdf
June 24, 2016	IMM Answer to IMEA RFR Docket No. ER15-623-010, EL15-29-006 and EL15-41-002 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Answer_Docket_Nos_ER15-623-010_EL15-29-006_EL15-41-002_20160624.pdf
July 6, 2016	Analysis of the 2018/2019 RPM Base Residual Auction Revised http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20182019_RPM_Base_Residual_Auction_20160706.pdf
July 7, 2016	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2017/2018, 2018/2019 and 2019/2020 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Must_Offer_Obligation_20160707.pdf
July 13, 2016	New Generation in the PJM Capacity Market: MW and Funding Sources for Delivery Years 2007/2008 through 2018/2019 ppt http://www.monitoringanalytics.com/reports/Presentations/2016/IMM_MIC_New_Generation_in_the_PJM_Capacity_Market_for_Delivery_Years_20072008_through_20182019_PPT_20160706.pdf
July 13, 2016	New Generation in the PJM Capacity Market: MW and Funding Sources for Delivery Years 2007/2008 through 2018/2019 http://www.monitoringanalytics.com/reports/Presentations/2016/IMM_MIC_New_Generation_in_the_PJM_Capacity_Market_for_Delivery_Years_20072008_through_20182019_20160706.pdf
August 26, 2016	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2017/2018, 2018/2019 and 2019/2020 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Must_Offer_Obligations_20160826.pdf
August 31, 2016	Analysis of the 2019/2020 RPM Base Residual Auction http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20192020_RPM_BRA_20160831-Revised.pdf
September 14, 2016	Capacity Release Proposal http://www.monitoringanalytics.com/reports/Presentations/2016/IMM_MIC_Capacity_Release_Proposal_20160914.pdf
November 22, 2016	IMM Complaint re Manual 18 Revisions Docket No. EL17-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Complaint_Docket_No_EL17-000_20161122.pdf
December 8, 2016	IMM Comments re CP Aggregate Rules Docket No. ER17-367-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Comments_Docket_No_ER17-367-000_20161208.pdf
December 22, 2016	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2017/2018, 2018/2019 and 2019/2020 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Must_Offer_Obligations_20161222.pdf
December 22, 2016	IMM Notice of Withdrawal re PJM Manual 18 Complaint Docket No. EL17-23-000 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Notice_of_Withdrawal_Docket_No_EL17-23_20161222.pdf
December 27, 2016	IMM Analysis of Replacement Capacity for RPM Commitments: June 01, 2007 to June 01, 2016 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf
December 30, 2016	IMM Motion to Lodge and for Commencement of Compliance Process re RPM Revisions Docket No. ER14-1461-000, -001 http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Motion_to_Lodge_Docket_No_ER14-1461_20161230.pdf

Table 5-2 RPM related MMU reports, January 2016 through September 2017 (continued)

Date	Name
January 11, 2017	Replacement Capacity http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_MIC_Replacement_Capacity_Report_20170111.pdf
January 24, 2017	Summary of BRA Analysis Results: 2013/2014 - 2019/2020 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_BRA_Scenario_Results_Summary_20170124.pdf
January 30, 2017	IMM Answer re Amended Calpine MOPR Complaint Docket No. EL16-49-000 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_Answer_Docket_No_EL16-49_20170130.pdf
February 13, 2017	IMM Answer re Base Capacity Complaint Docket Nos. EL17-32 and EL17-36 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_Answer_Docket_Nos_EL17-32_EL17-36_20170213.pdf
February 24, 2017	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2017/2018, 2018/2019 and 2019/2020 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/Messages/RPM_Must_Offer_Obligation_20170224.pdf
March 1, 2017	Incremental Auction Review http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_IASTF_Incremental_Auction_Review_20170301.pdf
May 11, 2017	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2018/2019, 2019/2020 and 2020/2021 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/RPM_Material/RPM_Must_Offer_Obligation_20170509.pdf
June 27, 2017	MMU Incremental Auction Recommendation - Package B http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_IASTF_MMU_Package_B_Summary_20170627.pdf
June 27, 2017	Replacement Capacity Issues http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_IASTF_Replacement_Capacity_Issues_20170627.pdf
August 30, 2017	IMM Answer re IMM MOPR Exemption Complaint Docket No. EL17-82 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_Answer_Docket_No_EL17-82_20170830.pdf
August 30, 2017	Incremental Auction Design Changes, Package B http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_IASTF_Package_B_Executive_Summary_20170830.pdf
September 5, 2017	IMM Comments re PJM Deficiency Letter Compliance Docket No. ER17-775-002 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_Comments_Docket_No_ER17-775-002_20170905.pdf
September 8, 2017	Generation Capacity Resources in PJM Region Subject to RPM Must Offer Obligation for 2018/2019, 2019/2020 and 2020/2021 Delivery Years http://www.monitoringanalytics.com/reports/Market_Messages/RPM_Material/RPM_Must_Offer_Obligation_20170509.pdf
September 11, 2017	IMM CAPPSTF Proposal http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_CAPPSTF_Proposal_20170911.pdf
September 12, 2017	IMM Answer re Pleasants Transfer Docket No. EC17-88 http://www.monitoringanalytics.com/reports/Reports/2017/IMM_Answer_Docket_No_EC17-88_20170912.pdf
October 17, 2017	Revised IMM MOPR-Ex Proposal for CAPPSTF http://www.monitoringanalytics.com/reports/Presentations/2017/IMM_Letter_CAPPSTF_IM_%20Proposal_Summary_Revised_20171017.pdf

Installed Capacity

On January 1, 2017, PJM installed capacity was 182,410.7 MW (Table 5-3).²⁹ Over the next nine months, new generation, unit deactivations, facility reratings, plus import and export shifts resulted in PJM installed capacity of 182,459.2 MW on September 30, 2017, an increase of 48.5 MW or 0.0 percent from the January 1 level.^{30 31} The 48.5 MW increase was the result of capacity modifications (595.8 MW) and new or reactivated generation (3,099.9 MW), offset by deactivations (2,017.7 MW), derates (507.9 MW), an increase in exports (450.5 MW), and a decrease in imports (671.1 MW).

At the beginning of the new delivery year on June 1, 2017, PJM installed capacity was 183,099.2 MW, a decrease of 386.8 MW or 0.2 percent from the May 31 level.

Figure 5-1 shows the share of installed capacity by fuel source for the first day of each delivery year, from June 1, 2007, to June 1, 2017, as well as the expected installed capacity for the next three delivery years, based on the results of all auctions held through September 30, 2017.³² On June 1, 2007, coal comprised 40.7 percent of the installed capacity, reached a maximum of 42.9 percent in 2012, decreased to 35.9 percent on June 1, 2017 and is projected to decrease to 26.7 percent by June 1, 2020. The share of gas increased from 29.1 percent in 2007 to 36.3 percent in 2017 and is projected to increase to 47.9 percent in 2020.

²⁹ Percent values shown in Table 5-3 are based on unrounded, underlying data and may differ from calculations based on the rounded values in the tables.

³⁰ Unless otherwise specified, the capacity described in this section is the summer installed capacity rating of all PJM generation capacity resources, as entered into the eRPM system, regardless of whether the capacity cleared in the RPM Auctions.

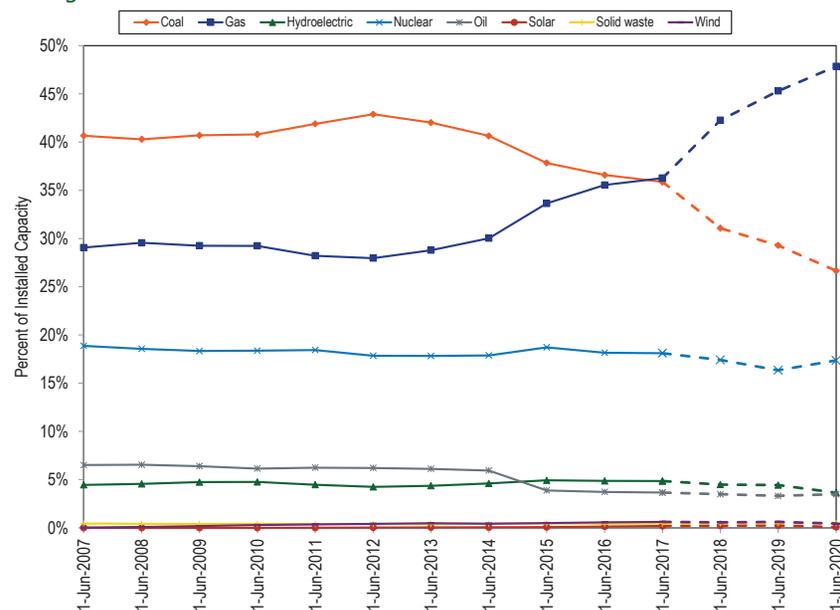
³¹ Wind resources accounted for 1,112.7 MW, and solar resources accounted for 373.2 MW of installed capacity in PJM on September 30, 2017. PJM administratively reduces the capabilities of all wind generators to 13 percent and solar generators to 38 percent of nameplate capacity when determining the installed capacity because wind and solar resources cannot be assumed to be available on peak and cannot respond to dispatch requests. As data become available, unforced capability of wind and solar resources will be calculated using actual data. There are additional wind and solar resources not reflected in total capacity because they are energy only resources and do not participate in the PJM Capacity Market. See "PJM Manual 21: Rules and Procedures for Determination of Generating Capability," Revision 12 (January 1, 2017) at 19.

³² Due to EFORd values not being finalized for future delivery years, the projected installed capacity is based on cleared unforced capacity (UCAP) MW using the EFORd submitted with the offer.

Table 5-3 PJM installed capacity (By fuel source): January 1, May 31, June 1, and September 30, 2017

	1-Jan-17		31-May-17		1-Jun-17		30-Sep-17	
	MW	Percent	MW	Percent	MW	Percent	MW	Percent
Coal	66,622.2	36.5%	66,941.3	36.5%	65,688.0	35.9%	65,111.0	35.7%
Gas	65,110.3	35.7%	65,787.1	35.9%	66,397.6	36.3%	66,335.9	36.4%
Hydroelectric	8,850.4	4.9%	8,850.4	4.8%	8,870.2	4.8%	8,870.2	4.9%
Nuclear	33,043.4	18.1%	33,103.7	18.0%	33,163.5	18.1%	33,163.5	18.2%
Oil	6,733.6	3.7%	6,687.0	3.6%	6,684.4	3.7%	6,683.3	3.7%
Solar	262.3	0.1%	268.0	0.1%	366.8	0.2%	373.2	0.2%
Solid waste	769.4	0.4%	769.4	0.4%	814.4	0.4%	809.4	0.4%
Wind	1,019.1	0.6%	1,079.1	0.6%	1,114.3	0.6%	1,112.7	0.6%
Total	182,410.7	100.0%	183,486.0	100.0%	183,099.2	100.0%	182,459.2	100.0%

Figure 5-1 Percent of PJM installed capacity (By fuel source): June 1, 2007 through June 1, 2020



Fuel Diversity

Figure 5-2 shows the fuel diversity index (FDI_c) for PJM installed capacity.³³ The FDI_c is defined as $1 - \sum_{i=1}^N s_i^2$, where s_i is the percent share of fuel type i . The minimum possible value for the FDI_c is zero, corresponding to all capacity from a single fuel type. The maximum possible value for the FDI_c is achieved when each fuel type has an equal share of capacity. For a capacity mix of eight fuel types, the maximum achievable index is 0.875. The fuel type categories used in the calculation of the FDI_c are the eight fuel sources in Table 5-3. The FDI_c is stable and does not exhibit any long-term trends. The only significant deviation occurred with the expansion of the PJM footprint. On April 1, 2002, PJM expanded with the addition of Allegheny Power System, which added about 12,000 MW of generation.³⁴ The reduction in the FDI_c resulted from an increase in coal capacity resources. A similar but more significant reduction occurred in 2004 with the expansion into the ComEd, AEP, and Dayton Power & Light control zones.³⁵ The FDI_c decreased on average 0.2 percent from the first nine months of 2016 to the first nine months of 2017. The decrease in FDI_c was a result of an increase in the capacity share of gas generators and corresponding small reductions in the share of coal, nuclear, hydroelectric, and oil. Figure 5-2 also includes the expected FDI_c through June 2020 based on the clearing of RPM auctions. The expected FDI_c is indicated in Figure 5-2 by the dashed orange line.

The FDI_c was used to measure the impact of potential retirements of resources that the MMU has identified as being at risk of retirement.³⁶ There were 96 resources with installed capacity totaling 14,500 MW identified as being at risk. The dashed green line in Figure 5-2 shows the FDI_c calculated assuming that the capacity from these 96 resources is replaced by gas generation. The FDI_c under these assumptions would decrease by 0.018 (2.6 percent) on average from the expected FDI_c for the period October 1, 2017, through June 1, 2020.

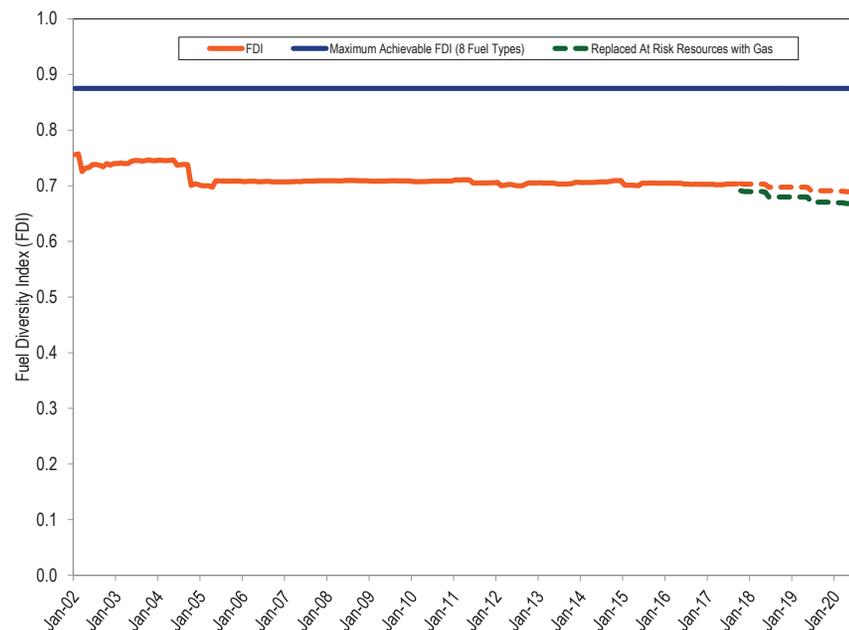
³³ Monitoring Analytics developed the FDI to provide an objective metric of fuel diversity. The FDI metric is similar to the HHI used to measure market concentration. The FDI is calculated separately for energy output and for installed capacity.

³⁴ On April 1, 2002, the PJM Region expanded with the addition of Allegheny Power System under a set of agreements known as "PJM-West." See page 4 in the *2002 State of the Market Report for PJM* for additional details.

³⁵ See the *2016 State of the Market Report for PJM*, Volume 2, Appendix A, "PJM Geography" for an explanation of the expansion of the PJM footprint. The integration of the ComEd Control Area occurred in May 2004 and the integration of the AEP and Dayton control zones occurred in October 2004.

³⁶ See the *2016 State of the Market Report for PJM*, Volume 2, Section 7, Units at Risk.

Figure 5-2 Fuel Diversity Index for PJM installed capacity: January 1, 2002 through June 1, 2020



RPM Capacity Market

The RPM Capacity Market, implemented June 1, 2007, is a forward-looking, annual, locational market, with a must-offer requirement for Existing Generation Capacity Resources and mandatory participation by load, with performance incentives, that includes clear market power mitigation rules and that permits the direct participation of demand-side resources.

Annual base auctions are held in May for Delivery Years that are three years in the future. Effective January 31, 2010, First, Second, and Third Incremental Auctions are conducted 20, 10, and three months prior to the Delivery Year.³⁷ In the third quarter of 2017, the 2018/2019 RPM Second Incremental Auction and the 2019/2020 RPM First Incremental Auction were conducted.

Market Structure

Supply

Table 5-4 shows generation capacity changes since the implementation of the Reliability Pricing Model through the 2016/2017 Delivery Year. The 19,439.8 MW increase was the result of new generation capacity resources (17,822.7 MW), reactivated generation capacity resources (967.0 MW), uprates (6,100.1 MW), integration of external zones (18,109.0 MW), a net increase in capacity imports (4,987.5 MW), a net decrease in capacity exports (2,298.3 MW), offset by deactivations (27,608.0 MW) and derates (3,236.8 MW).

³⁷ See PJM Interconnection, LLC, Letter Order in Docket No. ER10-366-000 (January 22, 2010).

Table 5-4 Generation capacity changes: 2007/2008 to 2017/2018

	ICAP (MW)									
	Total at June 1	New	Reactivations	Uprates	Integration	Net Change in Capacity Imports	Net Change in Capacity Exports	Deactivations	Derates	Net Change
2007/2008	163,659.4	372.8	156.8	1,238.1	0.0	(96.7)	143.9	389.5	617.8	519.8
2008/2009	164,179.2	812.9	6.3	1,108.9	0.0	871.1	(1,702.9)	615.0	612.4	3,274.7
2009/2010	167,453.9	188.1	13.0	370.4	0.0	68.6	735.9	472.4	171.2	(739.4)
2010/2011	166,714.5	1,751.2	16.0	587.3	11,821.6	187.2	(427.0)	1,439.2	286.9	13,064.2
2011/2012	179,778.7	3,095.0	138.0	553.8	3,607.4	262.7	(1,374.5)	2,758.5	313.0	5,959.9
2012/2013	185,738.6	266.4	79.0	364.5	2,680.0	841.8	(17.3)	4,152.1	267.6	(170.7)
2013/2014	185,567.9	264.7	20.9	397.9	0.0	2,217.2	21.6	4,027.7	421.9	(1,570.5)
2014/2015	183,997.4	3,036.0	0.0	480.4	0.0	859.1	73.3	11,442.9	221.0	(7,361.7)
2015/2016	176,635.7	5,497.8	0.0	409.0	0.0	787.6	285.1	863.4	156.4	5,389.5
2016/2017	182,025.2	2,537.8	537.0	589.8	0.0	(1,011.1)	(36.4)	1,447.3	168.6	1,074.0
2017/2018	183,099.2									
Total		17,822.7	967.0	6,100.1	18,109.0	4,987.5	(2,298.3)	27,608.0	3,236.8	19,439.8

Demand

The MMU analyzed market sectors in the PJM Capacity Market to determine how they met their load obligations. The PJM Capacity Market was divided into the following sectors:

- **PJM EDC.** EDCs with a franchise service territory within the PJM footprint. This sector includes traditional utilities, electric cooperatives, municipalities and power agencies.
- **PJM EDC Generating Affiliate.** Affiliate companies of PJM EDCs that own generating resources.
- **PJM EDC Marketing Affiliate.** Affiliate companies of PJM EDCs that sell power and have load obligations in PJM, but do not own generating resources.
- **Non-PJM EDC.** EDCs with franchise service territories outside the PJM footprint.
- **Non-PJM EDC Generating Affiliate.** Affiliate companies of non-PJM EDCs that own generating resources.

- **Non-PJM EDC Marketing Affiliate.** Affiliate companies of non-PJM EDCs that sell power and have load obligations in PJM, but do not own generating resources.
- **Non-EDC Generating Affiliate.** Affiliate companies of non-EDCs that own generating resources.
- **Non-EDC Marketing Affiliate.** Affiliate companies of non-EDCs that sell power and have load obligations in PJM, but do not own generating resources.

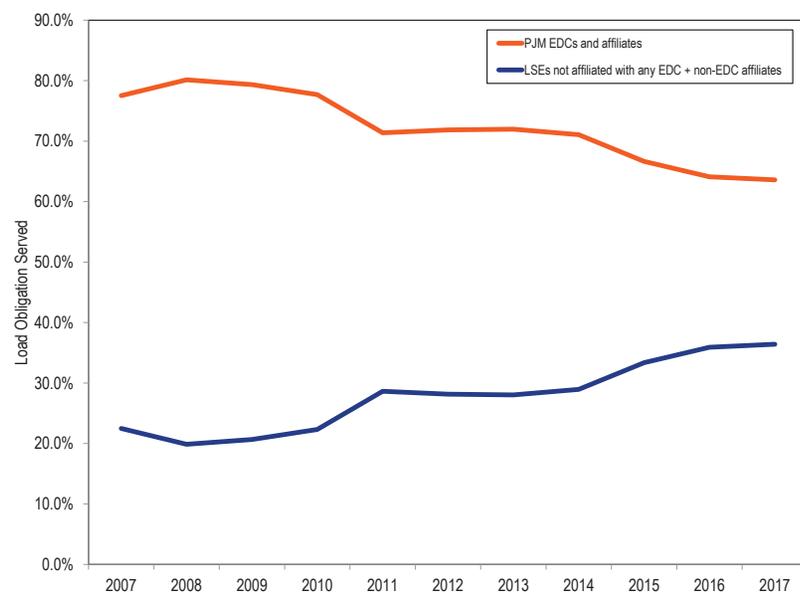
On June 1, 2017 PJM EDCs and their affiliates maintained a large market share of load obligations under RPM, together totaling 63.6 percent (Table 5-5), down from 64.1 percent on June 1, 2016. The combined market share of LSEs not affiliated with any EDC and of non-PJM EDC affiliates was 36.4 percent, up from 35.9 percent on June 1, 2016. The share of capacity market load obligation fulfilled by PJM EDCs and their affiliates, and LSEs not affiliated with any EDC and non-PJM EDC affiliates from June 1, 2007 to June 1, 2016 is shown in Figure 5-3. PJM EDCs' and their affiliates' share of load obligation has decreased from 77.5 percent on June 1, 2007, to 63.6 percent on June 1,

2017. The share of load obligation held by LSEs not affiliated with any EDC and non-PJM EDC affiliates increased from 22.5 percent on June 1, 2007, to 36.4 percent on June 1, 2017. Prior to the 2012/2013 Delivery Year, obligation was defined as cleared and make whole MW in the Base Residual Auction and the Second Incremental Auction plus ILR forecast obligations. Effective with the 2012/2013 Delivery Year, obligation is defined as the sum of the unforced capacity obligations satisfied through all RPM auctions for the delivery year.

Table 5-5 Capacity market load obligation served: June 1, 2017

	Obligation (MW)							Total
	PJM EDCs	PJM EDC Generating Affiliates	PJM EDC Marketing Affiliates	Non-PJM EDC Generating Affiliates	Non-PJM EDC Marketing Affiliates	Non-EDC Generating Affiliates	Non-EDC Marketing Affiliates	
Obligation	62,326.1	19,471.6	27,584.8	6,093.0	19,408.2	1,016.5	36,127.8	172,028.1
Percent of total obligation	36.2%	11.3%	16.0%	3.5%	11.3%	0.6%	21.0%	100.0%

Figure 5-3 Capacity market load obligation served: June 1, 2007 through June 1, 2017



Capacity Transfer Rights (CTRs)

Capacity Transfer Rights (CTRs) are used to return capacity market congestion revenues to load. Load pays for the transmission system through firm transmission charges and pays for congestion. Capacity market congestion revenues are the difference between the total dollars paid by load for capacity and the total dollars received by capacity market sellers. The MW of CTRs available for allocation to LSEs in an LDA is equal to the Unforced Capacity imported into the LDA, based on the results of the Base Residual Auction and Incremental Auctions, less any MW of CETL paid for directly by market participants in the form of Qualifying Transmission Upgrades (QTUs) cleared in an RPM Auction and Incremental Capacity Transfer Rights (ICTRs). There are two types of ICTRs, those allocated to a New Service Customer obligated to fund a transmission facility or upgrade and those associated with Incremental Rights-Eligible Required Transmission Enhancements.

For LDAs in which the RPM Auctions for a Delivery Year resulted in a positive average weighted Locational Price Adder, an LSE with CTRs corresponding to the LDA is entitled to a payment equal to the Locational Price Adder multiplied by the MW of the LSEs' CTRs.

In the 2020/2021 RPM Base Residual Auction, MAAC had -755.9 MW of CTRs with a total value of -\$2,623,808, EMAAC had 4,748.3 MW of CTRs with a total value of \$176,485,896, ComEd had 1,192.7 MW of CTRs with a total value of \$48,579,473, and DEOK had 2,619.7 MW of CTRs with a total value of \$51,127,157.³⁸ Credits for ICTRs in EMAAC totaled 948 MW with a total value of \$35,235,217. DOEK has 155 MW of ICTRs with a total value of \$3,025,065.

The negative CTRs for MAAC represent capacity that cleared inside of the MAAC to serve load in the Rest of RTO LDA. The import constraint into the MAAC was binding, and the MAAC LDA separated into EMAAC and the portion of MAAC comprised of SWMAAC and the Rest of MAAC. The clearing price

³⁸ A negative value indicates that the amount of capacity cleared in the MAAC LDA exceeded the UCAP obligation for the MAAC LDA.

in the RTO LDA was \$76.53, the clearing price in MAAC was \$86.04, and the clearing price in EMAAC was \$187.87. The portion of MAAC excluding EMAAC was long on cleared capacity relative to the UCAP obligation by 6,440.6 MW. Of the excess capacity, 5,761.4 MW cleared as imports into EMAAC, and the remaining 679.2 MW cleared to serve load outside of MAAC.³⁹ There was also an additional 76.7 MW of grandfathered, outgoing CTRs for MAAC, bringing the total to -755.9 MW of CTRs. The outgoing CTRs are valued at the capacity price difference between MAAC and the RTO, which is negative.

Market Concentration

Auction Market Structure

As shown in Table 5-6, all participants in the total PJM market as well as the LDA RPM markets failed the three pivotal supplier (TPS) test in the 2019/2020 RPM First Incremental Auction.⁴⁰ In the 2018/2019 RPM Second Incremental Auction, 35 participants in the RTO market passed the test. Offer caps were applied to all sell offers for resources which were subject to mitigation when the capacity market seller did not pass the test, the submitted sell offer exceeded the defined offer cap, and the submitted sell offer, absent mitigation, increased the market clearing price.^{41 42 43}

In applying the market structure test, the relevant supply for the RTO market includes all supply offered at less than or equal to 150 percent of the RTO cost-based clearing price. The relevant supply for the constrained LDA markets includes the incremental supply inside the constrained LDAs which was offered at a price higher than the unconstrained clearing price for the parent LDA market and less than or equal to 150 percent of the cost-based clearing price for the constrained LDA. The relevant demand consists of the MW needed inside the LDA to relieve the constraint.

Table 5-6 presents the results of the TPS test. A generation owner or owners are pivotal if the capacity of the owners' generation facilities is needed to meet the demand for capacity. The results of the TPS are measured by the residual supply index (RSIx). The RSIx is a general measure that can be used with any number of pivotal suppliers. The subscript denotes the number of pivotal suppliers included in the test. If the RSIx is less than or equal to 1.0, the supply owned by the specific generation owner, or owners, is needed to meet market demand and the generation owners are pivotal suppliers with a significant ability to influence market prices. If the RSIx is greater than 1.0, the supply of the specific generation owner or owners is not needed to meet market demand and those generation owners have a reduced ability to unilaterally influence market price.

³⁹ The negative CTRs result in part from the nested LDA solution approach used by PJM.

⁴⁰ The market definition used for the TPS test includes all offers with costs less than or equal to 1.50 times the clearing price. See *MMU Technical Reference for PJM Markets*, at "Three Pivotal Supplier Test" for additional discussion.

⁴¹ See OATT Attachment DD § 6.5.

⁴² Prior to November 1, 2009, existing DR and EE resources were subject to market power mitigation in RPM Auctions. See 129 FERC ¶ 61,081 at P 30 (2009).

⁴³ Effective January 31, 2011, the RPM rules related to market power mitigation were changed, including revising the definition for Planned Generation Capacity Resource and creating a new definition for Existing Generation Capacity Resource for purposes of the must-offer requirement and market power mitigation, and treating a proposed increase in the capability of a Generation Capacity Resource the same in terms of mitigation as a Planned Generation Capacity Resource. See 134 FERC ¶ 61,065 (2011).

Table 5-6 RSI results: 2017/2018 through 2020/2021 RPM Auctions⁴⁴

RPM Markets	RSI _{1.05}	RSI ₃	Total Participants	Failed RSI ₃ Participants
2017/2018 Base Residual Auction				
RTO	0.80	0.61	119	119
PSEG	0.00	0.00	1	1
2017/2018 First Incremental Auction				
RTO	0.47	0.40	38	38
PSEG	0.00	0.00	1	1
2017/2018 Second Incremental Auction				
RTO	0.65	0.32	30	30
PSEG	0.00	0.00	0	0
PSEG North	0.00	0.00	0	0
2017/2018 Third Incremental Auction				
RTO	0.70	0.42	63	63
PSEG	0.00	0.00	0	0
2018/2019 Base Residual Auction				
RTO	0.81	0.65	125	125
EMAAC	0.59	0.16	12	12
ComEd	1.11	0.02	4	4
2018/2019 First Incremental Auction				
RTO	0.51	0.23	32	32
EMAAC	-0.00	0.00	2	2
ComEd	0.00	0.00	1	1
2018/2019 Second Incremental Auction				
RTO	0.64	0.87	44	9
EMAAC	0.25	0.06	5	5
2019/2020 Base Residual Auction				
RTO	0.81	0.66	131	131
EMAAC	0.79	0.23	6	6
ComEd	0.74	0.12	6	6
BGE	0.00	0.00	1	1
2019/2020 First Incremental Auction				
RTO	0.63	0.50	53	53
EMAAC	0.00	0.00	5	5
2020/2021 Base Residual Auction				
RTO	0.81	0.69	119	119
MAAC	0.67	0.77	24	24
EMAAC	0.45	0.18	21	21
ComEd	0.47	0.20	14	14
DEOK	0.00	0.00	1	1

44 The RSI shown is the lowest RSI in the market.

Locational Deliverability Areas (LDAs)

Under the PJM Tariff, PJM determines, in advance of each BRA, whether defined Locational Deliverability Areas (LDAs) will be modeled in the auction. Effective with the 2012/2013 Delivery Year, an LDA is modeled as a potentially constrained LDA for a Delivery Year if the Capacity Emergency Transfer Limit (CETL) is less than 1.15 times the Capacity Emergency Transfer Objective (CETO), such LDA had a locational price adder in one or more of the three immediately preceding BRAs, or such LDA is determined by PJM in a preliminary analysis to be likely to have a locational price adder based on historic offer price levels. The rules also provide that starting with the 2012/2013 Delivery Year, EMAAC, SWMAAC, and MAAC LDAs are modeled as potentially constrained LDAs regardless of the results of the above three tests.⁴⁵ In addition, PJM may establish a constrained LDA even if it does not qualify under the above tests if PJM finds that “such is required to achieve an acceptable level of reliability.”⁴⁶ A reliability requirement and a Variable Resource Requirement (VRR) curve are established for each modeled LDA. Effective for the 2014/2015 through 2016/2017 Delivery Years, a Minimum Annual and a Minimum Extended Summer Resource Requirement are established for each modeled LDA. Effective for the 2017/2018 Delivery Year, Sub-Annual and Limited Resource Constraints, replacing the Minimum Annual and a Minimum Extended Summer Resource Requirements, are established for each modeled LDA.⁴⁷ Effective for the 2018/2019 through the 2019/2020 Delivery Years, Base Capacity Demand Resource Constraint and a Base Capacity Resource Constraint, replacing the Sub-Annual and Limited Resource Constraints, are established for each modeled LDA.

Locational Deliverability Areas are shown in Figure 5-4, Figure 5-5 and Figure 5-6.

45 Prior to the 2012/2013 Delivery Year, an LDA with a CETL less than 1.05 times CETO was modeled as a constrained LDA in RPM. No additional criteria were used in determining modeled LDAs.

46 OAT Attachment DD § 5.10 (a) (ii).

47 146 FERC ¶ 61,052 (2014).

Figure 5-4 Map of PJM locational deliverability areas

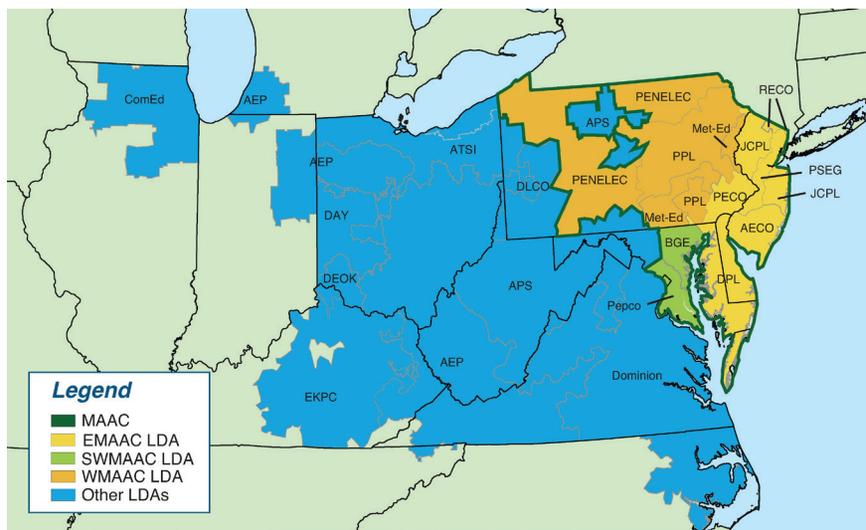


Figure 5-5 Map of PJM RPM EMAAC subzonal LDAs

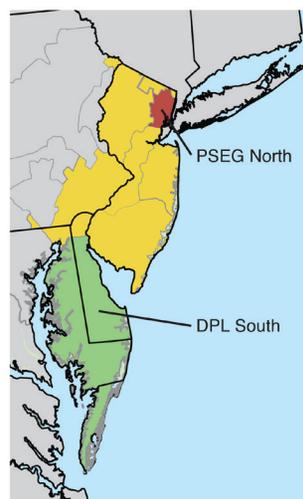
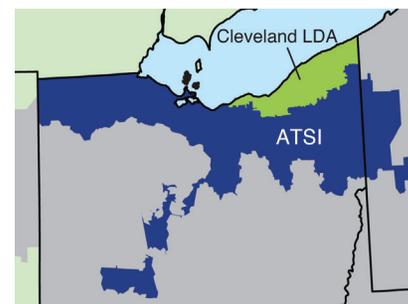


Figure 5-6 Map of PJM RPM ATSI subzonal LDA



Imports and Exports

Units external to the metered boundaries of PJM can qualify as PJM capacity resources if they meet the requirements to be capacity resources. Generators on the PJM system that do not have a commitment to serve PJM loads in the given delivery year as a result of RPM Auctions, FRR capacity plans, locational UCAP transactions, and/or are not designated as a replacement resource, are eligible to export their capacity from PJM.⁴⁸

The PJM market rules should not create inappropriate barriers to either the import or export of capacity. The market rules in other balancing authorities should also not create inappropriate barriers to the import or export of capacity. The PJM market rules should ensure that the definition of capacity is enforced including physical deliverability, recallability and the obligation to make competitive offers into the PJM Day-Ahead Energy Market. Physical deliverability can only be assured by requiring that all imports are deliverable to PJM load to ensure that they are full substitutes for internal capacity resources. While pseudo ties were a step toward this goal, pseudo ties alone are not adequate to ensure deliverability. Pseudo ties create potential issues in the exporting area and do not ensure deliverability into the importing area. Selling capacity into the PJM Capacity Market but making energy offers daily of \$999 per MWh would not fulfill the requirements of a capacity resource to make a competitive offer, but would constitute economic withholding.

⁴⁸ OATT Attachment DD § 5.6.6(b).

This is one of the reasons that the rules governing the obligation to make a competitive offer in the Day-Ahead Energy Market should be clarified for both internal and external resources.

For the 2017/2018 through the 2019/2020 Delivery Year, Capacity Import Limits (CILs) are established for each of the five external source zones and the overall PJM region to account for the risk that external generation resources may not be able to deliver energy during the relevant delivery year due to the curtailment of firm transmission by third parties.⁴⁹ Capacity Market Sellers may request an exception to the CIL for an external generation resource by committing that the resource will be pseudo tied prior to the start of the relevant delivery year, by demonstrating that it has long-term firm transmission service confirmed on the complete transmission path from the resource to PJM, and by agreeing to be subject to the same RPM must offer requirement as internal PJM generation resources.

Effective June 9, 2015, an external Generation Capacity Resource must obtain an exception to the CILs to be eligible to offer as a Capacity Performance Resource, which means that effective with the 2020/2021 delivery year, CILs are no longer defined as an RPM parameter.⁵⁰

As shown in Table 5-7, of the 4,961.8 MW of imports in the 2020/2021 RPM Base Residual Auction, 3,997.2 MW cleared. Of the cleared imports, 1,671.2 MW (41.8 percent) were from MISO.

Importing Capacity

Existing External Generation Capacity Resource

Generation external to the PJM region is eligible to be offered into an RPM Auction if it meets specific requirements.^{51 52} Firm transmission service from the unit to the border of PJM and generation deliverability into PJM must be demonstrated prior to the start of the delivery year. In order to demonstrate generation deliverability into PJM, external generators must obtain firm point-to-point transmission service on the PJM OASIS from the PJM border

49 147 FERC ¶ 61,060 (2014).

50 151 FERC ¶ 61,208 (2015).

51 See "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region," Schedule 9 ¶ 10.

52 See PJM "Manual 18: PJM Capacity Market," Rev. 38 (July 27, 2017) at 54-55 ¶ 81.

into the PJM transmission system or by obtaining network external designated transmission service. In the event that transmission upgrades are required to establish deliverability, those upgrades must be completed by the start of the delivery year. The following are also required: the external generating unit must be in the resource portfolio of a PJM member; twelve months of NERC/GADs unit performance data must be provided to establish an EFORd; the net capability of each unit must be verified through winter and summer testing; a letter of nonrecallability must be provided to assure PJM that the energy and capacity from the unit is not recallable to any other balancing authority.

All external generation resources that have an RPM commitment or FRR capacity plan commitment or that are designated as replacement capacity must be offered in the PJM Day-Ahead Energy Market.⁵³

To avoid balancing market deviations, any offer accepted in the Day-Ahead Energy Market must be scheduled to physically flow in the Real-Time Energy Market. When submitting the real-time energy market transaction, a valid NERC Tag is required, with the appropriate transmission reservations associated. Additionally, external capacity transactions must designate the transaction as such when submitting the NERC Tag. This designation allows the PJM dispatch operators to identify capacity backed transactions in order to avoid curtailing them out of merit order. External capacity backed transactions are evaluated the same way as all other energy transactions and are subject to all scheduling timing requirements and PJM interchange ramp limits. If the offer is not accepted in the Day-Ahead Energy Market, but the unit is requested during the operating day, the PJM dispatch operator will notify the participant. The market participant will then submit a tag to match the request. This tag will also be subject to all scheduling timing requirements and PJM interchange ramp limits.

Planned External Generation Capacity Resource

Planned External Generation Capacity Resources are eligible to be offered into an RPM Auction if they meet specific requirements.^{54 55} Planned External

53 OATT Schedule 1 § 1.10.1A.

54 See RAA § 1.69A.

55 See PJM "Manual 18: PJM Capacity Market," Rev. 38 (July 27, 2017) at 57-58.

Generation Capacity Resources are proposed Generation Capacity Resources, or a proposed increase in the capability of an Existing Generation Capacity Resource, that is located outside the PJM region; participates in the generation interconnection process of a balancing authority external to PJM; is scheduled to be physically and electrically interconnected to the transmission facilities of such balancing authority on or before the first day of the delivery year for which the resource is to be committed to satisfy the reliability requirements of the PJM Region; and is in full commercial operation prior to the first day of the delivery year.⁵⁶ An External Generation Capacity Resource becomes an Existing Generation Capacity Resource as of the earlier of the date that interconnection service commences or the resource has cleared an RPM Auction.⁵⁷

Exporting Capacity

Nonfirm transmission can be used to export capacity from the PJM region. A Generation Capacity Resource located in the PJM region not committed to service of PJM loads may be removed from PJM Capacity Resource status if the Capacity Market Seller shows that the resource has a financially and physically firm commitment to an external sale of its capacity.⁵⁸ The Capacity Market Seller must also identify the megawatt amount, export zone, and time period (in days) of the export.⁵⁹

The MMU evaluates requests submitted by Capacity Market Sellers to export Generation Capacity Resources, makes a determination as to whether the resource meets the applicable criteria to export, and must inform both the Capacity Market Seller and PJM of such determination.⁶⁰

When submitting a real-time market export capacity transaction, a valid NERC Tag is required, with the appropriate transmission reservations associated. Capacity transactions must designate the transaction as capacity when submitting the NERC Tag. This designation allows the PJM dispatch operators

⁵⁶ Prior to January 31, 2011, capacity modifications to existing generation capacity resources were not considered planned generation capacity resources. See 134 FERC ¶ 61,065 (2011).

⁵⁷ Effective January 31, 2011, the RPM rules related to market power mitigation were changed, including revising the definition for Planned Generation Capacity Resource for purposes of the must-offer requirement and market power mitigation. See 134 FERC ¶ 61,065 (2011).

⁵⁸ OATT Attachment DD § 6.6(g).

⁵⁹ *Id.*

⁶⁰ OATT Attachment M-Appendix § ILC.2.

to identify capacity backed transactions in order to avoid curtailing them out of merit order. External capacity backed transactions are evaluated the same way as all other energy transactions and are subject to all scheduling timing requirements and PJM interchange ramp limits.

Table 5-7 RPM imports: 2007/2008 through 2020/2021 RPM Base Residual Auctions

Base Residual Auction	UCAP (MW)					
	MISO		Non-MISO		Total Imports	
	Offered	Cleared	Offered	Cleared	Offered	Cleared
2007/2008	1,073.0	1,072.9	547.9	547.9	1,620.9	1,620.8
2008/2009	1,149.4	1,109.0	517.6	516.8	1,667.0	1,625.8
2009/2010	1,189.2	1,151.0	518.8	518.1	1,708.0	1,669.1
2010/2011	1,194.2	1,186.6	539.8	539.5	1,734.0	1,726.1
2011/2012	1,862.7	1,198.6	3,560.0	3,557.5	5,422.7	4,756.1
2012/2013	1,415.9	1,298.8	1,036.7	1,036.7	2,452.6	2,335.5
2013/2014	1,895.1	1,895.1	1,358.9	1,358.9	3,254.0	3,254.0
2014/2015	1,067.7	1,067.7	1,948.8	1,948.8	3,016.5	3,016.5
2015/2016	1,538.7	1,538.7	2,396.6	2,396.6	3,935.3	3,935.3
2016/2017	4,723.1	4,723.1	2,770.6	2,759.6	7,493.7	7,482.7
2017/2018	2,624.3	2,624.3	2,320.4	1,901.2	4,944.7	4,525.5
2018/2019	2,879.1	2,509.1	2,256.7	2,178.8	5,135.8	4,687.9
2019/2020	2,067.3	1,828.6	2,276.1	2,047.3	4,343.4	3,875.9
2020/2021	2,511.8	1,671.2	2,450.0	2,326.0	4,961.8	3,997.2

Demand Resources

There are three basic demand products incorporated in the RPM market design:⁶¹

- **Demand Resources (DR).** Interruptible load resource that is offered into an RPM Auction as capacity and receives the relevant LDA or RTO resource clearing price.
- **Interruptible Load for Reliability (ILR).** Interruptible load resource that is not offered into the RPM Auction, but receives the final zonal ILR price determined after the second incremental auction. The ILR product was eliminated after the 2011/2012 Delivery Year.

⁶¹ Effective June 1, 2007, the PJM active load management (ALM) program was replaced by the PJM load management (LM) program. Under ALM, providers had received a MW credit which offset their capacity obligation. With the introduction of LM, qualifying load management resources can be offered into RPM Auctions as capacity resources and receive the clearing price.

- **Energy Efficiency (EE) Resources.** Load resources that are offered into an RPM Auction as capacity and receive the relevant LDA or RTO resource clearing price. The EE resource type was eligible to be offered in RPM Auctions starting with the 2012/2013 Delivery Year and in incremental auctions in the 2011/2012 Delivery Year.⁶²

Effective for the 2014/2015 through the 2017/2018 Delivery Year, there are three types of Demand Resource products included in the RPM market design:^{63 64}

- **Annual DR.** A Demand Resource that is required to be available on any day in the relevant delivery year for an unlimited number of interruptions. Annual DR is required to be capable of maintaining each interruption for only ten hours only during the hours of 10:00 a.m. to 10:00 p.m. EPT for the period May through October and 6:00 a.m. to 9:00 p.m. EPT for the period November through April unless there is an Office of the Interconnection approved maintenance outage during October through April.
- **Extended Summer DR.** A Demand Resource that is required to be available on any day from June through October and the following May in the relevant delivery year for an unlimited number of interruptions. Extended Summer DR is required to be capable of maintaining each interruption for only ten hours only during the hours of 10:00 a.m. to 10:00 p.m. EPT.
- **Limited DR.** A Demand Resource that is required to be available on weekdays not including NERC holidays during the period of June through September in the relevant delivery year for up to 10 interruptions. Limited DR is required to be capable of maintaining each interruption for only six hours only during the hours of 12:00 p.m. to 8:00 p.m. EPT.

Effective for the 2018/2019 and the 2019/2020 Delivery Years, there are two types of Demand Resource and Energy Efficiency Resource products included in the RPM market design:^{65 66}

⁶² Letter Order in Docket No. ER10-366-000 (January 22, 2010).

⁶³ 134 FERC ¶ 61,066 (2011).

⁶⁴ "Reliability Assurance Agreement among Load-Serving Entities in the PJM Region," Article 1.

⁶⁵ 151 FERC ¶ 61,208.

⁶⁶ "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region," Article 1.

- **Base Capacity Resources**

- **Base Capacity Demand Resources.** A Demand Resource that is required to be available on any day from June through September for an unlimited number of interruptions. Base Capacity DR is required to be capable of maintaining each interruption for at least ten hours only during the hours of 10:00 a.m. to 10:00 p.m. EPT.
- **Base Capacity Energy Efficiency Resources.** A project designed to achieve a continuous (during summer peak periods) reduction in electric energy consumption that is not reflected in the peak load forecast for the delivery year for which the Base Capacity Energy Efficiency Resource is proposed, and that is fully implemented at all times during the relevant delivery year, without any requirement of notice, dispatch, or operator intervention. The peak period definition for the Base Capacity Energy Efficiency Resource type includes the period from the hour ending 15:00 EPT and the hour ending 18:00 EPT from June through August, excluding weekends and federal holidays.

- **Capacity Performance Resources**

- **Annual Demand Resources.** A Demand Resource that is required to be available on any day in the relevant delivery year for an unlimited number of interruptions. Annual DR is required to be capable of maintaining each interruption for only ten hours during the hours of 10:00 a.m. to 10:00 p.m. EPT for the period May through October and 6:00 a.m. to 9:00 p.m. EPT for the period November through April unless there is an Office of the Interconnection approved maintenance outage during October through April.
- **Annual Energy Efficiency Resources.** A project designed to achieve a continuous (during summer and winter peak periods) reduction in electric energy consumption during peak periods that is not reflected in the peak load forecast for the delivery year for which the Energy Efficiency Resource is proposed, and that is fully implemented at all times during the relevant delivery year, without any requirement of notice, dispatch, or operator intervention. The peak period definition for the Annual Energy Efficiency Resource type includes the period

from the hour ending 15:00 EPT and the hour ending 18:00 EPT from June through August, and the period from the hour ending 8:00 EPT and the hour ending 9:00 EPT and the period from the hour ending 19:00 EPT and the hour ending 20:00 EPT from January through February, excluding weekends and federal holidays.

- Effective with the 2020/2021 Delivery Year, the Capacity Performance Product will be the only capacity product type, with two possible season types, annual and summer.
- **Annual Capacity Performance Resources**
 - Annual Demand Resources
 - Annual Energy Efficiency Resources
- **Seasonal Capacity Performance Resources**
 - **Summer-Period Demand Resources.** A Demand Resource that is required to be available on any day from June through October and the following May of the Delivery Year for an unlimited number of interruptions. Summer Period DR is required to be capable of maintaining each interruption between the hours of 10:00 a.m. to 10:00 p.m. EPT.
 - **Summer-Period Energy Efficiency Resources.** A project designed to achieve a continuous (during summer peak periods) reduction in electric energy consumption during peak periods that is not reflected in the peak load forecast for the delivery year for which the Energy Efficiency Resource is proposed, and that is fully implemented at all times during the relevant delivery year, without any requirement of notice, dispatch, or operator intervention. The peak period definition for the Summer-Period Efficiency Resource type includes the period from the hour ending 15:00 EPT and the hour ending 18:00 EPT from June through August, excluding weekends and federal holidays.

As shown in Table 5-8, Table 5-9, and Table 5-10, capacity in the RPM load management programs was 10,117.8 MW for June 1, 2017, as a result of cleared capacity for Demand Resources and Energy Efficiency Resources in RPM Auctions for the 2017/2018 Delivery Year (13,793.0 MW) less replacement capacity (3,675.2 MW).

Table 5-8 RPM load management statistics by LDA: June 1, 2016 to June 1, 2020^{67 68 69 70}

	UCAP (MW)														
	RTO	MAAC	EMAAC	SWMAAC	DPL South	PSEG	PSEG North	Pepco	ATSI	ATSI Cleveland	ComEd	BGE	PPL	DAY	DEOK
DR cleared	13,265.3	5,398.0	2,017.5	1,622.6	105.7	622.6	227.1	683.9	1,841.4	470.8					
EE cleared	1,723.2	418.0	86.4	262.6	2.0	27.9	10.8	136.5	226.9	58.6					
DR net replacements	(4,800.7)	(1,908.8)	(802.5)	(407.4)	(43.1)	(287.8)	(92.8)	(150.1)	(1,290.5)	(342.3)					
EE net replacements	61.1	111.0	27.1	94.5	(0.6)	6.3	3.3	17.9	(79.0)	(15.4)					
RPM load management @ 01-Jun-16	10,248.9	4,018.2	1,328.5	1,572.3	64.0	369.0	148.4	688.2	698.8	171.7					
DR cleared	11,870.7	4,584.5	1,630.9	1,464.1	86.3	402.8	157.1	658.3	1,256.0	323.5	1,602.9	805.8	811.9		
EE cleared	1,922.3	547.7	180.0	291.5	5.6	55.2	18.5	155.4	192.3	41.4	747.6	136.1	43.2		
DR net replacements	(3,870.8)	(1,461.6)	(555.7)	(344.8)	(39.5)	(107.9)	(30.6)	(136.5)	(457.2)	(163.1)	(279.2)	(208.3)	(299.2)		
EE net replacements	195.6	145.8	20.6	98.3	(0.4)	4.4	2.6	26.2	(41.9)	(11.7)	10.3	72.1	(9.9)		
RPM load management @ 01-Jun-17	10,117.8	3,816.4	1,275.8	1,509.1	52.0	354.5	147.6	703.4	949.2	190.1	2,081.6	805.7	546.0		
DR cleared	11,275.8	4,339.4	1,700.6	1,210.5	86.8	389.9	139.2	550.5	964.0	287.2	1,895.2	660.0	716.2		
EE cleared	1,785.9	526.7	211.9	261.3	5.4	59.9	18.7	155.6	90.0	16.8	762.7	105.7	32.0		
DR net replacements	(232.4)	(81.4)	(68.9)	0.0	0.0	(10.9)	0.0	0.0	(16.0)	0.0	(95.0)	0.0	0.0		
EE net replacements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
RPM load management @ 01-Jun-18	12,829.3	4,784.7	1,843.6	1,471.8	92.2	438.9	157.9	706.1	1,038.0	304.0	2,562.9	765.7	748.2		
DR cleared	10,375.9	3,796.3	1,650.3	745.1	91.3	380.7	176.5	488.7	900.9	289.9	1,757.4	256.4	739.8		
EE cleared	1,802.1	508.0	186.2	232.1	3.2	57.4	12.8	117.2	87.7	5.7	731.2	114.9	53.6		
DR net replacements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
EE net replacements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
RPM load management @ 01-Jun-19	12,178.0	4,304.3	1,836.5	977.2	94.5	438.1	189.3	605.9	988.6	295.6	2,488.6	371.3	793.4		
DR cleared	7,820.4	2,699.0	1,114.8	458.4	72.6	327.7	141.4	211.9	688.7	168.9	1,512.9	246.5	579.9	164.6	152.8
EE cleared	1,710.2	545.0	293.1	191.9	8.6	93.3	17.9	66.8	33.2	0.4	701.9	125.1	34.5	33.1	65.8
DR net replacements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
EE net replacements	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RPM load management @ 01-Jun-20	9,530.6	3,244.0	1,407.9	650.3	81.2	421.0	159.3	278.7	721.9	169.3	2,214.8	371.6	614.4	197.7	218.6

67 See OATT Attachment DD § 8.4. The reported DR cleared MW may reflect reductions in the level of committed MW due to relief from Capacity Resource Deficiency Charges.

68 Pursuant to DA § 15.1.6(c), PJM Settlement shall attempt to close out and liquidate forward capacity commitments for PJM Members that are declared in collateral default. The replacement transactions reported for the 2014/2015 Delivery Year include transactions associated with RTP Controls, Inc., which was declared in collateral default on March 9, 2012.

69 See OATT Attachment DD § 5.14C. The reported DR cleared MW for the 2015/2016 and 2016/2017 Delivery Years reflect reductions in the level of committed MW due to the Demand Response Operational Resource Flexibility Transition Provision.

70 See OATT Attachment DD § 5.14E. The reported DR cleared MW for the 2016/2017, 2017/2018, and 2018/2019 Delivery Years reflect reductions in the level of committed MW due to the Demand Response Legacy Direct Load Control Transition Provision.

Table 5-9 RPM commitments, replacement, and registrations for Demand Resources: June 1, 2007 to June 1, 2020^{71 72 73}

	UCAP (MW)						Registered DR		
	RPM Cleared	Adjustments to Cleared	Net Replacements	RPM Commitments	RPM Commitment Shortage	RPM Commitments Less Commitment Shortage	ICAP (MW)	UCAP Conversion Factor	UCAP (MW)
01-Jun-07	127.6	0.0	0.0	127.6	0.0	127.6	0.0	1.033	0.0
01-Jun-08	559.4	0.0	(40.0)	519.4	(58.4)	461.0	488.0	1.034	504.7
01-Jun-09	892.9	0.0	(474.7)	418.2	(14.3)	403.9	570.3	1.033	589.2
01-Jun-10	962.9	0.0	(516.3)	446.6	(7.7)	438.9	572.8	1.035	592.6
01-Jun-11	1,826.6	0.0	(1,052.4)	774.2	0.0	774.2	1,117.9	1.035	1,156.5
01-Jun-12	8,752.6	(11.7)	(2,253.6)	6,487.3	(34.9)	6,452.4	7,443.7	1.037	7,718.4
01-Jun-13	10,779.6	0.0	(3,314.4)	7,465.2	(30.5)	7,434.7	8,240.1	1.042	8,586.8
01-Jun-14	14,943.0	0.0	(6,731.8)	8,211.2	(219.4)	7,991.8	8,923.4	1.042	9,301.2
01-Jun-15	15,774.8	(321.1)	(4,829.7)	10,624.0	(61.8)	10,562.2	10,946.0	1.038	11,360.0
01-Jun-16	13,284.7	(19.4)	(4,800.7)	8,464.6	(455.4)	8,009.2	8,961.2	1.042	9,333.4
01-Jun-17	11,870.7	0.0	(3,870.8)	7,999.9	(30.3)	7,969.6	8,681.4	1.039	9,016.3
01-Jun-18	11,275.8	0.0	(232.4)	11,043.4	0.0	11,043.4	0.0	1.090	0.0
01-Jun-19	10,375.9	0.0	0.0	10,375.9	0.0	10,375.9	0.0	1.089	0.0
01-Jun-20	7,820.4	0.0	0.0	7,820.4	0.0	7,820.4	0.0	1.089	0.0

Table 5-10 RPM commitments and replacements for Energy Efficiency Resources: June 1, 2007 to June 1, 2020⁷⁴

	UCAP (MW)						
	RPM Cleared	Adjustments to Cleared	Net Replacements	RPM Commitments	RPM Commitment Shortage	RPM Commitments Less Commitment Shortage	
01-Jun-07	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01-Jun-08	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01-Jun-09	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01-Jun-10	0.0	0.0	0.0	0.0	0.0	0.0	0.0
01-Jun-11	76.4	0.0	0.2	76.6	0.0	76.6	76.6
01-Jun-12	666.1	0.0	(34.9)	631.2	(5.1)	626.1	626.1
01-Jun-13	904.2	0.0	120.6	1,024.8	(13.5)	1,011.3	1,011.3
01-Jun-14	1,077.7	0.0	204.7	1,282.4	(0.2)	1,282.2	1,282.2
01-Jun-15	1,189.6	0.0	335.9	1,525.5	(0.9)	1,524.6	1,524.6
01-Jun-16	1,723.2	0.0	61.1	1,784.3	(0.5)	1,783.8	1,783.8
01-Jun-17	1,922.3	0.0	195.6	2,117.9	(7.4)	2,110.5	2,110.5
01-Jun-18	1,785.9	0.0	0.0	1,785.9	0.0	1,785.9	1,785.9
01-Jun-19	1,802.1	0.0	0.0	1,802.1	0.0	1,802.1	1,802.1
01-Jun-20	1,710.2	0.0	0.0	1,710.2	0.0	1,710.2	1,710.2

71 See OATT Attachment DD § 8.4. The reported DR adjustments to cleared MW include reductions in the level of committed MW due to relief from Capacity Resource Deficiency Charges.

72 See OATT Attachment DD § 5.14C. The reported DR adjustments to cleared MW for the 2015/2016 and 2016/2017 Delivery Years include reductions in the level of committed MW due to the Demand Response Operational Resource Flexibility Transition Provision.

73 See OATT Attachment DD § 5.14E. The reported DR adjustments to cleared MW for the 2016/2017, 2017/2018, and 2018/2019 Delivery Years include reductions in the level of committed MW due to the Demand Response Legacy Direct Load Control Transition Provision.

74 Pursuant to PJM Operating Agreement § 15.1.6(c), PJM Settlement shall attempt to close out and liquidate forward capacity commitments for PJM members that are declared in collateral default. The replacement transactions reported for the 2014/2015 Delivery Year included transactions associated with RTP Controls, Inc., which was declared in collateral default on March 9, 2012.

Market Conduct

Offer Caps and Offer Floors

Market power mitigation measures were applied to Capacity Resources such that the sell offer was set equal to the defined offer cap when the Capacity Market Seller failed the market structure test for the auction, the submitted sell offer exceeded the defined offer cap, and the submitted sell offer, absent mitigation, would have increased the market clearing price.^{75 76 77} For Base Capacity, offer caps are defined as avoidable costs less PJM market revenues, or opportunity costs based on the potential sale of capacity in an external market. For Capacity Performance Resources, offer caps are defined as the applicable zonal net Cost of New Entry (CONE) times (B) where B is the average of the Balancing Ratios (B) during the Performance Assessment Hours in the three consecutive calendar years that precede the Base Residual Auction for such Delivery Year unless net avoidable costs exceed this level, or opportunity costs based on the potential sale of capacity in an external market. For RPM Third Incremental Auctions, capacity market sellers may elect, for Base Capacity offers, an offer cap equal to 1.1 times the BRA clearing price for the relevant LDA and delivery year or, for Capacity Performance offers, an offer cap equal to the greater of the net CONE for the relevant LDA and delivery year or 1.1 times the BRA clearing price for the relevant LDA and delivery year.

Avoidable costs are the costs that a generation owner would not incur if the generating unit did not operate for one year, in particular the delivery year.⁷⁸ In the calculation of avoidable costs, there is no presumption that the unit would retire as the alternative to operating, although that possibility could be reflected if the owner documented that retirement was the alternative. Avoidable costs may also include annual capital recovery associated with investments required to maintain a unit as a Generation Capacity Resource, termed Avoidable Project Investment Recovery (APIR). Avoidable cost based

⁷⁵ See OATT Attachment DD § 6.5.

⁷⁶ Prior to November 1, 2009, existing DR and EE resources were subject to market power mitigation in RPM Auctions. See 129 FERC ¶ 61,081 at P 30 (2009).

⁷⁷ Effective January 31, 2011, the RPM rules related to market power mitigation were changed, including revising the definition for Planned Generation Capacity Resource and creating a new definition for Existing Generation Capacity Resource for purposes of the must-offer requirement and market power mitigation, and treating a proposed increase in the capability of a Generation Capacity Resource the same in terms of mitigation as a Planned Generation Capacity Resource. See 134 FERC ¶ 61,065 (2011).

⁷⁸ OATT Attachment DD § 6.8 (b).

offer caps are defined to be net of revenues from all other PJM markets and unit-specific bilateral contracts. For Capacity Performance Resources, avoidable cost based offer caps are defined to be net of revenues from all other PJM markets and unit-specific bilateral contracts and expected bonus performance payments/non-performance charges.⁷⁹ Capacity resource owners could provide ACR data by providing their own unit-specific data or, for delivery years prior to 2020/2021, by selecting the default ACR values. The specific components of avoidable costs are defined in the PJM Tariff.⁸⁰

Effective for the 2018/2019 and subsequent Delivery Years, the ACR definition includes two additional components, Avoidable Fuel Availability Expenses (AFAE) and Capacity Performance Quantifiable Risk (CPQR).⁸¹ AFAE is available for Capacity Performance Resources. AFAE is defined to include expenses related to fuel availability and delivery. CPQR is available for Capacity Performance Resources and, for the 2018/2019 and 2019/2020 Delivery Years, Base Capacity Resources. CPQR is defined to be the quantifiable and reasonably supported cost of mitigating the risks of nonperformance associated with submission of an offer.

The opportunity cost option allows Capacity Market Sellers to offer based on a documented price available in a market external to PJM, subject to export limits. If the relevant RPM market clears above the opportunity cost, the Generation Capacity Resource is sold in the RPM market. If the opportunity cost is greater than the clearing price and the Generation Capacity Resource does not clear in the RPM market, it is available to sell in the external market.

Effective April 12, 2011, the RPM Minimum Offer Price Rule (MOPR) was changed.⁸² The changes to the MOPR included updating the calculation of the net Cost of New Entry (CONE) for Combined Cycle (CC) and Combustion Turbine (CT) plants which is used as a benchmark value in assessing the competitiveness of a sell offer, increasing the percentage value used in the screen to 90 percent for CC and CT plants, eliminating the net-short requirement as a prerequisite

⁷⁹ For details on the competitive offer of a capacity performance resource, see "Analysis of the 2019/2020 RPM Base Residual Auction Revised." <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_the_20192020_RPM_BRA_20160831-Revised.pdf> (August 31, 2016).

⁸⁰ OATT Attachment DD § 6.8 (a).

⁸¹ 151 FERC ¶ 61,208.

⁸² 135 FERC ¶ 61,022 (2011).

for applying the MOPR, eliminating the impact screen, revising the process for reviewing proposed exceptions to the defined minimum sell offer price, and clarifying which resources are subject to the MOPR along with the duration of mitigation. Subsequent FERC Orders revised the MOPR, including clarification on the duration of mitigation, which resources are subject to MOPR, and the MOPR review process.⁸³

Effective May 3, 2013, the RPM Minimum Offer Price Rule (MOPR) was changed again.⁸⁴ The changes to the MOPR included establishing Competitive Entry and Self Supply Exemptions while also retaining the unit specific exemption process for those that do not qualify for the Competitive Entry or Self Supply Exemptions; changing the applicability of MOPR to include only combustion turbine, combined cycle, integrated gasification combined cycle (IGCC) technologies while excluding units primarily fueled with landfill gas or cogeneration units which are certified or self-certified as Qualifying Facilities (QFs); changing the applicability to increases in installed capacity of 20.0 MW or more combined for all units at a single point of interconnection to the transmission system; changing the applicability to include the full capability of repowering of plants based on combustion turbine, combined cycle, IGCC technology; increasing the screen from 90 percent to 100 percent of the applicable net CONE values; and broadening the region subject to MOPR to the entire RTO from constrained LDAs only.

2018/2019 RPM Second Incremental Auction

As shown in Table 5-11, 68 generation resources submitted Base Capacity offers in the 2018/2019 RPM Second Incremental Auction. The MMU calculated offer caps for 23 generation resources (33.8 percent), of which 12 were based on the technology specific default (proxy) ACR values and 11 were unit-specific offer caps (16.2 percent of all generation resources), of which all included an APIR component. Of the 68 generation resources with Base Capacity offers, six Planned Generation Capacity Resources had uncapped offers (8.8 percent), and the remaining 39 generation resources were price takers (57.4 percent). Market power mitigation was applied to the Base Capacity sell offers of zero generation resources, including 0.0 MW.

⁸³ 135 FERC ¶ 61,022 (2011), *order on reh'g*, 137 FERC ¶ 61,145 (2011).
⁸⁴ 143 FERC ¶ 61,090 (2013).

As shown in Table 5-11, 344 generation resources submitted Capacity Performance offers in the 2018/2019 RPM Second Incremental Auction. The MMU calculated offer caps for five generation resources (1.5 percent), all of which were unit-specific with an APIR component. Of the 344 generation resources, 327 generation resources had the B times net CONE offer cap (95.1 percent), four Planned Generation Capacity Resources had uncapped offers (1.2 percent), and the remaining eight generation resources were price takers (2.3 percent). Market power mitigation was applied to the Capacity Performance sell offers of zero generation resources, including 0.0 MW.

As shown in Table 5-11, 81 generation resources submitted Base Capacity offers in the 2019/2020 RPM First Incremental Auction. The MMU calculated offer caps for 28 generation resources (34.6 percent), of which 17 were based on the technology specific default (proxy) ACR values and 11 were unit-specific offer caps (13.6 percent of all generation resources), of which all included an APIR component. Of the 81 generation resources with Base Capacity offers, the remaining 53 generation resources were price takers (65.4 percent). Market power mitigation was applied to the Base Capacity sell offers of zero generation resources, including 0.0 MW.

As shown in Table 5-11, 382 generation resources submitted Capacity Performance offers in the 2019/2020 RPM First Incremental Auction. The MMU calculated offer caps for seven generation resources (1.8 percent), of which six were unit-specific with an APIR component and one was based on the technology specific default (proxy) ACR value. Of the 382 generation resources, 362 generation resources had the B times net CONE offer cap (94.8 percent), one Planned Generation Capacity Resource had an uncapped offer (0.3 percent), one generation resource had an uncapped planned uprate plus price taker status for the existing portion of the unit (0.3 percent), and the remaining 11 generation resources were price takers (2.9 percent). Market power mitigation was applied to the Capacity Performance sell offers of zero generation resources, including 0.0 MW.

Market power mitigation measures are applied to MOPR Screened Generation Resources such that the sell offer is set equal to the MOPR Floor Offer Price

when the submitted sell offer is less than the MOPR Floor Offer Price and an exemption or exception was not granted, or the sell offer is set equal to the agreed upon minimum level of sell offer when the sell offer is less than the agreed upon minimum level of sell offer based on a Unit-Specific Exception. As shown in Table 5-12, of the 12,171.0 ICAP MW of MOPR Competitive Entry Exemption requests for the 2020/2021 RPM Base Residual Auction, all requests were granted. Of the 3,301.2 MW offered for MOPR Screened Generation Resources in the 2020/2021 RPM Base Residual Auction, 2,646.7 MW cleared and 654.5 MW did not clear.

Table 5-11 ACR statistics: RPM Auctions conducted in third quarter, 2017

Offer Cap/Mitigation Type	2018/2019 Second Incremental Auction				2019/2020 First Incremental Auction			
	Base Capacity		Capacity Performance		Base Capacity		Capacity Performance	
	Number of Generation Resources	Percent of Generation Resources Offered						
Default ACR	12	17.6%	0	0.0%	17	21.0%	1	0.3%
Unit specific ACR (APIR)	11	16.2%	5	1.5%	11	13.6%	5	1.3%
Unit specific ACR (APIR and CPQR)	0	0	0	0.0%	0	0	1	0.3%
Unit specific ACR (non-APIR)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unit specific ACR (non-APIR and CPQR)	0	0	0	0.0%	0	0	0	0.0%
Opportunity cost input	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Default ACR and opportunity cost	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Net CONE times B	NA	NA	327	95.1%	NA	NA	362	94.8%
Offer cap of 1.1 times BRA clearing price elected	NA	NA	NA	NA	NA	NA	NA	NA
Uncapped planned uprate and default ACR	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Uncapped planned uprate and opportunity cost	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Uncapped planned uprate and Net CONE times B	NA	NA	0	0.0%	NA	NA	0	0.0%
Uncapped planned uprate and price taker	0	0.0%	0	0.0%	0	0.0%	1	0.3%
Uncapped planned uprate and 1.1 times BRA clearing price elected	NA	NA	NA	NA	NA	NA	NA	NA
Uncapped planned generation resources	6	8.8%	4	1.2%	0	0.0%	1	0.3%
Existing generation resources as price takers	39	57.4%	8	2.3%	53	65.4%	11	2.9%
Total Generation Capacity Resources offered	68	100.0%	344	100.0%	81	100.0%	382	100.0%

Table 5-12 MOPR Statistics: 2017/2018 through 2020/2021 RPM Base Residual Auctions⁸⁵

Base Residual Auction	Request Type	Requested ICAP (MW)	Granted ICAP (MW)	Offered ICAP (MW)	Offered UCAP (MW)	Cleared UCAP (MW)
2017/2018	Competitive Entry Exemption	12,405.1	12,405.1	5,786.3	5,573.1	4,737.5
2017/2018	Self-Supply Exemption	940.0	940.0	940.0	906.1	906.1
2017/2018	Unit-Specific Exception	0.0	0.0	0.0	0.0	0.0
2017/2018	Total	13,345.1	13,345.1	6,726.3	6,479.2	5,643.6
2018/2019	Competitive Entry Exemption	13,462.5	13,462.5	3,723.3	3,563.6	3,563.6
2018/2019	Self-Supply Exemption	0.0	0.0	0.0	0.0	0.0
2018/2019	Unit-Specific Exception	0.0	0.0	0.0	0.0	0.0
2018/2019	Total	13,462.5	13,462.5	3,723.3	3,563.6	3,563.6
2019/2020	Competitive Entry Exemption	12,270.0	12,270.0	4,671.0	4,515.1	3,561.7
2019/2020	Self-Supply Exemption	1,827.2	1,827.2	1,779.5	1,697.8	1,697.8
2019/2020	Unit-Specific Exception	0.0	0.0	0.0	0.0	0.0
2019/2020	Total	14,097.2	14,097.2	6,450.5	6,212.9	5,259.5
2020/2021	Competitive Entry Exemption	12,171.0	12,171.0	3,212.5	3,161.1	2,646.7
2020/2021	Self-Supply Exemption	0.0	0.0	0.0	0.0	0.0
2020/2021	Unit-Specific Exception	0.0	0.0	0.0	0.0	0.0
2020/2021	Total	12,171.0	12,171.0	3,212.5	3,161.1	2,646.7

Replacement Capacity⁸⁶

Table 5-13 shows the committed and replacement capacity for all capacity resources for June 1 of each year from 2007 through 2020. The 2018 through 2020 numbers are not final.

⁸⁵ There were additional MOPR Screened Generation Resources for which no exceptions or exemptions were requested and to which the MOPR floor was applied. Some numbers not reported as a result of PJM confidentiality rules.

⁸⁶ For more details on replacement capacity, see "Analysis of Replacement Capacity for RPM Commitments: June 1, 2007 to June 1, 2016," <http://www.monitoringanalytics.com/reports/Reports/2016/IMM_Analysis_of_Replacement_Capacity_for_RPM_Commitments_06012007_to_06012016_20161227.pdf> (December 27, 2016).

Table 5-13 RPM commitments and replacements for all Capacity Resources: June 1, 2007 to June 1, 2020

	UCAP (MW)					
	RPM Cleared	Adjustments to Cleared	Net Replacements	RPM Commitments	RPM Commitment Shortage	RPM Commitments Less Commitment Shortage
	01-Jun-07	129,409.2	0.0	0.0	129,409.2	(8.1)
01-Jun-08	130,629.8	0.0	(766.5)	129,863.3	(246.3)	129,617.0
01-Jun-09	134,030.2	0.0	(2,068.2)	131,962.0	(14.7)	131,947.3
01-Jun-10	134,036.2	0.0	(4,179.0)	129,857.2	(8.8)	129,848.4
01-Jun-11	134,182.6	0.0	(6,717.6)	127,465.0	(79.3)	127,385.7
01-Jun-12	141,295.6	(11.7)	(9,400.6)	131,883.3	(157.2)	131,726.1
01-Jun-13	159,844.5	0.0	(12,235.3)	147,609.2	(65.4)	147,543.8
01-Jun-14	161,214.4	(9.4)	(13,615.9)	147,589.1	(1,208.9)	146,380.2
01-Jun-15	173,845.5	(326.1)	(11,849.4)	161,670.0	(1,822.0)	159,848.0
01-Jun-16	179,773.6	(24.6)	(16,157.5)	163,591.5	(924.4)	162,667.1
01-Jun-17	180,590.5	0.0	(13,982.7)	166,607.8	(626.1)	165,981.7
01-Jun-18	171,798.8	0.0	(718.5)	171,080.3	0.0	171,080.3
01-Jun-19	169,624.6	0.0	(120.0)	169,504.6	0.0	169,504.6
01-Jun-20	165,109.2	0.0	0.0	165,109.2	0.0	165,109.2

Market Performance

Figure 5-7 shows cleared MW weighted average capacity market prices on a Delivery Year basis for the entire history of the PJM capacity markets. Table 5-14 shows RPM clearing prices for all RPM Auctions held through the first nine months of 2017.

Figure 5-8 shows the RPM cleared MW weighted average prices for each LDA for the current Delivery Year and all results for auctions for future Delivery Years that have been held through the first nine months of 2017. A summary of these weighted average prices is given in Table 5-15.

Table 5-16 shows RPM revenue by resource type for all RPM Auctions held through the first nine months of 2017 with \$7.5 billion for new/repower/reactivated generation resources based on the unforced MW cleared and the resource clearing prices. A resource classified as "new/repower/reactivated" is a capacity resource addition since the implementation of RPM and is considered "new/repower/reactivated" for its initial offer and all its subsequent offers in RPM Auctions.

Table 5-17 shows RPM revenue by calendar year for all RPM Auctions held through the first nine months of 2017. In 2016, RPM revenue was \$8.8 billion. In 2017, RPM revenue was \$8.8 billion.

Table 5-18 shows the RPM annual charges to load. For the 2016/2017 Delivery Year, RPM annual charges to load are \$7.7 billion. For the 2017/2018 Delivery Year, annual charges to load are \$9.1 billion.

Table 5-14 Capacity prices: 2007/2008 through 2020/2021 RPM Auctions

Product Type	RPM Clearing Price (\$ per MW-day)													
	RTO	MAAC	APS	PPL	EMAAC	SWMAAC	DPL South	PSEG	PSEG North	Pepco	ATSI	ComEd	BGE	
2007/2008 BRA	\$40.80	\$40.80	\$40.80	\$40.80	\$197.67	\$188.54	\$197.67	\$197.67	\$197.67	\$188.54		\$40.80	\$188.54	
2008/2009 BRA	\$111.92	\$111.92	\$111.92	\$111.92	\$148.80	\$210.11	\$148.80	\$148.80	\$148.80	\$210.11		\$111.92	\$210.11	
2008/2009 Third Incremental Auction	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$223.85	\$10.00	\$10.00	\$10.00	\$223.85		\$10.00	\$223.85	
2009/2010 BRA	\$102.04	\$191.32	\$191.32	\$191.32	\$191.32	\$237.33	\$191.32	\$191.32	\$191.32	\$191.32		\$102.04	\$237.33	
2009/2010 Third Incremental Auction	\$40.00	\$86.00	\$86.00	\$86.00	\$86.00	\$86.00	\$86.00	\$86.00	\$86.00	\$86.00		\$40.00	\$86.00	
2010/2011 BRA	\$174.29	\$174.29	\$174.29	\$174.29	\$174.29	\$174.29	\$174.29	\$186.12	\$174.29	\$174.29		\$174.29	\$174.29	
2010/2011 Third Incremental Auction	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00	\$50.00		\$50.00	\$50.00	
2011/2012 BRA	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00	\$110.00		\$110.00	\$110.00	
2011/2012 First Incremental Auction	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00	\$55.00		\$55.00	\$55.00	
2011/2012 ATSI FRR Integration Auction	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	\$108.89	
2011/2012 Third Incremental Auction	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00	
2012/2013 BRA	\$16.46	\$133.37	\$16.46	\$133.37	\$139.73	\$133.37	\$222.30	\$139.73	\$185.00	\$133.37		\$16.46	\$133.37	
2012/2013 ATSI FRR Integration Auction	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	\$20.46	
2012/2013 First Incremental Auction	\$16.46	\$16.46	\$16.46	\$16.46	\$153.67	\$16.46	\$153.67	\$153.67	\$153.67	\$16.46	\$16.46	\$16.46	\$16.46	
2012/2013 Second Incremental Auction	\$13.01	\$13.01	\$13.01	\$13.01	\$48.91	\$13.01	\$48.91	\$48.91	\$48.91	\$13.01	\$13.01	\$13.01	\$13.01	
2012/2013 Third Incremental Auction	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	\$2.51	
2013/2014 BRA	\$27.73	\$226.15	\$27.73	\$226.15	\$245.00	\$226.15	\$245.00	\$245.00	\$245.00	\$247.14	\$27.73	\$27.73	\$226.15	
2013/2014 First Incremental Auction	\$20.00	\$20.00	\$20.00	\$20.00	\$178.85	\$54.82	\$178.85	\$178.85	\$178.85	\$54.82	\$20.00	\$20.00	\$54.82	
2013/2014 Second Incremental Auction	\$7.01	\$10.00	\$7.01	\$10.00	\$40.00	\$10.00	\$40.00	\$40.00	\$40.00	\$10.00	\$7.01	\$7.01	\$10.00	
2013/2014 Third Incremental Auction	\$4.05	\$30.00	\$4.05	\$30.00	\$188.44	\$30.00	\$188.44	\$188.44	\$188.44	\$30.00	\$4.05	\$4.05	\$30.00	
2014/2015 BRA	Limited	\$125.47	\$125.47	\$125.47	\$125.47	\$125.47	\$125.47	\$125.47	\$125.47	\$213.97	\$125.47	\$125.47	\$125.47	
2014/2015 BRA	Extended Summer	\$125.99	\$136.50	\$125.99	\$136.50	\$136.50	\$136.50	\$136.50	\$136.50	\$225.00	\$136.50	\$125.99	\$125.99	
2014/2015 BRA	Annual	\$125.99	\$136.50	\$125.99	\$136.50	\$136.50	\$136.50	\$136.50	\$136.50	\$225.00	\$136.50	\$125.99	\$125.99	
2014/2015 First Incremental Auction	Limited	\$0.03	\$5.23	\$0.03	\$5.23	\$5.23	\$5.23	\$5.23	\$5.23	\$399.62	\$5.23	\$0.03	\$5.23	
2014/2015 First Incremental Auction	Extended Summer	\$5.54	\$16.56	\$5.54	\$16.56	\$16.56	\$16.56	\$16.56	\$16.56	\$410.95	\$16.56	\$5.54	\$16.56	
2014/2015 First Incremental Auction	Annual	\$5.54	\$16.56	\$5.54	\$16.56	\$16.56	\$16.56	\$16.56	\$16.56	\$410.95	\$16.56	\$5.54	\$16.56	
2014/2015 Second Incremental Auction	Limited	\$25.00	\$56.94	\$25.00	\$56.94	\$56.94	\$56.94	\$56.94	\$56.94	\$310.00	\$56.94	\$25.00	\$56.94	
2014/2015 Second Incremental Auction	Extended Summer	\$25.00	\$56.94	\$25.00	\$56.94	\$56.94	\$56.94	\$56.94	\$56.94	\$310.00	\$56.94	\$25.00	\$56.94	
2014/2015 Second Incremental Auction	Annual	\$25.00	\$56.94	\$25.00	\$56.94	\$56.94	\$56.94	\$56.94	\$56.94	\$310.00	\$56.94	\$25.00	\$56.94	
2014/2015 Third Incremental Auction	Limited	\$25.51	\$132.20	\$25.51	\$132.20	\$132.20	\$132.20	\$132.20	\$132.20	\$256.76	\$132.20	\$25.51	\$132.20	
2014/2015 Third Incremental Auction	Extended Summer	\$25.51	\$132.20	\$25.51	\$132.20	\$132.20	\$132.20	\$132.20	\$132.20	\$256.76	\$132.20	\$25.51	\$132.20	
2014/2015 Third Incremental Auction	Annual	\$25.51	\$132.20	\$25.51	\$132.20	\$132.20	\$132.20	\$132.20	\$132.20	\$256.76	\$132.20	\$25.51	\$132.20	
2015/2016 BRA	Limited	\$118.54	\$150.00	\$118.54	\$150.00	\$150.00	\$150.00	\$150.00	\$150.00	\$150.00	\$150.00	\$304.62	\$118.54	\$150.00
2015/2016 BRA	Extended Summer	\$136.00	\$167.46	\$136.00	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$322.08	\$136.00	\$167.46
2015/2016 BRA	Annual	\$136.00	\$167.46	\$136.00	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$167.46	\$357.00	\$136.00	\$167.46
2015/2016 First Incremental Auction	Limited	\$43.00	\$111.00	\$43.00	\$111.00	\$111.00	\$111.00	\$111.00	\$111.00	\$122.95	\$111.00	\$168.37	\$43.00	\$111.00
2015/2016 First Incremental Auction	Extended Summer	\$43.00	\$111.00	\$43.00	\$111.00	\$111.00	\$111.00	\$111.00	\$111.00	\$122.95	\$111.00	\$168.37	\$43.00	\$111.00
2015/2016 First Incremental Auction	Annual	\$43.00	\$111.00	\$43.00	\$111.00	\$111.00	\$111.00	\$111.00	\$111.00	\$122.95	\$111.00	\$168.37	\$43.00	\$111.00
2015/2016 Second Incremental Auction	Limited	\$123.56	\$141.12	\$123.56	\$141.12	\$141.12	\$141.12	\$141.12	\$155.02	\$155.02	\$141.12	\$204.10	\$123.56	\$141.12

Table 5-14 Capacity prices: 2007/2008 through 2020/2021 RPM Auctions (continued)

	Product Type	RPM Clearing Price (\$ per MW-day)													
		RTO	MAAC	APS	PPL	EMAAC	SWMAAC	DPL South	PSEG North	Pepco	ATSI	ComEd	BGE		
2015/2016 Second Incremental Auction	Extended Summer	\$136.00	\$153.56	\$136.00	\$153.56	\$153.56	\$153.56	\$153.56	\$153.56	\$167.46	\$167.46	\$153.56	\$216.54	\$136.00	\$153.56
2015/2016 Second Incremental Auction	Annual	\$136.00	\$153.56	\$136.00	\$153.56	\$153.56	\$153.56	\$153.56	\$153.56	\$167.46	\$167.46	\$153.56	\$216.54	\$136.00	\$153.56
2015/2016 Third Incremental Auction	Limited	\$100.76	\$122.33	\$100.76	\$122.33	\$122.33	\$122.33	\$122.33	\$122.33	\$122.56	\$122.56	\$122.33	\$100.76	\$100.76	\$122.33
2015/2016 Third Incremental Auction	Extended Summer	\$163.20	\$184.77	\$163.20	\$184.77	\$184.77	\$184.77	\$184.77	\$184.77	\$185.00	\$185.00	\$184.77	\$163.20	\$163.20	\$184.77
2015/2016 Third Incremental Auction	Annual	\$163.20	\$184.77	\$163.20	\$184.77	\$184.77	\$184.77	\$184.77	\$184.77	\$185.00	\$185.00	\$184.77	\$163.20	\$163.20	\$184.77
2016/2017 BRA	Limited	\$59.37	\$119.13	\$59.37	\$119.13	\$119.13	\$119.13	\$119.13	\$119.13	\$219.00	\$219.00	\$119.13	\$94.45	\$59.37	\$119.13
2016/2017 BRA	Extended Summer	\$59.37	\$119.13	\$59.37	\$119.13	\$119.13	\$119.13	\$119.13	\$119.13	\$219.00	\$219.00	\$119.13	\$114.23	\$59.37	\$119.13
2016/2017 BRA	Annual	\$59.37	\$119.13	\$59.37	\$119.13	\$119.13	\$119.13	\$119.13	\$119.13	\$219.00	\$219.00	\$119.13	\$114.23	\$59.37	\$119.13
2016/2017 First Incremental Auction	Limited	\$53.93	\$89.35	\$53.93	\$89.35	\$89.35	\$89.35	\$89.35	\$89.35	\$214.44	\$214.44	\$89.35	\$94.45	\$53.93	\$89.35
2016/2017 First Incremental Auction	Extended Summer	\$60.00	\$119.13	\$60.00	\$119.13	\$119.13	\$119.13	\$119.13	\$119.13	\$244.22	\$244.22	\$119.13	\$100.52	\$60.00	\$119.13
2016/2017 First Incremental Auction	Annual	\$60.00	\$119.13	\$60.00	\$119.13	\$119.13	\$119.13	\$119.13	\$119.13	\$244.22	\$244.22	\$119.13	\$100.52	\$60.00	\$119.13
2016/2017 Second Incremental Auction	Limited	\$31.00	\$71.00	\$31.00	\$71.00	\$71.00	\$71.00	\$71.00	\$71.00	\$99.01	\$212.53	\$71.00	\$101.50	\$31.00	\$71.00
2016/2017 Second Incremental Auction	Extended Summer	\$31.00	\$71.00	\$31.00	\$71.00	\$71.00	\$71.00	\$71.00	\$71.00	\$99.01	\$212.53	\$71.00	\$101.50	\$31.00	\$71.00
2016/2017 Second Incremental Auction	Annual	\$31.00	\$71.00	\$31.00	\$71.00	\$71.00	\$71.00	\$71.00	\$71.00	\$99.01	\$212.53	\$71.00	\$101.50	\$31.00	\$71.00
2016/2017 Capacity Performance Transition Auction	Capacity Performance	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00	\$134.00
2016/2017 Third Incremental Auction	Limited	\$5.02	\$10.02	\$5.02	\$10.02	\$10.02	\$10.02	\$10.02	\$10.02	\$54.76	\$184.97	\$10.02	\$5.02	\$5.02	\$10.02
2016/2017 Third Incremental Auction	Extended Summer	\$5.02	\$10.02	\$5.02	\$10.02	\$10.02	\$10.02	\$10.02	\$10.02	\$54.76	\$184.97	\$10.02	\$5.02	\$5.02	\$10.02
2016/2017 Third Incremental Auction	Annual	\$5.02	\$10.02	\$5.02	\$10.02	\$10.02	\$10.02	\$10.02	\$10.02	\$54.76	\$184.97	\$10.02	\$5.02	\$5.02	\$10.02
2017/2018 BRA	Limited	\$106.02	\$106.02	\$106.02	\$40.00	\$106.02	\$106.02	\$106.02	\$106.02	\$201.02	\$201.02	\$106.02	\$106.02	\$106.02	\$106.02
2017/2018 BRA	Extended Summer	\$120.00	\$120.00	\$120.00	\$53.98	\$120.00	\$120.00	\$120.00	\$120.00	\$215.00	\$215.00	\$120.00	\$120.00	\$120.00	\$120.00
2017/2018 BRA	Annual	\$120.00	\$120.00	\$120.00	\$120.00	\$120.00	\$120.00	\$120.00	\$120.00	\$215.00	\$215.00	\$120.00	\$120.00	\$120.00	\$120.00
2017/2018 Capacity Performance Transition Auction	Capacity Performance	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50	\$151.50
2017/2018 First Incremental Auction	Limited	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$143.08	\$143.08	\$84.00	\$84.00	\$84.00	\$84.00
2017/2018 First Incremental Auction	Extended Summer	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$143.08	\$143.08	\$84.00	\$84.00	\$84.00	\$84.00
2017/2018 First Incremental Auction	Annual	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$84.00	\$143.08	\$143.08	\$84.00	\$84.00	\$84.00	\$84.00
2017/2018 Second Incremental Auction	Limited	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$120.43	\$179.00	\$26.50	\$26.50	\$26.50	\$26.50
2017/2018 Second Incremental Auction	Extended Summer	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$120.43	\$179.00	\$26.50	\$26.50	\$26.50	\$26.50
2017/2018 Second Incremental Auction	Annual	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$26.50	\$120.43	\$179.00	\$26.50	\$26.50	\$26.50	\$26.50
2017/2018 Third Incremental Auction	Limited	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$115.76	\$115.76	\$36.49	\$36.49	\$36.49	\$36.49
2017/2018 Third Incremental Auction	Extended Summer	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$115.76	\$115.76	\$36.49	\$36.49	\$36.49	\$36.49
2017/2018 Third Incremental Auction	Annual	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$36.49	\$115.76	\$115.76	\$36.49	\$36.49	\$36.49	\$36.49
2018/2019 BRA	Base Capacity	\$149.98	\$149.98	\$149.98	\$75.00	\$210.63	\$149.98	\$210.63	\$210.63	\$210.63	\$210.63	\$149.98	\$149.98	\$200.21	\$149.98
2018/2019 BRA	Base Capacity DR/EE	\$149.98	\$149.98	\$149.98	\$75.00	\$210.63	\$59.95	\$210.63	\$210.63	\$210.63	\$210.63	\$41.09	\$149.98	\$200.21	\$59.95
2018/2019 BRA	Capacity Performance	\$164.77	\$164.77	\$164.77	\$164.77	\$225.42	\$164.77	\$225.42	\$225.42	\$225.42	\$225.42	\$164.77	\$164.77	\$215.00	\$164.77
2018/2019 First Incremental Auction	Base Capacity	\$22.51	\$22.51	\$22.51	\$22.51	\$80.04	\$22.51	\$35.68	\$80.04	\$80.04	\$22.51	\$22.51	\$25.36	\$22.51	\$22.51
2018/2019 First Incremental Auction	Base Capacity DR/EE	\$22.51	\$22.51	\$22.51	\$22.51	\$80.04	\$22.51	\$35.68	\$80.04	\$80.04	\$22.51	\$22.51	\$25.36	\$22.51	\$22.51
2018/2019 First Incremental Auction	Capacity Performance	\$27.15	\$27.15	\$27.15	\$27.15	\$84.68	\$27.15	\$84.68	\$84.68	\$84.68	\$27.15	\$27.15	\$30.00	\$27.15	\$27.15
2018/2019 Second Incremental Auction	Base Capacity	\$5.00	\$5.00	\$5.00	\$5.00	\$35.02	\$5.00	\$30.00	\$35.02	\$35.02	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
2018/2019 Second Incremental Auction	Base Capacity DR/EE	\$5.00	\$5.00	\$5.00	\$5.00	\$35.02	\$5.00	\$30.00	\$35.02	\$35.02	\$5.00	\$5.00	\$5.00	\$5.00	\$5.00
2018/2019 Second Incremental Auction	Capacity Performance	\$50.00	\$50.00	\$50.00	\$50.00	\$80.02	\$50.00	\$80.02	\$80.02	\$80.02	\$80.02	\$50.00	\$50.00	\$50.00	\$50.00
2019/2020 BRA	Base Capacity	\$80.00	\$80.00	\$80.00	\$80.00	\$99.77	\$80.00	\$99.77	\$99.77	\$99.77	\$99.77	\$80.00	\$80.00	\$182.77	\$80.30
2019/2020 BRA	Base Capacity DR/EE	\$80.00	\$80.00	\$80.00	\$80.00	\$99.77	\$80.00	\$99.77	\$99.77	\$99.77	\$99.77	\$0.01	\$80.00	\$182.77	\$80.30
2019/2020 BRA	Capacity Performance	\$100.00	\$100.00	\$100.00	\$100.00	\$119.77	\$100.00	\$119.77	\$119.77	\$119.77	\$119.77	\$100.00	\$100.00	\$202.77	\$100.30
2020/2021 BRA	Capacity Performance	\$76.53	\$86.04	\$76.53	\$86.04	\$187.87	\$86.04	\$187.87	\$187.87	\$187.87	\$187.87	\$86.04	\$76.53	\$188.12	\$86.04

Table 5-15 Weighted average clearing prices by zone: 2017/2018 through 2020/2021

LDA	Weighted Average Clearing Price (\$ per MW-day)			
	2017/2018	2018/2019	2019/2020	2020/2021
RTO				
AEP	\$140.03	\$161.00	\$96.03	\$76.54
APS	\$140.03	\$161.00	\$96.03	\$76.54
ATSI	\$138.22	\$151.68	\$96.48	\$76.53
Cleveland	\$138.43	\$159.55	\$96.35	\$76.53
ComEd	\$140.48	\$207.32	\$195.55	\$188.13
DAY	\$140.03	\$161.00	\$96.03	\$76.54
DEOK	\$140.03	\$161.00	\$96.03	\$76.54
DLCO	\$140.03	\$161.00	\$96.03	\$76.54
Dominion	\$140.03	\$161.00	\$96.03	\$76.54
EKPC	\$140.03	\$161.00	\$96.03	\$76.54
MAAC				
EMAAC				
AECO	\$137.20	\$217.00	\$114.30	\$187.72
DPL	\$137.20	\$217.00	\$114.30	\$187.72
DPL South	\$133.72	\$218.65	\$117.45	\$187.87
JCPL	\$137.20	\$217.00	\$114.30	\$187.72
PECO	\$137.20	\$217.00	\$114.30	\$187.72
PSEG	\$205.58	\$218.93	\$117.10	\$187.75
PSEG North	\$212.51	\$222.39	\$117.81	\$187.87
RECO	\$137.20	\$217.00	\$114.30	\$187.72
SWMAAC				
BGE	\$125.37	\$143.22	\$95.18	\$85.94
Pepco	\$133.34	\$149.40	\$91.94	\$86.01
WMAAC				
Met-Ed	\$139.32	\$154.61	\$97.15	\$86.06
PENELEC	\$139.32	\$154.61	\$97.15	\$86.06
PPL	\$136.20	\$148.41	\$96.29	\$86.04

Table 5-16 RPM revenue by type: 2007/2008 through 2020/2021^{87 88}

	Coal				Gas		Hydroelectric		Nuclear		
	Demand Resources	Energy Efficiency Resources	Imports	Existing	New/repower/reactivated	Existing	New/repower/reactivated	Existing	New/repower/reactivated	Existing	New/repower/reactivated
2007/2008	\$5,537,085	\$0	\$22,225,980	\$1,019,060,206	\$0	\$1,624,067,951	\$3,516,075	\$209,490,444	\$0	\$996,085,233	\$0
2008/2009	\$35,349,116	\$0	\$60,918,903	\$1,835,059,769	\$0	\$2,112,880,414	\$9,784,064	\$287,838,147	\$12,255	\$1,322,601,837	\$0
2009/2010	\$65,762,003	\$0	\$56,517,793	\$2,409,315,953	\$1,854,781	\$2,548,801,710	\$30,168,831	\$364,731,344	\$11,173	\$1,517,723,628	\$0
2010/2011	\$60,235,796	\$0	\$106,046,871	\$2,648,278,766	\$3,168,069	\$2,823,632,390	\$58,065,964	\$442,410,730	\$19,085	\$1,799,258,125	\$0
2011/2012	\$55,795,785	\$139,812	\$185,421,273	\$1,586,775,249	\$28,330,047	\$1,717,850,463	\$98,448,693	\$278,529,660	\$0	\$1,079,386,338	\$0
2012/2013	\$264,387,897	\$11,408,552	\$13,260,822	\$1,014,858,378	\$7,568,127	\$1,256,096,304	\$76,633,409	\$179,117,374	\$11,998	\$762,719,550	\$0
2013/2014	\$558,715,114	\$21,598,174	\$31,804,645	\$1,741,613,525	\$12,950,135	\$2,153,560,721	\$167,844,235	\$308,853,673	\$25,708	\$1,346,223,419	\$0
2014/2015	\$681,315,139	\$42,308,549	\$135,573,409	\$1,935,468,356	\$57,078,818	\$2,172,570,169	\$205,555,569	\$333,941,614	\$6,649,774	\$1,464,950,862	\$0
2015/2016	\$903,496,003	\$66,652,986	\$260,806,674	\$2,902,870,267	\$63,682,708	\$2,672,530,801	\$535,039,154	\$389,540,948	\$15,478,144	\$1,850,033,226	\$0
2016/2017	\$466,952,356	\$68,709,670	\$244,091,507	\$2,137,545,515	\$72,217,195	\$2,212,974,257	\$667,098,133	\$283,613,426	\$13,927,638	\$1,483,759,630	\$0
2017/2018	\$515,145,457	\$86,147,605	\$218,710,769	\$2,452,687,763	\$62,790,145	\$2,546,380,480	\$984,733,791	\$348,972,234	\$15,219,121	\$1,694,447,711	\$0
2018/2019	\$636,049,319	\$96,609,059	\$262,514,266	\$2,632,098,014	\$77,069,006	\$2,977,175,919	\$1,443,285,559	\$414,573,552	\$15,344,022	\$1,990,827,045	\$0
2019/2020	\$372,486,674	\$84,844,416	\$124,519,680	\$1,609,158,969	\$47,528,002	\$1,943,077,786	\$1,057,018,794	\$247,795,677	\$6,208,824	\$1,274,763,734	\$0
2020/2021	\$325,121,955	\$87,314,763	\$105,675,035	\$1,274,487,087	\$36,115,158	\$2,073,983,594	\$1,144,499,809	\$208,893,366	\$7,721,948	\$1,413,162,803	\$0

	Oil		Solar		Solid waste		Wind		Total revenue
	Existing	New/repower/reactivated	Existing	New/repower/reactivated	Existing	New/repower/reactivated	Existing	New/repower/reactivated	
2007/2008	\$340,362,114	\$0	\$0	\$0	\$31,512,230	\$0	\$430,065	\$0	\$4,252,287,381
2008/2009	\$378,756,365	\$4,837,523	\$0	\$0	\$35,011,991	\$0	\$1,180,153	\$2,917,048	\$6,087,147,586
2009/2010	\$450,523,876	\$5,676,582	\$0	\$0	\$42,758,762	\$523,739	\$2,011,156	\$6,836,827	\$7,503,218,157
2010/2011	\$446,000,462	\$4,339,539	\$0	\$0	\$40,731,606	\$413,503	\$1,819,413	\$15,232,177	\$8,449,652,496
2011/2012	\$266,483,502	\$967,887	\$0	\$66,978	\$25,636,836	\$261,690	\$1,072,929	\$9,919,881	\$5,335,087,023
2012/2013	\$248,611,128	\$2,772,987	\$0	\$1,246,337	\$26,840,670	\$316,420	\$812,644	\$5,052,036	\$3,871,714,635
2013/2014	\$386,561,718	\$5,670,399	\$0	\$3,523,555	\$43,943,130	\$1,977,705	\$1,373,205	\$13,538,988	\$6,799,778,047
2014/2015	\$323,630,668	\$4,106,697	\$0	\$3,836,582	\$34,281,137	\$1,709,533	\$1,524,551	\$32,766,219	\$7,437,267,646
2015/2016	\$401,718,239	\$5,947,275	\$0	\$7,064,983	\$35,862,368	\$6,179,607	\$1,829,269	\$42,994,253	\$10,161,726,902
2016/2017	\$265,547,984	\$4,030,823	\$0	\$7,057,256	\$32,648,789	\$6,380,604	\$1,144,873	\$26,189,042	\$7,993,888,695
2017/2018	\$280,738,408	\$3,888,126	\$0	\$10,899,883	\$34,771,100	\$9,036,976	\$1,529,251	\$40,577,901	\$9,306,676,719
2018/2019	\$343,333,510	\$2,922,855	\$0	\$15,939,493	\$38,078,648	\$9,645,386	\$1,166,553	\$53,665,227	\$11,010,297,432
2019/2020	\$187,309,985	\$1,723,692	\$0	\$11,594,905	\$21,205,162	\$5,326,702	\$753,594	\$45,510,662	\$7,040,827,258
2020/2021	\$214,430,999	\$1,406,926	\$0	\$5,734,079	\$26,917,827	\$5,428,707	\$25,124	\$33,760,562	\$6,964,679,740

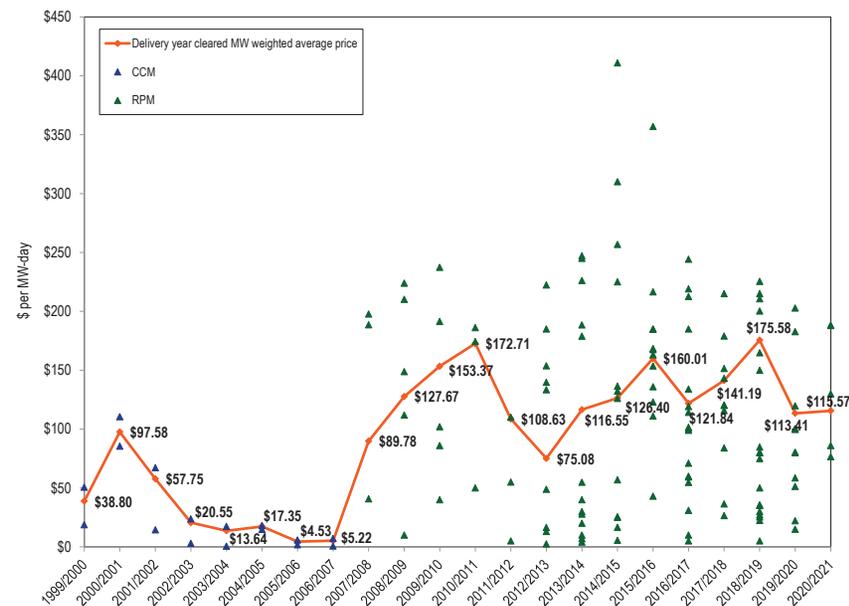
87 A resource classified as "new/repower/reactivated" is a capacity resource addition since the implementation of RPM and is considered "new/repower/reactivated" for its initial offer and all its subsequent offers in RPM Auctions.

88 The results for the ATSI Integration Auctions are not included in this table.

Table 5-17 RPM revenue by calendar year: 2007 through 2021⁸⁹

Year	Weighted Average RPM Price (\$ per MW-day)	Weighted Average Cleared UCAP (MW)	Effective Days	RPM Revenue
2007	\$89.78	129,409.2	214	\$2,486,310,108
2008	\$111.93	130,223.2	366	\$5,334,880,241
2009	\$142.74	132,772.0	365	\$6,917,391,702
2010	\$164.71	134,033.9	365	\$8,058,113,907
2011	\$135.14	134,105.2	365	\$6,615,032,130
2012	\$89.01	137,684.7	366	\$4,485,656,150
2013	\$99.39	154,044.3	365	\$5,588,442,225
2014	\$122.32	160,668.7	365	\$7,173,539,072
2015	\$146.10	169,112.0	365	\$9,018,343,604
2016	\$137.69	176,742.6	366	\$8,906,998,628
2017	\$133.19	180,272.0	365	\$8,763,578,112
2018	\$161.36	174,981.4	365	\$10,305,511,877
2019	\$139.13	170,759.7	365	\$8,671,712,815
2020	\$114.67	166,963.8	366	\$7,007,460,680
2021	\$115.57	165,109.2	151	\$2,881,278,468

Figure 5-7 History of PJM capacity prices: 1999/2000 through 2020/2021⁹⁰



89 The results for the ATSI Integration Auctions are not included in this table.

90 The 1999/2000-2006/2007 capacity prices are CCM combined market, weighted average prices. The 2007/2008-2020/2021 capacity prices are RPM weighted average prices. The CCM data points plotted are cleared MW weighted average prices for the daily and monthly markets by Delivery Year. The RPM data points plotted are RPM resource clearing prices. For the 2014/2015 and subsequent Delivery Years, only the prices for Annual Resources or Capacity Performance Resources are plotted.

Figure 5-8 Map of RPM capacity prices: 2017/2018 through 2020/2021

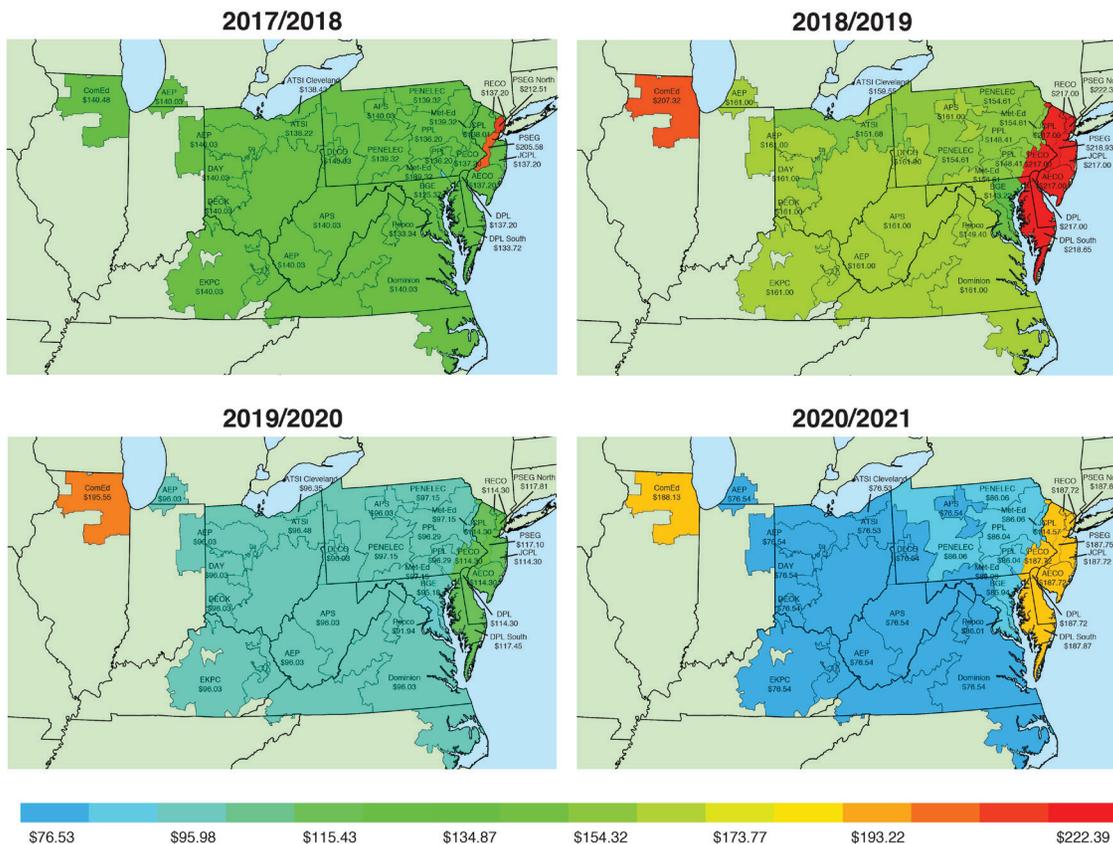


Table 5-18 RPM cost to load: 2016/2017 through 2020/2021 RPM Auctions⁹¹
92 93

	Net Load Price (\$ per MW-day)	UCAP Obligation (MW)	Annual Charges
2016/2017			
Rest of RTO	\$101.62	81,169.7	\$3,010,600,585
Rest of MAAC	\$163.27	52,594.4	\$3,134,361,252
PSEG	\$224.70	11,042.7	\$905,665,239
ATSI	\$133.23	14,084.2	\$684,910,081
Total		158,891.0	\$7,735,537,157
2017/2018			
Rest of RTO	\$153.61	94,874.5	\$5,319,445,392
Rest of MAAC	\$153.74	44,352.0	\$2,488,734,815
PSEG	\$208.59	10,932.0	\$832,333,767
PPL	\$151.86	7,935.5	\$439,869,055
Total		158,094.0	\$9,080,383,029
2018/2019			
Rest of RTO	\$164.68	80,744.7	\$4,853,530,001
Rest of MAAC	\$218.96	31,062.7	\$2,482,513,646
BGE	\$158.21	7,735.7	\$446,719,430
DPL	\$219.00	4,525.0	\$362,693,243
ComEd	\$211.92	24,800.0	\$1,918,266,822
Pepco	\$156.94	7,393.5	\$423,512,918
PPL	\$155.03	8,244.4	\$466,513,972
Total		164,506.1	\$10,953,750,032
2019/2020			
Rest of RTO	\$97.61	89,604.4	\$3,201,154,059
Rest of EMAAC	\$115.15	24,335.4	\$1,025,577,181
BGE	\$97.73	7,676.6	\$274,595,000
ComEd	\$190.88	25,311.9	\$1,768,321,123
Pepco	\$92.47	7,381.5	\$249,814,744
PSEG	\$115.40	11,299.1	\$477,218,187
		165,609.0	\$6,996,680,295
2020/2021			
Rest of RTO	\$76.83	69,612.5	\$1,952,261,955.97
Rest of MAAC	\$86.63	29,769.1	\$941,266,092.93
Rest of EMAAC	\$174.85	35,369.6	\$2,257,334,820.17
ComEd	\$183.14	25,153.0	\$1,681,377,780.76
DEOK	\$103.39	5,205.0	\$196,428,322.59
		165,109.2	\$7,028,668,972.43

⁹¹ The RPM annual charges are calculated using the rounded, net load prices as posted in the PJM RPM Auction results.

⁹² There is no separate obligation for DPL South as the DPL South LDA is completely contained within the DPL Zone. There is no separate obligation for PSEG North as the PSEG North LDA is completely contained within the PSEG Zone.

⁹³ Prior to the 2009/2010 Delivery Year, the final UCAP obligation is determined after the clearing of the Second Incremental Auction. For the 2009/2010 through 2011/2012 Delivery Years, the final UCAP obligations are determined after the clearing of the Third Incremental Auction. Effective with the 2012/2013 Delivery Year, the final UCAP obligation is determined after the clearing of the final Incremental Auction. Prior to the 2012/2013 Delivery Year, the Final Zonal Capacity Prices are determined after certification of ILR. Effective with the 2012/2013 Delivery Year, the Final Zonal Capacity Prices are determined after the final Incremental Auction. The 2018/2019, 2019/2020, and 2020/2021 Net Load Prices are not finalized. The 2018/2019, 2019/2020, and 2020/2021 obligation MW are not finalized.

Generator Performance

Generator performance results from the interaction between the physical characteristics of the units and the level of expenditures made to maintain the capability of the units, which in turn is a function of incentives from energy, ancillary services and capacity markets. Generator performance indices include those based on total hours in a period (generator performance factors) and those based on hours when units are needed to operate by the system operator (generator forced outage rates).

Capacity Factor

Capacity factor measures the actual output of a power plant over a period of time compared to the potential output of the unit had it been running at full nameplate capacity for every hour during that period. In the first nine months of 2017, nuclear units had a capacity factor of 94.1 percent, compared to 91.5 percent in the first nine months of 2016; combined cycle units had a capacity factor of 59.7 percent in the first nine months of 2017, compared to a capacity factor of 65.0 percent in the first nine months of 2016; all steam units had a capacity factor of 41.3 percent in the first nine months of 2017, compared to 43.9 percent in the first nine months of 2016; coal units had a capacity factor of 47.4 percent in the first nine months of 2017, compared to 47.6 percent in the first nine months of 2016.

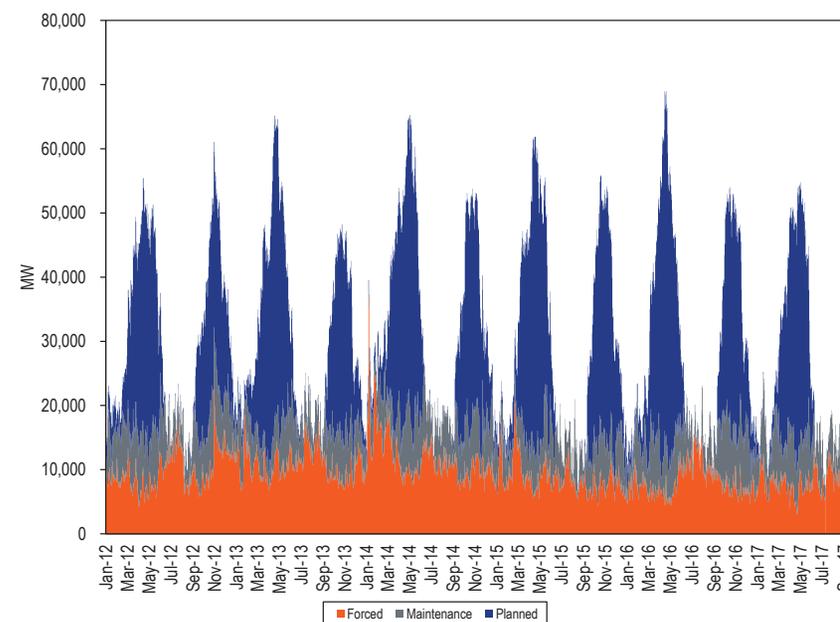
Table 5-19 PJM capacity factor (By unit type (GWh)): January 1 through September 30, 2016 and 2017⁹⁴

Unit Type	2016 (Jan-Sep)		2017 (Jan-Sep)		Change in 2017 from 2016
	Generation (GWh)	Capacity Factor	Generation (GWh)	Capacity Factor	
Battery	12.0	0.6%	20.5	1.0%	0.4%
Combined Cycle	144,495.4	65.0%	147,933.9	59.7%	(5.4%)
Combustion Turbine	14,691.6	7.8%	9,765.9	5.2%	(2.7%)
Diesel	493.6	20.1%	533.5	19.1%	(1.0%)
Diesel (Landfill gas)	1,081.2	48.9%	1,217.5	50.4%	1.5%
Fuel Cell	170.0	86.1%	169.4	86.2%	0.0%
Nuclear	209,893.3	91.5%	215,089.3	94.1%	2.6%
Pumped Storage Hydro	4,918.2	14.8%	5,076.6	15.3%	0.5%
Run of River Hydro	6,011.7	33.1%	6,852.4	38.7%	5.6%
Solar	782.7	19.5%	1,153.8	19.6%	0.1%
Steam	223,850.8	43.9%	207,200.8	41.3%	(2.6%)
Coal	210,268.1	47.6%	197,633.2	47.4%	(0.2%)
Wind	11,963.2	25.1%	14,268.3	27.6%	2.4%
Total	618,363.7	49.1%	609,282.1	47.5%	(1.6%)

Generator Performance Factors

Generator outages fall into three categories: planned, maintenance, and forced. The MW on outage vary throughout the year. For example, the MW on planned outage are generally highest in the spring and fall, as shown in Figure 5-9, due to restrictions on planned outages during the winter and summer. The effect of the seasonal variation in outages can be seen in the monthly generator performance metrics in Figure 5-12.

Figure 5-9 PJM outages (MW): 2012 through September 2017



Performance factors include the equivalent availability factor (EAF), the equivalent maintenance outage factor (EMOF), the equivalent planned outage factor (EPOF) and the equivalent forced outage factor (EFOF). These four factors add to 100 percent for any generating unit. The EAF is the proportion of hours in a year when a unit is available to generate at full capacity while the three outage factors include all the hours when a unit is unavailable. The EMOF is the proportion of hours in a year when a unit is unavailable because of maintenance outages and maintenance deratings. The EPOF is the proportion of hours in a year when a unit is unavailable because of planned outages and planned deratings. The EFOF is the proportion of hours in a year when a unit is unavailable because of forced outages and forced deratings.

The PJM aggregate EAF, EFOF, EPOF, and EMOF are shown in Figure 5-10. Metrics by unit type are shown in Table 5-20.

⁹⁴ The capacity factors in this table are based on nameplate capacity values, and are calculated based on when the units come on line.

Figure 5–10 PJM equivalent outage and availability factors: January 1 through September 30, 2007 to 2017

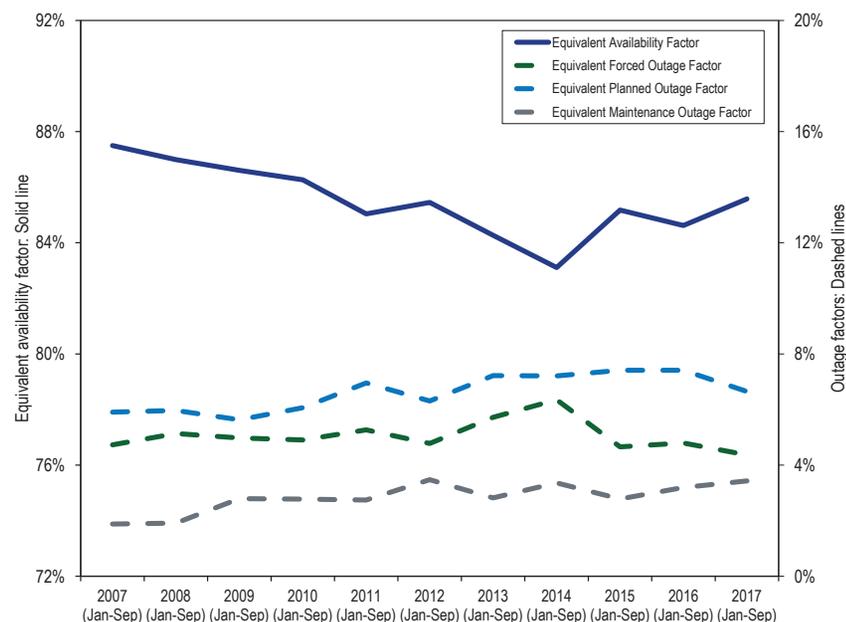


Table 5–20 EFOF, EPOF, EMOF and EAF by unit type: January 1 through September 30, 2007 through 2017

	Combined Cycle				Combustion Turbine				Diesel				Hydroelectric				Nuclear				Steam			
	EFOF	EPOF	EMOF	EAF	EFOF	EPOF	EMOF	EAF	EFOF	EPOF	EMOF	EAF	EFOF	EPOF	EMOF	EAF	EFOF	EPOF	EMOF	EAF	EFOF	EPOF	EMOF	EAF
2007 (Jan-Sep)	2.0%	5.3%	1.8%	91.0%	4.7%	2.1%	2.2%	91.0%	10.8%	0.7%	1.8%	86.7%	1.3%	5.4%	1.6%	91.8%	1.1%	3.8%	0.3%	94.7%	7.1%	8.2%	2.5%	82.3%
2008 (Jan-Sep)	2.1%	4.7%	1.5%	91.7%	2.9%	3.6%	2.0%	91.6%	9.8%	1.2%	1.2%	87.9%	1.6%	6.8%	1.7%	89.9%	0.9%	5.2%	0.6%	93.3%	8.4%	7.2%	2.5%	81.8%
2009 (Jan-Sep)	3.1%	4.8%	3.5%	88.6%	1.2%	2.6%	1.9%	94.3%	6.7%	0.3%	1.2%	91.8%	2.1%	8.9%	2.3%	86.7%	4.2%	4.2%	0.7%	90.9%	7.1%	7.1%	3.8%	82.0%
2010 (Jan-Sep)	2.4%	5.5%	3.0%	89.1%	1.8%	2.2%	1.6%	94.4%	4.7%	0.6%	0.8%	93.9%	0.8%	8.4%	2.1%	88.8%	1.9%	4.4%	0.5%	93.1%	7.9%	7.9%	4.1%	80.2%
2011 (Jan-Sep)	2.1%	7.0%	2.1%	88.8%	1.7%	3.1%	1.5%	93.7%	3.8%	0.0%	1.9%	94.3%	1.6%	13.2%	2.0%	83.2%	2.2%	5.8%	1.5%	90.5%	8.6%	8.1%	3.8%	79.5%
2012 (Jan-Sep)	2.5%	6.7%	1.8%	89.0%	2.1%	2.3%	1.5%	94.1%	3.9%	0.1%	1.7%	94.4%	3.5%	4.9%	1.8%	89.8%	1.4%	6.1%	0.9%	91.6%	7.6%	7.7%	5.6%	79.0%
2013 (Jan-Sep)	2.5%	7.1%	2.4%	88.0%	5.2%	2.8%	1.6%	90.4%	5.5%	0.3%	1.4%	92.8%	2.1%	6.5%	1.6%	89.7%	1.2%	5.6%	0.8%	92.4%	8.8%	9.5%	4.3%	77.4%
2014 (Jan-Sep)	2.8%	8.7%	2.0%	86.5%	7.0%	3.1%	1.5%	88.5%	14.0%	0.5%	2.3%	83.2%	2.0%	8.9%	3.0%	86.1%	1.8%	5.9%	0.9%	91.5%	9.3%	8.7%	5.5%	76.5%
2015 (Jan-Sep)	2.1%	8.7%	1.7%	87.5%	3.0%	3.7%	2.1%	91.3%	8.4%	0.4%	2.3%	88.9%	2.3%	8.0%	1.5%	88.3%	1.2%	4.9%	1.3%	92.7%	7.8%	9.5%	4.1%	78.6%
2016 (Jan-Sep)	3.0%	8.2%	1.7%	87.1%	2.2%	4.0%	2.1%	91.6%	5.4%	0.2%	2.5%	91.9%	2.1%	6.8%	2.7%	88.4%	2.1%	4.6%	1.1%	92.2%	8.0%	9.9%	5.2%	76.9%
2017 (Jan-Sep)	1.8%	8.1%	1.5%	88.6%	1.2%	4.0%	1.8%	93.0%	5.4%	0.2%	1.7%	92.7%	2.2%	5.3%	3.0%	89.6%	0.6%	5.0%	0.6%	93.9%	8.6%	8.2%	6.3%	76.9%

Generator Forced Outage Rates

There are three primary forced outage rate metrics. The most fundamental forced outage rate metric is EFORd. The other forced outage rate metrics either exclude some outages, XEFORd, or exclude some outages and exclude some time periods, EFORp. The other outage rate metrics will no longer be used under the capacity performance capacity market design.

The unadjusted forced outage rate of a generating unit is measured as the equivalent demand forced outage rate (EFORd). EFORd is a measure of the probability that a generating unit will fail, either partially or totally, to perform when it is needed to operate. EFORd measures the forced outage rate during periods of demand, and does not include planned or maintenance outages. A period of demand is a period during which a generator is running or needed to run. EFORd calculations use historical performance data, including equivalent forced outage hours, service hours, average forced outage duration, average run time, average time between unit starts, available hours and period hours.⁹⁵ The EFORd metric includes all forced outages, regardless of the reason for those outages.

⁹⁵ Equivalent forced outage hours are the sum of all forced outage hours in which a generating unit is fully inoperable and all partial forced outage hours in which a generating unit is partially inoperable prorated to represent full hours.

The average PJM EFORd for the first nine months of 2017 was 6.9 percent, an increase from 6.6 percent for the first nine months of 2016. Figure 5-11 shows the average EFORd since 1999 for all units in PJM.⁹⁶

Figure 5-11 Trends in the PJM equivalent demand forced outage rate (EFORd): January 1 through September 30, 1999 through 2017



Table 5-21 shows the class average EFORd by unit type.

Table 5-21 PJM EFORd data for different unit types: January 1 through September 30, 2007 through 2017

	2007 (Jan-Sep)	2008 (Jan-Sep)	2009 (Jan-Sep)	2010 (Jan-Sep)	2011 (Jan-Sep)	2012 (Jan-Sep)	2013 (Jan-Sep)	2014 (Jan-Sep)	2015 (Jan-Sep)	2016 (Jan-Sep)	2017 (Jan-Sep)
Combined Cycle	3.2%	3.3%	4.0%	3.1%	2.7%	3.1%	3.0%	4.5%	2.6%	3.5%	2.3%
Combustion Turbine	10.8%	10.7%	8.3%	8.2%	7.1%	6.6%	10.5%	16.6%	9.3%	5.4%	5.1%
Diesel	12.3%	10.8%	8.8%	6.7%	9.8%	5.1%	6.1%	15.0%	9.7%	7.3%	6.7%
Hydroelectric	1.9%	2.5%	2.7%	1.3%	2.2%	5.1%	3.3%	3.1%	3.1%	2.9%	2.9%
Nuclear	1.2%	1.0%	4.3%	2.1%	2.4%	1.5%	1.3%	2.0%	1.2%	2.3%	0.6%
Steam	8.7%	10.6%	9.6%	9.8%	11.3%	10.3%	12.0%	12.6%	10.3%	10.5%	12.8%
Total	6.7%	7.6%	7.5%	7.0%	7.6%	7.0%	8.2%	9.8%	7.0%	6.6%	6.9%

⁹⁶ The universe of units in PJM changed as the PJM footprint expanded and as units retired from and entered PJM markets. See the 2016 *State of the Market Report for PJM*, Appendix A: "PJM Geography" for details.

Other Forced Outage Rate Metrics

There are a number of performance incentives in the current capacity market design, but they fall short of the incentives that a unit would face if it earned all its revenue in an energy market. These incentives will change when the capacity performance capacity market design is implemented beginning with 2018/2019 Delivery Year but remain essential reasons why the incentive components of capacity performance design were necessary.

Currently, there are two additional forced outage rate metrics that play a significant role in PJM markets, XEFORd and EFORp. Under the capacity performance modifications to RPM, neither XEFORd nor EFORp will be relevant.

The XEFORd metric is the EFORd metric adjusted to remove outages that have been defined to be outside management control (OMC). Under the capacity performance modifications to RPM, all outages will be included in the EFORd metric used to determine the level of unforced capacity for specific units that must be offered in PJM's Capacity Market, including the outages previously designated as OMC. OMC outages will no longer be excluded from the EFORd calculations.

The EFORp metric is the EFORd metric adjusted to remove OMC outages and to reflect unit availability only during the approximately 500 hours defined in the PJM RPM tariff to be the critical load hours. Under the capacity performance modifications to RPM, EFORp will no longer be used to calculate performance penalties.

Current PJM capacity market rules use XEFORD to determine the UCAP for generating units. Unforced capacity in the PJM Capacity Market for any individual generating unit is equal to one minus the XEFORD multiplied by the unit ICAP.

The current PJM Capacity Market rules create an incentive to minimize the forced outage rate excluding OMC outages, but not an incentive to minimize the forced outage rate accounting for all forced outages. In fact, because PJM uses XEFORD as the outage metric to define capacity available for sale, the current PJM Capacity Market includes an incentive to classify as many forced outages as possible as OMC. That incentive is removed in the capacity performance design.

Outages Deemed Outside Management Control

OMC outages will continue to be excluded from outage rate calculations through the end of the 2017/2018 Delivery Year. Under the capacity performance modifications to RPM, effective with the 2018/2019 Delivery Year, OMC outages will no longer be excluded from the EFORD metric used to determine the level of unforced capacity for specific units that must be offered in PJM's Capacity Market. All forced outages will be included.⁹⁷

Table 5-22 shows OMC forced outages by cause code, as classified by PJM. OMC forced outages accounted for 2.6 percent of all forced outages in the first nine months of 2017. The largest contributor to OMC outages, lightning, was the cause of 25.8 percent of OMC outages and 0.7 percent of all forced outages.

Table 5-22 OMC outages: January 1 through September 30, 2017

OMC Cause Code	Percent of OMC Forced Outages	Percent of all Forced Outages
Lightning	25.8%	0.7%
Lack of fuel	22.9%	0.6%
Flood	21.5%	0.5%
Switchyard system protection devices	9.5%	0.2%
Transmission line	5.4%	0.1%
Switchyard circuit breakers	4.2%	0.1%
Lack of water (hydro)	2.4%	0.1%
Transmission system problems other than catastrophes	2.2%	0.1%
Other switchyard equipment	2.2%	0.1%
Transmission equipment	2.1%	0.1%
Wet coal	1.0%	0.0%
Transmission equipment beyond the 1st substation	0.3%	0.0%
Switchyard transformers and associated cooling systems	0.3%	0.0%
Other miscellaneous external problems	0.2%	0.0%
Tornado	0.1%	0.0%
Storms (ice; snow; etc)	0.0%	0.0%
Other fuel quality problems	0.0%	0.0%
Total	100.0%	2.6%

Forced Outage Analysis

The MMU analyzed the causes of forced outages for the entire PJM system. The metric used was lost generation, which is the product of the duration of the outage and the size of the outage reduction. Lost generation can be converted into lost system equivalent availability.⁹⁸ On a system wide basis, the resultant lost equivalent availability from the forced outages is equal to the equivalent forced outage factor (EFOF).⁹⁹

PJM EFOF was 4.4 percent in the first nine months of 2017. This means there was 4.4 percent lost availability because of forced outages. Table 5-23 shows that forced outages for boiler tube leaks, at 22.2 percent of the systemwide EFOF, were the largest single contributor to EFOF.

⁹⁷ "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region," Schedule 5.B.

⁹⁸ For any unit, lost generation can be converted to lost equivalent availability by dividing lost generation by the product of the generating units' capacity and period hours. This can also be done on a systemwide basis.

⁹⁹ EFOF incorporates all outages regardless of their designation as OMC.

Table 5-23 Contribution to EFOF by unit type by cause: January 1 through September 30, 2017

	Combined		Combustion					System
	Cycle	Turbine	Diesel	Hydroelectric	Nuclear	Steam		
Boiler Tube Leaks	5.4%	0.0%	0.0%	0.0%	0.0%	26.1%	22.2%	
Feedwater System	1.2%	0.0%	0.0%	0.0%	1.4%	12.4%	10.5%	
Electrical	25.2%	11.4%	6.3%	3.8%	12.6%	6.2%	7.8%	
Low Pressure Turbine	0.1%	0.0%	0.0%	0.0%	0.0%	6.5%	5.4%	
Wet Scrubbers	0.0%	0.0%	0.0%	0.0%	0.0%	6.2%	5.1%	
Boiler Air and Gas Systems	0.0%	0.0%	0.0%	0.0%	0.0%	6.0%	5.0%	
Exciter	4.5%	1.8%	0.0%	10.6%	0.0%	3.4%	3.5%	
Miscellaneous (Pollution Control Equipment)	0.0%	5.8%	0.0%	0.0%	0.0%	3.3%	3.0%	
Reserve Shutdown	4.8%	13.3%	18.7%	20.8%	10.1%	1.5%	3.0%	
Boiler Fuel Supply from Bunkers to Boiler	0.5%	0.0%	0.0%	0.0%	0.0%	3.1%	2.6%	
Condensing System	4.3%	0.0%	0.0%	0.0%	2.1%	2.4%	2.3%	
Miscellaneous (Generator)	3.0%	3.0%	7.0%	17.8%	12.3%	1.3%	2.2%	
Boiler Piping System	4.2%	0.0%	0.0%	0.0%	0.0%	2.2%	2.1%	
Generator	9.8%	6.8%	8.1%	1.3%	5.1%	0.5%	1.6%	
Valves	0.8%	0.0%	0.0%	0.0%	7.1%	1.6%	1.6%	
Cooling System	0.2%	0.5%	0.0%	0.0%	6.5%	1.5%	1.5%	
Controls	2.6%	1.7%	1.4%	1.9%	6.2%	1.0%	1.3%	
Catastrophe	6.8%	8.4%	0.8%	1.8%	0.0%	0.4%	1.2%	
Boiler Fuel Supply to Bunker	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	1.2%	
All Other Causes	26.7%	47.1%	57.7%	42.0%	36.7%	13.2%	17.1%	
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

Table 5-24 shows the categories which are included in the economic category.¹⁰⁰ Lack of fuel that is considered outside management control accounted for 61.0 percent of all economic reasons.

OMC lack of fuel is described as “Lack of fuel where the operator is not in control of contracts, supply lines, or delivery of fuels.”¹⁰¹ Only a handful of units use other economic problems to describe outages. Other economic problems are not defined by NERC GADS and are best described as economic problems that cannot be classified by the other NERC GADS economic problem cause codes. Lack of water events occur when a hydroelectric plant does not have sufficient fuel (water) to operate.

¹⁰⁰ The definitions of these outages are defined by NERC GADS.

¹⁰¹ The definitions of these outages are defined by NERC GADS.

Table 5-24 Contributions to Economic Outages: January 1 through September 30, 2017

	Contribution to Economic Reasons
Lack of fuel (OMC)	61.0%
Lack of fuel (Non-OMC)	19.2%
Other economic problems	9.4%
Lack of water (hydro)	6.3%
Fuel conservation	1.9%
Ground water or other water supply problems	1.5%
Problems with primary fuel for units with secondary fuel operation	0.8%
Wet fuel (biomass)	0.5%
Total	100.0%

EFORd, XEFORd and EFORp

The equivalent forced outage rate during peak hours (EFORp) is a measure of the probability that a generating unit will fail, either partially or totally, to perform when it is needed to operate during the peak hours of the day in the peak months of January, February, June, July and August. EFORp is calculated using historical performance data and is designed to measure if a unit would have run had the unit not been forced out. Like XEFORd, EFORp excludes OMC outages. PJM systemwide EFORp is a capacity-weighted average of individual unit EFORp.

Until the capacity performance market design is fully implemented for the 2020/2021 Delivery Year, EFORp will be used in the calculation of nonperformance charges for units that are not capacity performance capacity resources. Under capacity performance, EFORp will not be used.

EFORd, XEFORd and EFORp are designed to measure the rate of forced outages, which are defined as outages that cannot be postponed beyond the end of the next weekend.¹⁰² It is reasonable to expect that units have some degree of control over when to take a forced outage, depending on the underlying cause of the forced outage. If units had no control over the timing of forced outages, outages during peak hours of the peak months would be expected to occur at roughly the same rate as outages during periods of demand throughout

¹⁰² See "PJM Manual 22: Generator Resource Performance Indices," Rev. 17 (April 1, 2017), Definitions.

the rest of the year. With the exception of nuclear units, EFORp is lower than XEFORd, suggesting that units elect to take non OMC forced outages during off-peak hours, as much as it is within their ability to do so. That is consistent with the incentives created by the PJM Capacity Market but it does not directly address the question of the incentive effect of omitting OMC outages from the EFORp metric.

Table 5-25 shows the capacity-weighted class average of EFORd, XEFORd and EFORp.

Table 5-25 PJM EFORd, XEFORd and EFORp data by unit type: January 1 through September 30, 2017¹⁰³

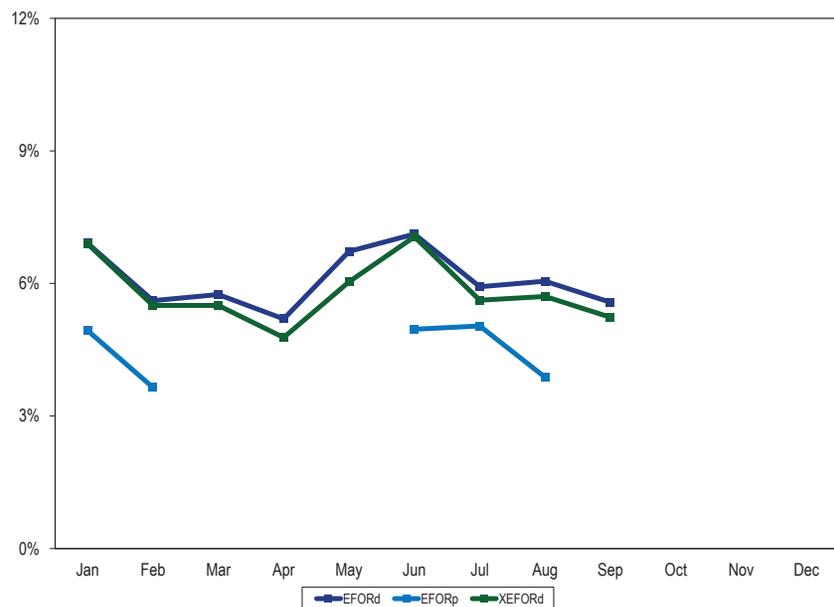
	EFORd	XEFORd	EFORp	Difference EFORd and XEFORd	Difference EFORd and EFORp
Combined Cycle	2.3%	2.1%	1.2%	0.2%	1.2%
Combustion Turbine	5.1%	4.6%	2.3%	0.6%	2.8%
Diesel	6.7%	6.1%	4.0%	0.6%	2.7%
Hydroelectric	2.9%	2.8%	2.4%	0.1%	0.5%
Nuclear	0.6%	0.6%	1.0%	0.0%	(0.3%)
Steam	12.8%	11.9%	9.2%	0.9%	3.6%
Total	6.9%	6.4%	4.8%	0.5%	2.1%

Performance by Month

On a monthly basis, EFORp values were less than EFORd and XEFORd values as shown in Figure 5-12, demonstrating that units had fewer non-OMC outages during peak hours than would have been expected based on EFORd.

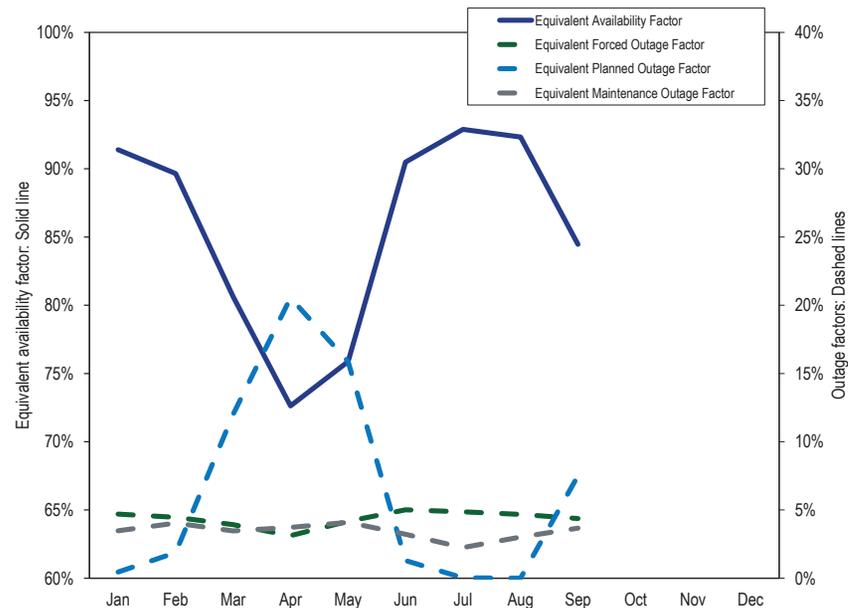
¹⁰³ EFORp is only calculated for the peak months of January, February, June, July and August.

Figure 5-12 PJM EFORd, XEFORd and EFORp: January 1 through September 30, 2017



On a monthly basis, unit availability as measured by the equivalent availability factor is shown in Figure 5-13.

Figure 5-13 PJM monthly generator performance factors: January 1 through September 30, 2017



Demand Response

Markets require both a supply side and a demand side to function effectively. The demand side of wholesale electricity markets is underdeveloped. Wholesale power markets will be more efficient when the demand side of the electricity market becomes fully functional without depending on special programs as a proxy for full participation.

Overview

- **Demand Response Activity.** Demand response includes the economic program and the emergency program. The economic program includes the response to energy prices in the energy market. The emergency and pre-emergency programs are part of the capacity market program which includes both capacity payments and associated energy revenues when the capacity is called on to respond.¹ In the first nine months of 2017, the emergency program accounted for 98.6 percent of all revenue received by demand response providers, the economic program for 0.5 percent, synchronized reserve for 0.6 percent and the regulation market for 0.3 percent. Total emergency revenue decreased by \$166.0 million, 31.2 percent, from \$ 531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017. Capacity market revenue, which comprised 100.0 percent of the emergency demand response program in the first nine months of 2017, decreased by \$166.0 million, 31.2 percent, from \$531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017.²

Economic program revenue decreased by \$1.3 million, 43.2 percent, from \$3.0 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017.³ Synchronized reserve revenue decreased by \$0.5 million, 17.2 percent, from \$2.7 million in the first nine months of 2016 to \$2.3 million in the first nine months of 2017. Regulation revenue increased by \$0.5 million, 69.7 percent, from \$0.8 million in the first nine months of 2016 to \$1.3 million in the first nine months of 2017.

¹ Throughout this document, emergency demand response refers to both emergency and pre-emergency demand response.

² The total credits and MWh numbers for demand resources were calculated as of October 16, 2017 and may change as a result of continued PJM billing updates.

³ Economic credits are synonymous with revenue received for reductions under the economic load response program.

Total demand response revenue decreased by \$167.2 million, 31.1 percent, from \$537.8 million in the first nine months of 2016 to \$370.6 million in the first nine months of 2017. Not all DR activities in the first nine months of 2017 had been reported to PJM at the time of this report.

Emergency and Economic demand response energy payments are uplift. LMP does not cover demand response energy payments although emergency demand response can and does set LMP. Emergency demand response energy costs are paid by PJM market participants in proportion to their net purchases in the real-time market. Economic demand response energy costs are paid by real-time exports from the PJM Region and real-time loads in each zone for which the load-weighted average real-time LMP for the hour during which the reduction occurred is greater than the single system price determined under the net benefits test for that month.⁴

- **Demand Response Market Concentration.** The ownership of economic demand response was highly concentrated in the first nine months of 2016 and 2017. The HHI for economic demand response reductions increased from 7658 in the first nine months of 2016 to 7883 in the first nine months of 2017. The ownership of emergency demand response was moderately concentrated in 2017. The HHI for emergency demand response registrations was 1433 for the 2017/2018 Delivery Year. In the 2017/2018 Delivery Year, the four largest companies contributed 69.6 percent of all registered emergency demand response resources.
- **Locational Dispatch of Demand Resources.** Beginning with the 2014/2015 Delivery Year, demand resources are dispatchable for mandatory reduction on a subzonal basis, defined by zip codes, but only if the subzone is defined at least one day before it is dispatched and only until PJM removes the definition of the subzone. More locational dispatch of demand resources in a nodal market improves market efficiency. The goal should be nodal dispatch of demand resources with no advance notice required, as is the case for generation resources.

⁴ "PJM Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) at 78.

Recommendations

The MMU recognizes that PJM incorporated some of the recommendations related to Demand Response in the Capacity Performance filing. The status of each recommendation reflects the status at September 30, 2017.

- The MMU recommends, as a preferred alternative to having PJM demand side programs, that demand response be on the demand side of the markets and that customers be able to avoid capacity and energy charges by not using capacity and energy at their discretion and that customer payments be determined only by metered load. (Priority: High. First reported 2014. Status: Not adopted.)
- The MMU recommends that the option to specify a minimum dispatch price under the Emergency and Pre-Emergency Program Full option be eliminated and that participating resources receive the hourly real-time LMP less any generation component of their retail rate. (Priority: Medium. First reported 2010. Status: Not adopted.)
- The MMU recommends that the emergency load response program be treated as an economic resource, responding to economic price signals like other capacity resources and not an emergency program responding only after an emergency is called, and not triggering the definition of a PJM emergency and not triggering a Performance Assessment Hour under the new PJM Capacity Market rules. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that the Emergency Program Energy Only option be eliminated because the opportunity to receive the appropriate energy market incentive is already provided in the Economic Program. (Priority: Low. First reported 2010. Status: Not adopted.)
- The MMU recommends that a daily energy market must offer requirement apply to demand resources, comparable to the rule applicable to generation capacity resources.⁵ (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that demand resources be required to provide their nodal location, comparable to generation resources. (Priority: High. First reported 2011. Status: Not adopted.)
- The MMU recommends that PJM require nodal dispatch of demand resources with no advance notice required or, if nodal location is not required, subzonal dispatch of demand resources with no advance notice required. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM eliminate the measurement of compliance across zones within a compliance aggregation area (CAA). The multiple zone approach is less locational than the zonal and subzonal approach and creates larger mismatches between the locational need for the resources and the actual response. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that measurement and verification methods for demand resources be modified to reflect compliance more accurately. (Priority: Medium. First reported 2009. Status: Not adopted.)
- The MMU recommends that compliance rules be revised to include submittal of all necessary hourly load data, and that negative values be included when calculating event compliance across hours and registrations. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM adopt the ISO-NE five-minute metering requirements in order to ensure that dispatchers have the necessary information for reliability and that market payments to demand resources be calculated based on interval meter data at the site of the demand reductions.⁶ (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that demand response event compliance be calculated for each hour and the penalty structure reflect hourly compliance for the base and capacity performance products. (Priority: Medium. First reported 2013. Status: Partially adopted.)

⁵ See "Complaint and Motion to Consolidate of the Independent Market Monitor for PJM," Docket No. EL14-20-000 (January 27, 2014) at 1.

⁶ See ISO-NE Tariff, Section III, Market Rule 1, Appendix E1 and Appendix E2, "Demand Response," <http://www.iso-ne.com/regulatory/tariff/sect_3/mr1_append-e.pdf>. (Accessed October 17, 2017) ISO-NE requires that DR have an interval meter with five minute data reported to the ISO and each behind the meter generator is required to have a separate interval meter. After June 1, 2017, demand response resources in ISO-NE must also be registered at a single node.

- The MMU recommends that load management testing be initiated by PJM with limited warning to CSPs in order to more accurately represent the conditions of an emergency event. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that shutdown cost be defined as the cost to curtail load for a given period that does not vary with the measured reduction or, for behind the meter generators, be the start cost defined in Manual 15 for generators. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the Net Benefits Test be eliminated and that demand response resources be paid LMP less any generation component of the applicable retail rate. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that the tariff rules for demand response clarify that a resource and its CSP, if any, must notify PJM of material changes affecting the capability of the resource to perform as registered and to terminate registrations that are no longer capable of responding to PJM dispatch directives because load has been reduced or eliminated, such as in the case of bankrupt and/or out of service facilities. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not remove any defined subzone and maintain a public record of all created and removed subzones. (Priority: Low. First reported 2016. Status: Not adopted.)
- The MMU recommends that there be only one demand response product, with an obligation to respond when called for all hours of the year. (Priority: High. First reported 2011. Status: Partially adopted.⁷)
- The MMU recommends that the lead times for demand resources be shortened to 30 minutes with an hour minimum dispatch for all resources. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends capping the baseline for measuring capacity compliance under winter compliance at the customers' PLC, similar

to GLD, to avoid double counting. (Priority: High. First reported 2010. Status: Partially adopted.)

- The MMU recommends capping the baseline for measuring compliance under GLD, for the limited summer product, at the customers' PLC. (Priority: High. First reported 2010. Status: Adopted 2015.)
- The MMU recommends that demand resources whose technology type (load drop method) is designated as "Other" explicitly record the technology type. (Priority: Low. First reported 2013. Status: Adopted, 2014.)

Conclusion

A fully functional demand side of the electricity market means that end use customers or their designated intermediaries will have the ability to see real-time energy price signals in real time, will have the ability to react to real-time prices in real time and will have the ability to receive the direct benefits or costs of changes in real-time energy use. In addition, customers or their designated intermediaries will have the ability to see current capacity prices, will have the ability to react to capacity prices and will have the ability to receive the direct benefits or costs of changes in the demand for capacity in the same year in which demand for capacity changes. A functional demand side of these markets means that customers will have the ability to make decisions about levels of power consumption based both on the value of the uses of the power and on the actual cost of that power.

In the energy market, if there is to be a demand side program, demand resources should be paid the value of energy, which is LMP less any generation component of the applicable retail rate. There is no reason to have the net benefits test. The necessity for the net benefits test is an illustration of the illogical approach to demand side compensation embodied in paying full LMP to demand resources. The benefit of demand side resources is not that they suppress market prices, but that customers can choose not to consume at the current price of power, that individual customers benefit from their choices and that the choices of all customers are reflected in market prices. If customers face the market price, customers should have the ability to not

⁷ PJM's Capacity Performance proposal includes this change. See "Reforms to the Reliability Pricing Market ("RPM") and Related Rules in the PJM Open Access Transmission Tariff ("Tariff") and Reliability Assurance Agreement Among Load Serving Entities ("RAA")," Docket No. ER15-632-000 and "PJM Interconnection, L.L.C." Docket No. EL15-29-000.

purchase power and the market impact of that choice does not require a test for appropriateness.

If demand resources are to continue competing directly with generation capacity resources in the PJM Capacity Market, the product must be defined such that it can actually serve as a substitute for generation. This is a prerequisite to a functional market design.

In order to be a substitute for generation, demand resources should be defined in PJM rules as an economic resource, as generation is defined. Demand resources should be required to offer in the Day-Ahead Energy Market and should be called when the resources are required and prior to the declaration of an emergency. Demand resources should be available for every hour of the year and not be limited to a small number of hours.

In order to be a substitute for generation, demand resources should be subject to robust measurement and verification techniques to ensure that transitional DR programs incent the desired behavior. The methods used in PJM programs today are not adequate to determine and quantify deliberate actions taken to reduce consumption.

In order to be a substitute for generation, demand resources should provide a nodal location and should be dispatched nodally to enhance the effectiveness of demand resources and to permit the efficient functioning of the energy market. Both subzonal and multi-zone compliance should be eliminated because they are inconsistent with an efficient nodal market.

In order to be a substitute for generation, compliance by demand resources to PJM dispatch instructions should include both increases and decreases in load. The current method applied by PJM simply ignores increases in load and thus artificially overstates compliance.

In order to be a substitute for generation, reductions should be calculated hourly for dispatched DR. The current rules use the average reduction for the duration of an event. The average reduction across multiple hours does not provide an accurate metric for each hour of the event and is inconsistent

with the measurement of generation resources. Measuring compliance hourly would provide accurate information to the PJM system. Under the new CP rules, the performance of demand response during Performance Assessment Hours (PAH) will be measured on an hourly basis.

In order to be a substitute for generation, any demand resource and its Curtailment Service Provider (CSP), should be required to notify PJM of material changes affecting the capability of the resource to perform as registered and to terminate registrations that are no longer capable of responding to PJM dispatch directives, such as in the case of bankrupt and out of service facilities. Generation resources are required to inform PJM of any change in availability status, including outages and shutdown status.

As a preferred alternative, demand response should be on the demand side of the capacity market rather than on the supply side. Rather than complex demand response programs with their attendant complex and difficult to administer rules, customers would be able to avoid capacity and energy charges by not using capacity and energy at their discretion.

The long term appropriate end state for demand resources in the PJM markets should be comparable to the demand side of any market. Customers should use energy as they wish and that usage will determine the amount of capacity and energy for which each customer pays. There would be no counterfactual measurement and verification.

Under this approach, customers that wish to avoid capacity payments would reduce their load during expected high load hours. Capacity costs would be assigned to LSEs and by LSEs to customers, based on actual load on the system during these critical hours. Customers wishing to avoid high energy prices would reduce their load during high price hours. Customers would pay for what they actually use, as measured by meters, rather than relying on flawed measurement and verification methods. No M&V estimates are required. No promises of future reductions which can only be verified by M&V are required. To the extent that customers enter into contracts with CSPs or

LSEs to manage their payments, M&V can be negotiated as part of a bilateral commercial contract between a customer and its CSP or LSE.

This approach provides more flexibility to customers to limit usage at their discretion. There is no requirement to be available year round or every hour of every day. There is no 30 minute notice requirement. There is no requirement to offer energy into the day-ahead market. All decisions about interrupting are up to the customers only and they may enter into bilateral commercial arrangements with CSPs at their sole discretion. Customers would pay for capacity and energy depending solely on metered load.

A transition to this end state should be defined in order to ensure that appropriate levels of demand side response are incorporated in PJM's load forecasts and thus in the demand curve in the capacity market for the next three years. That transition should be defined by the PRD rules, modified as proposed by the MMU.

This approach would work under the current RPM design and this approach would work under the CP design. This approach is entirely consistent with the Supreme Court decision in *EPSA* as it does not depend on whether FERC has jurisdiction over the demand side. This approach will allow FERC to more fully realize its overriding policy objective to create competitive and efficient wholesale energy markets. The decision of the Supreme Court addressed jurisdictional issues and did not address the merits of FERC's approach. The Supreme Court's decision has removed the uncertainty surrounding the jurisdictional issues and created the opportunity for FERC to revisit its approach to demand side.

PJM Demand Response Programs

All PJM demand response programs can be grouped into economic, emergency and pre-emergency programs or Price Responsive Demand (PRD). Pre-emergency demand response is defined to be dispatchable before an emergency event is declared.⁸ Pre-emergency demand response functions as emergency demand response because a pre-emergency event triggers a PAH.

⁸ 147 FERC ¶ 61,103 (2014).

Table 6-1 provides an overview of the key features of PJM demand response programs. Demand response program is used here to refer to pre-emergency, emergency and economic programs. Demand Resources is used here to refer to emergency and pre-emergency load response, which participate in the capacity market, and Economic Resources refer to economic load response, which participates solely in the energy market. All Demand Resources must register as pre-emergency unless the participant relies on behind the meter generation or the resource has environmental restrictions that limit the resource's ability to operate only in emergency conditions.⁹ In all demand response programs, CSPs are companies that seek to sign up end-use customers, participants, that have the ability to reduce load. After a demand response event occurs, PJM compensates CSPs for their participants' load reductions and CSPs in turn compensate their participants. Only CSPs are eligible to participate in the PJM demand response program, but a participant can register as a PJM special member and become a CSP without any additional cost. PRD does not receive capacity or energy payments. PRD reduces the amount of capacity that must be purchased by the LSE and therefore reduces the LSE's payments for capacity. When PRD load is not on the system, that load also avoids paying for the associated energy. PRD meets its obligation by responding when LMP is at or above price thresholds outlined in the PRD plan.¹⁰ PRD does not have to respond during performance assessment hours (PAH) and therefore is inferior to other capacity resources and is not a substitute for other capacity resources in the capacity performance construct.

⁹ OA Schedule 1 § 8.5.

¹⁰ The Demand Response Subcommittee (DRSC) is currently working to align PRD with the CP designed products.

Table 6-1 Overview of demand response programs

Emergency and Pre-Emergency Load Response Program				Economic Load Response Program	Price Responsive Demand
Load Management (LM)					
Market	Capacity Only	Capacity and Energy	Energy Only	Energy Only	Capacity Only
Capacity Market	DR cleared in RPM	DR cleared in RPM	Not included in RPM	Not included in RPM	PRD cleared in RPM
Dispatch Requirement	Mandatory Curtailment	Mandatory Curtailment	Voluntary Curtailment	Dispatched Curtailment	Price Threshold
Penalties	RPM event or test compliance penalties	RPM event or test compliance penalties	NA	NA	RPM event or test compliance penalties
Capacity Payments	Capacity payments based on RPM clearing price	Capacity payments based on RPM clearing price	NA	NA	Avoided capacity costs
Energy Payments	No energy payment	Energy payment based on submitted higher of "minimum dispatch price" and LMP. Energy payment during PJM declared Emergency Event mandatory curtailments.	Energy payment based on submitted higher of "minimum dispatch price" and LMP. Energy payment only for voluntary curtailments.	Energy payment based on full LMP. Energy payment for hours of dispatched curtailment.	NA

Non-PJM Demand Response Programs

Within the PJM footprint, states may have additional demand response programs as part of a Renewable Portfolio Standard (RPS) or a separate program. Indiana, Ohio, Pennsylvania and North Carolina include demand response in their RPS.¹¹ If demand response is dispatched by a state run program, the demand response resources are ineligible to receive payments from PJM during the state dispatch.

Participation in Demand Response Programs

On April 1, 2012, FERC Order No. 745 was implemented in the PJM economic program, requiring payment of full LMP for dispatched demand resources when a net benefits test (NBT) price threshold is exceeded. This approach replaced the payment of LMP minus the charges for wholesale power and transmission included in customers' tariff rates.

Figure 6-1 shows all revenue from PJM demand response programs by market for the first nine months of 2008 through 2017. Since the implementation of the RPM Capacity Market on June 1, 2007, demand response that participated through the capacity market, which includes emergency energy revenue, has been the primary source of revenue to demand response participants.¹²

¹¹ See the 2017 State of the Market Report for PJM: January through September, Section 8: Environmental and Renewables, Table 8-6.

¹² This includes both capacity market revenue and emergency energy revenue for capacity resources.

In the first nine months of 2017, emergency and pre-emergency revenue, which includes capacity and emergency energy revenue, accounted for 98.6 percent of all revenue received by demand response providers, the economic program for 0.5 percent, synchronized reserve for 0.6 percent and the regulation market for 0.3 percent.

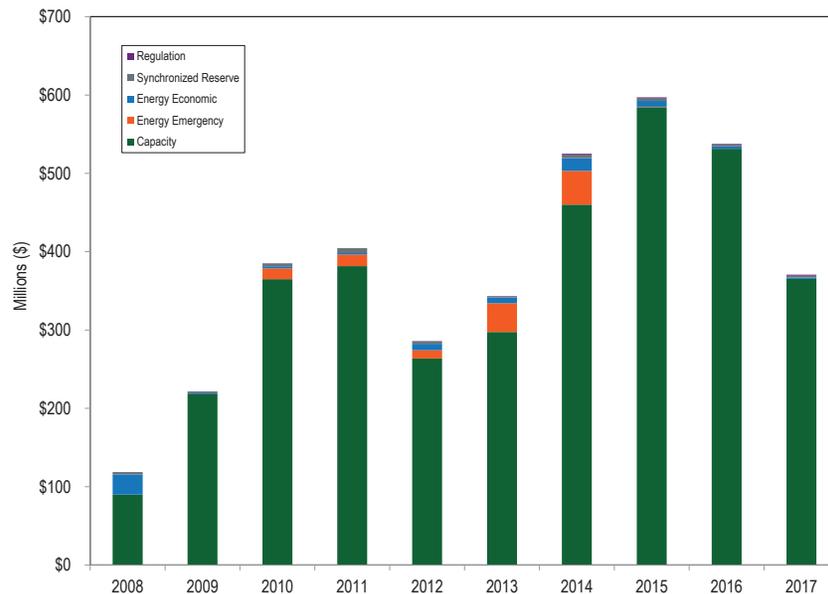
Total emergency revenue decreased by \$166.0 million, 31.2 percent, from \$531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017. Capacity market revenue, which comprised 100.0 percent of the emergency demand response program in the first nine months of 2017, decreased by \$166.0 million, 31.2 percent, from \$531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017. This was in part a result of lower capacity market prices in 2017. The capacity revenue in 2016 is from 2015/2016 and 2016/2017 RPM auction clearing prices and the capacity revenue in 2017 is from 2016/2017 and 2017/2018 RPM auction clearing prices. Weighted average capacity market prices decreased \$38 per MW-day from \$160 in the 2015/2016 Delivery Year to \$122 in the 2016/2017 Delivery Year, a 23.9 percent decrease.¹³ Total demand response revenue decreased by \$167.2 million, 31.1 percent, from \$537.8 million in the first nine months of 2016 to \$370.6 million in the first nine months of 2017. Total

¹³ See the 2016 State of the Market Report for PJM, Volume 2, Section 7: Net Revenues, Table 7-6.

demand response revenue includes economic, pre-emergency, emergency, synchronized reserve and regulation revenue.

Economic program revenue decreased by \$1.3 million, 43.2 percent, from \$3.0 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017.

Figure 6-1 Demand response revenue by market: January 1 through September 30, 2008 through 2017



Economic Program

Table 6-2 shows registered sites and MW for the last day of each month for the period January 1, 2010 through September 30, 2017. Registration is a prerequisite for CSPs to participate in the economic program. The average number of registrations for economic demand response increased and the average registered MW decreased in the first nine months of 2017 compared to the first nine months of 2016. The average number of monthly registrations decreased by seven, 0.9 percent, from 760 in the first nine months of 2016 to 754 in the first nine months of 2017. The average monthly registered MW decreased by 428 MW, 16.8 percent, from 2,541 MW in the first nine months of 2016 to 2,113 MW in the first nine months of 2017.

Several demand response resources are registered for both the economic and emergency demand response programs. There were 1,671 registrations and 1,265 nominated MW in the emergency program that were also registered in the economic program during the first nine months of 2017.

Table 6-2 Economic program registrations on the last day of the month: January 1, 2010 through September 30, 2017

Month	2010		2011		2012		2013		2014		2015		2016		2017	
	Registrations	Registered MW														
Jan	1,841	2,623	1,609	2,432	1,993	2,385	841	2,314	1,180	2,325	1,078	2,960	838	2,557	871	2,603
Feb	1,842	2,624	1,612	2,435	1,995	2,384	843	2,327	1,174	2,330	1,076	2,956	835	2,557	842	2,578
Mar	1,845	2,623	1,612	2,519	1,996	2,356	788	2,284	1,185	2,692	1,075	2,949	834	2,556	850	2,576
Apr	1,849	2,587	1,611	2,534	189	1,318	970	2,346	1,194	2,827	1,076	2,938	832	2,556	897	2,574
May	1,875	2,819	1,687	3,166	371	1,669	1,375	2,414	745	2,511	980	2,846	829	2,545	977	2,626
Jun	813	1,608	1,143	1,912	803	2,347	1,302	2,144	928	2,943	871	2,614	518	2,500	577	1,305
Jul	1,192	2,159	1,228	2,062	942	2,323	1,315	2,443	1,036	3,006	870	2,609	519	2,421	589	1,548
Aug	1,616	2,398	1,987	2,194	1,013	2,373	1,299	2,527	1,080	3,033	869	2,609	805	2,569	590	1,541
Sep	1,609	2,447	1,962	2,183	1,052	2,421	1,280	2,475	1,077	2,919	867	2,608	831	2,608	589	1,664
Oct	1,606	2,444	1,954	2,179	828	2,269	1,210	2,335	1,060	2,943	858	2,568	822	2,564		
Nov	1,605	2,444	1,988	2,255	824	2,267	1,192	2,307	1,063	2,995	851	2,566	820	2,564		
Dec	1,598	2,439	1,992	2,259	846	2,283	1,192	2,311	1,071	2,923	850	2,566	807	2,561		
Avg	1,609	2,432	1,606	2,382	1,150	2,175	1,113	2,364	1,067	2,732	974	2,788	774	2,547	754	2,113

The registered MW in the economic load response program are not a good measure of the MW available for dispatch in the energy market. Economic resources can dispatch less or the same amount of MW as registered in the program. Table 6-3 shows the sum of peak economic MW dispatched by registration each month from January 1, 2010 through September 30, 2017. The monthly peak is the sum of each registration’s monthly noncoincident peak dispatched MW and annual peak is the sum of each registration’s annual noncoincident peak dispatched MW. The peak dispatched MW for all economic demand response registered resources decreased by 243 MW, 17.0 percent, from 1,429 MW in the first nine months of 2016 to 1,186 MW in the first nine months of 2017.¹⁴

Table 6-3 Sum of peak MW reductions for all registrations per month: January 1, 2010 through September 30, 2017

Month	Sum of Peak MW Reductions for all Registrations per Month							
	2010	2011	2012	2013	2014	2015	2016	2017
Jan	183	132	110	193	446	169	139	123
Feb	121	89	101	119	307	336	128	83
Mar	115	81	72	127	369	198	120	111
Apr	111	80	108	133	146	143	118	54
May	172	98	143	192	151	161	131	155
Jun	209	561	954	433	483	833	121	240
Jul	999	561	1,631	1,088	665	1,362	1,316	936
Aug	794	161	952	497	358	272	249	134
Sep	276	84	451	530	795	816	263	13
Oct	118	81	242	168	214	136	150	
Nov	111	86	165	155	166	127	116	
Dec	114	88	98	168	155	122	147	
Annual	1,202	840	1,942	1,486	1,739	1,858	1,451	1,186

Emergency and Economic demand response energy payments are uplift rather than market payments. Economic demand response energy costs are assigned to real-time exports from the PJM Region and real-time loads in each zone for which the load-weighted average real-time LMP for the hour during which the

¹⁴ As a result of the 60 day data lag from event date to settlement, not all settlements for August and September 2017 are incorporated in this report.

reduction occurred is greater than the price determined under the net benefits test for that month.¹⁵ The zonal allocation is shown in Table 6-13.

Table 6-4 shows the total MW reductions made by participants in the economic program and the total credits paid for these reductions for the first nine months of 2010 through 2017. The average credits per MWh paid decreased by \$4.94 per MWh, 11.0 percent, from \$44.91 per MWh in the first nine months of 2016 to \$39.97 per MWh in the first nine months of 2017. The load-weighted, average LMP was 3.5 percent higher in the first nine months of 2017 than in the first nine months of 2016, \$30.36 per MWh versus \$29.32 per MWh. Curtailed energy for the economic program decreased by 24,406, 36.1 percent, from 67,516 MWh in the first nine months of 2016 to 43,110 MWh in the first nine months of 2017. Total credits paid for economic DR in the first nine months of 2017 decreased by \$1.3 million, 43.2 percent, from \$3.0 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017.

Table 6-4 Credits paid to the PJM economic program participants: January 1 through September 30, 2010 through 2017

Year (Jan-Sep)	Total MWh	Total Credits	\$/MWh
2010	58,280	\$2,677,937	\$45.95
2011	15,376	\$1,943,507	\$126.40
2012	121,381	\$8,172,654	\$67.33
2013	105,299	\$7,387,658	\$70.16
2014	118,007	\$16,510,733	\$139.91
2015	103,721	\$7,355,263	\$70.91
2016	67,516	\$3,032,039	\$44.91
2017	45,545	\$1,722,986	\$37.83

Economic demand response resources that are dispatched in both the economic and emergency programs at the same time are settled under emergency rules. For example, assume a demand resource has an economic offer price of \$100 per MWh and an emergency strike price of \$1,800 per MWh. If this resource were scheduled to reduce in the Day-Ahead Energy Market, the demand resource would receive \$100 per MWh, but if an emergency event were called during the economic dispatch, the demand resource would receive

¹⁵ "PJM Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) at 78.

its emergency strike price of \$1,800 per MWh instead. The rationale for this rule is not clear. All other resources that clear in the day-ahead market are financially firm at the clearing price.

Figure 6-2 shows monthly economic demand response credits and MWh, from January 2010 through June 2017.

Figure 6-2 Economic program credits and MWh by month: January 1, 2010 through September 30, 2017

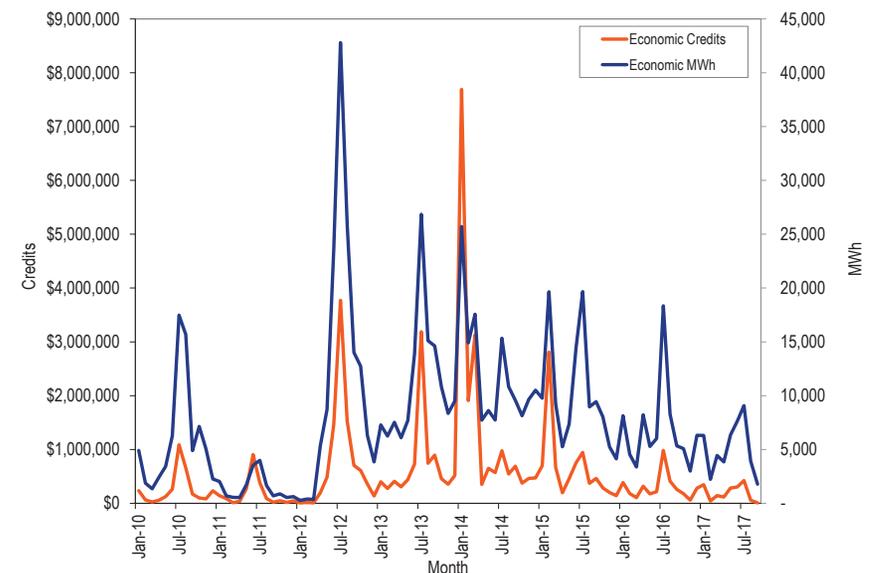


Table 6-5 shows performance for the first nine months of 2016 and 2017 in the economic program by control zone. Total reductions under the economic program decreased by 21,971 MW, 32.5 percent, from 67,516 MW in the first nine months of 2016 to 45,545 MW in the first nine months of 2017. Total revenue under the economic program decreased by \$1.3 million, 43.2 percent, from \$3.0 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017.¹⁶

¹⁶ Economic demand response reductions that are submitted to PJM for payment but have not received payment are not included in Table 6-5. Payments for Economic demand response reductions are settled monthly.

Table 6-5 PJM economic program participation by zone: January 1 through September 30, 2016 and 2017

Zones	Credits			MWh Reductions			Credits per MWh Reduction		
	Jan-Sep 2016	Jan-Sep 2017	Percent Change	Jan-Sep 2016	Jan-Sep 2017	Percent Change	Jan-Sep 2016	Jan-Sep 2017	Percent Change
AECO	\$5,900.85		NA	110		NA	\$53.78		
AEP		\$8.84	NA		0	NA		\$42.19	
APS	\$53,971.54	\$9,414.81	(82.6%)	1,213	293	(75.8%)	\$44.51	\$32.12	(27.8%)
ATSI	\$381,084.89	\$91,257.07	(76.1%)	9,302	3,515	(62.2%)	\$40.97	\$25.96	(36.6%)
BGE	\$488,046.57	\$132,077.02	(72.9%)	8,608	2,500	(71.0%)	\$56.70	\$52.84	(6.8%)
ComED	\$201,077.16	\$117,143.03	(41.7%)	5,082	3,619	(28.8%)	\$39.57	\$32.37	(18.2%)
DEOK	\$28,324.20	\$12,682.20	(55.2%)	287	91	(68.3%)	\$98.81	\$139.45	41.1%
Dominion	\$848,285.77	\$510,804.40	(39.8%)	17,953	7,850	(56.3%)	\$47.25	\$65.07	37.7%
DPL	\$23,435.88	\$11,019.81	(53.0%)	410	516	25.8%	\$57.12	\$21.36	(62.6%)
JCPL	\$176,199.52	\$85,579.20	(51.4%)	3,051	1,242	(59.3%)	\$57.75	\$68.92	19.3%
Met-Ed	\$3,677.98	\$9,816.66	166.9%	79	223	182.9%	\$46.66	\$44.02	(5.7%)
PECO	\$44,373.11	\$4,815.59	(89.1%)	491	152	(69.1%)	\$90.40	\$31.73	(64.9%)
PENELEC	\$330,930.20	\$176,804.20	(46.6%)	8,953	7,813	(12.7%)	\$36.96	\$22.63	(38.8%)
PEPCO	\$36,066.78	\$53,642.85	48.7%	1,009	1,095	8.5%	\$35.75	\$49.00	37.1%
PPL	\$51,603.48	\$57,285.40	11.0%	894	1,508	68.6%	\$57.70	\$37.99	(34.2%)
PSEG	\$359,061.40	\$450,634.67	25.5%	10,074	15,129	50.2%	\$35.64	\$29.79	(16.4%)
Total	\$3,032,039.33	\$1,722,976.91	(43.2%)	67,516	45,545	(32.5%)	\$44.91	\$37.83	(15.8%)

Table 6-6 shows total settlements submitted for the first nine months of 2010 through 2017. A settlement is counted for every day on which a registration is dispatched in the economic program.

Table 6-6 Settlements submitted in the economic program: January 1 through September 30, 2010 through 2017

Year	Jan-Sep 2010	Jan-Sep 2011	Jan-Sep 2012	Jan-Sep 2013	Jan-Sep 2014	Jan-Sep 2015	Jan-Sep 2016	Jan-Sep 2017
Number of Settlements	3,367	703	5,334	2,358	2,425	1,851	1,524	1,417

Table 6-7 shows the number of CSPs, and the number of participants in their portfolios, submitting settlements by year for the first nine months of 2010 through 2017. The number of active participants increased by 13, 22.4 percent, from 58 in the first nine months of 2016 to 71 in the first nine months of 2017. All participants must be included in a CSP.

Table 6-7 Participants and CSPs submitting settlements in the economic program by year: January 1 through September 30, 2010 through 2017

	(Jan-Sep) 2010		(Jan-Sep) 2011		(Jan-Sep) 2012		(Jan-Sep) 2013		(Jan-Sep) 2014		(Jan-Sep) 2015		(Jan-Sep) 2016		(Jan-Sep) 2017	
	Active CSPs	Active Participants														
Total Distinct Active	16	257	15	203	22	428	20	273	16	154	18	114	12	58	12	71

The ownership of economic demand response resources was highly concentrated in the first nine months of 2016 and 2017.¹⁷ Table 6-8 shows the average hourly HHI for each month and the average hourly HHI for 2016 and the first nine months of 2017. Table 6-8 also lists the share of reductions provided by, and the share of credits claimed by the four largest parent companies in each year. In the first nine months of 2017, 82.6 percent of all economic DR reductions and 85.1 percent of economic DR revenue were attributable to the four largest parent companies. The HHI for economic demand response increased 225 points, 2.9 percent, from 7658 in the first nine months of 2016 to 7883 in the first nine months of 2017.

Table 6-8 HHI and market concentration in the economic program: January 1, 2016 through September 30, 2017¹⁸

Month	HHI		Top Four Companies Share of Reduction			Top Four Companies Share of Credit			
	2016	2017	2016	2017	Change in Percent	2016	2017	Change in Percent	
Jan	7434	8952	97.5%	99.7%	2.2%	98.0%	99.6%	1.7%	
Feb	7697	9263	100.0%	100.0%	0.0%	100.0%	100.0%	0.0%	
Mar	8587	8170	(4.9%)	98.9%	99.4%	0.5%	99.4%	98.1%	(0.0%)
Apr	6754	6099	(9.7%)	100.0%	100.0%	0.0%	100.0%	100.0%	0.0%
May	8150	7095	(12.9%)	97.9%	100.0%	2.1%	96.3%	100.0%	3.7%
Jun	7700	7702	0.0%	100.0%	91.6%	(8.4%)	100.0%	88.9%	(8.4%)
Jul	7282	7549	3.7%	96.0%	92.4%	(3.6%)	89.2%	93.0%	3.2%
Aug	7557	8006	5.9%	93.5%	99.6%	6.1%	89.3%	98.3%	10.3%
Sep	7631	9887	29.6%	93.8%			92.7%		
Oct	7710			100.0%			100.0%		
Nov	8856			100.0%			100.0%		
Dec	7541			93.4%			92.5%		
Total	7658	7883	2.9%	90.6%	82.6%	(8.0%)	90.3%	85.1%	(5.2%)

Table 6-9 shows average MWh reductions and credits by hour for the first nine months of 2016 and 2017. In the first nine months of 2016, 88.5 percent of reductions and 87.7 percent of credits occurred in hours ending 0900 to 2100, and in the first nine months of 2017, 92.9 percent of reductions and 90.7 percent of credits occurred in hours ending 0900 to 2100.

Table 6-9 Hourly frequency distribution of economic program MWh reductions and credits: January 1 through September 30, 2016 and 2017

Hour Ending (EPT)	MWh Reductions			Program Credits		
	Jan-Sep 2016	Jan-Sep 2017	Percent Change	Jan-Sep 2016	Jan-Sep 2017	Percent Change
1 through 6	622	529	(15%)	\$15,553	\$35,014	125%
7	2,226	335	(85%)	\$142,574	\$20,767	(85%)
8	3,629	1,212	(67%)	\$175,577	\$54,407	(69%)
9	4,109	1,839	(55%)	\$147,014	\$59,329	(60%)
10	3,475	2,153	(38%)	\$117,229	\$62,244	(47%)
11	2,906	2,398	(18%)	\$94,898	\$68,360	(28%)
12	2,979	2,595	(13%)	\$101,787	\$78,086	(23%)
13	3,189	2,797	(12%)	\$115,445	\$89,537	(22%)
14	4,804	3,664	(24%)	\$235,107	\$134,309	(43%)
15	5,637	4,199	(26%)	\$293,362	\$161,236	(45%)
16	6,765	4,467	(34%)	\$334,271	\$176,979	(47%)
17	7,229	4,545	(37%)	\$357,406	\$204,461	(43%)
18	6,929	4,650	(33%)	\$351,651	\$209,652	(40%)
19	5,280	3,803	(28%)	\$230,802	\$145,281	(37%)
20	3,570	3,098	(13%)	\$128,322	\$100,625	(22%)
21	2,879	2,104	(27%)	\$102,168	\$73,670	(28%)
22	723	723	0%	\$22,310	\$37,790	69%
23 through 24	564	435	(23%)	\$10,639	\$11,239	6%
Total	67,516	45,545	(33%)	\$2,976,115	\$1,722,986	(42%)

Table 6-10 shows the distribution of economic program MWh reductions and credits by ranges of real-time zonal, load-weighted, average LMP in the first nine months of 2016 and 2017. In the first nine months of 2017, 0.1 percent of MWh reductions and 0.3 percent of program credits occurred during hours when the applicable zonal LMP was higher than \$175 per MWh.

¹⁷ Parent companies may own one CSP or multiple CSPs. All HHI calculations in this section are at the parent company level.

¹⁸ September 2017 is omitted for the top four companies share of reductions and credits columns due to confidentiality requirements.

Table 6-10 Frequency distribution of economic program zonal, load-weighted, average LMP (By hours): January 1 through September 30, 2016 and 2017

LMP	MWh Reductions			Program Credits		
	Jan-Sep 2016	Jan-Sep 2017	Percent Change	Jan-Sep 2016	Jan-Sep 2017	Percent Change
\$0 to \$25	10,009	2,762	(72%)	\$221,540	\$23,209	(90%)
\$25 to \$50	42,907	31,108	(27%)	\$1,576,090	\$891,476	(43%)
\$50 to \$75	7,992	7,486	(6%)	\$482,040	\$412,898	(14%)
\$75 to \$100	2,265	2,169	(4%)	\$165,376	\$169,469	2%
\$100 to \$125	2,217	960	(57%)	\$227,592	\$90,768	(60%)
\$125 to \$150	1,046	640	(39%)	\$135,013	\$77,382	(43%)
\$150 to \$175	470	349	(26%)	\$58,826	\$51,945	(12%)
> \$175	594	63	(89%)	\$109,361	\$5,839	(95%)
Total	67,499	45,538	(33%)	\$2,975,839	\$1,722,986	(42%)

Following Order No. 745, all ISO/RTOs are required to calculate an NBT threshold price each month above which the net benefits of DR are deemed to exceed the cost to load. PJM calculates the NBT price threshold by first taking the generation offers from the same month of the previous year. For example, the NBT price calculation for February 2016 was calculated using generation offers from February 2015. PJM then adjusts these offers to account for changes in fuel prices and uses these adjusted offers to create an average monthly supply curve. PJM estimates a function that best fits this supply curve and then finds the point on this curve where the elasticity is equal to 1.¹⁹ The price at this point is the NBT threshold price.

The NBT test is a crude tool that is not based in market logic. The NBT threshold price is a monthly estimate calculated from a monthly supply curve that does not incorporate real-time or day-ahead prices. In addition, it is a single price used to trigger payments to economic demand response resources throughout the entire RTO, regardless of their location.

The necessity for the NBT test is an illustration of the illogical approach to demand side compensation embodied in paying full LMP to demand resources. The benefit of demand side resources is not that they suppress market prices, but that customers can choose not to consume at the current price of power, that individual customers benefit from their choices and that the choices of

¹⁹ "PJM Manual 11: Energy & Ancillary Services Market Operations," Rev.91 (October 3, 2017) at 146.

all customers are reflected in market prices. If customers face the market price, customers should have the ability to not purchase power and the market impact of that choice does not require a test for appropriateness.

When the LMP is above the NBT threshold price, economic demand response resources that reduce their power consumption are paid the full LMP. When the LMP is below the NBT threshold price, economic demand response resources are not paid for any load reductions.

Table 6-11 shows the NBT threshold price from April 1, 2012, when Order No. 745 was implemented in PJM, through September 30, 2017.

Table 6-11 Net benefits test threshold prices: April 1, 2012 through September 30, 2017

Month	Net Benefits Test Threshold Price (\$/MWh)					
	2012	2013	2014	2015	2016	2017
Jan		\$25.72	\$29.51	\$29.63	\$23.67	\$32.60
Feb		\$26.27	\$30.44	\$26.52	\$26.71	\$31.57
Mar		\$25.60	\$34.93	\$24.99	\$22.10	\$30.56
Apr	\$25.89	\$26.96	\$32.59	\$24.92	\$19.93	\$30.45
May	\$23.46	\$27.73	\$32.08	\$23.79	\$20.69	\$29.77
Jun	\$23.86	\$28.44	\$31.62	\$23.80	\$20.62	\$27.14
Jul	\$22.99	\$29.42	\$31.62	\$23.03	\$20.73	\$24.42
Aug	\$24.47	\$28.58	\$29.85	\$23.17	\$23.24	\$22.75
Sep	\$24.93	\$28.80	\$29.83	\$21.69	\$24.70	\$21.51
Oct	\$25.96	\$29.13	\$30.20	\$21.48	\$26.50	
Nov	\$25.63	\$31.63	\$29.17	\$22.28	\$29.27	
Dec	\$25.97	\$28.82	\$29.01	\$22.31	\$29.71	
Average	\$24.80	\$28.09	\$30.91	\$23.97	\$23.99	\$27.86

Table 6-12 shows the number of hours that at least one zone in PJM had day-ahead LMP or real-time LMP higher than the NBT threshold price. In the first nine months of 2017, the highest zonal LMP in PJM was higher than the NBT threshold price 4,319 hours out of 6,551 hours, or 65.9 percent of all hours. Reductions occurred in 2,423 hours, 56.1 percent, of those 4,319 hours in the first nine months of 2017. The last three columns illustrate how often economic demand response activity occurred when LMPs exceeded NBT threshold prices for January 1, 2016 through September 30, 2017. There were

1.4 percent of hours with demand response below the NBT threshold price in the first nine months of 2016 and 7.0 percent of hours with demand response below the NBT threshold price in the first nine months of 2017.

Table 6-12 Hours with price higher than NBT and DR occurrences in those hours: January 1, 2016 through September 30, 2017

Month	Number of Hours		Number of Hours with LMP Higher than NBT			Percent of NBT Hours with DR		
	2016	2017	2016	2017	Percent Change	2016	2017	Percent Change
Jan	744	744	690	388	(43.8%)	47.5%	63.4%	15.9%
Feb	696	672	595	414	(30.4%)	32.3%	37.7%	5.4%
Mar	743	743	710	484	(31.8%)	29.0%	64.3%	35.2%
Apr	720	720	692	407	(41.2%)	60.1%	72.7%	12.6%
May	744	744	602	445	(26.1%)	70.1%	76.0%	5.9%
Jun	720	720	576	421	(26.9%)	67.7%	67.5%	(0.2%)
Jul	744	744	697	546	(21.7%)	65.6%	67.2%	1.6%
Aug	744	744	704	573	(18.6%)	64.2%	48.9%	(15.3%)
Sep	720	720	651	641	(1.5%)	49.0%	22.6%	(26.4%)
Oct	744		693			48.6%		
Nov	721		401			52.1%		
Dec	744		519			72.4%		
Total	8,784	6,551	8,192	4,319	(47.3%)	59.8%	56.1%	(3.7%)

Economic DR revenues are paid by real-time loads and real-time scheduled exports as an uplift charge. Table 6-13 shows the sum of real-time DR charges and day-ahead DR charges paid in each zone and paid by exports. Real-time loads in AEP, Dominion, and exports paid the highest DR charges in the first nine months of 2017.

Table 6-13 Zonal DR charge: January 1 through September 30, 2017

Zone	January	February	March	April	May	June	July	August	September	Total
AECO	\$4,351	\$186	\$1,126	\$727	\$3,405	\$4,007	\$6,985	\$830	\$95	\$21,712
AEP	\$51,963	\$3,130	\$16,305	\$13,425	\$41,704	\$41,958	\$62,115	\$8,189	\$1,217	\$240,007
APS	\$22,797	\$1,432	\$6,373	\$5,307	\$16,047	\$16,540	\$23,634	\$3,181	\$447	\$95,757
ATSI	\$26,957	\$2,190	\$9,581	\$8,097	\$22,836	\$24,670	\$34,318	\$4,611	\$677	\$133,938
BGE	\$16,680	\$1,915	\$4,947	\$4,167	\$11,813	\$13,543	\$18,460	\$2,224	\$308	\$74,057
ComEd	\$17,767	\$1,894	\$9,538	\$7,797	\$22,974	\$35,092	\$53,462	\$6,322	\$1,124	\$155,971
DAY	\$6,596	\$584	\$2,295	\$2,352	\$6,343	\$6,112	\$8,674	\$1,170	\$175	\$34,300
DEOK	\$9,180	\$540	\$2,981	\$2,666	\$9,256	\$9,104	\$14,189	\$1,878	\$273	\$50,067
Dominion	\$50,509	\$2,916	\$13,496	\$12,459	\$36,978	\$37,705	\$57,187	\$6,917	\$924	\$219,092
DPL	\$9,422	\$3,025	\$2,399	\$1,638	\$5,916	\$6,872	\$11,110	\$1,335	\$164	\$41,880
DLCO	\$5,236	\$348	\$1,694	\$1,511	\$4,925	\$5,059	\$7,394	\$1,001	\$142	\$27,310
EKPC	\$5,657	\$280	\$1,511	\$1,080	\$3,839	\$3,916	\$6,658	\$798	\$112	\$23,852
JCPL	\$10,106	\$1,241	\$3,012	\$2,162	\$8,835	\$10,439	\$15,269	\$1,856	\$232	\$53,153
Met-Ed	\$6,970	\$560	\$2,270	\$2,586	\$5,408	\$5,587	\$7,931	\$1,056	\$148	\$32,516
PECO	\$17,178	\$695	\$4,851	\$4,196	\$14,229	\$14,831	\$22,742	\$2,852	\$390	\$81,964
PENELEC	\$7,453	\$830	\$2,271	\$2,774	\$5,488	\$4,981	\$7,016	\$1,020	\$159	\$31,992
Pepco	\$14,713	\$1,276	\$4,379	\$3,980	\$11,762	\$12,650	\$18,124	\$2,199	\$299	\$69,381
PPL	\$19,561	\$1,853	\$6,217	\$3,928	\$12,675	\$13,837	\$19,092	\$2,609	\$363	\$80,135
PSEG	\$18,859	\$2,788	\$5,675	\$4,265	\$16,364	\$18,918	\$26,420	\$3,289	\$442	\$97,020
RECO	\$601	\$89	\$175	\$146	\$640	\$749	\$1,021	\$125	\$17	\$3,563
Exports	\$24,075	\$14,581	\$11,475	\$23,798	\$21,391	\$17,626	\$14,673	\$1,418	\$265	\$129,302
Total	\$346,632	\$42,353	\$112,574	\$109,060	\$282,830	\$304,195	\$436,473	\$54,880	\$7,973	\$1,696,969

Table 6-14 shows the total zonal DR charge per MWh of real-time load and exports in the first nine months of 2017. On a dollar per MWh basis, real-time load and exports in PSEG paid the highest charges for economic demand response in the first nine months of 2017. The highest average zonal monthly per MWh charges for economic demand response occurred in March, when EKPC paid an average of \$0.022/MWh.

Table 6-14 Zonal DR charge per MWh of load and exports: January 1 through September 30, 2017

Zone	January	February	March	April	May	June	July	August	September	Zonal Average
AECO	\$0.016	\$0.010	\$0.019	\$0.002	\$0.001	\$0.004	\$0.013	\$0.005	\$0.005	\$0.008
AEP	\$0.012	\$0.009	\$0.020	\$0.002	\$0.000	\$0.004	\$0.011	\$0.004	\$0.005	\$0.008
APS	\$0.013	\$0.009	\$0.019	\$0.002	\$0.001	\$0.004	\$0.011	\$0.004	\$0.006	\$0.008
ATSI	\$0.012	\$0.009	\$0.018	\$0.002	\$0.001	\$0.004	\$0.011	\$0.004	\$0.006	\$0.007
BGE	\$0.014	\$0.008	\$0.018	\$0.002	\$0.000	\$0.004	\$0.011	\$0.005	\$0.006	\$0.008
ComEd	\$0.009	\$0.009	\$0.013	\$0.002	\$0.001	\$0.005	\$0.010	\$0.004	\$0.006	\$0.007
DAY	\$0.012	\$0.008	\$0.018	\$0.002	\$0.001	\$0.004	\$0.011	\$0.005	\$0.006	\$0.007
DEOK	\$0.013	\$0.009	\$0.020	\$0.002	\$0.001	\$0.004	\$0.011	\$0.004	\$0.006	\$0.008
Dominion	\$0.012	\$0.009	\$0.019	\$0.002	\$0.001	\$0.004	\$0.011	\$0.004	\$0.006	\$0.007
DPL	\$0.015	\$0.010	\$0.019	\$0.002	\$0.001	\$0.004	\$0.013	\$0.006	\$0.006	\$0.008
DLCO	\$0.013	\$0.009	\$0.019	\$0.002	\$0.001	\$0.004	\$0.012	\$0.004	\$0.006	\$0.008
EKPC	\$0.012	\$0.009	\$0.022	\$0.002	\$0.001	\$0.004	\$0.011	\$0.004	\$0.005	\$0.008
JCPL	\$0.018	\$0.011	\$0.018	\$0.002	\$0.001	\$0.004	\$0.013	\$0.008	\$0.006	\$0.009
Met-Ed	\$0.014	\$0.010	\$0.018	\$0.002	\$0.001	\$0.004	\$0.013	\$0.006	\$0.008	\$0.008
PECO	\$0.015	\$0.010	\$0.019	\$0.002	\$0.001	\$0.004	\$0.014	\$0.004	\$0.006	\$0.008
PENELEC	\$0.013	\$0.008	\$0.018	\$0.002	\$0.001	\$0.004	\$0.011	\$0.007	\$0.008	\$0.008
Pepco	\$0.014	\$0.009	\$0.018	\$0.002	\$0.001	\$0.004	\$0.011	\$0.005	\$0.006	\$0.008
PPL	\$0.015	\$0.010	\$0.018	\$0.002	\$0.001	\$0.004	\$0.013	\$0.007	\$0.006	\$0.008
PSEG	\$0.016	\$0.010	\$0.018	\$0.002	\$0.001	\$0.004	\$0.013	\$0.009	\$0.006	\$0.009
RECO	\$0.017	\$0.011	\$0.017	\$0.002	\$0.001	\$0.004	\$0.013	\$0.008	\$0.006	\$0.009
Exports	\$0.006	\$0.005	\$0.008	\$0.001	\$0.000	\$0.004	\$0.006	\$0.009	\$0.009	\$0.005
Monthly Average	\$0.013	\$0.009	\$0.018	\$0.002	\$0.001	\$0.004	\$0.012	\$0.006	\$0.006	\$0.008

Table 6-15 shows the monthly day-ahead and real-time DR charges and the per MWh DR charges for January 1, 2016, through September 30, 2017. The day-ahead DR charges decreased by \$0.4 million, 45.0 percent, from \$0.9 million in the first nine months of 2016 to \$0.5 million in the first nine months of 2017. The real-time DR charges decreased \$0.8 million, 42.4 percent, from \$2.1 million in the first nine months of 2016 to \$1.2 million in the first nine months of 2017. The per MWh charge paid by all real-time load and exports for economic DR decreased \$0.008/MWh, 51.3 percent, from \$0.016/MWh in the first nine months of 2016 to \$0.008/MWh in the first nine months of 2017.

Table 6-15 Monthly day-ahead and real-time DR charge: January 1, 2016 through September 30, 2017

Month	Day-ahead DR Charge			Real-time DR Charge			Per MWh Charge (\$/MWh)		
	2016	2017	Percent Change	2016	2017	Percent Change	2016	2017	Percent Change
Jan	\$163,639	\$35,134	(78.5%)	\$222,281	\$311,498	40.1%	\$0.010	\$0.013	34.9%
Feb	\$64,230	\$25,562	(60.2%)	\$117,388	\$16,797	(85.7%)	\$0.022	\$0.009	(58.3%)
Mar	\$14,620	\$70,093	379.4%	\$90,349	\$75,293	(16.7%)	\$0.002	\$0.018	791.6%
Apr	\$94,264	\$87,514	(7.2%)	\$223,013	\$27,455	(87.7%)	\$0.009	\$0.002	(79.5%)
May	\$64,456	\$57,455	(10.9%)	\$111,839	\$225,376	101.5%	\$0.010	\$0.001	(94.7%)
Jun	\$71,162	\$132,225	85.8%	\$144,731	\$171,970	18.8%	\$0.004	\$0.004	1.6%
Jul	\$310,567	\$96,325	(69.0%)	\$670,150	\$327,436	(51.1%)	\$0.063	\$0.012	(81.7%)
Aug	\$98,494	\$12,821	(87.0%)	\$312,815	\$42,059	(86.6%)	\$0.010	\$0.006	(43.5%)
Sep	\$58,644	\$0	(100.0%)	\$199,396	\$7,973	(96.0%)	\$0.014	\$0.006	(56.6%)
Oct	\$40,868			\$136,214			\$0.003		
Nov	\$24,038			\$35,821			\$0.001		
Dec	\$122,480			\$159,075			\$0.002		
Total	\$1,127,462	\$517,129		\$2,423,073	\$1,205,857		\$0.013	\$0.008	
Jan-Sep	\$940,076	\$517,129	(45.0%)	\$2,091,963	\$1,205,857	(42.4%)	\$0.016	\$0.008	(51.3%)

Emergency and Pre-Emergency Programs

The emergency and pre-emergency load response programs consist of the limited, extended summer, annual and capacity performance demand response products. To participate as an emergency or pre-emergency demand resource, the CSP must clear MW in an RPM auction. Emergency and pre-emergency resources receive capacity revenue from the capacity market and also receive energy revenue at a predefined strike price from the energy market for reductions during a PJM initiated emergency or pre-emergency event. The rules applied to demand resources in the current market design do not treat demand resources in a manner comparable to generation capacity resources, even though demand resources are sold in the same capacity market, are treated as a substitute for other capacity resources and displace other capacity resources in RPM auctions.

The MMU recommends that if demand resources remain on the supply side of the capacity market, a daily must offer requirement in the Day-Ahead Energy Market apply to demand resources, comparable to the rule applicable to generation capacity resources. This will help to ensure comparability and consistency for demand resources.

The MMU recommends that the option to specify a minimum dispatch price under the Emergency and Pre-Emergency Program Full option be eliminated and that participating resources receive the hourly real-time LMP less any generation component of their retail rate.²⁰

The ownership of Demand Resources was moderately concentrated in 2017. The HHI for Demand Resources was 1433 for the 2017/2018 Delivery Year. In the 2017/2018 Delivery Year, the four largest companies contributed 69.6 percent of all registered Demand Resources.

Table 6-16 shows the HHI value for LDAs by delivery year. The HHI values are calculated by the cleared UCAP MW in each delivery year for Demand Resources. The ownership of DR was unconcentrated in one LDA in the 2016/2017 Delivery Year. The ownership of DR in five LDAs was moderately

concentrated in the 2016/2017 Delivery Year. The ownership of DR in four LDAs was highly concentrated in the 2016/2017 Delivery Year. The ownership of DR was unconcentrated in one LDA in the 2017/2018 Delivery Year. The ownership of DR in four LDAs was moderately concentrated in the 2017/2018 Delivery Year. The ownership of DR in seven LDAs was highly concentrated in the 2017/2018 Delivery Year.

Table 6-16 HHI value for LDAs by delivery year: 2016/2017 and 2017/2018 Delivery Years

Delivery Year	LDA	UCAP MW	HHI Value
2016/2017	RTO	4,911.1	2522
	MAAC	1,743.3	1913
	EMAAC	1,270.0	2045
	SWMAAC	935.6	5178
	DPL-SOUTH	105.7	2338
	PSEG	395.5	1443
	PS-NORTH	223.4	1666
	PEPCO	663.9	3619
	ATSI	1,343.2	2817
	ATSI-CLEVELAND	468.7	3768
2017/2018	RTO	4,018.0	2593
	MAAC	655.7	1914
	EMAAC	1,057.3	2093
	DPL-SOUTH	86.3	3145
	PSEG	236.9	1409
	PS-NORTH	151.5	2043
	PEPCO	608.4	3726
	ATSI	720.8	3615
	ATSI-CLEVELAND	282.4	4927
	COMED	1,470.8	3353
BGE	790.7	5309	
PPL	650.5	2167	

Table 6-17 shows zonal monthly capacity market revenue to demand resources for the first nine months of 2017. Capacity market revenue decreased in the first nine months of 2017 by \$165.9 million, 31.2 percent, from \$531.3 million in the first nine months of 2016 to \$365.4 million in the first nine months of 2017. This reduction is a result of lower RPM prices and fewer MW of DR cleared in RPM for the 2017/2018 delivery year.

²⁰ See "Complaint and Motion to Consolidate of the Independent Market Monitor for PJM," Docket No. EL14-20-000 (January 28, 2014); "Comments of the Independent Market Monitor for PJM," Docket No. ER15-852-000 (February 13, 2015).

Table 6-17 Zonal monthly capacity revenue: January 1 through September 30, 2017

Zone	January	February	March	April	May	June	July	August	September	Total
AECO	\$638,888	\$577,060	\$638,888	\$618,278	\$638,888	\$474,310	\$490,121	\$490,121	\$474,310	\$5,040,863
AEP, EKPC	\$3,402,006	\$3,072,780	\$3,402,006	\$3,292,264	\$3,402,006	\$6,075,467	\$6,277,982	\$6,277,982	\$6,075,467	\$41,277,960
APS	\$1,666,929	\$1,505,613	\$1,666,929	\$1,613,157	\$1,666,929	\$3,518,353	\$3,635,631	\$3,635,631	\$3,518,353	\$22,427,523
ATSI	\$5,891,717	\$5,321,551	\$5,891,717	\$5,701,661	\$5,891,717	\$3,937,233	\$4,068,474	\$4,068,474	\$3,937,233	\$44,709,775
BGE	\$3,467,109	\$3,131,582	\$3,467,109	\$3,355,267	\$3,467,109	\$2,882,337	\$2,978,415	\$2,978,415	\$2,882,337	\$28,609,679
ComEd	\$3,079,815	\$2,781,769	\$3,079,815	\$2,980,466	\$3,079,815	\$5,739,694	\$5,931,017	\$5,931,017	\$5,739,694	\$38,343,102
DAY	\$463,438	\$418,589	\$463,438	\$448,489	\$463,438	\$732,787	\$757,213	\$757,213	\$732,787	\$5,237,393
DEOK	\$596,264	\$538,561	\$596,264	\$577,029	\$596,264	\$658,601	\$680,554	\$680,554	\$658,601	\$5,582,692
DLCO	\$2,475,103	\$2,235,577	\$2,475,103	\$2,395,261	\$2,475,103	\$4,301,456	\$4,444,838	\$4,444,838	\$4,301,456	\$29,548,733
Dominion	\$1,624,702	\$1,467,472	\$1,624,702	\$1,572,292	\$1,624,702	\$1,445,005	\$1,493,172	\$1,493,172	\$1,445,005	\$13,790,222
DPL	\$401,741	\$362,863	\$401,741	\$388,781	\$401,741	\$643,123	\$664,561	\$664,561	\$643,123	\$4,572,234
JCPL	\$824,053	\$744,306	\$824,053	\$797,470	\$824,053	\$596,570	\$616,455	\$616,455	\$596,570	\$6,439,984
Met-Ed	\$1,158,290	\$1,046,198	\$1,158,290	\$1,120,926	\$1,158,290	\$1,085,982	\$1,122,182	\$1,122,182	\$1,085,982	\$10,058,322
PECO	\$1,961,524	\$1,771,699	\$1,961,524	\$1,898,249	\$1,961,524	\$1,800,302	\$1,860,312	\$1,860,312	\$1,800,302	\$16,875,752
PENELEC	\$1,596,528	\$1,442,025	\$1,596,528	\$1,545,027	\$1,596,528	\$1,287,278	\$1,330,187	\$1,330,187	\$1,287,278	\$13,011,565
Pepco	\$2,458,692	\$2,220,754	\$2,458,692	\$2,379,380	\$2,458,692	\$2,245,984	\$2,320,851	\$2,320,851	\$2,245,985	\$21,109,880
PPL	\$3,690,484	\$3,333,341	\$3,690,484	\$3,571,436	\$3,690,484	\$2,410,862	\$2,491,224	\$2,491,224	\$2,410,862	\$27,780,404
PSEG	\$4,224,394	\$3,815,581	\$4,224,394	\$4,088,123	\$4,224,394	\$2,493,066	\$2,576,169	\$2,576,169	\$2,493,066	\$30,715,354
RECO	\$37,300	\$33,690	\$37,300	\$36,097	\$37,300	\$12,072	\$12,475	\$12,475	\$12,072	\$230,780
Total	\$39,658,975	\$35,821,010	\$39,658,975	\$38,379,653	\$39,658,975	\$42,340,483	\$43,751,832	\$43,751,832	\$42,340,483	\$365,362,218

Table 6-18 shows the amount of energy efficiency (EE) resources in PJM for the 2012/2013 through 2017/2018 delivery years. Energy efficiency resources are offered in the PJM Capacity Market. The total MW of energy efficiency resources committed increased by 18.7 percent from 1,784.3 MW in the 2016/2017 delivery year to 2,117.9 MW in the 2017/2018 Delivery Year.²¹

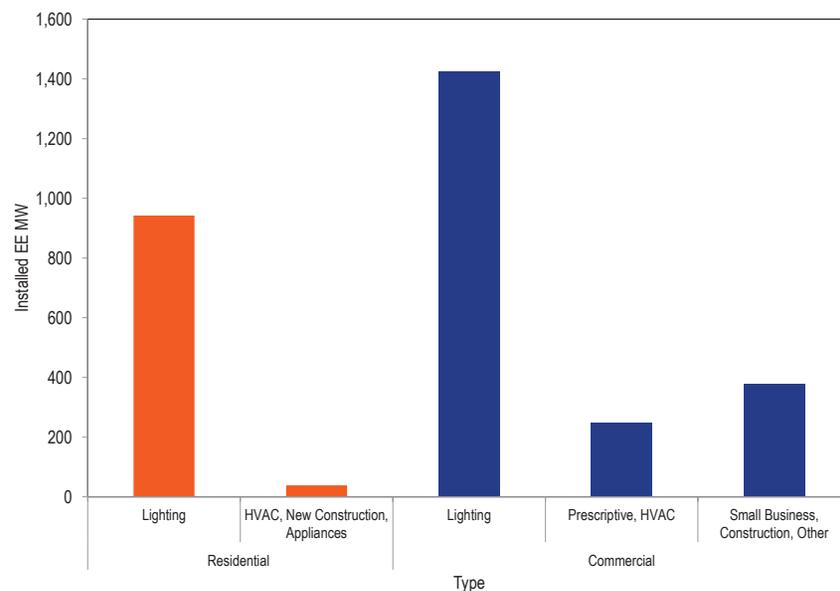
Table 6-18 Energy efficiency resources (MW): 2012/2013 through 2017/2018 Delivery Year

UCAP (MW) RPM Commitments	
1-Jun-12	631.2
1-Jun-13	1,024.8
1-Jun-14	1,282.4
1-Jun-15	1,525.5
1-Jun-16	1,784.3
1-Jun-17	2,117.9

²¹ See the 2017 Quarterly State of the Market Report for PJM: January through September, Section 5: Capacity Market, Table 5-10.

Figure 6-3 shows the amount of installed EE MW in PJM by technology available for the 2017/2018 Delivery Year. An installed EE resource has four years to participate as a capacity resource. The installed EE resources for the 2017/2018 Delivery Year include any installed EE resource between June 1, 2013 and May 31, 2017.

Figure 6-3 Installed energy efficiency MW by type: 2017/2018 Delivery Year



FERC accepted PJM's proposed 30 minute lead time as a phased in approach on May 9, 2014, effective on June 1, 2015.²² The quick lead time demand response was defined after Demand Resources cleared in the RPM base residual auctions for the 2014/2015, 2015/2016, 2016/2017 and 2017/2018 delivery years. PJM submitted a filing on October 20, 2014, to allow DR that is unable to respond within 30 minutes to exit the market without penalty before the mandatory 30 minute lead time with the 2015/2016 Delivery Year.²³ The quick lead time is the default lead time starting June 1, 2015, unless a CSP submits an exception request for 60 or 120 minute notification time due to a physical constraint.²⁴ The exception requests must clearly state why the resource is unable to respond within 30 minutes based on the defined reasons for exception listed in Manual 18. Once a location is granted a longer lead time, the resource does not need to resubmit for a longer lead time each

²² See 147 FERC ¶ 61,103 (2014).

²³ See PJM Interconnection, LLC, Docket No. ER14-135-000 (October 20, 2014).

²⁴ See "PJM Manual 18: Capacity Market," Rev. 38 (July 27, 2017) at 62.

delivery year. Resources that request longer lead times without a physical constraint are rejected.

Table 6-19 shows the amount of nominated MW and locations by product type and lead time for the 2016/2017 Delivery Year. PJM approved 2,675 locations, or 16.8 percent of all locations, which have 3,593.1 nominated MW, or 38.5 percent of all nominated MW, for exceptions to the 30 minute lead time rule for the 2016/2017 delivery year.

Table 6-19 Nominated MW and locations by product type and lead time: 2016/2017 Delivery Year

Lead Type	Pre-Emergency MW					Emergency MW					Total
	Limited	Extended Summer	Annual	Capacity Performance	Pre-Emergency Total	Limited	Extended Summer	Annual	Capacity Performance	Emergency Total	
Quick Lead (30 Minutes)	4,716.8	453.5	69.0	302.8	5,542.1	185.0	0.0	0.3	22.7	208.1	5,750.2
Short Lead (60 Minutes)	387.2	0.5	0.0	19.1	406.8	16.0	0.0	0.0	0.0	16.0	422.8
Long Lead (120 Minutes)	2,342.9	414.7	101.3	240.2	3,099.2	60.7	0.0	0.0	10.3	71.1	3,170.3
Total	7,446.9	868.7	170.4	562.1	9,048.1	261.7	0.0	0.3	33.1	295.1	9,343.3

Lead Type	Pre-Emergency Locations					Emergency Locations					Total
	Limited	Extended Summer	Annual	Capacity Performance	Pre-Emergency Total	Limited	Extended Summer	Annual	Capacity Performance	Emergency Total	
Quick Lead (30 Minutes)	11,928	658	127	93	12,806	375	0	1	24	400	13,206
Short Lead (60 Minutes)	276	1	0	3	280	33	0	0	0	33	313
Long Lead (120 Minutes)	1,959	21	307	23	2,310	51	0	0	1	52	2,362
Total	14,163	680	434	119	15,396	459	0	1	25	485	15,881

Table 6-20 shows the amount of nominated MW and locations by product type and lead time for the 2017/2018 Delivery Year. PJM approved 2,682 locations, or 17.1 percent of all locations, which have 3,681.5 nominated MW, or 40.2 percent of all nominated MW, for exceptions to the 30 minute lead time rule for the 2017/2018 delivery year.

Table 6-20 Nominated MW and locations by product type and lead time: 2017/2018 Delivery Year

Lead Type	Pre-Emergency MW					Emergency MW					Total
	Limited	Extended Summer	Annual	Capacity Performance	Pre-Emergency Total	Limited	Extended Summer	Annual	Capacity Performance	Emergency Total	
Quick Lead (30 Minutes)	1,410.8	3,137.9	418.0	280.6	5,247.3	51.1	160.4	7.5	7.0	225.9	5,473.2
Short Lead (60 Minutes)	129.5	140.8	46.0	79.6	395.9	3.0	13.2	0.0	0.0	16.1	412.0
Long Lead (120 Minutes)	822.6	1,701.2	476.6	156.4	3,156.7	18.8	43.1	44.7	6.2	112.8	3,269.6
Total	2,362.9	4,979.8	940.6	516.6	8,799.9	72.8	216.7	52.2	13.2	354.8	9,154.7

Lead Type	Pre-Emergency Locations					Emergency Locations					Total
	Limited	Extended Summer	Annual	Capacity Performance	Pre-Emergency Total	Limited	Extended Summer	Annual	Capacity Performance	Emergency Total	
Quick Lead (30 Minutes)	3,712	7,587	1,205	126	12,630	84	269	8	23	384	13,014
Short Lead (60 Minutes)	97	155	47	6	305	17	6	0	0	23	328
Long Lead (120 Minutes)	380	617	1,288	15	2,300	12	35	6	1	54	2,354
Total	4,189	8,359	2,540	147	15,235	113	310	14	24	461	15,696

There are three different ways to measure load reductions of Demand Resources. The Firm Service Level (FSL) method measures the difference between a customer's peak load contribution (PLC) and real time load, multiplied by the loss factor (LF). The Guaranteed Load Drop (GLD) method measures the minimum of: the comparison load minus real time load multiplied by the loss factor; or the PLC minus the real time load multiplied by the loss factor. The comparison load estimates what the load would have been if PJM did not declare a Load Management Event, similar to a CBL, by using a comparable day, same day, customer baseline, regression analysis or backup generation method. Limiting the GLD method to the minimum of the two calculations ensures reductions occur below the

PLC, thus avoiding double counting of load reductions.²⁵ The Direct Load Control (DLC) method measures when the CSP turns on and turns off the direct load control switch to remotely trigger load reductions. DLC customers were not required to submit meter data to calculate load reductions. The direct load control method is no longer an eligible reduction method after May 31, 2016.²⁶ The FSL and GLD equations for calculating load reductions are:

$$\text{FSL Reduction} = \text{PLC} - (\text{Load} \cdot \text{LF})$$

$$\text{GLD Reduction} = \text{Minimum of } \{(\text{comparison load} - \text{Load}) \cdot \text{LF}; \text{PLC} - (\text{Load} \cdot \text{LF})\}$$

Table 6-21 shows the MW registered by measurement and verification method and by technology type for the 2016/2017 Delivery Year. If a CSP does not submit a technology type for a registration, the MW are allocated to the Other category. For the 2016/2017 Delivery Year, 99.1 percent use the firm service level (FSL) method and 0.9 percent use the guaranteed load drop (GLD) measurement and verification method. The direct load control method is no longer an eligible reduction method after May 31, 2016.²⁷

Table 6-21 Reduction MW by each demand response method: 2016/2017 Delivery Year

Measurement and Verification Method	Technology Type								Total	Percent by type
	On-site Generation MW	HVAC MW	Refrigeration MW	Lighting MW	Manufacturing MW	Water Heating MW	Other, Batteries or Plug Load MW			
Firm Service Level	1,139.3	2,950.0	223.4	805.5	3,930.3	142.4	67.7	9,258.6	99.1%	
Guaranteed Load Drop	17.1	25.9	1.6	8.7	31.1	0.1	0.0	84.6	0.9%	
Total	1,156.4	2,976.0	225.1	814.2	3,961.4	142.6	67.7	9,343.3	100.0%	
Percent by method	12.4%	31.9%	2.4%	8.7%	42.4%	1.5%	0.7%	100.0%		

Table 6-22 shows the MW registered by measurement and verification method and by technology type for the 2017/2018 Delivery Year. For the 2017/2018 Delivery Year, 99.4 percent use the FSL method and 0.6 percent use the GLD measurement and verification method.

Table 6-22 Reduction MW by each demand response method: 2017/2018 Delivery Year

Measurement and Verification Method	Technology Type								Total	Percent by type
	On-site Generation MW	HVAC MW	Refrigeration MW	Lighting MW	Manufacturing MW	Water Heating MW	Other, Batteries or Plug Load MW			
Firm Service Level	1,266.4	2,973.7	237.4	769.6	3,726.2	78.7	52.0	9,104.0	99.4%	
Guaranteed Load Drop	8.9	19.4	1.6	3.6	17.1	0.1	-0.0	50.7	0.6%	
Total	1,275.4	2,993.1	239.0	773.2	3,743.2	78.8	52.0	9,154.7	100.0%	
Percent by method	13.9%	32.7%	2.6%	8.4%	40.9%	0.9%	0.6%	100.0%		

²⁵ 135 FERC ¶ 61,212.

²⁶ PJM "Manual 18: PJM Capacity Market," Rev. 38 (July 27, 2017) at 63.

²⁷ *Id.*

Table 6-23 shows the fuel type used in the onsite generators identified in Table 6-21 for the 2016/2017 Delivery Year. Of the 12.4 percent of nominated emergency and pre-emergency demand response MW identified as using onsite generation for the 2016/2017 Delivery Year, 75.5 percent of MW are diesel, 19.2 percent of MW are natural gas and 5.3 percent of MW are gasoline, kerosene, oil, propane or waste products.

Table 6-23 Onsite generation fuel type (MW): 2016/2017 Delivery Year

Fuel Type	2016/2017	
	MW	Percent
Diesel	855.6	74.0%
Natural Gas	273.4	23.6%
Gasoline, Kerosene, Oil, Propane, Waste Products	27.4	2.4%
Total	1,156.4	100.0%

Table 6-24 shows the fuel type used in the onsite generators for the 2017/2018 Delivery Year. Of the 13.9 percent of nominated emergency and pre-emergency demand response MW identified as using onsite generation for the 2017/2018 Delivery Year, 74.5 percent of MW are diesel, 24.4 percent of MW are natural gas and 1.1 percent of MW are gasoline, kerosene, oil, propane or waste products.

Table 6-24 Onsite generation fuel type (MW): 2017/2018 Delivery Year

Fuel Type	2017/2018	
	MW	Percent
Diesel	950.1	74.5%
Natural Gas	311.3	24.4%
Gasoline, Kerosene, Oil, Propane, Waste Products	13.9	1.1%
Total	1,275.4	100.0%

Emergency and Pre-Emergency Event Reported Compliance

Table 6-25 shows the demand response cleared UCAP MW for PJM by Delivery Year. Total demand response cleared in PJM decreased by 2,188.4 MW, or 11.5 percent, from 15,453.7 MW in the 2015/2016 Delivery Year to 13,265.3 MW in the 2016/2017 Delivery Year. The DR percent of capacity decreased by 3.9

percent, from 8.9 percent in the 2015/2016 Delivery Year to 5.1 percent in the 2016/2017 Delivery Year.

Table 6-25 Demand response cleared MW UCAP for PJM: 2011/2012 through 2016/2017 Delivery Year

Delivery Year	DR Cleared MW UCAP	DR Percent of Capacity MW UCAP
2011/2012	1,826.6	1.4%
2012/2013	8,740.9	6.2%
2013/2014	10,779.6	6.7%
2014/2015	14,943.0	9.3%
2015/2016	15,453.7	8.9%
2016/2017	13,265.3	5.1%

Subzonal dispatch of emergency demand resources was mandatory for the 2014/2015 Delivery Year, but only if the subzone was defined by PJM no later than the day before the dispatch. There are twelve dispatchable subzones in PJM effective April 26, 2017: AEP_CANTON, ATSI_CLE, DPL_SOUTH, PS_NORTH, ATSI_NEWCASOE, PPL_WESCO, ATSI_BLKRIVER, PENELEC_ERIC, APS_EAST, DOM_CHES, DOM_YORKTOWN, AECO_ENGLAND, JCPL_REDBANK.²⁸ PJM can remove a defined subzone at their discretion. Subzones should not be removed once defined, as the subzone may need to be dispatched again in the future. The METED_EAST, PENELEC_EAST, PPL_EAST and DOM_NORFOLK subzones were removed by PJM. More subzones may have been removed by PJM but PJM does not keep a record of created and removed subzones. The MMU recommends that PJM not remove any defined subzones and maintain a public record of all created and removed subzones.

The subzone design and closed loop interfaces are related. PJM implemented closed loop interfaces with the stated purpose of improving the incorporation of reactive constraints into energy prices and to allow emergency DR to set price.²⁹ PJM applies closed loop interfaces so that it can use units needed for reactive support to set the energy price when they would not otherwise set price under the LMP algorithm. PJM also applies closed loop interfaces so

²⁸ See "Load Management Subzones," <<http://www.pjm.com/~media/markets-ops/demand-response/subzone-definition-workbook.ashx>> (Accessed June 23, 2017).

²⁹ See PJM/Alstom, "Approaches to Reduce Energy Uplift and PJM Experiences," presented at the FERC Technical Conference: Increasing Real-Time and Day-Ahead Market Efficiency Through Improved Software in Docket No. AD10-12-006 <<http://www.ferc.gov/june-tech-conf/2015/presentations/m2-3.pdf>> (June 23, 2015).

that it can use emergency DR resources to set the real-time LMP when DR resources would not otherwise set price under the fundamental LMP logic. Of the 17 closed loop interface definitions, 11 (65 percent) were created for the purpose of allowing emergency DR to set price.³⁰

Demand resources can be dispatched for voluntary compliance during any hour of any day, but dispatched resources are not measured for compliance outside of the mandatory compliance window for each demand product. A demand response event during a product's mandatory compliance window also may not result in a compliance score. When demand response events occur for partial hours under 30 minutes or for a subzone dispatch that was not defined one business day before dispatch, the events are not measured for compliance.

Limited, Extended Summer and Annual Demand Resources are paid based on the average performance by registration for the duration of a demand response event. Demand response should measure compliance no less than hourly to accurately report reductions during demand response events. The current rules use the average reduction for the duration of an event. The average duration across multiple hours does not provide an accurate metric for each hour of the event and is inconsistent with the measurement of generation resources. Measuring compliance hourly would provide accurate information to the PJM system. The MMU recommends demand response event compliance be calculated for each hour and the penalty structure reflect hourly compliance.³¹

Under the new capacity performance design of the PJM Capacity Market, compliance for potential penalties will be measured for DR only during performance assessment hours (PAH).³² When pre-emergency or emergency demand response is dispatched, a PAH is triggered for PJM. As a result, PJM now classifies all demand response as an emergency resource.

The MMU recommends that demand response resources be treated as economic resources like all other capacity resources and therefore that the dispatch

³⁰ See the *2017 Quarterly State of the Market Report for PJM: January through September*, Section 4, Energy Uplift, for additional information regarding all closed loop interfaces and the impacts to the PJM markets.

³¹ PJM "Manual 18: Capacity Market," Rev. 338 (July 27, 2017) at 148.

³² OATT § 1 (Performance Assessment Hour).

of demand response resources not automatically trigger a Performance Assessment Hour (PAH) for CP compliance.

PJM allows compliance to be measured across zones within a compliance aggregation area (CAA).³³ This changes the way CSPs dispatch resources when multiple electrically contiguous areas with the same RPM clearing prices are dispatched. The compliance rules determine how CSPs are paid and thus create incentives that CSPs will incorporate in their decisions about how to respond to PJM dispatch.³⁴ The multiple zone approach is even less locational than the zonal and subzonal approaches and creates larger mismatches between the locational need for the resources and the actual response. If multiple zones within a CAA are called by PJM, a CSP will dispatch the least cost resources across the zones to cover the CSP's obligation. This can result in more MW dispatched in one zone that are locationally distant from the relief needed and no MW dispatched in another zone, yet the CSP could be considered 100 percent compliant and pay no penalties. More locational deployment of load management resources would improve efficiency. The MMU recommends that demand resources be required to provide their nodal location. Nodal dispatch of demand resources would be consistent with the nodal dispatch of generation.

Load increases are not netted against load decreases for dispatched demand resources across hours or across registrations within hours for compliance purposes, but are treated as zero. This skews the compliance results towards higher compliance since poorly performing demand resources are not used in the compliance calculation. When load is above the peak load contribution during a demand response event, the load reduction is negative; it is a load increase rather than a decrease. PJM ignores such negative reduction values and instead replaces the negative values with a zero MW reduction value. The PJM Tariff and PJM Manuals do not limit the compliance calculation value to a zero MW reduction value.³⁵ The compliance values PJM reports for demand

³³ CAA is "a geographic area of Zones or sub-Zones that are electrically-contiguous and experience for the relevant Delivery Year, based on Resource Clear Prices of, for Delivery Years through May 31, 2018, Annual Resources and for the 2018/2019 Delivery Year and subsequent Delivery Years, Capacity Performance Resources; the same locational price separation in the Base Residual Auction, the same locational price separation in the First Incremental Auction, the same locational price separation in the Second Incremental Auction, or the same locational price separation in the Third Incremental Auction." OATT § 1.

³⁴ See PJM "Manual 18: Capacity Market," Rev. 38 (July 27, 2017) at 166.

³⁵ OA Schedule 1 § 8.9.

response events are different than the actual compliance values accounting for both increases and decreases in load from demand resources that are called on and paid under the program.

The MMU recommends that compliance rules be revised to include submittal of all necessary hourly load data, and that negative values be included when calculating event compliance across hours and registrations.

Demand Resources that are also registered as Economic Resources have a calculated CBL for the emergency event days. Demand Resources that are not registered as Economic Resources use the hour before a dispatched event as the CBL for measuring energy reductions. A 2011 KEMA report stated that the hour before method performs poorly during early winter hours. “The hour before the reduction event is typically prior to the morning peak, therefore this CBL severely underestimates the morning peak and the subsequent hours.”³⁶ The calculated CBL more accurately measures reductions for Demand Resources.

Definition of Compliance

Currently, the calculation methods of event and test compliance do not provide reliable results. PJM’s interpretation of load management event rules allows over compliance to be reported when there is no actual over compliance. Settlement locations with a negative load reduction value (load increase) are not netted by PJM within registrations or within demand response portfolios. A resource that has load above their baseline during a demand response event has a negative performance value. PJM limits compliance shortfall values to zero MW. This is not explicitly stated in the Tariff or supporting Manuals and the compliance formulas for FSL and GLD customers do allow negative values.³⁷

Limiting compliance to only positive values incorrectly calculates compliance. For example, if a registration had two locations, one with a 50 MWh load increase when called, and another with a 75 MWh load reduction when called,

³⁶ See “PJM Empirical Analysis of Demand Response Baseline Methods,” KEMA, April 2011, <<https://www.pjm.com/~media/markets-ops/dsr/pjm-analysis-of-dr-baseline-methods-full-report.ashx>>.

³⁷ OA Schedule 1 § 8.9.

PJM calculates compliance for that registration as a 75 MWh load reduction for that event hour. Negative settlement MWh are not netted across hours or across registrations for compliance purposes. A location with a load increase is set to a zero MW reduction. For example, in a two hour event, if a registration showed a 15 MWh load increase in hour one, but a 30 MWh reduction in hour two, the registration would have a calculated 0 MWh reduction in hour one and a 30 MWh reduction in hour two. This has compliance calculated at an average hourly 15 MWh load reduction for that two hour event, compared to a 7.5 MWh observed reduction. Reported compliance is greater than observed compliance, as locations with load increases, i.e. negative reductions, are treated as zero for compliance purposes.

Changing a demand resource compliance calculation from a negative value to 0 MW inaccurately values event performance and capacity performance. Inflated compliance numbers for an event overstates the true value and capacity of demand resources. A demand response capacity resource that performs negatively is also displacing another capacity resource that could supply capacity during a delivery year. By setting the negative compliance value to 0 MW, PJM is inaccurately calculating the value of demand resources.

An extreme example makes clear the fundamental problems with the use of measurement and verification methods to define the level of power that would have been used but for the DR actions, and the payments to DR customers that result from these methods. The current rules for measurement and verification for demand resources make a bankrupt company, a customer that no longer exists due to closing of a facility or a permanently shut down company, or a company with a permanent reduction in peak load due to a partial closing of a facility, an acceptable demand response customer under some interpretations of the tariff, although it is the view of the MMU that such customers should not be permitted to be included as registered demand resources. Companies that remain in business, but with a substantially reduced load, can maintain their pre-bankruptcy FSL (firm service level to which the customer agrees to reduce in an event) commitment, which can be greater than or equal to the post-bankruptcy peak load. The customer agrees to reduce to a level which is greater than or equal to its new peak load after bankruptcy. When demand

response events occur the customer would receive credit for 100 percent reduction, even though the customer took no action and could take no action to reduce load. This problem exists regardless of whether the customer is still paying for capacity. To qualify and participate as a Demand Resource, the customer must have the ability to reduce load. “A participant that has the ability to reduce a measurable and verifiable portion of its load, as metered on an EDC account basis.”³⁸ Such a customer no longer has the ability to reduce load in response to price or a PJM demand response event. CSPs in PJM have and continue to register bankrupt customers as DR customers. PJM finds acceptable the practice of CSPs maintaining the registration of customers with a bankruptcy related reduction in demand that are unable, as a result, to respond to emergency events.

Emergency Energy Payments

Emergency and pre-emergency demand response dispatched during a load management event by PJM are eligible to receive emergency energy payments if registered under the full program option. The full program option includes an energy payment for load reductions during a pre-emergency or emergency event for demand response events and capacity payments.³⁹ There were 97.9 percent of nominated MW for the 2016/2017 Delivery Year and 98.2 percent of nominated MW for the 2017/2018 Delivery Year registered under the full program option. The dispatch price is set by the CSP before the delivery year starts and cannot be changed during the delivery year. The demand resource energy payments are equal to the higher of hourly zonal LMP or a strike price energy offer made by the participant, including a dollar per MWh minimum dispatch price and an associated shutdown cost. The scarcity pricing rules allow a maximum DR energy price of \$1,849 per MWh for the 2016/2017 Delivery Year and the 2017/2018 Delivery Year.^{40 41}

Shutdown costs for demand response resources are not adequately defined in Manual 15. PJM’s Cost Development Subcommittee (CDS) approved changes

³⁸ OA Schedule 1 § 8.2.

³⁹ *Id.*

⁴⁰ 139 FERC ¶ 61,057 (2012).

⁴¹ FERC accepted proposed changes to have the maximum strike price for 30 minute demand response to be \$1,000/MWh + 1*Shortage penalty - \$1.00, for 60 minute demand response to be \$1,000/MWh + (Shortage Penalty/2) and for 120 minute demand response to be \$1,100/MWh from ER14-822-000.

to Manual 15 to eliminate shutdown costs for demand response resources participating in the Synchronized Reserve Market, but not Demand Resources or Economic Resources.⁴²

FERC Order No. 831 requires all energy offers above \$1,000 per MWh to provide supporting documentation.⁴³ CSPs must provide documentation to verify the marginal costs of Demand Resources and Economic Resources for offers above \$1,000 per MWh. To date, CSPs have indicated that they cannot calculate their marginal costs.

Table 6-26 shows the distribution of registrations and associated MW in the emergency full option across ranges of minimum dispatch prices for the 2016/2017 Delivery Year. The majority of participants, 78.6 percent of locations and 59.8 percent of nominated MW, have a minimum dispatch price between \$1,550 and \$1,849 per MWh, which is the maximum price allowed for the 2016/2017 Delivery Year, 4.6 percent of location and 3.6 percent of nominated MW have a dispatch price between \$0 and \$999 per MWh, and 95.4 percent of locations and 96.4 percent of nominated MW have a dispatch price above \$1,000 per MWh. Energy offers are further increased by submitted shutdown costs, which, in the 2016/2017 Delivery Year, range from \$0 to more than \$10,000. Depending on the size of the registration, the shutdown costs can significantly increase the effective energy offer. The shutdown cost of resources with \$1,000 to \$1,275 per MWh strike prices had the highest average at \$184.65 per location and \$143.22 per nominated MW.

⁴² PJM “Manual 15: Cost Development Guidelines,” Rev. 29 (May 15, 2017) at 59.

⁴³ 157 FERC ¶ 61,115 (2016).

Table 6-26 Distribution of registrations and associated MW in the full option across ranges of minimum dispatch prices: 2016/2017 Delivery Year⁴⁴

Ranges of Strike Prices (\$/MWh)	Locations	Percent of Total	Nominated MW (ICAP)	Percent of Total	Shutdown Cost per Location	Shutdown Cost Per Nominated MW (ICAP)
\$0-\$999	728	4.6%	331.1	3.6%	\$51.81	\$49.15
\$1,000-\$1,275	2,363	15.0%	3,047.1	33.3%	\$184.65	\$143.22
\$1,276-\$1,549	287	1.8%	300.3	3.3%	\$56.00	\$53.51
\$1,550-\$1,849	12,390	78.6%	5,470.8	59.8%	\$41.76	\$94.57
Total	15,768	100.0%	9,149.3	100.0%	\$62.12	\$107.06

Table 6-27 shows the distribution of registrations and associated MW in the emergency full option across ranges of minimum dispatch prices for the 2017/2018 Delivery Year. The majority of participants, 73.4 percent of locations and 65.7 percent of nominated MW, have a minimum dispatch price between \$1,550 and \$1,849 per MWh, which is the maximum price allowed for the 2017/2018 Delivery Year, 4.8 percent of location and 4.0 percent of nominated MW have a dispatch price between \$0 and \$999 per MWh, and 95.2 percent of locations and 96.0 percent of nominated MW have a dispatch price above \$1,000 per MWh. The shutdown cost of resources with \$999 to \$1,100 per MWh strike prices had the highest average at \$239.13 per location and \$937.37 per nominated MW.

Table 6-27 Distribution of registrations and associated MW in the full option across ranges of minimum dispatch: 2017/2018 Delivery Year

Ranges of Strike Prices (\$/MWh)	Locations	Percent of Total	Nominated MW (ICAP)	Percent of Total	Shutdown Cost per Location	Shutdown Cost Per Nominated MW (ICAP)
\$0-\$1	459	2.9%	53.9	0.6%	\$0.00	\$0.00
\$1-\$999	291	1.9%	305.4	3.4%	\$77.61	\$73.94
\$999-\$1,100	1,288	8.3%	328.6	3.7%	\$239.13	\$937.37
\$1,100-\$1,275	1,789	11.5%	2,925.9	32.5%	\$94.68	\$57.89
\$1,275-\$1,550	315	2.0%	283.5	3.2%	\$57.43	\$63.81
\$1,550-\$1,849	11,437	73.4%	5,093.4	56.7%	\$44.54	\$100.01
Total	15,579	100.0%	8,990.8	100.0%	\$65.95	\$114.28

⁴⁴ In this analysis nominated MW does not include capacity only resources, which do not receive energy market credits.

Net Revenue

The Market Monitoring Unit (MMU) analyzed measures of PJM energy market structure, participant conduct and market performance. As part of the review of market performance, the MMU analyzed the net revenues earned by combustion turbine (CT), combined cycle (CC), coal plant (CP), diesel (DS), nuclear (NU), solar, and wind generating units.

Overview

Net Revenue

- Energy net revenues are significantly affected by energy prices and fuel prices. Energy prices and fuel prices were higher in the first nine months of 2017 than in the first nine months of 2016. Gas prices increased more than LMP and CTs and CCs ran fewer hours with lower margins as a result. Coal prices increased more than LMP but less than gas prices and CPs ran for slightly more hours in the first nine months of 2017 than in the first nine months of 2016 and margins varied by zone.
- In the first nine months of 2017, average energy market net revenues decreased by 51 percent for a new CT, 28 percent for a new CC, 17 percent for a new CP, 6 percent for a new DS, and 9 percent for a new solar installation compared to the first nine months of 2016. Average energy market net revenues increased by 6 percent for a new nuclear plant, and 15 percent for a new wind installation compared to the first nine months of 2016.

Historical New Entrant CT and CC Revenue Adequacy

Total unit net revenues include energy and capacity revenues. Analysis of the total unit revenues of theoretical new entrant CTs and CCs for three representative locations shows that units that entered the PJM markets in 2007 have not covered their total costs, including the return on and of capital, on a cumulative basis through September 30, 2017. The analysis also shows that theoretical new entrant CTs and CCs that entered the PJM markets in 2012 have covered their total costs on a cumulative basis in the eastern PSEG and BGE zones but have not covered total costs in the western ComEd

Zone. Energy market revenues were not sufficient to cover total costs in any scenario except the new entrant CC unit that went into operation in 2012 in BGE, which demonstrates the critical role of capacity market revenue in covering total costs.

Conclusion

Wholesale electric power markets are affected by externally imposed reliability requirements. A regulatory authority external to the market makes a determination as to the acceptable level of reliability which is enforced through a requirement to maintain a target level of installed or unforced capacity. The requirement to maintain a target level of installed capacity can be enforced via a variety of mechanisms, including government construction of generation, full-requirement contracts with developers to construct and operate generation, state utility commission mandates to construct capacity, or capacity markets of various types. Regardless of the enforcement mechanism, the exogenous requirement to construct capacity in excess of what is constructed in response to energy market signals has an impact on energy markets. The reliability requirement results in maintaining a level of capacity in excess of the level that would result from the operation of an energy market alone. The result of that additional capacity is to reduce the level and volatility of energy market prices and to reduce the duration of high energy market prices. This, in turn, reduces net revenue to generation owners which reduces the incentive to invest. The exact level of both aggregate and locational excess capacity is a function of the calculation methods used by RTOs and ISOs.

Unlike cost of service regulation, markets do not guarantee that units will cover their costs. New CT and CC units that began operation in 2007 have not covered their total costs from energy market and capacity market revenues through September 30, 2017 in the ComEd Zone, in the PSEG Zone and in the BGE Zone. New CT and CC units that began operation on June 1, 2012, have covered or more than covered their total costs in the PSEG Zone and the BGE Zone through September 30, 2017, and have not covered their total costs in the ComEd Zone through September 30, 2017.

Net Revenue

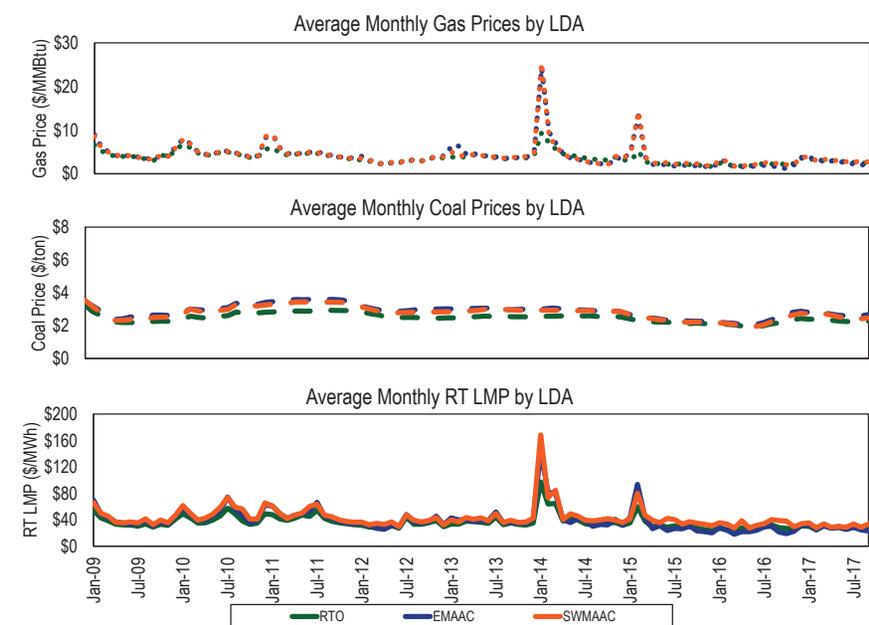
When compared to annualized fixed costs, net revenue is an indicator of generation investment profitability, and thus is a measure of overall market performance as well as a measure of the incentive to invest in new generation to serve PJM markets. Net revenue equals total revenue received by generators from PJM energy, capacity and ancillary Service Markets and from the provision of black start and reactive services less the variable costs of energy production. In other words, net revenue is the amount that remains, after the short run marginal costs of energy production have been subtracted from gross revenue, to cover fixed costs, which include a return on investment, depreciation, taxes and fixed operation and maintenance expenses. Net revenue is the contribution to total fixed received by generators from all PJM markets.

In a perfectly competitive, energy only market in long run equilibrium, net revenue from the energy market would be expected to equal the total of all annualized fixed costs for the marginal unit, including a competitive return on investment. The PJM market design includes other markets intended to contribute to the payment of fixed costs. In PJM, the Energy, Capacity and Ancillary Service Markets are all significant sources of revenue to cover the fixed costs of generators, as are payments for the provision of black start and reactive services. Thus, in a perfectly competitive market in long-run equilibrium, with energy, capacity and ancillary service revenues, net revenue from all sources would be expected to equal the annualized fixed costs of generation for the marginal unit. Net revenue is a measure of whether generators are receiving competitive returns on invested capital and of whether market prices are high enough to encourage entry of new capacity. In actual wholesale power markets, where equilibrium seldom occurs, net revenue is expected to fluctuate above and below the equilibrium level based on actual conditions in all relevant markets.

Net revenues are significantly affected by energy prices, fuel prices and capacity prices. The real-time load-weighted average LMP was 3.5 percent higher in the first nine months of 2017 than in the first nine months of 2016,

\$30.36 per MWh versus \$29.32 per MWh. Natural gas prices and coal prices increased in the first nine months of 2017 over the first nine months of 2016. The price of Northern Appalachian coal was 25.4 percent higher; the price of Central Appalachian coal was 33.2 percent higher; the price of Powder River Basin coal was 17.1 percent higher; the price of eastern natural gas was 35.9 percent higher; and the price of western natural gas was 37.0 percent higher (Figure 7-1).

Figure 7-1 Energy market net revenue factor trends: January 1, 2009 through September 30, 2017



Spark Spreads, Dark Spreads, and Quark Spreads

The spark, dark, or quark spread is defined as the difference between the LMP received for selling power and the cost of fuel used to generate power converted to a cost per MWh. The spark spread compares power prices to the cost of gas, the dark spread compares power prices to the cost of coal, and the

quark spread compares power prices to the cost of uranium. The spread is a measure of the approximate difference between revenues and marginal costs and is an indicator of net revenue and profitability.

Spread volatility is a result of fluctuations in LMP and the price of fuel. Spreads can be positive or negative.

Table 7-1 shows average peak hour spreads by year and Table 7-2 shows the associated standard deviation.

Table 7-1 Peak hour spreads (\$/MWh): January 1, 2011, through September 30, 2017

	BGE			ComEd			PSEG			Western Hub		
	Spark	Dark	Quark	Spark	Dark	Quark	Spark	Dark	Quark	Spark	Dark	Quark
2011	\$26.27	\$33.76	\$48.66	\$12.47	\$33.68	\$30.85	\$22.99	\$28.15	\$47.70	\$19.50	\$26.15	\$41.06
2012	\$24.29	\$24.21	\$36.25	\$16.17	\$30.87	\$27.23	\$19.51	\$17.57	\$33.01	\$19.94	\$19.86	\$31.91
2013	\$19.59	\$26.45	\$40.79	\$10.70	\$31.64	\$30.44	\$13.65	\$25.09	\$42.13	\$16.16	\$22.34	\$36.68
2014	\$30.27	\$51.11	\$66.58	\$11.14	\$42.50	\$43.23	\$19.85	\$43.01	\$60.19	\$23.23	\$39.58	\$55.05
2015	\$25.86	\$34.71	\$44.42	\$14.48	\$27.68	\$26.98	\$13.53	\$23.38	\$34.31	\$23.59	\$25.29	\$35.00
2016	\$28.29	\$28.11	\$38.32	\$14.22	\$25.72	\$26.58	\$13.44	\$10.80	\$24.06	\$21.47	\$18.53	\$28.75
2017 (Jan-Sep)	\$17.33	\$17.98	\$32.72	\$12.33	\$26.06	\$28.80	\$13.17	\$10.49	\$28.82	\$16.62	\$14.76	\$29.50

Table 7-2 Peak hour spread standard deviation (\$/MWh): January 1, 2011, through September 30, 2017

	BGE			ComEd			PSEG			Western Hub		
	Spark	Dark	Quark	Spark	Dark	Quark	Spark	Dark	Quark	Spark	Dark	Quark
2011	\$50.7	\$51.1	\$51.1	\$26.3	\$26.9	\$26.9	\$43.6	\$45.3	\$45.3	\$37.2	\$37.5	\$37.4
2012	\$33.7	\$33.9	\$33.7	\$23.6	\$23.7	\$23.7	\$29.6	\$29.7	\$29.7	\$27.6	\$28.0	\$27.8
2013	\$32.6	\$33.3	\$33.3	\$18.2	\$18.3	\$18.2	\$32.4	\$30.4	\$30.4	\$25.3	\$25.5	\$25.5
2014	\$88.1	\$118.9	\$118.9	\$68.1	\$68.3	\$68.3	\$78.3	\$94.0	\$94.3	\$83.0	\$86.7	\$86.7
2015	\$42.4	\$44.9	\$45.0	\$20.8	\$22.5	\$22.5	\$32.7	\$40.9	\$41.1	\$31.3	\$33.1	\$33.4
2016	\$32.8	\$32.6	\$32.6	\$16.4	\$16.6	\$16.8	\$17.0	\$18.6	\$18.4	\$19.1	\$18.5	\$18.5
2017 (Jan-Sep)	\$24.4	\$25.0	\$25.0	\$21.8	\$21.8	\$21.9	\$18.9	\$19.8	\$19.9	\$21.3	\$21.0	\$21.0

Figure 7-2 shows the hourly spark spread for peak hours since January 1, 2017, for BGE, ComEd, PSEG, and Western Hub.

Figure 7-2 Hourly spark spread (gas) for peak hours (\$/MWh): January 1 through September 30, 2017¹

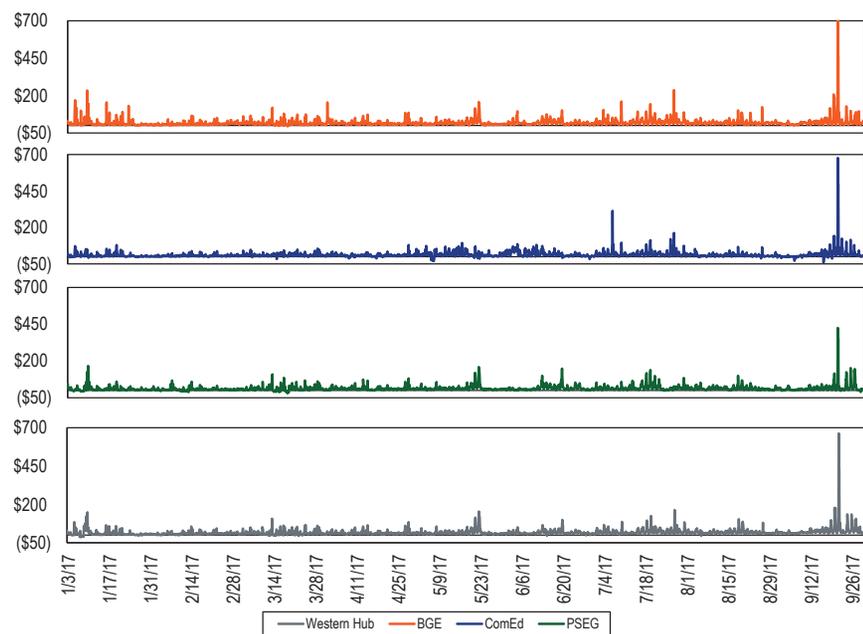
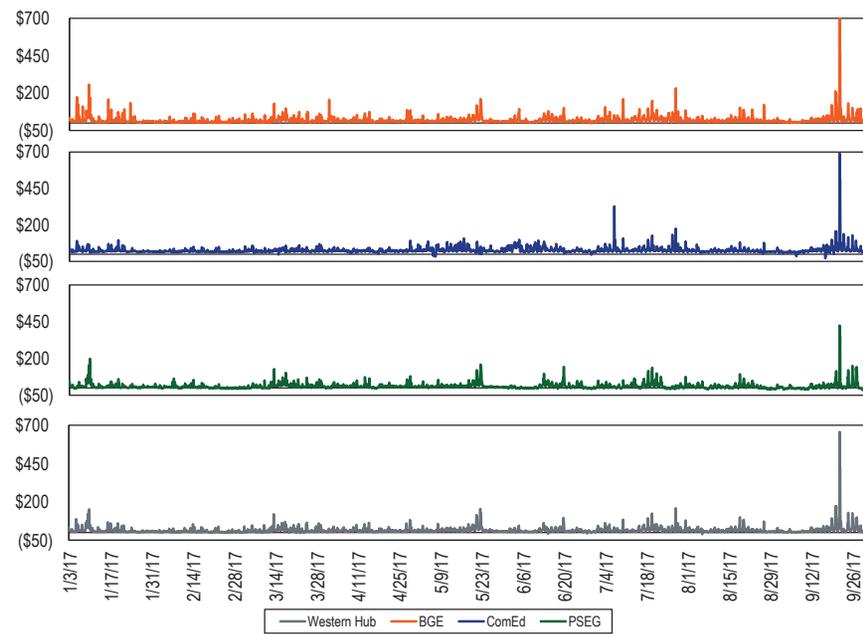


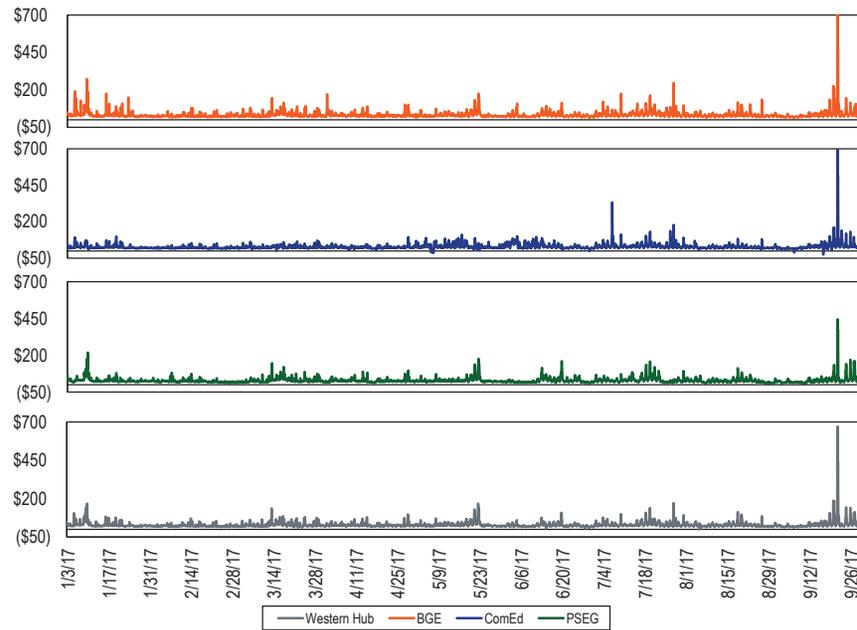
Figure 7-3 Hourly dark spread (coal) for peak hours (\$/MWh): January 1 through September 30, 2017²



¹ Spark spreads use a combined cycle heat rate of 7,000 Btu/kWh, zonal hourly LMPs and daily gas prices; Chicago City Gate for ComEd, Zone 6 non-NY for BGE, Zone 6 NY for PSEG, and Texas Eastern M3 for Western Hub.

² Dark spreads use a heat rate of 10,000 Btu/kWh, zonal hourly LMPs and daily coal prices; Powder River Basin coal for ComEd, Northern Appalachian coal for BGE and Western Hub, and Central Appalachian coal for PSEG.

Figure 7-4 Hourly quark spread (uranium) for selected zones (\$/MWh): January 1 through September 30, 2017³



Theoretical Energy Market Net Revenue

The net revenues presented in this section are theoretical as they are based on explicitly stated assumptions about how a new unit with specific characteristics would operate under economic dispatch. The economic dispatch uses technology specific operating constraints in the calculation of a new entrant's operations and potential net revenue in PJM markets.

³ Quark spreads use a heat rate of 10,000 Btu/kWh, zonal hourly LMPs, and daily uranium prices.

Analysis of energy market net revenues for a new entrant includes seven power plant configurations:

- The CT plant has an installed capacity of 641.2 MW and consists of two GE Frame 7HA.02 CTs, equipped with full inlet air mechanical refrigeration and selective catalytic reduction (SCR) for NO_x reduction.
- The CC plant has an installed capacity of 971.4 MW and consists of two GE Frame 7HA.02 CTs equipped with evaporative cooling, duct burners, a heat recovery steam generator (HRSG) for each CT with steam reheat and SCR for NO_x reduction with a single steam turbine generator.⁴
- The CP has an installed capacity of 600.0 MW and is a sub-critical steam unit, equipped with selective catalytic reduction system (SCR) for NO_x control, a flue gas desulphurization (FGD) system with chemical injection for SO_x and mercury control, and a bag-house for particulate control.
- The DS plant has an installed capacity of 2.0 MW and consists of one oil fired CAT 2 MW unit using New York Harbor ultra low sulfur diesel.
- The nuclear plant has an installed capacity of 2,200 MW and consists of two units and related facilities using the Westinghouse AP1000 technology.
- The wind installation consists of 22 Siemens 2.3 MW wind turbines totaling 50.6 MW installed capacity.
- The solar installation consists of a 60 acre ground mounted solar farm totaling 10 MW of AC installed capacity.

Net revenue calculations for the CT, CC and CP include the hourly effect of actual local ambient air temperature on plant heat rates and generator output for each of the three plant configurations.^{5 6} Plant heat rates account for the efficiency changes and corresponding cost changes resulting from ambient air temperatures.

⁴ The duct burner firing dispatch rate is developed using the same methodology as for the unfired dispatch rate, with adjustments to the duct burner fired heat rate and output.

⁵ Hourly ambient conditions supplied by Schneider Electric.

⁶ Heat rates provided by Pasteris Energy, Inc. No-load costs are included in the dispatch price since each unit type is dispatched at full load for every economic hour resulting in a single offer point.

CO₂, NO_x and SO₂ emission allowance costs are included in the hourly plant dispatch cost, the short run marginal cost. CO₂, NO_x and SO₂ emission allowance costs were obtained from daily spot cash prices.⁷

A forced outage rate for each class of plant was calculated from PJM data and incorporated into all revenue calculations.⁸ In addition, each CT, CC, CP, and DS plant was assumed to take a continuous 14 day planned annual outage in the fall season.

Zonal net revenues reflect zonal fuel costs based on locational fuel indices and zone specific delivery charges.⁹ The delivered fuel cost for natural gas reflects the zonal, daily delivered price of natural gas and is from published commodity daily cash prices, with a basis adjustment for transportation costs.¹⁰ The delivered cost of coal reflects the zone specific, delivered price of coal and was developed from the published prompt-month prices, adjusted for rail transportation costs.¹¹

Short run marginal cost includes fuel costs, emissions costs, and VOM costs.^{12 13} Average short run marginal costs are shown in Table 7-3.

Table 7-3 Average short run marginal costs: January 1 through September 30, 2017

Unit Type	Short Run Marginal Costs (\$/MWh)	Heat Rate (Btu/kWh)	VOM (\$/MWh)
CT	\$27.97	9,437	\$0.25
CC	\$20.37	6,679	\$1.00
CP	\$30.15	9,250	\$4.00
DS	\$134.64	9,660	\$0.25
Nuclear	\$8.50	NA	\$3.00
Wind	\$0.00	NA	\$0.00
Solar	\$0.00	NA	\$0.00

⁷ CO₂, NO_x and SO₂ emission daily prompt prices obtained from Evolution Markets, Inc.

⁸ Outage figures obtained from the PJM eGADS database.

⁹ Startup fuel burns and emission rates provided by Pasteris Energy, Inc. Startup station power consumption costs were obtained from the station service rates published quarterly by PJM and netted against the MW produced during startup at the preceding applicable hourly LMP. All starts associated with combined cycle units are assumed to be hot starts.

¹⁰ Gas daily cash prices obtained from Platts.

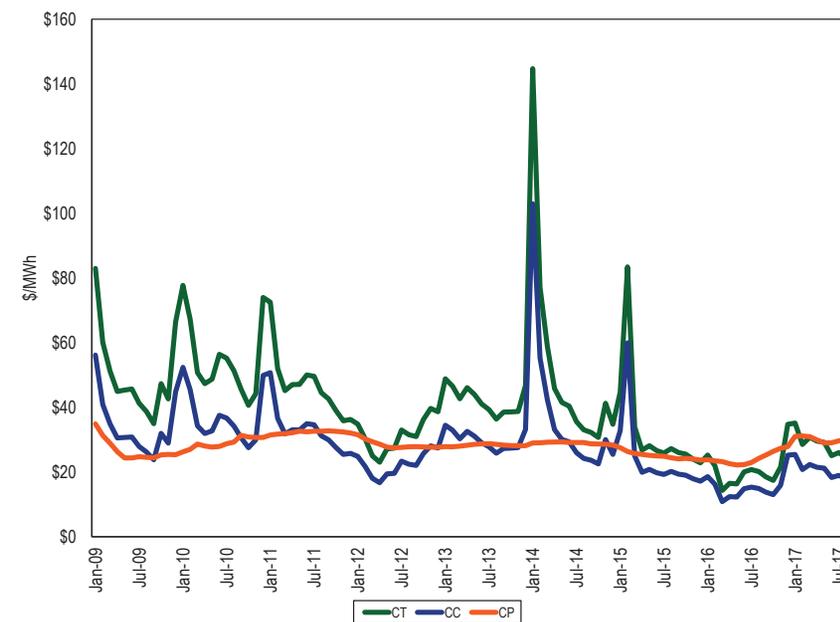
¹¹ Coal prompt prices obtained from Platts.

¹² Fuel costs are calculated using the daily spot price and may not equal what participants actually paid.

¹³ VOM rates provided by Pasteris Energy, Inc.

A comparison of the short run marginal cost of the theoretical CT, CC and CP plants since January 1, 2009, shows that the CC plant has been competitive with the CP plant but that the costs of the CC plant have been more volatile than the costs of the CP plant as a result of the higher volatility of gas prices compared to coal prices (Figure 7-5).

Figure 7-5 Average short run marginal costs: January 1, 2009 through September 30, 2017



The net revenue measure does not include the potentially significant contribution from the explicit or implicit sale of the option value of physical units or from bilateral agreements to sell output at a price other than the PJM day-ahead or real-time energy market prices, e.g., a forward price.

Gas prices, coal prices, and energy prices are reflected in new entrant run hours. Table 7-4 shows the average run hours by a new entrant unit.

Table 7-4 Average run hours: January 1 through September 30, 2009 through 2017

	CT	CC	CP	DS	Nuclear	Wind	Solar
2009	974	4,338	6,552	40	6,552		
2010	1,392	4,230	6,552	99	6,552		
2011	2,056	5,081	6,552	50	6,552		
2012	3,975	6,141	6,576	23	6,576	5,073	2,954
2013	1,765	5,052	6,552	19	6,552	5,040	3,013
2014	2,834	5,167	6,552	171	6,552	5,111	2,907
2015	3,446	5,420	6,552	174	6,552	4,948	2,975
2016	4,259	6,006	2,589	61	6,576	4,703	1,554
2017	2,598	5,687	2,691	18	6,552	4,960	1,380

New Entrant Combustion Turbine

Table 7-5 Energy net revenue for a new entrant gas fired CT under economic dispatch: January 1 through September 30, 2009 through 2017 (Dollars per installed MW-year)¹⁴

Zone	2009	2010	2011	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
AECO	\$10,044	\$37,036	\$58,032	\$43,904	\$27,441	\$54,259	\$46,922	\$46,038	\$21,028	(54%)
AEP	\$3,625	\$9,376	\$25,847	\$36,762	\$17,232	\$55,328	\$33,465	\$30,773	\$16,003	(48%)
AP	\$11,768	\$25,272	\$44,348	\$45,910	\$22,546	\$75,153	\$53,727	\$65,912	\$32,572	(51%)
ATSI	NA	NA	\$0	\$39,144	\$21,931	\$64,352	\$36,313	\$28,383	\$16,034	(44%)
BGE	\$13,048	\$47,046	\$56,522	\$64,182	\$37,242	\$79,650	\$61,380	\$94,974	\$30,624	(68%)
ComEd	\$2,228	\$9,034	\$17,923	\$24,184	\$12,714	\$25,196	\$12,614	\$17,279	\$11,379	(34%)
DAY	\$2,880	\$9,782	\$25,834	\$40,286	\$17,846	\$56,021	\$32,672	\$26,240	\$15,802	(40%)
DEOK	NA	NA	NA	\$32,943	\$17,096	\$68,978	\$70,718	\$28,320	\$16,649	(41%)
DLCO	\$2,992	\$14,229	\$28,062	\$39,464	\$17,795	\$48,396	\$28,110	\$59,478	\$32,526	(45%)
Dominion	\$13,837	\$41,776	\$43,998	\$48,374	\$28,992	\$39,654	\$32,045	\$36,578	\$15,858	(57%)
DPL	\$11,042	\$37,029	\$51,739	\$55,149	\$30,953	\$65,039	\$35,792	\$47,931	\$18,074	(62%)
EKPC	NA	NA	NA	NA	\$0	\$66,992	\$63,599	\$24,722	\$11,642	(53%)
JCPL	\$9,053	\$34,187	\$53,702	\$42,224	\$33,097	\$56,246	\$46,092	\$40,903	\$24,021	(41%)
Met-Ed	\$7,839	\$34,791	\$46,245	\$40,916	\$26,299	\$47,331	\$43,478	\$42,892	\$29,070	(32%)
PECO	\$8,417	\$33,519	\$54,247	\$42,750	\$24,846	\$49,001	\$41,991	\$39,802	\$21,215	(47%)
PENELEC	\$7,120	\$18,964	\$42,948	\$46,886	\$31,855	\$108,799	\$103,662	\$57,951	\$25,499	(56%)
Pepco	\$15,392	\$44,270	\$50,876	\$58,419	\$34,308	\$71,683	\$45,881	\$47,022	\$17,017	(64%)
PPL	\$7,250	\$29,100	\$48,836	\$37,116	\$24,819	\$53,872	\$42,438	\$39,968	\$23,143	(42%)
PSEG	\$6,902	\$32,803	\$43,946	\$40,227	\$26,161	\$41,398	\$22,482	\$28,534	\$14,533	(49%)
RECO	\$5,653	\$30,775	\$34,876	\$36,485	\$27,128	\$40,277	\$24,224	\$29,370	\$14,545	(50%)
PJM	\$8,182	\$28,764	\$40,443	\$42,912	\$24,015	\$58,381	\$43,880	\$41,653	\$20,362	(51%)

¹⁴ The energy net revenues presented for the PJM area in this section represent the zonal average energy net revenues.

Energy market net revenue was calculated for a new CT plant economically dispatched by PJM. It was assumed that the CT plant had a minimum run time of two hours. The unit was first committed day ahead in profitable blocks of at least two hours, including start costs. If the unit was not already committed day ahead, it was run in real time in standalone profitable blocks of at least two hours, or any profitable hours bordering the profitable day-ahead or real-time block.

New entrant CT plant energy market net revenues were lower across all zones in the first nine months of 2017 than in the first nine months of 2016 (Table 7-5). The increase in gas prices caused average CT operating costs to be higher than the average LMP in January, February and April, resulting in a 40 percent reduction in run hours. In addition, there were fewer high LMP hours in the first nine months of 2017 than in 2016, which means that the CT had fewer hours to operate with high margins.

New Entrant Combined Cycle

Energy market net revenue was calculated for a new CC plant economically dispatched by PJM. It was assumed that the CC plant had a minimum run time of four hours. The unit was first committed day-ahead in profitable blocks of at least four hours, including start costs.¹⁵ If the unit was not already committed day ahead, it was run in real time in standalone profitable blocks of at least four hours, or any profitable hours bordering the profitable day-ahead or real-time block.

New entrant CC plant energy market net revenues were lower across all zones in the first nine months of 2017 than in the first nine months of 2016 (Table 7-6). In the first nine months of 2017, the new CC plant had a 6 percent reduction in run hours from the first nine months of 2016. Gas prices increased more than the LMP increased, resulting in lower margins and lower energy net revenues.

Table 7-6 Energy net revenue for a new entrant CC under economic dispatch: January 1 through September 30, 2009 through 2017 (Dollars per installed MW-year)¹⁶

Zone	2009	2010	2011	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
AECO	\$34,530	\$65,409	\$93,684	\$74,365	\$55,749	\$104,160	\$79,564	\$70,106	\$50,790	(28%)
AEP	\$14,702	\$23,155	\$52,355	\$68,103	\$43,575	\$84,646	\$60,851	\$60,237	\$45,295	(25%)
AP	\$37,258	\$48,836	\$81,838	\$77,472	\$52,720	\$110,774	\$83,827	\$91,181	\$65,667	(28%)
ATSI	NA	NA	\$0	\$71,769	\$51,346	\$98,438	\$65,546	\$57,837	\$43,811	(24%)
BGE	\$37,714	\$76,019	\$89,251	\$94,619	\$69,981	\$138,411	\$93,406	\$125,594	\$68,726	(45%)
ComEd	\$9,094	\$19,005	\$28,907	\$49,354	\$26,127	\$36,024	\$25,336	\$41,306	\$30,384	(26%)
DAY	\$12,805	\$22,975	\$51,109	\$72,126	\$45,823	\$86,948	\$61,077	\$56,525	\$43,740	(23%)
DEOK	NA	NA	NA	\$63,256	\$42,917	\$110,828	\$103,503	\$56,836	\$42,441	(25%)
DLCO	\$12,435	\$27,135	\$51,343	\$69,956	\$39,755	\$70,587	\$52,208	\$83,612	\$64,588	(23%)
Dominion	\$42,474	\$72,788	\$78,375	\$79,191	\$57,136	\$76,359	\$59,199	\$69,529	\$44,710	(36%)
DPL	\$35,834	\$64,538	\$86,932	\$85,471	\$60,938	\$116,347	\$63,402	\$75,400	\$46,160	(39%)
EKPC	NA	NA	NA	NA	\$0	\$107,076	\$96,045	\$52,186	\$36,865	(29%)
JCPL	\$34,167	\$62,903	\$90,596	\$73,317	\$62,129	\$109,303	\$79,225	\$64,991	\$55,117	(15%)
Met-Ed	\$28,494	\$59,799	\$77,701	\$70,542	\$52,733	\$94,591	\$71,996	\$66,637	\$59,693	(10%)
PECO	\$30,369	\$60,474	\$88,715	\$72,715	\$50,899	\$97,271	\$74,041	\$63,245	\$50,329	(20%)
PENELEC	\$28,349	\$40,838	\$78,814	\$79,145	\$68,494	\$163,972	\$132,907	\$83,581	\$58,852	(30%)
Pepco	\$37,685	\$74,053	\$82,407	\$88,933	\$66,461	\$125,072	\$75,669	\$82,680	\$47,452	(43%)
PPL	\$26,890	\$52,570	\$78,871	\$66,913	\$50,520	\$95,882	\$72,592	\$64,029	\$53,115	(17%)
PSEG	\$30,159	\$62,435	\$76,859	\$68,867	\$53,069	\$87,551	\$43,268	\$50,652	\$41,175	(19%)
RECO	\$25,325	\$57,752	\$60,375	\$64,666	\$54,169	\$86,288	\$43,361	\$51,824	\$42,275	(18%)
PJM	\$28,134	\$52,393	\$69,341	\$73,199	\$50,227	\$100,026	\$71,851	\$68,399	\$49,559	(28%)

¹⁵ All starts associated with combined cycle units are assumed to be hot starts.

¹⁶ The energy net revenues presented for the PJM area in this section represent the zonal average energy net revenues.

New Entrant Coal Plant

Energy market net revenue was calculated for a new CP plant economically dispatched by PJM. It was assumed that the CP plant had a minimum run time of eight hours. The unit was first committed day-ahead in profitable blocks of at least eight hours, including start costs. If the unit was not already committed day ahead, it was run in real time in standalone profitable blocks of at least eight hours, or any profitable hours bordering the profitable day-ahead or real-time block. The regulation clearing price was compared to the day-ahead LMP. If the reference CP could provide regulation more profitably than energy, the unit was assumed to provide regulation during that hour.

New entrant CP plant energy market net revenues were higher in eight zones and lower in 12 zones in the first nine months of 2017 than in the first nine months of 2016 (Table 7-7). The increase in LMP was more than offset by the increase in coal prices, resulting in slightly more run hours at lower margins in most zones.

Table 7-7 Energy net revenue for a new entrant CP: January 1 through September 30, 2009 through 2017 (Dollars per installed MW-year)¹⁷

Zone	2009	2010	2011	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
AECO	\$82,808	\$123,363	\$91,942	\$23,558	\$47,414	\$170,151	\$74,429	\$18,275	\$11,002	(40%)
AEP	\$33,143	\$79,883	\$76,083	\$22,674	\$54,899	\$118,501	\$53,883	\$18,035	\$19,577	9%
AP	\$78,625	\$118,182	\$98,223	\$33,229	\$61,669	\$142,636	\$73,716	\$19,246	\$19,526	1%
ATSI	NA	NA	\$0	\$28,570	\$60,636	\$131,340	\$56,385	\$17,866	\$20,979	17%
BGE	\$92,204	\$154,092	\$112,530	\$46,712	\$73,505	\$212,972	\$122,859	\$50,896	\$22,382	(56%)
ComEd	\$83,265	\$115,961	\$112,618	\$87,516	\$104,250	\$154,747	\$79,884	\$15,521	\$18,241	18%
DAY	\$32,977	\$77,240	\$73,913	\$19,587	\$58,948	\$122,202	\$53,404	\$16,849	\$19,537	16%
DEOK	NA	NA	NA	\$15,351	\$50,838	\$111,478	\$48,858	\$16,928	\$19,017	12%
DLCO	\$32,002	\$63,403	\$46,321	\$20,302	\$35,451	\$88,804	\$42,472	\$17,200	\$19,292	12%
Dominion	\$82,093	\$139,673	\$95,725	\$32,457	\$59,955	\$167,681	\$95,683	\$25,267	\$19,072	(25%)
DPL	\$90,353	\$138,575	\$111,741	\$41,698	\$65,687	\$200,422	\$98,199	\$27,690	\$15,614	(44%)
EKPC	NA	NA	NA	NA	\$0	\$108,041	\$41,903	\$15,094	\$14,185	(6%)
JCPL	\$81,909	\$120,447	\$88,735	\$21,794	\$53,056	\$174,143	\$73,931	\$13,888	\$12,938	(7%)
Met-Ed	\$81,157	\$130,268	\$96,673	\$29,075	\$55,790	\$168,801	\$74,574	\$16,258	\$17,300	6%
PECO	\$78,182	\$118,089	\$87,642	\$22,952	\$43,595	\$164,314	\$70,812	\$15,669	\$11,536	(26%)
PENELEC	\$60,807	\$93,660	\$73,609	\$26,685	\$53,893	\$140,148	\$67,779	\$15,239	\$12,129	(20%)
Pepco	\$87,267	\$137,857	\$85,838	\$28,765	\$58,786	\$192,026	\$99,191	\$31,201	\$19,195	(38%)
PPL	\$72,859	\$107,497	\$78,079	\$17,797	\$43,190	\$161,459	\$69,464	\$13,691	\$12,321	(10%)
PSEG	\$77,583	\$123,112	\$88,770	\$23,924	\$62,776	\$191,011	\$84,306	\$13,820	\$10,287	(26%)
RECO	\$71,409	\$116,130	\$71,479	\$21,468	\$67,841	\$185,603	\$85,200	\$13,308	\$10,470	(21%)
PJM	\$71,685	\$115,143	\$82,773	\$29,690	\$55,609	\$155,324	\$73,347	\$19,597	\$16,230	(17%)

¹⁷ The energy net revenues presented for the PJM area in this section represent the zonal average energy net revenues.

New Entrant Diesel

Energy market net revenue was calculated for a DS plant economically dispatched by PJM in real time.

New entrant DS plant energy market net revenues were higher in all but six zones in the first nine months of 2017 than in the first nine months of 2016 (Table 7-8). There were relatively few hours in 2017 with high LMPs and positive margins because prices were higher but less volatile than in the first nine months of 2016.

Table 7-8 Energy market net revenue for a new entrant DS: January 1 through September 30, 2009 through 2017 (Dollars per installed MW-year)

Zone	2009	2010	2011	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
AECO	\$1,623	\$10,048	\$6,708	\$1,392	\$1,082	\$36,616	\$13,733	\$1,730	\$677	(61%)
AEP	\$100	\$495	\$1,717	\$786	\$484	\$15,803	\$4,905	\$700	\$1,248	78%
AP	\$832	\$1,394	\$2,007	\$1,022	\$741	\$20,496	\$9,336	\$875	\$1,127	29%
ATSI	NA	NA	\$0	\$1,033	\$23,643	\$15,523	\$4,843	\$1,869	\$1,528	(18%)
BGE	\$3,061	\$12,069	\$7,815	\$2,460	\$2,551	\$55,146	\$21,485	\$6,740	\$2,168	(68%)
ComEd	\$7	\$480	\$811	\$909	\$384	\$12,411	\$2,921	\$555	\$1,222	120%
DAY	\$174	\$548	\$1,894	\$904	\$517	\$15,611	\$4,893	\$797	\$1,434	80%
DEOK	NA	NA	NA	\$664	\$462	\$14,743	\$4,397	\$1,100	\$2,605	137%
DLCO	\$605	\$2,839	\$2,165	\$885	\$1,163	\$14,261	\$4,546	\$2,182	\$1,254	(43%)
Dominion	\$3,055	\$9,142	\$3,983	\$1,611	\$1,509	\$46,858	\$13,517	\$1,728	\$1,618	(6%)
DPL	\$2,576	\$8,689	\$5,769	\$2,210	\$1,083	\$42,831	\$20,342	\$3,438	\$1,817	(47%)
EKPC	NA	NA	NA	NA	\$0	\$15,767	\$3,864	\$473	\$838	77%
JCPL	\$1,626	\$7,110	\$6,610	\$1,557	\$2,014	\$36,731	\$14,956	\$677	\$919	36%
Met-Ed	\$1,477	\$7,655	\$5,032	\$1,681	\$1,254	\$35,603	\$14,827	\$662	\$2,348	255%
PECO	\$1,425	\$7,600	\$5,379	\$1,787	\$985	\$35,981	\$13,806	\$666	\$927	39%
PENELEC	\$203	\$930	\$2,642	\$2,066	\$1,104	\$18,141	\$7,838	\$777	\$1,103	42%
Pepco	\$3,253	\$10,922	\$5,961	\$1,945	\$2,134	\$56,581	\$14,869	\$2,623	\$1,655	(37%)
PPL	\$1,303	\$6,814	\$5,305	\$1,611	\$1,054	\$36,526	\$14,711	\$608	\$1,494	146%
PSEG	\$1,249	\$6,534	\$5,447	\$1,549	\$1,257	\$36,377	\$14,437	\$692	\$935	35%
RECO	\$1,068	\$5,431	\$4,255	\$1,619	\$2,387	\$33,728	\$15,903	\$730	\$946	30%
PJM	\$1,390	\$5,806	\$4,083	\$1,457	\$2,290	\$29,787	\$11,006	\$1,481	\$1,393	(6%)

New Entrant Nuclear Plant

Energy market net revenue was calculated assuming that the nuclear plant was dispatched day ahead by PJM for all available plant hours. The unit runs for all hours of the year other than forced outage hours.¹⁸

New entrant nuclear plant energy market net revenues were higher in all but four zones in the first nine months of 2017 than in the first nine months of 2016 (Table 7-9). The increase in LMP resulted in higher margins and higher net revenues in most zones.

Table 7-9 Energy net revenue for a new entrant nuclear plant: January 1 through September 30, 2009 through 2017 (Dollars per installed MW-year)¹⁹

Zone	2009	2010	2011	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
AECO	\$220,444	\$283,596	\$275,481	\$160,586	\$198,641	\$332,216	\$190,727	\$108,018	\$118,299	10%
AEP	\$165,079	\$199,798	\$205,599	\$144,556	\$174,656	\$252,952	\$164,054	\$124,262	\$132,088	6%
AP	\$195,683	\$240,187	\$234,187	\$153,584	\$183,795	\$279,391	\$187,270	\$129,462	\$133,307	3%
ATSI	NA	NA	\$0	\$147,800	\$182,629	\$266,784	\$168,226	\$126,330	\$135,801	7%
BGE	\$224,368	\$302,330	\$276,074	\$180,658	\$215,476	\$374,646	\$244,221	\$183,793	\$150,731	(18%)
ComEd	\$132,962	\$175,483	\$172,796	\$131,406	\$157,272	\$222,150	\$133,450	\$112,155	\$119,273	6%
DAY	\$160,936	\$198,821	\$204,683	\$148,590	\$177,043	\$256,115	\$164,680	\$125,439	\$136,190	9%
DEOK	NA	NA	NA	\$139,704	\$167,933	\$244,094	\$159,469	\$122,250	\$132,812	9%
DLCO	\$155,568	\$199,157	\$201,501	\$146,126	\$170,938	\$234,864	\$154,508	\$121,731	\$132,114	9%
Dominion	\$213,382	\$286,412	\$257,755	\$163,557	\$200,179	\$324,381	\$214,263	\$143,885	\$142,726	(1%)
DPL	\$222,294	\$285,118	\$275,071	\$171,153	\$206,621	\$357,351	\$211,908	\$131,519	\$127,631	(3%)
EKPC	NA	NA	NA	NA	\$0	\$240,126	\$151,693	\$117,443	\$126,913	8%
JCPL	\$219,404	\$280,306	\$271,918	\$159,284	\$205,141	\$336,396	\$189,411	\$102,496	\$122,710	20%
Met-Ed	\$212,079	\$275,729	\$258,451	\$156,059	\$195,208	\$320,029	\$182,397	\$104,070	\$127,349	22%
PECO	\$215,347	\$277,735	\$270,547	\$158,845	\$193,881	\$324,425	\$184,521	\$100,980	\$117,975	17%
PENELEC	\$189,728	\$235,110	\$233,235	\$155,445	\$193,062	\$292,097	\$181,285	\$117,280	\$126,280	8%
Pepco	\$225,419	\$299,684	\$268,964	\$175,051	\$211,746	\$361,650	\$226,209	\$157,421	\$145,632	(7%)
PPL	\$209,319	\$265,668	\$259,612	\$152,507	\$193,155	\$321,046	\$182,826	\$101,365	\$120,666	19%
PSEG	\$223,101	\$285,232	\$276,936	\$162,490	\$220,267	\$358,194	\$200,258	\$106,067	\$124,690	18%
RECO	\$216,226	\$277,469	\$257,121	\$158,052	\$225,932	\$352,042	\$201,547	\$105,844	\$125,589	19%
PJM	\$200,079	\$256,932	\$233,330	\$156,077	\$183,679	\$302,547	\$184,646	\$122,091	\$129,939	6%

¹⁸ The class average forced outage rate was applied to total energy market net revenues.

¹⁹ The energy net revenues presented for the PJM area in this section represent the zonal average energy net revenues.

New Entrant Wind Installation

Energy market net revenues for a wind installation located in the ComEd and PENELEC zones were calculated hourly assuming the unit was generating at the average capacity factor of operating wind units in the zone if 75 percent of existing wind units in the zone were generating at greater than or equal to 25 percent capacity factor in that hour.²⁰ The unit is credited with wind RECs for its generation and is assumed to have taken a 1603 payment instead of either the Investment Tax Credit (ITC) or Production Tax Credit (PTC).²¹

Wind energy market net revenues were higher in both zones in the first nine months of 2017 than in the first nine months of 2016 as a result of higher energy prices and higher margins (Table 7-10).

Table 7-10 Energy net revenue for a wind installation: January 1 through September 30, 2012 through 2017 (Dollars per installed MW-year)

Zone	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
ComEd	\$52,229	\$59,854	\$81,514	\$55,936	\$48,119	\$51,661	7%
PENELEC	\$48,210	\$63,471	\$99,658	\$66,444	\$40,959	\$49,857	22%

New Entrant Solar Installation

Energy market net revenues for a solar installation located in the PSEG Zone were calculated hourly assuming the unit was generating at the average hourly capacity factor of operating solar units in the zone if 75 percent of existing solar units in the zone were generating at greater than or equal to 25 percent capacity factor in that hour. The unit is credited with SRECs for its generation and is assumed to have taken a 1603 payment instead of either the Investment Tax Credit (ITC) or Production Tax Credit (PTC).²²

²⁰ The condition that existing wind units in the zone were generating at greater than or equal to 25 percent capacity factor was not included in prior analyses of wind unit net revenues.

²¹ The 1603 payment is a direct payment of 30 percent of the project cost. REC related net revenues were overstated for the new entrant wind installation in the 2016 Quarterly State of the Market Report for PJM: January through June and the 2016 Quarterly State of the Market Report for PJM: January through September and were updated beginning with the 2016 State of the Market Report for PJM.

²² The 1603 payment is a direct payment of 30 percent of the project cost. SREC related net revenues were overstated for the new entrant solar installation in the 2016 Quarterly State of the Market Report for PJM: January through June and the 2016 Quarterly State of the Market Report for PJM: January through September and have been updated as of the 2016 State of the Market Report for PJM.

Solar energy market net revenues were slightly lower in the first nine months of 2017 than in the first nine months of 2016 with higher LMPs not offsetting fewer run hours (Table 7-11).

Table 7-11 PSEG energy net revenue for a solar installation: January 1 through September 30, 2012 through 2017 (Dollars per installed MW-year)

Zone	2012	2013	2014	2015	2016	2017	Change in 2017 from 2016
PSEG	\$39,831	\$69,202	\$87,522	\$60,592	\$32,882	\$30,065	(9%)

Historical New Entrant CT and CC Revenue Adequacy

Total unit net revenues include energy and capacity revenues. Analysis of the total unit revenues of theoretical new entrant CTs and CCs for three representative locations shows that units that entered the PJM markets in 2007 have not covered their total costs, including the return on and of capital, on a cumulative basis through September 30, 2017. The analysis also shows that theoretical new entrant CTs and CCs that entered the PJM markets in 2012 have covered their total costs on a cumulative basis in the eastern PSEG and BGE zones, but have not covered total costs in the western ComEd Zone. Energy market revenues were not sufficient to cover total costs in any scenario except the new entrant CC unit that went into operation in 2012 in BGE, which demonstrates the critical role of capacity market revenue in covering total costs.

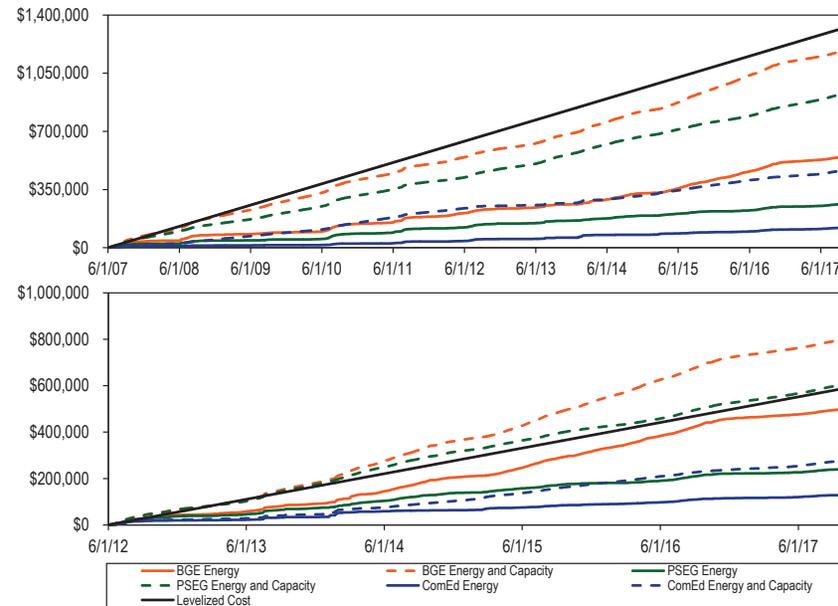
Under cost of service regulation, units are guaranteed that they will cover their total costs, assuming that the costs were determined to be reasonable. To the extent that units built in the PJM markets did not cover their total costs, investors were worse off and customers were better off than under cost of service regulation.

The summary figures compare net revenues for a new entrant CT and CC that began operation on June 1, 2007, at the start of the RPM Capacity Market, and new entrant CT and CC that began operation on June 1, 2012. In each figure,

the solid black line shows the total net revenue required to cover total costs. The solid colored lines show net energy revenue by zone. The dashed colored lines show the sum of net energy and capacity revenue by zone.

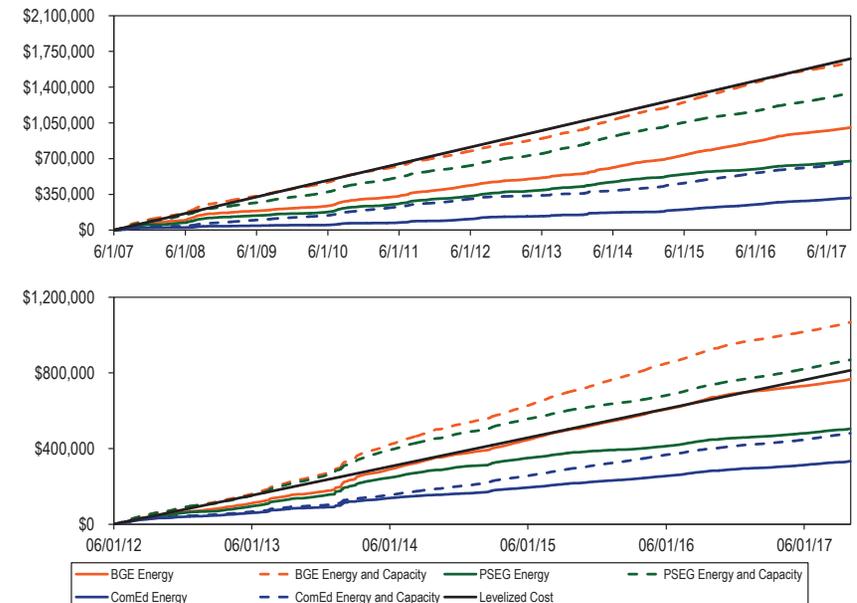
For the ComEd Zone, the PSEG Zone and the BGE Zone, Figure 7-6 compares cumulative energy market net revenues and energy market net revenues plus capacity market revenues to cumulative levelized costs for a new CT that began operation on June 1, 2007 and for a new CT that began operation on June 1, 2012. Cumulative energy market net revenues were less than cumulative total costs in all cases. Cumulative total market net revenues were less than the cumulative total costs of the 2007 new entrant CT unit for each year in each of the three zones. Cumulative total market net revenues were greater than the cumulative total costs of the 2012 new entrant CT unit in BGE and PSEG zones and less than total costs for the ComEd Zone.

Figure 7-6 Historical new entrant CT revenue adequacy: June 1, 2007 through September 30, 2017 and June 1, 2012 through September 30, 2017



For the ComEd Zone, the PSEG Zone and the BGE Zone, Figure 7-7 compares cumulative energy market net revenues and energy market net revenues plus capacity market revenues to cumulative levelized costs for a new CC that began operation on June 1, 2007 and for a new CC that began operation on June 1, 2012. Cumulative total market net revenues were less than the cumulative total costs of the 2007 new entrant CC unit for each year in each of the three zones. Cumulative total market net revenues through September 30, 2017, were greater than the cumulative total costs of the 2012 new entrant CC unit in BGE and PSEG zones and less than total costs for the ComEd Zone.

Figure 7-7 Historical new entrant CC revenue adequacy: June 1, 2007 through September 30, 2017 and June 1, 2012 through September 30, 2017



Assumptions used for this analysis are shown in Table 7-12.

Table 7-12 Assumptions for analysis of new entry

	2007 CT	2012 CT	2007 CC	2012 CC
Project Cost CT	\$311,737,000	\$319,167,000	\$658,598,000	\$665,995,000
Fixed O&M (\$/MW-Year)	\$14,475	\$14,628	\$20,016	\$20,126
End of Life Value	\$0	\$0	\$0	\$0
Loan Term	20 years	20 years	20 years	20 years
Percent Equity (%)	50%	50%	50%	50%
Percent Debt (%)	50%	50%	50%	50%
Loan Interest Rate (%)	7%	7%	7%	7%
Federal Income Tax Rate (%)	35%	35%	35%	35%
State Income Tax Rate (%)	9%	9%	9%	9%
General Escalation (%)	2.5%	2.5%	2.5%	2.5%
Technology	GE Frame 7FA	GE Frame 7FA.05	GE Frame 7FA	GE Frame 7FA.05
ICAP (MW)	336	410	601	655
Depreciation MACRS 150% declining balance	15 years	15 years	20 years	20 years

Actual Net Revenue

The actual net revenue results for 2016 have been updated to include the results for nuclear plants.^{23 24}

Table 7-13 Avoidable cost recovery by quartile

Technology	Total Installed Capacity (ICAP)	Recovery of avoidable costs from energy and ancillary net revenue			Recovery of avoidable costs from all markets		
		First quartile	Median	Third quartile	First quartile	Median	Third quartile
Nuclear (2016)	31,661	61%	88%	105%	91%	119%	135%
Nuclear (October 2016 through September 2017)	31,661	84%	97%	111%	109%	126%	143%

Table 7-13 shows the avoidable cost recovery from PJM energy and ancillary services markets by quartiles. The results have been updated using nuclear plant operating costs of \$25.83 per MWh for single unit sites and \$18.73 per MWh for multiunit sites as avoidable costs.²⁵ For the 12 months ended September 30, 2017, fewer than a quarter of nuclear units did not recover

²³ In prior reports the results did not include nuclear power plants in order not to reveal confidential data and because there was not good public data on nuclear unit avoidable costs.

²⁴ The analysis of nuclear plants uses uniform fuel costs for all units. Net revenue is net of fuel costs.

²⁵ Operating costs from: Nuclear Energy Institute (August, 2017) "Nuclear Costs in Context," <<https://www.nei.org/CorporateSite/media/filefolder/Policy/Papers/Nuclear-Costs-in-Context.pdf?ext=.pdf>>

avoidable costs from energy and capacity revenues. The average DA LMP increase of 5.3 percent between the 12 months ended September 30, 2017, and 2016, resulted in all nuclear plants recovering more than 90 percent of avoidable costs for the 12 months ended September 30, 2017.

Capital expenditures are generally sunk costs and appropriately excluded from this analysis. To the extent that there are annual avoidable capital expenditures, the results could be affected. As a sensitivity analysis, the results were calculated with one third of the NEI capital expenditures added to the avoidable costs.²⁶ For the 12 months ended September 30, 2017, approximately a quarter of nuclear units did not recover the sum of avoidable costs plus one third of the NEI capital expenditures.

²⁶ *Id.*

Environmental and Renewable Energy Regulations

Environmental requirements and renewable energy mandates have a significant impact on PJM markets.

At the federal level, the Mercury and Air Toxics Standards Rule (MATS) requires significant investments for some fossil fuel fired power plants in the PJM footprint in order to reduce heavy metal emissions. The Environmental Protection Agency (EPA) has promulgated intrastate and interstate air quality standards and associated emissions limits for states. The Cross-State Air Pollution Rule (CSAPR) will require investments for some fossil fuel fired power plants in the PJM footprint in order to reduce SO₂ and NO_x emissions.

State regulations and multi-state agreements have an impact on PJM markets. New Jersey's high electric demand day (HEDD) rule limits NO_x emissions on peak energy demand days and requires investments for noncompliant units. CO₂ costs resulting from the Regional Greenhouse Gas Initiative (RGGI) affect some unit offers in the PJM energy market.

The investments required for environmental compliance have resulted in higher offers in the Capacity Market, and when units do not clear, in the retirement of units. Federal and state renewable energy mandates and associated incentives have resulted in the construction of substantial amounts of renewable capacity in the PJM footprint, especially wind and solar powered resources. Renewable energy credit (REC) markets created by state programs and federal tax credits have significant impacts on PJM wholesale markets.

Overview

Federal Environmental Regulation

- **EPA Mercury and Air Toxics Standards Rule.** The U.S. Environmental Protection Agency's (EPA) Mercury and Air Toxics Standards rule (MATS) applies the Clean Air Act (CAA) maximum achievable control technology (MACT) requirement to new or modified sources of emissions of mercury

and arsenic, acid gas, nickel, selenium and cyanide.¹ The future of MATS is currently uncertain. The U.S. Supreme Court ruled in 2015 that the EPA acted "unreasonably when it deemed cost irrelevant to the decision to regulate power plants."² The EPA performed a cost review and made the required determination on cost in a supplemental finding.³ In a case now pending before the U.S. Court of Appeals for the District of Columbia Circuit, the supplemental finding is under review.⁴ On April 28, 2017, the Court granted the EPA's request to postpone scheduled oral argument "to allow the new Administration adequate time to review the Supplemental Finding to determine whether it will be reconsidered."⁵

- **Air Quality Standards (NO_x and SO₂ Emissions).** The CAA requires each state to attain and maintain compliance with fine particulate matter (PM) and ozone national ambient air quality standards (NAAQS). The CAA also requires that each state prohibit emissions that significantly interfere with the ability of another state to meet NAAQS.⁶ In January 2016, the EPA began the implementation of the Cross-State Air Pollution Rule (CSAPR) to address this issue through an interstate emissions trading regime.⁷ As of January 1, 2017, CSAPR's Phase 2 emissions budgets and assurance provisions apply.
- **National Emission Standards for Reciprocating Internal Combustion Engines.** On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit reversed the portion of the final rule exempting 100 hours of run time for certain stationary reciprocating internal combustion engines (RICE) participating in emergency demand response programs.⁸ On May 3, 2016, the Court issued a mandate to implement its May 1, 2015, order. The provisions that allowed RICE participating in emergency

¹ *National Emission Standards for Hazardous Air Pollutants From Coal and Oil-Fired Electric Utility Steam Generating Units and Standards of Performance for Fossil Fuel Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-Commercial-Institutional Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234, 77 Fed. Reg. 9304 (February 16, 2012).

² 135 S. Ct. 2699, 2712 (2015).

³ *See Supplemental Finding That It Is Appropriate and Necessary to Regulate Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234; *see also* White Stallion Energy Center, LLC v EPA, Slip Op. No. 12-1100 [D.C. Cir. 2015] [per curiam].

⁴ *See* Case No. 16-1127, et al.

⁵ Respondent EPA's Motion to Continue Oral Argument, Case No. 16-1127, et al. (April 18, 2017) at 1.

⁶ CAA § 110(a)(2)(D)(i)(I).

⁷ Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals, Final Rule, Docket No. EPA-HQ-OAR-2009-0491, 76 Fed. Reg. 48208 (August 8, 2011) ("CSAPR").

⁸ Delaware Department of Natural Resources and Environmental Control (DENREC) v. EPA, Slip Op. No. 13-1093; *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines*, Final Rule, EPA Docket No. EPA-HQ-OAR-2008-0708, 78 Fed. Reg. 9403 (January 30, 2013).

demand response programs to operate for additional hours have been eliminated.⁹ Zero hours are exempt.¹⁰ As a result, the national emissions standards uniformly apply to all RICE.¹¹ All RICE are allowed to operate during emergencies, including declared Energy Emergency Alert Level 2 or five percent voltage/frequency deviations.¹²

- **Greenhouse Gas Emissions Rule.** On August 3, 2015, the EPA issued a final rule for regulating CO₂ from certain existing power generation facilities titled Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units (the Clean Power Plan).¹³ The rule requires that individual state plans be submitted by September 6, 2016. However, on February 9, 2016, the U.S. Supreme Court issued a stay of the rule that will prevent its taking effect until judicial review is completed.¹⁴ On October 10, 2017, EPA proposed to repeal the Clean Power Plan based a determination that the Plan exceeds the EPA's authority under Section 111 of the EPA Act.¹⁵
- **Cooling Water Intakes.** An EPA rule implementing Section 316(b) of the Clean Water Act (CWA) requires that cooling water intake structures reflect the best technology available for minimizing adverse environmental impacts.¹⁶ The rule is implemented as National Pollutant Discharge Elimination System (NPDES) permits are issued, with exceptions in certain cases for permits expiring prior to July 14, 2018.

On June 17, 2017, the EPA issued a rulemaking to rescind the definition of "Waters of the United States" (WOTUS) proposed in the 2015 Clean Water Rule.¹⁷ The rule would avoid the potential implementation of a broader definition of WOTUS included in the 2015 rule that was never

implemented as the result of a stay issued by a reviewing Court.¹⁸ The rule would restore the pre 2015 version of the rule to the code, which remains in effect as a result of the stay.

- **Waste Disposal.** On December 19, 2014, the EPA issued its Coal Combustion Residuals rule (CCRR), effective October 19, 2015. The rule sets nonbinding criteria for coal ash disposal facilities.

State Environmental Regulation

- **NJ High Electric Demand Day (HEDD) Rule.** A New Jersey rule that imposes operational restrictions and emissions control requirements on units responsible for significant NO_x emissions on high electric demand days (HEDD).¹⁹ New Jersey's HEDD rule, which became effective May 19, 2009, applies to HEDD units, which include units that have a NO_x emissions rate on HEDD equal to or exceeding 0.15 lbs/MMBtu and lack identified emission control technologies.²⁰
- **Illinois Air Quality Standards (NO_x, SO₂ and Hg).** The State of Illinois has its own standards for NO_x, SO₂ and Hg (mercury) known as Multi-Pollutant Standards (MPS) and Combined Pollutants Standards (CPS) that are more stringent and take effect earlier than comparable Federal regulations, such as the EPA MATS rule.²¹
- **Regional Greenhouse Gas Initiative (RGGI).** The Regional Greenhouse Gas Initiative (RGGI) is a CO₂ emissions cap and trade agreement among Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont that applies to power generation facilities. The auction price in the September 8, 2017, auction for the 2015–2017 compliance period was \$4.35 per ton. The clearing price is equivalent to a price of \$4.80 per metric tonne, the unit used in other carbon markets. The price increased by \$1.82 per ton, 71.9 percent, from \$2.53 per ton from June 7, 2017, to \$4.35 per ton for September 8, 2017.

⁹ EPA, Memorandum, Peter Tsigoris Guidance on Vacatur of RICE NESHAP and NSPS Provisions for Emergency Engines (April 15, 2016).

¹⁰ *Id.*

¹¹ *Id.*

¹² See 40 CFR §§ 60.4211(f)(2)(ii)–(iii), 60.4243(d)(2)(ii)–(iii), and 63.6640(f)(2)(ii)–(iii) (Declared Energy Emergency Alert Level 2 or 5 percent voltage/frequency deviations); 0 CFR §§ 60.4211(f)(1), 60.4243(d)(1), and 63.6640(f)(1) ("There is no time limit on the use of emergency stationary ICE in emergency situations."); 40 CFR 60.4211(f)(3), 60.4243(d)(3), 63.6640(f)(3)–(4).

¹³ *Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, EPA-HQ-OAR-2013-0602, Final Rule *mimeo* (August 3, 2015), also known as the "Clean Power Plan."

¹⁴ *North Dakota v. EPA*, et al., Order 15A793.

¹⁵ See *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, Proposed Rule, EPA Docket No. EPA-HQ-OAR-2017-0355, 82 Fed. Reg. 48035 (October 16, 2017).

¹⁶ See EPA, *National Pollutant Discharge Elimination System—Final Regulations to Establish Requirements for Cooling Water Intake Structures at Existing Facilities and Amend Requirements at Phase I Facilities*, EPA-HQ-OW-2008-0667, 79 Fed. Reg. 48300 (Aug. 15, 2014).

¹⁷ 80 Fed. Reg. 37054 (June 29, 2015).

¹⁸ The stay was issued by the U.S. Court of Appeals for the Sixth Circuit on October 9, 2015.

¹⁹ N.J.A.C. § 7:27–19.

²⁰ CTS must have either water injection or selective catalytic reduction (SCR) controls; steam units must have either an SCR or selective noncatalytic reduction (SNCR).

²¹ 35 Ill. Admin. Code §§ 225.233 (Multi-Pollutant Standard (MPS)), 224.295 (Combined Pollutant Standard: Emissions Standards for NO_x and SO₂ (CPS)).

State Renewable Portfolio Standards

Many states in PJM have enacted legislation to require that a defined percentage of retail suppliers' load be served by renewable resources, for which definitions vary. These are typically known as renewable portfolio standards, or RPS. As of September 30, 2017, Delaware, Illinois, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, and Washington, DC had renewable portfolio standards. Virginia and Indiana had voluntary renewable portfolio standards. Kentucky and Tennessee did not have renewable portfolio standards. West Virginia had a voluntary standard, but the state legislature repealed their renewable portfolio standard effective February 3, 2015.²²

Emissions Controls in PJM Markets

Environmental regulations affect decisions about emission control investments in existing units, investment in new units and decisions to retire units. As a result of environmental regulations and agreements to limit emissions, many PJM units burning fossil fuels have installed emission control technology. On September 30, 2017, 92.8 percent of coal steam MW had some type of flue-gas desulfurization (FGD) technology to reduce SO₂ emissions, while 99.5 percent of coal steam MW had some type of particulate control, and 93.6 percent of fossil fuel fired capacity in PJM had NO_x emission control technology.

Renewable Generation

Total wind and solar generation was 2.3 percent of total generation in PJM for the first nine months of 2017, total renewable generation was 4.5 percent of total generation in PJM and was 6.3 percent if coal and solid waste resources in the Tier II RECs programs are included.

Recommendations

- The MMU recommends that renewable energy credit markets based on state renewable portfolio standards be brought into PJM markets as they are an increasingly important component of the wholesale energy market. (Priority: Medium. First reported 2010. Status: Not adopted.)

²² See Enr. Com. Sub. For H. B. No. 2001.

Conclusion

Environmental requirements and renewable energy mandates at both the federal and state levels have a significant impact on the cost of energy and capacity in PJM markets. The extension of the RPS concept to include nuclear power as a zero emissions source in order to provide subsidies to nuclear power will increase this impact. Renewable energy credit (REC) markets are markets related to the production and purchase of wholesale power, but FERC has determined that RECs are not regulated under the Federal Power Act unless the REC is sold as part of a transaction that also includes a wholesale sale of electric energy in a bundled transaction.²³

RECs, federal investment tax credits and federal production tax credits provide out of market payments to qualifying resources, primarily wind and solar, which create an incentive to generate MWh until the LMP is equal to the marginal cost of producing power minus the credit received for each MWh. The same is true for nuclear power credits, ZECs (zero emissions credits). The credits provide an incentive to make negative energy offers and more generally provide an incentive to operate whenever possible. These subsidies affect the offer behavior and the operational behavior of these resources in PJM markets and in some cases the existence of these resources and thus the market prices and the mix of clearing resources.

RECs clearly affect prices in the PJM wholesale power market. Some resources are not economic except for the ability to purchase or sell RECs. REC markets are not transparent. Data on REC prices, clearing quantities and markets are not publicly available for all PJM states. RECs do not need to be consumed during the year of production which creates multiple prices for a REC based on the year of origination. RECs markets are, as an economic fact, integrated with PJM markets including energy and capacity markets, but are not formally recognized as part of PJM markets. It would be preferable to have a single, transparent market for RECs operated by PJM that would meet the standards and requirements of all states in the PJM footprint including those

²³ See 139 FERC ¶ 61,061 at PP 18, 22 (2012) ("[W]e conclude that unbundled REC transactions fall outside of the Commission's jurisdiction under sections 201, 205 and 206 of the FPA. We further conclude that bundled REC transactions fall within the Commission's jurisdiction under sections 201, 205 and 206 of the FPA... [A]lthough a transaction may not directly involve the transmission or sale of electric energy, the transaction could still fall under the Commission's jurisdiction because it is "in connection with" or "affects" jurisdictional rates or charges.")

with no RPS. This would provide better information for market participants about supply and demand and prices and contribute to a more efficient and competitive market and to better price formation. This could also facilitate entry by qualifying renewable resources by reducing the risks associated with lack of transparent market data. This would be a significant improvement even if some unusual or unique types of RECs remained outside this market.

PJM markets provide a flexible mechanism for incorporating the costs of environmental controls and meeting environmental requirements in a cost effective manner. Costs for environmental controls are part of bids for capacity resources in the PJM Capacity Market. The costs of emissions credits are included in energy offers. PJM markets also provide a flexible mechanism that incorporates renewable resources and the impacts of renewable energy credit markets, and ensure that renewable resources have access to a broad market. PJM markets provide efficient price signals that permit valuation of resources with very different characteristics when they provide the same product.

PJM markets could also provide a flexible mechanism for states to comply with the EPA's Clean Power Plan, for example by incorporating a carbon price in unit offers which would be reflected in PJM's economic dispatch. If there is a social decision to limit carbon output, a carbon price would be the most efficient way to implement that decision. It would also be an alternative to specific subsidies to individual nuclear power plants and instead provide a market signal to which any resource could respond. The imposition of specific and prescriptive environmental dispatch rules would, in contrast, pose a threat to economic dispatch and efficient markets and create very difficult market power monitoring and mitigation issues. The provision of subsidies to individual units creates a discriminatory regime that is not consistent with competition.

Federal Environmental Regulation

The U.S. Environmental Protection Agency (EPA) administers the Clean Air Act (CAA). The CAA regulates air emissions by providing for the establishment of acceptable levels of emissions of hazardous air pollutants. The EPA issues technology based standards for major sources and area sources of emissions.^{24 25} The EPA's actions have and will continue to affect the cost to build and operate generating units in PJM, which in turn affects wholesale energy prices and capacity prices.

The EPA also administers the Clean Water Act (CWA), which regulates water pollution. The EPA implements the CWA through a permitting process, which regulates discharges from point sources that impact water quality and temperature in navigable waterways. In 2014, the EPA implemented new regulations for cooling water intakes under section 316(b) of the CWA.

Control of Mercury and Other Hazardous Air Pollutants

Section 112 of the CAA requires the EPA to promulgate emissions control standards, known as the National Emission Standards for Hazardous Air Pollutants (NESHAP), from both new and existing area and major sources.

On December 21, 2011, the U.S. Environmental Protection Agency (EPA) issued its Mercury and Air Toxics Standards rule (MATS), which applies the Clean Air Act (CAA) maximum achievable control technology (MACT) requirement to new or modified sources of emissions of mercury and arsenic, acid gas, nickel, selenium and cyanide.²⁶ The rule established a compliance deadline of April 16, 2015.

In a related EPA rule also issued on December 16, 2011, regarding utility New Source Performance Standards (NSPS), the EPA required new coal and oil fired

²⁴ 42 U.S.C. § 7401 et seq. (2000).

²⁵ The EPA defines "major sources" as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source.

²⁶ *National Emission Standards for Hazardous Air Pollutants From Coal and Oil-Fired Electric Utility Steam Generating Units and Standards of Performance for Fossil Fuel Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-Commercial-Institutional Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234, 77 Fed. Reg. 9304 (February 16, 2012); *aff'd*, *White Stallion Energy Center, LLC v EPA*, No. 12-1100 (D.C. Cir. April 15, 2014).

electric utility generating units constructed after May 3, 2011, to comply with amended emission standards for SO₂, NO_x and filterable particulate matter (PM).²⁷

The future of MATS is currently uncertain. On June 29, 2015, the U.S. Supreme Court remanded MATS to the U.S. Court of Appeals for the D.C. Circuit and ordered the EPA to consider cost earlier in the process when making the decision whether to regulate power plants under MATS.²⁸ The U.S. Supreme Court ruled in 2015 that “the EPA acted unreasonably when it deemed cost irrelevant to the decision to regulate power plants.”²⁹ The remand did not stay MATS and had no effect on the implementation of MATS. The EPA performed a cost review and made the required determination on cost in a supplemental finding.³⁰ On April 14, 2016, the EPA issued the required finding that “a consideration of cost does not cause us to change our determination that regulation of hazardous air pollutant (HAP) emissions from coal- and oil-fired EGUs is appropriate and necessary.”³¹ The rule has been effective since April 14, 2016, and remains effective. In a case now pending before the U.S. Court of Appeals for the District of Columbia Circuit, the supplemental finding is under review.³² On April 28, 2017, the Court granted EPA’s request to postpone scheduled oral argument “to allow the new Administration adequate time to review the Supplemental Finding to determine whether it will be reconsidered.”³³

Air Quality Standards: Control of NO_x, SO₂ and O₃ Emissions Allowances

The CAA requires each state to attain and maintain compliance with fine particulate matter and ozone national ambient air quality standards (NAAQS). Under NAAQS, the EPA establishes emission standards for six air pollutants,

including NO_x, SO₂, O₃ at ground level, PM, CO, and Pb, and approves state plans to implement these standards, known as State Implementation Plans (SIPs).³⁴ Standards for each pollutant are set and periodically revised, most recently for SO₂ in 2010, and SIPs are filed, approved and revised accordingly.

On April 29, 2014, the U.S. Supreme Court upheld the EPA’s Cross-State Air Pollution Rule (CSAPR) and on October 23, 2014, the U.S. Court of Appeals for the District of Columbia Circuit lifted the stay imposed on CSAPR, clearing the way for the EPA to implement this rule and to replace the Clean Air Interstate Rule (CAIR) then in effect. On November 21, 2014, the EPA issued a rule requiring compliance with CSAPR’s Phase 1 emissions budgets effective January 1, 2015, and CSAPR’s Phase 2 emissions effective January 1, 2017.³⁵ The ruling and the EPA rules eliminated CAIR and replaced it with CSAPR.

In January, 2015, the EPA began implementation of the Cross-State Air Pollution Rule (CSAPR) to address the CAA’s requirement that each state prohibit emissions that significantly interfere with the ability of another state to meet NAAQS.³⁶ The CSAPR requires specific states in the eastern and central United States to reduce power plant emissions of SO₂ and NO_x that cross state lines and contribute to ozone and fine particle pollution in other states. The CSAPR requires reductions to levels consistent with the 1997 ozone and fine particle and 2006 fine particle NAAQS.³⁷ The CSAPR covers 28 states, including all of the PJM states except Delaware, and also excluding the District of Columbia.³⁸

CSAPR establishes two groups of states with separate requirements standards. Group 1 includes a core region comprised of 21 states, including all of the PJM states except Delaware, and also excluding the District of Columbia.³⁹

27 NSPS are promulgated under CAA § 111.

28 Michigan et al. v. EPA, Slip Op. No. 14-46.

29 135 S. Ct. 2699, 2712 (2015).

30 See *Supplemental Finding That It Is Appropriate and Necessary to Regulate Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234; see also *White Stallion Energy Center, LLC v. EPA*, Slip Op. No. 12-1100 (D.C. Cir. 2015) [per curiam].

31 *Supplemental Finding that it is Appropriate and Necessary to Regulate Hazardous Air Pollutants from Coal- and Oil-Fired Electric Utility Steam Generating Units*, EPA Docket No. EPA-HQ-OAR-2009-0234; see also *White Stallion Energy Center, LLC v. EPA*, Slip Op. No. 12-1100 (D.C. Cir. 2015) [per curiam].

32 See Case No. 16-1127, et al.

33 Respondent EPA’s Motion to Continue Oral Argument, Case No. 16-1127, et al. (April 18, 2017) at 1.

34 Nitric Oxides (NO_x), Sulfur Dioxide (SO₂), Ozone (O₃), Particulate Matter (PM), Carbon Monoxide (CO) and Lead (Pb).

35 *Rulemaking to Amend Dates in Federal Implementation Plans Addressing Interstate Transport of Ozone and Fine Particulate Matter*, EPA-HQ-OAR-2009-0491.

36 CAA § 110(a)(2)(D)(i)(I).

37 *Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals*, Final Rule, Docket No. EPA-HQ-OAR-2009-0491, 76 Fed. Reg. 48208 (August 8, 2011) (“CSAPR”); *Revisions to Federal Implementation Plans To Reduce Interstate Transport of Fine Particulate Matter and Ozone*, Final Rule, Docket No. EPA-HQ-2009-0491, 77 Fed. Reg. 10342 (February 21, 2012); *Revisions to Federal Implementation Plans To Reduce Interstate Transport of Fine Particulate Matter and Ozone*, Final Rule, Docket No. EPA-HQ-2009-0491, 77 Fed. Reg. 34830 (June 12, 2012).

38 *Id.*

39 Group 1 states include: New York, Pennsylvania, New Jersey, Maryland, Virginia, West Virginia, North Carolina, Tennessee, Kentucky, Ohio, Indiana, Illinois, Missouri, Iowa, Wisconsin, and Michigan.

Group 2 does not include any states in the PJM region.⁴⁰ Group 1 states must reduce both annual SO₂ and NO_x emissions to help downwind areas attain the 24-Hour and/or Annual Fine Particulate Matter⁴¹ NAAQS and to reduce ozone season NO_x emissions to help downwind areas attain the 2008 8-Hour Ozone NAAQS.

CSAPR requires reductions of emissions for each state below certain assurance levels, established separately for each emission type. Assurance levels are the state budget for each type of emission, determined by the sum of unit-level allowances assigned to each unit located in such state, plus a variability limit, which is meant to account for the inherent variability in the state's yearly baseline emissions. Because allowances are allocated only up to the state emissions budget, any level of emissions in a state above its budget must be covered by allowances obtained through trading for unused allowances allocated to units located in other states included in the same group.

The rule provides for implementation of a trading program for states in the CSAPR region. Sources in each state may achieve those limits as they prefer, including unlimited trading of emissions allowances among power plants within the same state and limited trading of emission allowances among power plants in different states in the same group.

If state emissions exceed the applicable assurance level, including the variability limit, a penalty is assessed and allocated to resources within the state in proportion to their responsibility for the excess. The penalty requires surrender of two additional allowances for each allowance needed to the cover the excess.

On September 7, 2016, the EPA issued a final rule updating the CSAPR ozone season NO_x emissions program to reflect the decrease to the ozone season NAAQS that occurred in 2008 (CSAPR Update).⁴² The CSAPR had been finalized in 2011 based on the 1997 ozone season NAAQS. The 2008 ozone

40 Group 2 states include: Minnesota, Nebraska, Kansas, Texas, Alabama, Georgia and South Carolina.

41 The EPA defines Particulate Matter (PM) as "[a] complex mixture of extremely small particles and liquid droplets. It is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles." Fine PM (PM_{2.5}) measures less than 2.5 microns across.

42 Cross-State Air Pollution Rule Update for the 2008 Ozone NAAQS, EPA-HQ-OAR-2015-0500, 81 Fed. Reg. 74504 (-Oct. 26, 2016) ("CSAPR Update").

season NO_x emissions level was lowered to 0.075 ppm from 0.08 in 1997.⁴³ The CSAPR Update increases the reductions required from upwind states to assist downwind states' ability to meet the lower 2008 standard.

The CSAPR Update also finalizes Federal Implementation Plans (FIPs) for each of the PJM states covered by CSAPR.⁴⁴ The EPA approves a FIP for states that fail to timely submit and obtain approval of their own implementation plan (SIPs).

Starting May 1, 2017, the CSAPR Update requires reduced summertime NO_x from power plants in certain PJM states: Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, Ohio, Pennsylvania, Tennessee, Virginia and West Virginia.⁴⁵ The EPA has removed North Carolina from the ozone season NO_x trading program.⁴⁶ Table 8-1 shows the revised reduced NO_x emissions budgets for each PJM affected state. Table 8-1 also shows the assurance level, which is a hard cap on emissions, meaning that emissions above the assurance cannot be covered by emissions allowances, even if available.

Table 8-1 Current and proposed CSAPR ozone season NO_x budgets for electric generating units (before accounting for variability)⁴⁷

State	2017 CSAPR Ozone Season NO _x Budget for Electric Generating Units (before accounting for variability) (Tons)	Assurance Level (Tons)
Illinois	14,601	17,667
Indiana	23,303	28,197
Kentucky	21,115	25,549
Maryland	3,828	4,632
Michigan	17,023	20,598
New Jersey	2,062	19,094
Ohio	19,522	23,622
Pennsylvania	17,952	21,722
Tennessee	7,736	9,361
Virginia	9,223	11,160
West Virginia	17,815	21,556

43 Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone, NOPR, EPA-HQ-OAR-2009-0491, 75 Fed. Reg. 45210, 45220 (Aug. 2, 2010).

44 CSAPR Update at 74506 & n.9. PJM states that did not submit SIPs include Illinois, Maryland, Michigan, New Jersey, North Carolina, Pennsylvania, Tennessee, Virginia, and West Virginia; PJM states submitting SIPs but not obtaining approval include Indiana, Kentucky and Ohio. *Id.*

45 *Id.* at 74554.

46 *Id.* at 74507 n.13.

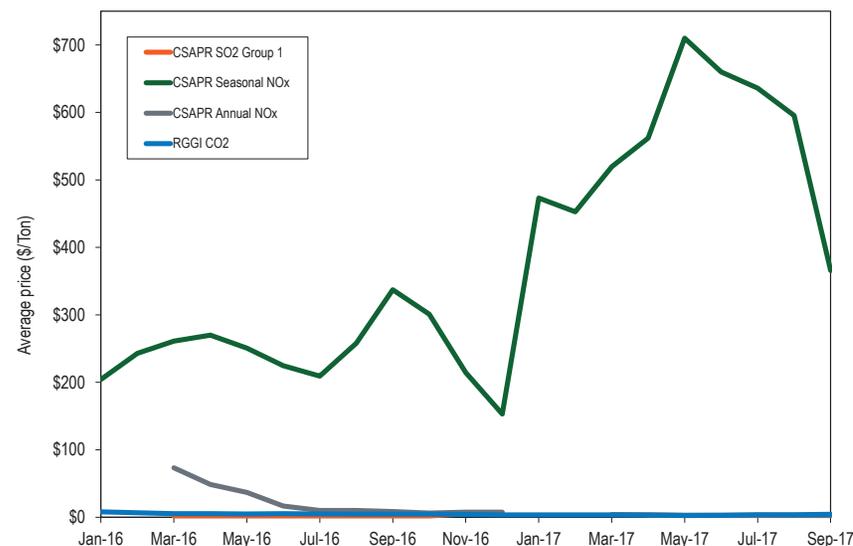
47 CSAPR Update at 74567.

During the delay of CSAPR implementation, the EPA estimates that there “will be approximately 350,000 banked allowances entering the CSAPR NO_x ozone season trading program by the start of the 2017 ozone season control period.”⁴⁸ The EPA is concerned that “[w]ithout imposing a limit on the transitioned vintage 2015 and 2016 banked allowances, the number of banked allowances would increase the risk of emissions exceeding the CSAPR Update emission budgets or assurance levels and would be large enough to let all affected sources emit up to the CSAPR Update assurance levels for five consecutive ozone seasons.”⁴⁹ Accordingly, the EPA established a formulaic limit on the use of transitioned vintage 2015 and 2016 banked allowances.⁵⁰

Figure 8-1 shows average, monthly settled prices for NO_x, CO₂ and SO₂ emissions allowances including CSAPR related allowances for January 1, 2016 through September 30, 2017. Figure 8-1 also shows the average, monthly settled price for the Regional Greenhouse Gas Initiative (RGGI) CO₂ allowances.

In the first nine months of 2017, CSAPR annual NO_x prices were 89.1 percent lower than in the first nine months of 2016. The CSAPR annual NO_x price was \$73.18 in March 2016, and has decreased steadily since then. There were not any reported CSAPR Annual NO_x cleared purchases for January or February 2016. The CSAPR Seasonal NO_x price hit a peak of \$710.12 in May 2017. The CSAPR Update resulted in fewer CSAPR Seasonal NO_x allowances.⁵¹

Figure 8-1 Spot monthly average emission price comparison: January 1, 2016 through September 30, 2017⁵²



Emission Standards for Reciprocating Internal Combustion Engines

On January 14, 2013, the EPA signed a final rule amending its rules regulating emissions from a wide variety of stationary reciprocating internal combustion engines (RICE).⁵³ RICE include certain types of electrical generation facilities like diesel engines typically used for backup, emergency or supplemental power, including facilities located behind the meter. These rules include: National Emission Standard for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE); New Source Performance Standards

⁴⁸ *Id.* at 74588.

⁴⁹ *Id.*

⁵⁰ *Id.* at 74560. The EPA states: “The one-time conversion of the 2015 and 2016 banked allowances will be made using a calculated ratio, or equation, to be applied in early 2017 once compliance reconciliation (or “true-up”)s for the 2016 ozone season program is completed.” *Id.*

⁵¹ There were not any reported cleared purchases for January or February 2016 for CSAPR SO₂ or CSAPR Annual NO_x. There were not any reported cleared purchases for January through March 2017 for CSAPR SO₂.

⁵² Spot monthly average emission price information obtained through Evomarkets, <<http://www.evomarkets.com>> (Accessed October 23, 2017).

⁵³ *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines*, Final Rule, EPA Docket No. EPA-HQ-OAR-2008-0708, 78 Fed. Reg. 6674 (January 30, 2013) (“2013 NESHAP RICE Rule”). In 2010, the EPA promulgated two rules with standards for hazardous air pollutant emissions from backup generators. The rules allowed backup generators to operate without emissions controls for fifteen hours each year as part of “demand response programs” during “emergency conditions that could lead to a potential electrical blackout.” EPA Docket No. EPA-HQ-OAR-2009-0234 & -2011-0044, codified at 40 CFR Part 63, Subpart ZZZZ; EPA Dockets Nos. EPA-HQ-OAR-2005-0030 & EPA-HQ-OAR-2005-0029, -2010-0295, codified at 40 CFR Part 60 Subpart JJJJ (“2010 RICH NESHAP Rule”).

(NSPS) of Performance for Stationary Spark Ignition Internal Combustion Engines; and Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (collectively RICE Rules).⁵⁴

The RICE Rules apply to emissions such as formaldehyde, acrolein, acetaldehyde, methanol, CO, NO_x, volatile organic compounds (VOCs) and PM. The regulatory regime for RICE is complicated, and the applicable requirements turn on whether the engine is an “area source” or “major source,” and the starter mechanism for the engine (compression ignition or spark ignition).⁵⁵

On May 22, 2012, the EPA proposed amendments to the 2010 RICE NESHAP Rule.⁵⁶ The proposed rule would have allowed owners and operators of emergency stationary internal combustion engines to operate them in emergency conditions, as defined in those regulations, as part of an emergency demand response program for 100 hours per year or the minimum hours required by an Independent System Operator’s tariff, whichever is less. The rule would have increased the 2010 Rule’s 15 hour per year run limit. The exempted emergency demand response programs included RPM demand resources.

On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit reversed the portion of the final rule exempting 100 hours of run time for certain stationary reciprocating internal combustion engines (RICE) participating in emergency demand response programs from the otherwise applicable emission standards.⁵⁷ As a result, the national emissions standards uniformly apply to all RICE.⁵⁸ The Court held that the “EPA acted arbitrarily and capriciously when it modified the National Emissions Standards and the Performance Standards to allow backup generators to operate without emissions controls for up to 100 hours per year as part of an emergency

⁵⁴ *Id.*

⁵⁵ CAA § 112(a) defines “major source” to mean “any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants,” and “area source” to mean, “any stationary source of hazardous air pollutants that is not a major source.”

⁵⁶ *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines*, Proposed Rule, EPA Docket No. EPA-HQ-OAR-2008-0708.

⁵⁷ *Delaware Department of Natural Resources and Environmental Control (DENREC) v. EPA*, Slip Op. No. 13-1093; *National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Stationary Internal Combustion Engines*, Final Rule, EPA Docket No. EPA-HQ-OAR-2008-0708, 78 Fed. Reg. 9403 (January 30, 2013).

⁵⁸ *Id.*

demand-response program.”⁵⁹ Specifically, the Court found that the EPA failed to consider arguments concerning the rule’s “impact on the efficiency and reliability of the energy grid,” including arguments raised by the MMU.⁶⁰

On April 15, 2016, the EPA issued a letter explaining how it would implement the vacatur order.⁶¹ The EPA explained upon issuance of the Court’s mandate, “an engine may not operate in circumstances described in the vacated [portions of the 2013 NESHAP RICE Rule] for any number of hours power per year.”⁶² The EPA explained that such engines could, however, continue to operate for specified emergency and nonemergency reasons.⁶³

On May 3, 2016, the Court issued a mandate to implement its May 1, 2015, order. Issuance of the mandate triggered implementation of the policy.

The MMU is currently taking steps to ensure resource portfolios remain in compliance. The MMU contacted all CSPs with Demand Resources using diesel fuel to ensure compliance is met among all PJM resources.

Regulation of Greenhouse Gas Emissions

The EPA regulates CO₂ as a pollutant using CAA provisions that apply to pollutants not subject to NAAQS.⁶⁴ ⁶⁵

The U.S. Court of Appeals for the Seventh Circuit has determined that a government agency can reasonably consider the global benefits of carbon emissions reduction against costs imposed in the U.S. by regulations in analyses known as the “Social Costs of Carbon.”⁶⁶ The Court rejected claims

⁵⁹ *DENREC v. EPA* at 3, 20-21.

⁶⁰ *Id.* at 22, citing Comments of the Independent Market Monitor for PJM, EPA Docket No. EPA-HQ-OAR-2008-0708 (August 9, 2012) at 2.

⁶¹ EPA, Memorandum, Peter Tsirigotis Guidance on Vacatur of RICE NESHAP and NSPS Provisions for Emergency Engines (April 15, 2016).

⁶² See 40 CFR §§ 60.4211(f)(2)(ii)-(iii), 60.4243(d)(2)(ii)-(iii), and 63.6640(f)(2)(ii)-(iii) (Declared Energy Emergency Alert Level 2 or 5 percent voltage/frequency deviations).

⁶³ See 40 CFR §§ 60.4211(f)(1), 60.4243(d)(1), and 63.6640(f)(1) (“There is no time limit on the use of emergency stationary ICE in emergency situations.”); 40 CFR 60.4211(f)(3), 60.4243(d)(3), 63.6640(f)(3)-(4).

⁶⁴ See CAA § 111.

⁶⁵ On April 2, 2007, the U.S. Supreme Court overruled the EPA’s determination that it was not authorized to regulate greenhouse gas emissions under the CAA and remanded the matter to the EPA to determine whether greenhouse gases endanger public health and welfare. *Massachusetts v. EPA*, 549 U.S. 497. On December 7, 2009, the EPA determined that greenhouse gases, including carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, endanger public health and welfare. See *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act*, 74 Fed. Reg. 66496, 66497 (December 15, 2009). In a decision dated June 26, 2012, the U.S. Court of Appeals for the D.C. Circuit upheld the endangerment finding, rejecting challenges brought by industry groups and a number of states. *Coalition for Responsible Regulation, Inc., et al. v. EPA*, No 09-1322.

⁶⁶ See *Zero Zone, Inc., et al., v. U.S. Dept. of Energy, et al.*, Case Nos. 14-2147, et al., Slip Op. (August 8, 2016).

raised by petitioners that raised concerns that the Social Cost of Carbon estimates were arbitrary, were not developed through transparent processes, and were based on inputs that were not peer-reviewed.⁶⁷ Although the decision applies only to the Department of Energy's regulations of manufacturers, it bolsters the ability of the EPA and state regulators to rely on social cost of carbon analyses.

On September 20, 2013, the EPA proposed national limits on the amount of CO₂ that new power plants would be allowed to emit.⁶⁸ The proposed rule includes two limits for fossil fuel fired utility boilers and integrated gasification combined cycle (IGCC) units based on the compliance period selected: 1,100 lb CO₂/MWh gross over a 12 operating month period, or 1,000–1,050 lb CO₂/MWh gross over an 84 operating month (seven year) period. The proposed rule also includes two standards for natural gas fired stationary combustion units based on the size: 1,000 lb CO₂/MWh gross for larger units (> 850 mmBtu/hr), or 1,100 lb CO₂/MWh gross for smaller units (≤ 850 mmBtu/hr).

On August 3, 2015, the EPA issued a final rule for regulating CO₂ from certain existing power generation facilities titled Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units (the Clean Power Plan).⁷⁰ The rule requires that individual state plans be submitted by September 6, 2016. However, on February 9, 2016, the U.S. Supreme Court issued a stay of the rule that will prevent its taking effect until judicial review is completed.⁷¹

The future of the Clean Power Plan is currently uncertain. On October 10, 2017, the EPA proposed to repeal the Clean Power Plan based on its determination that the Plan exceeds the EPA's authority under Section 111 of the EPA Act.⁷²

⁶⁷ *Id.*

⁶⁸ *Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units*, Proposed Rule, EPA-HQ-OAR-2013-0495, 79 Fed. Reg. 1430 (January 8, 2014); The President's Climate Action Plan, Executive Office of the President (June 2013) (Climate Action Plan); Presidential Memorandum—Power Sector Carbon Pollution Standards, Environmental Protection Agency (June 25, 2013); Presidential Memorandum—Power Sector Carbon Pollution Standards (June 25, 2013) ("June 25th Presidential Memorandum"). The Climate Action Plan can be accessed at: <<http://www.whitehouse.gov/sites/default/files/image/president27climateactionplan.pdf>>.

⁶⁹ 79 Fed. Reg. 1352 (January 8, 2014).

⁷⁰ *Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, EPA-HQ-OAR-2013-0602, Final Rule *mimeo* (August 3, 2015), also known as the "Clean Power Plan."

⁷¹ *North Dakota v. EPA*, et al., Order 15A793.

⁷² See *Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, Proposed Rule, EPA Docket No. EPA-HQ-OAR-2017-0355, 82 Fed. Reg. 48035 (October 16, 2017).

On August 8, 2017, the U.S. Court of Appeals for the District of Columbia Circuit issued an order continuing for 60 days to hold in abeyance court proceedings challenging the Clean Power Plan.⁷³

Federal Regulation of Environmental Impacts on Water

Water cooling systems at steam electric power generating stations are subject to regulation under the Clean Water Act (CWA).

The CWA applies to the waters of the United States (WOTUS). CWA defines WOTUS as "navigable waters."⁷⁴ On June 17, 2017, the EPA issued a rulemaking to rescind the definition of WOTUS proposed in the 2015 Clean Water Rule.⁷⁵ The rule would avoid the potential implementation of a broader definition of WOTUS included in the 2015 rule that was never implemented as the result of a stay issued by a reviewing Court.⁷⁶ The proposed rule would restore the pre 2015 rule to the code and the interpreting precedent applicable to the pre 2015 rule. As a result of the stay, the pre 2015 rule is now in effect. The pre 2015 rule includes all navigable waters and waters with a "significant nexus" to such waters.⁷⁷

EPA regulations of discharges from steam electric power generating stations are set forth in the Generating Effluent Guidelines and Standards in 1974. These standards were amended most recently in 2015.

Section 301(a) of the CWA prohibits the point source discharge of pollutants to a water of the United States, unless authorized by permit.⁷⁸ Section 402 of the CWA establishes the required permitting process, known as the National Pollutant Discharge Elimination System (NPDES). NPDES permits

⁷³ See *West Virginia v. EPA*, No. 15-1363 (D.C. Cir.); *North Dakota v. EPA*, No. 15-1381 (D.C. Cir.).

⁷⁴ 33 U.S.C. § 1362(7).

⁷⁵ 80 Fed. Reg. 37054 (June 29, 2015).

⁷⁶ The stay was issued by the U.S. Court of Appeals for the Sixth Circuit on October 9, 2015.

⁷⁷ *Rapanos v. U.S.*, 547 U.S. 715 (2006).

⁷⁸ The CWA applies to "navigable waters," which are, in turn, defined to include the "waters of the United States, including territorial seas." 33 U.S.C. § 1362(7). An interpretation of this rule has created some uncertainty on the scope of the waters subject to EPA jurisdiction, (see *Rapanos v. U.S.*, et al., 547 U.S. 715 (2006)), which the EPA continues to attempt to resolve. EPA issued a rule providing an expansive definition of "waters of the United States" in 2015 that the current administration has indicated intent to review. See Executive Order: Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the "Waters of the United States" Rule (February 28, 2017) referring to "Clean Water Rule: Definition of 'Waters of the United States,'" 80 Fed. Reg. 37054 (June 29, 2015).

limit discharges and include monitoring and reporting requirements. NPDES permits last five years before they must be renewed.

NPDES permits must satisfy the more stringent of a technology based standard, known as Best Technology Available (BTA), or water quality standards. NPDES permits include limits designed to prevent discharges that would cause or contribute to violations of water quality standards. Water quality standards include thermal limits.

PJM states are authorized to issue NPDES permits, with the exception of the District of Columbia. Pennsylvania, Delaware, Indiana and Illinois are partially authorized; the balance of PJM states are fully authorized.

The CWA regulates intakes in addition to discharges.

Section 316(b) of the CWA requires that cooling water intake structures reflect the BTA for minimizing adverse environmental impacts. The EPA's rule implementing Section 316(b) requires an existing facility to use BTA to reduce impingement of aquatic organisms (pinned against intake structures) if the facility withdraws 25 percent or more of its cooling water from WOTUS and has a design intake flow of greater than two million gallons per day (mgd).⁷⁹

Existing facilities withdrawing 125 mgd must conduct studies that may result in a requirement to install site-specific controls for reducing entrainment of aquatic organisms (drawn into intake structures). If a new generating unit is added to an existing facility, the rule requires addition of BTA that either (i) reduces actual intake flow at the new unit to a level at least commensurate with what can be attained using a closed-cycle recirculating system or (ii) reduces entrainment mortality of all stages of aquatic organisms that pass through a sieve with a maximum opening dimension of 0.56 inches to a prescribed level.

⁷⁹ See EPA, *National Pollutant Discharge Elimination System—Final Regulations to Establish Requirements for Cooling Water Intake Structures at Existing Facilities and Amend Requirements at Phase I Facilities*, EPA-HQ-DW-2008-0667, 79 Fed. Reg. 48300 (Aug. 15, 2014).

Federal Regulation of Coal Ash

The EPA administers the Resource Conservation and Recovery Act (RCRA), which governs the disposal of solid and hazardous waste.⁸⁰

Solid waste is regulated under subtitle D, which encourages state management of nonhazardous industrial solid waste and sets nonbinding criteria for solid waste disposal facilities. Subtitle D prohibits open dumping. Subtitle D criteria are not directly enforced by the EPA. However, the owners of solid waste disposal facilities are exposed under the act to civil suits, and criteria set by the EPA under subtitle D can be expected to influence the outcome of such litigation.

Subtitle C governs the disposal of hazardous waste. Hazardous waste is subject to direct regulatory control by the EPA from the time it is generated until its ultimate disposal.

The EPA issued a rule under RCRA, the Coal Combustion Residuals rule (CCRR), which sets criteria for the disposal of coal combustion residues (CCRs), or coal ash, produced by electric utilities and independent power producers.⁸¹ CCRs include fly ash (trapped by air filters), bottom ash (scooped out of boilers) and scrubber sludge (filtered using wet limestone scrubbers). These residues are typically stored on site in ponds (surface impoundments) or sent to landfills.

The CCRR exempts: (i) beneficially used CCRs that are encapsulated (i.e. physically bound into a product); (ii) coal mine filling; (iii) municipal landfills; (iv) landfills receiving CCRs before the effective date; (v) surface impoundments closed by the effective date; and (vi) landfills and surface impoundments on the site of generation facilities that deactivate prior to the effective date. Less restrictive criteria may also apply to some surface impoundments deemed inactive under not yet clarified criteria.

Table 8-2 describes the criteria and anticipated implementation dates.

⁸⁰ 42 U.S.C. §§ 6901 et seq.

⁸¹ See *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities*, 80 Fed. Reg. 21302 (April 17, 2015).

Table 8-2 Minimum criteria for existing CCR ponds (surface impoundments) and landfills and date by which implementation is expected

Requirement	Description of requirement to be completed	Implementation Date
Location Restrictions (§ 257.60–§ 257.64)	For Ponds: Complete demonstration for placement above the uppermost aquifer, for wetlands, fault areas, seismic impact zones and unstable areas.	October 17, 2018
	For Landfills: Complete demonstration for unstable areas.	October 17, 2018
Design Criteria (§ 257.71)	For Ponds: Document whether CCR unit is either a lined or unlined CCR surface impoundment.	October 17, 2016
Structural Integrity (§ 257.73)	For Ponds: Install permanent marker.	December 17, 2015
	For Ponds: Compile a history of construction, complete initial hazard potential classification assessment, initial structural stability assessment, and initial safety factor assessment.	October 17, 2016
Air Criteria (§ 257.80)	Prepare emergency action plan.	April 17, 2017
	Ponds and Landfills: Prepare fugitive dust control plan.	October 17, 2015
Run-On and Run-Off Controls (§ 257.81)	For Landfills: Prepare initial run-on and run-off control system plan.	October 17, 2016
Hydrologic and Hydraulic Capacity (§ 257.82)	Prepare initial inflow design flood control system plan.	October 17, 2016
Inspections (§ 257.83)	For Ponds and Landfills: Initiate weekly inspections of the CCR unit.	October 17, 2015
	For Ponds: Initiate monthly monitoring of CCR unit instrumentation.	October 17, 2015
	For Ponds and Landfills: Complete the initial annual inspection of the CCR unit.	January 17, 2016
Groundwater Monitoring and Corrective Action (§ 257.90–§ 257.98)	For Ponds and Landfills: Install the groundwater monitoring system; develop the groundwater sampling and analysis program; initiate the detection monitoring program; and begin evaluating the groundwater monitoring data for statistically significant increases over background levels.	October 17, 2017
Closure and Post-Closure Care (§ 257.103–§ 257.104)	For Ponds and Landfills: Prepare written closure and post-closure care plans.	October 17, 2016
Recordkeeping, Notification, and Internet Requirements (§ 257.105–§ 257.107)	For Ponds and landfills: Conduct required recordkeeping; provide required notifications; establish CCR website.	October 17, 2015

such high energy demand days.⁸² New Jersey’s HEDD rule, which became effective May 19, 2009, applies to HEDD units, which include units that have a NO_x emissions rate on HEDD equal to or exceeding 0.15 lbs/MMBtu and lack identified emission control technologies.⁸³ NO_x emissions limits for coal units became effective December 15, 2012.⁸⁴ NO_x emissions limits for other unit types became effective May 1, 2015.⁸⁵ As of September 30, 2017, two Cedar Station units, three Middle Street units, three Missouri units, one Sherman Ave unit, three Burlington units, three Edison units, four Essex units, three Kearny units, one Mercer unit, one National Park unit, one Sewaren unit, eight Glen Gardner units and four Werner units identified as NJ HEDD units have retired.⁸⁶ In total, 37 NJ HEDD units have retired and the remaining 41 NJ HEDD units are still operating after taking actions to comply with the HEDD regulations.

Table 8-3 shows the HEDD emissions limits applicable to each unit type.

State Environmental Regulation

New Jersey High Electric Demand Day (HEDD) Rules

The EPA’s transport rules apply to total annual and seasonal emissions. Units that run only during peak demand periods have relatively low annual emissions, and have less reason to make such investments under the EPA transport rules.

New Jersey addressed the issue of NO_x emissions on peak energy demand days with a rule that defines peak energy usage days, referred to as high electric demand days or HEDD, and imposes operational restrictions and emissions control requirements on units responsible for significant NO_x emissions on

⁸² N.J.A.C. § 7:27-19.
⁸³ CTS must have either water injection or selective catalytic reduction (SCR) controls; steam units must have either an SCR or selective noncatalytic reduction (SNCR).
⁸⁴ N.J.A.C. § 7:27-19.4.
⁸⁵ N.J.A.C. § 7:27-19.5.
⁸⁶ See Current New Jersey Turbines that are HEDD Units, <http://www.nj.gov/dep/workgroups/docs/apcrule_20110909turbinelist.pdf>.

Table 8-3 HEDD maximum NO_x emission rates⁸⁷

Fuel and Unit Type	NO _x Emission Limit (lbs/MWh)
Coal Steam Unit	1.50
Heavier than No. 2 Fuel Oil Steam Unit	2.00
Simple Cycle Gas CT	1.00
Simple Cycle Oil CT	1.60
Combined Cycle Gas CT	0.75
Combined Cycle Oil CT	1.20
Regenerative Cycle Gas CT	0.75
Regenerative Cycle Oil CT	1.20

Illinois Air Quality Standards (NO_x, SO₂ and Hg)

The State of Illinois has promulgated its own standards for NO_x, SO₂ and Hg (mercury) known as Multi-Pollutant Standards (MPS) and Combined Pollutants Standards (CPS).⁸⁸ MPS and CPS establish standards that are more stringent and take effect earlier than comparable Federal regulations, such as the EPA's MATS.

The Illinois Pollution Control Board has granted variances with conditions for compliance with MPS/CPS for Illinois units included in or potentially included in PJM markets.⁸⁹ In order to obtain variances, companies in PJM agreed to terms with the Illinois Pollution Control Board that resulted in investments in the installation of environmental pollution control equipment at units and deactivation of Illinois units that differ from what would have occurred had only Federal regulations applied.⁹⁰

State Regulation of Greenhouse Gas Emissions

RGGI

The Regional Greenhouse Gas Initiative (RGGI) is a cooperative effort by Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont to cap CO₂ emissions from power generation

facilities.⁹¹ RGGI generates revenues for the participating states which have spent approximately 64 percent of revenues on energy efficiency, 16 percent on clean and renewable energy, 4 percent on greenhouse gas abatements and 10 percent on direct bill assistance.⁹²

Table 8-4 shows the RGGI CO₂ auction clearing prices and quantities for the 2009–2011 compliance period auctions, the 2012–2014 compliance period auctions and 2015–2017 compliance period auctions held as of September 30, 2017, in short tons and metric tonnes. Prices for auctions held September 8, 2017, for the 2015–2017 compliance period were at \$4.35 per allowance (equal to one ton of CO₂), above the current price floor of \$2.05 for RGGI auctions.⁹³ The RGGI base budget for CO₂ will be reduced by 2.5 percent per year each year from 2015 through 2020. The price increased from the last auction clearing price of \$2.53 in June 2017. The September 3, 2015, auction included additional Cost Containment Reserves (CCRs) since the clearing price for allowances was above the CCR trigger price of \$6.00 per ton in 2015. The auctions on March 5, 2014, and September 3, 2015, were the only auctions to use CRRs.

⁸⁷ Regenerative cycle CTs are combustion turbines that recover heat from their exhaust gases and use that heat to preheat the inlet combustion air which is fed into the combustion turbine.

⁸⁸ 35 Ill. Admin. Code §§ 225.233 (Multi-Pollutant Standard (MPS)), 224.295 (Combined Pollutant Standard: Emissions Standards for NO_x and SO₂ (CPS)).

⁸⁹ See, e.g., Midwest Generation, LLC, Opinion and Order of the Board, Docket No. PCB 13-24 (Variance-Air) (April 4, 2013); Midwest Generation, LLC, Opinion and Order of the Board, Docket No. PCB 12-121 (Variance-Air) (August 23, 2012).

⁹⁰ See *Id.*

⁹¹ RGGI provides a link on its website to state statutes and regulations authorizing its activities, which can be accessed at: <<http://www.rggi.org/design/regulations>>.

⁹² *Investment of RGGI Proceeds Through 2015*, The Regional Greenhouse Gas Initiative, <https://www.rggi.org/docs/ProceedsReport/RGGI_Proceeds_Report_2015.pdf>.

⁹³ RGGI measures carbon in short tons (short ton equals 2,000 pounds) while world carbon markets measure carbon in metric tonnes (metric tonne equals 1,000 kilograms or 2,204.6 pounds).

Table 8-4 RGGI CO₂ allowance auction prices and quantities in short tons and metric tonnes: 2009-2011, 2012-2014 and 2015-2017 Compliance Periods⁹⁴

Auction Date	Short Tons			Metric Tonnes		
	Clearing Price	Quantity Offered	Quantity Sold	Clearing Price	Quantity Offered	Quantity Sold
September 25, 2008	\$3.07	12,565,387	12,565,387	\$3.38	11,399,131	11,399,131
December 17, 2008	\$3.38	31,505,898	31,505,898	\$3.73	28,581,678	28,581,678
March 18, 2009	\$3.51	31,513,765	31,513,765	\$3.87	28,588,815	28,588,815
June 17, 2009	\$3.23	30,887,620	30,887,620	\$3.56	28,020,786	28,020,786
September 9, 2009	\$2.19	28,408,945	28,408,945	\$2.41	25,772,169	25,772,169
December 2, 2009	\$2.05	28,591,698	28,591,698	\$2.26	25,937,960	25,937,960
March 10, 2010	\$2.07	40,612,408	40,612,408	\$2.28	36,842,967	36,842,967
June 9, 2010	\$1.88	40,685,585	40,685,585	\$2.07	36,909,352	36,909,352
September 10, 2010	\$1.86	45,595,968	34,407,000	\$2.05	41,363,978	31,213,514
December 1, 2010	\$1.86	43,173,648	24,755,000	\$2.05	39,166,486	22,457,365
March 9, 2011	\$1.89	41,995,813	41,995,813	\$2.08	38,097,972	38,097,972
June 8, 2011	\$1.89	42,034,184	12,537,000	\$2.08	38,132,781	11,373,378
September 7, 2011	\$1.89	42,189,685	7,847,000	\$2.08	38,273,849	7,118,681
December 7, 2011	\$1.89	42,983,482	27,293,000	\$2.08	38,993,970	24,759,800
March 14, 2012	\$1.93	34,843,858	21,559,000	\$2.13	31,609,825	19,558,001
June 6, 2012	\$1.93	36,426,008	20,941,000	\$2.13	33,045,128	18,997,361
September 5, 2012	\$1.93	37,949,558	24,589,000	\$2.13	34,427,270	22,306,772
December 5, 2012	\$1.93	37,563,083	19,774,000	\$2.13	34,076,665	17,938,676
March 13, 2013	\$2.80	37,835,405	37,835,405	\$3.09	34,323,712	34,323,712
June 5, 2013	\$3.21	38,782,076	38,782,076	\$3.54	35,182,518	35,182,518
September 4, 2013	\$2.67	38,409,043	38,409,043	\$2.94	34,844,108	34,844,108
December 4, 2013	\$3.00	38,329,378	38,329,378	\$3.31	34,771,837	34,771,837
March 5, 2014	\$4.00	23,491,350	23,491,350	\$4.41	21,311,000	21,311,000
June 4, 2014	\$5.02	18,062,384	18,062,384	\$5.53	16,385,924	16,385,924
September 3, 2014	\$4.88	17,998,687	17,998,687	\$5.38	16,328,139	16,328,139
December 3, 2014	\$5.21	18,198,685	18,198,685	\$5.74	16,509,574	16,509,574
March 11, 2015	\$5.41	15,272,670	15,272,670	\$5.96	13,855,137	13,855,137
June 3, 2015	\$5.50	15,507,571	15,507,571	\$6.06	14,068,236	14,068,236
September 3, 2015	\$6.02	25,374,294	25,374,294	\$6.64	23,019,179	23,019,179
December 2, 2015	\$7.50	15,374,274	15,374,274	\$8.27	13,947,311	13,947,311
March 9, 2016	\$5.25	14,838,732	14,838,732	\$5.79	13,461,475	13,461,475
June 1, 2016	\$4.53	15,089,652	15,089,652	\$4.99	13,689,106	13,689,106
September 7, 2016	\$4.54	14,911,315	14,911,315	\$5.00	13,527,321	13,527,321
December 7, 2016	\$3.55	14,791,315	14,791,315	\$3.91	13,418,459	13,418,459
March 8, 2017	\$3.00	14,371,300	14,371,300	\$3.31	13,037,428	13,037,428
June 7, 2017	\$2.53	14,597,470	14,597,470	\$2.79	13,242,606	13,242,606
September 8, 2017	\$4.35	14,371,585	14,371,585	\$4.80	13,037,686	13,037,686

94 See Regional Greenhouse Gas Initiative, "Auction Results," <http://www.rggi.org/market/co2_auctions/results> (Accessed October 23, 2017).

Zero Emissions Credits (ZEC) Programs

On December 7, 2016, the State of Illinois enacted legislation that, among other things, provides subsidies, known as zero emission credits (ZECs), for certain existing nuclear-powered generation units that indicated they would otherwise retire.⁹⁵ The ZEC program provides that starting June 1, 2017, the Illinois Power Agency (IPA) must procure ZECs under 10 year contracts with select Illinois nuclear power plants.⁹⁶

IPA must procure ZECs equal to 16 percent of 2014 Illinois retail load.⁹⁷ The initial base ZEC price equals \$16.50/MWh and increases \$1.00/MWh annually commencing with the 2023/2024 Delivery Year.⁹⁸ The base price is reduced by the amount that "the market price index for the applicable delivery year exceeds the baseline market price index for the consecutive 12-month period ending May 31, 2016."⁹⁹

The revenues provided by the ZEC legislation are expected to forestall the retirement of a specific PJM nuclear unit in Illinois, the Quad Cities Generating Station.¹⁰⁰

On February 14, 2017, the Electric Power Supply Association (EPSA) and others filed a complaint in the U.S. District Court for the Northern District of Illinois Eastern Division.¹⁰¹ State defendants have filed a motion to dismiss and EPSA et al. have filed a motion for a stay. On April 24, 2017, the MMU filed an amicus curiae brief opposing the motion to dismiss and supporting the motion for a stay. The District Court granted the motion to dismiss on July 14, 2017. EPSA appealed to the U.S. Court of Appeals for the Seventh Circuit.

95 See Illinois 99th Gen. Assemb., S.B. 2814 (Dec. 7, 2016), which can be accessed at: <<http://www.ilga.gov/legislation/99/SB/099005B2814v.htm>>. The Governor of Illinois signed the ZEC legislation, amending the Illinois Power Agency Act ("IPAA"), on December 7, 2016; see also ICC, et al., Potential Nuclear Power Plant Closings in Illinois (Jan. 5, 2015), which can be accessed at: <http://www.ilga.gov/reports/special/report_potential%20nuclear%20power%20plant%20closings%20in%20il.pdf>.

96 See IPAA § 1-75(d-5)(1).

97 See *id.*

98 See IPAA § 1-75(d-5)(1)(B).

99 See *id.*

100 See Ted Caddell, RTO Insider "Exelon's Crane Reports 'Monumental Year,'" (Feb. 8, 2017); Exelon, Press Release, "Exelon Announces Early Retirement of Clinton and Quad Cities Nuclear Plants" (June 2, 2016) (citing "lack of progress on Illinois energy legislation" as a key factor), <<http://www.exeloncorp.com/newsroom/clinton-and-quad-cities-retirement>>; Thomas Overton, Power, "Byron, Three Mile Island Nuclear Plants at Risk, Exelon Says" (June 7, 2016) (reporting Exelon statement that Byron is "economically challenged"), <<http://www.powermag.com/byron-three-mile-island-nuclear-plants-at-risk-exelon-says/?printmode=1>>.

101 Case No. 17-cv-01164.

On September 6, 2017, the MMU filed a brief of amicus curiae supporting the appeal. The appeal is pending.

The ZEC legislation creates subsidies for existing units that create the same price suppressive effects as subsidies for new entry that are addressed by the Minimum Offer Price Rule.¹⁰² The MMU has supported modification of the Minimum Offer Price (MOPR) Rules to apply to existing units receiving subsidies.¹⁰³ The MMU's proposed modification of the MOPR rules would, if in place, apply to nuclear units receiving subsidies. Such subsidies may otherwise result in noncompetitive offers in PJM markets that would be addressed on a unit specific basis.

A similar issue has arisen in New York, where the New York Public Service Commission (New York PSC) established a program requiring the purchase of ZEC credits from specific nuclear facilities in upstate New York. The constitutionality of the New York PSC's program has been challenged in a case pending before the U.S. District Court for the Southern District of New York.¹⁰⁴ On January 9, 2017, the MMU filed an amicus curiae brief supporting plaintiffs on the grounds that the ZEC subsidies interfere with the operation of wholesale power markets in New York and have price suppressive effects in the energy markets in PJM.¹⁰⁵ In a decision issued July 25, 2017, the District Court dismissed the case. The Coalition for Competitive Electricity appealed to the U.S. Court of Appeals for the Second Circuit. On October 23, 2017, the MMU filed a brief of amicus curiae supporting the appeal. The appeal is pending.

State Renewable Portfolio Standards

Nine PJM jurisdictions have enacted legislation that requires that a defined percentage of retail load be served by renewable resources, for which there are many standards and definitions. These are typically known as renewable portfolio standards, or RPS. In PJM jurisdictions that have adopted an RPS, load serving entities are often required by law to meet defined shares of

load using specific renewable and/or alternative energy sources commonly called "eligible technologies." Load serving entities may generally fulfill these obligations in one of two ways: they may use their own generation resources classified as eligible technologies to produce power or they may purchase renewable energy credits (RECs) that represent a known quantity of power produced with eligible technologies by other market participants or in other geographical locations. Load serving entities that fail to meet the percent goals set in their jurisdiction's RPS by generating power from eligible technologies or purchasing RECs are penalized with alternative compliance payments. As of September 30, 2017, Delaware, Illinois, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, and Washington, D.C. had renewable portfolio standards that are mandatory and include penalties in the form of alternative compliance payments for underperformance.

Two PJM jurisdictions have enacted voluntary renewable portfolio standards. Load serving entities in states with voluntary standards are not bound by law to participate and face no alternative compliance payments. Instead, incentives are offered to load serving entities to develop renewable generation or, to a more limited extent, purchase RECs. As of September 30, 2017, Virginia and Indiana had renewable portfolio standards that are voluntary and do not include penalties in the form of alternative compliance payments for underperformance.

In this section, voluntary standards will not be directly compared to RPS with enforceable compliance payments. Indiana's voluntary standard illustrates the issue. Although a voluntary standard including target shares was enacted by the Indiana legislature in 2011, no load serving entities have volunteered to participate in the program.¹⁰⁶

Three PJM states have no renewable portfolio standards. Kentucky and Tennessee have enacted no renewable portfolio standards. West Virginia had a voluntary standard, but the state legislature repealed their renewable portfolio standard on January 27, 2015, effective February 3, 2015.¹⁰⁷

¹⁰² OATT Attachment DD § 5.14(h).

¹⁰³ See, e.g., Comments of the Independent Market Monitor for PJM, FERC Docket No. EL16-49-000 (April 11, 2016).

¹⁰⁴ Coalition for Competitive Electricity, et al., v. Audrey Zibelman, et al., Case No. 1:16-cv-08164-VEC (USDC SDNY).

¹⁰⁵ Brief of Amicus Curiae of Monitoring Analytics, LLC, acting in its capacity as the Independent Market Monitor for PJM, USDC SDNY Case No. 1:16-cv-08164-VEC (Jan. 9, 2017).

¹⁰⁶ See the Indiana Utility Regulatory Commission's "2016 Annual Report." P 34 (Sept. 2016) <<http://www.in.gov/iurc/files/Annual%20Report%202016%20WEB%20version.pdf>>.

¹⁰⁷ See Enr. Com. Sub. For H. B. No. 2001.

Table 8-5 shows the percent of retail electric load that must be served by renewable and/or alternative energy resources under each PJM jurisdictions’ RPS by year. Washington, DC will require 35 percent of load to be served by renewable resources in 2028, the highest standard of PJM jurisdictions. In October 2016, the Council of the District of Columbia passed legislation that expanded the District’s RPS program and increased the percent of retail load in the District that must be served by clean energy resources to 50 percent by 2032.¹⁰⁸ On December 15, 2016, the Michigan State Senate approved Senate Bill 438 (S.B. 438) which increased the Michigan RPS percent requirements. The previous version of the bill required that 10 percent of retail electric load in Michigan be served by renewable and alternative energy resources in 2015 and subsequent years. S.B. 438 increased the percent of retail electric load to be served by renewable and alternative energy resources in Michigan to be 12.5 percent in 2019 and 2020 and 15 percent in 2021 and subsequent years.¹⁰⁹ In February 2017, the Maryland State House approved House Bill 1106 which increased the total RPS requirement from 20 percent by 2022 to 25 percent by 2020.

Each PJM jurisdiction with an RPS identifies the type of generation resources that may be used for compliance. These resources are often called eligible technologies. Some PJM jurisdictions with RPS group different eligible technologies into tiers based on the magnitude of their environmental impact. Of the nine PJM states with mandatory RPS, Maryland, New Jersey, Pennsylvania, and Washington, DC group the eligible technologies that must be used to comply with their RPS programs into Tier I and Tier II resources. Though there are minor differences across these four jurisdictions’ definitions of Tier I resources, technologies that use solar photovoltaic, solar thermal, wind, ocean, tidal, biomass, low-impact hydro, and geothermal sources to produce electricity are classified as Tier I resources.

Delaware, Illinois, Michigan, North Carolina, and Ohio do not classify the resources eligible for their RPS standards by tiers. In Delaware, Illinois, North Carolina, and Ohio, eligible technologies are for the most part identical to Tier I resources. Michigan is the only state with an RPS that does not classify eligible technologies into tiers and also permits technologies that differ markedly from those classified as Tier I resources in states that do

classify technologies. Michigan’s RPS includes coal gasification, industrial cogeneration, and coal with carbon capture and storage as eligible technologies.

Table 8-6 shows the percent of retail electric load that must be served by Tier II resources under each PJM jurisdictions’ RPS by year. Table 8-6 also shows specific technology requirements that PJM jurisdictions have added to their renewable portfolio standards. The standards shown in Table 8-6 are included in the total RPS requirements presented in Table 8-5. Illinois requires that a defined proportion of retail load be served by wind resources, increasing from 8.63 percent of load served in 2017 to 18.75 percent in 2026. Maryland, New Jersey, Pennsylvania and Washington, DC all have Tier II or “Class 2” standards, which allow

Table 8-5 Renewable standards of PJM jurisdictions: 2017 to 2028¹¹⁰

Jurisdiction with RPS	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Delaware	16.00%	17.50%	19.00%	20.00%	21.00%	22.00%	23.00%	24.00%	25.00%	25.00%	25.00%	25.00%
Illinois	11.50%	13.00%	14.50%	16.00%	17.50%	19.00%	20.50%	22.00%	23.50%	25.00%	25.00%	25.00%
Maryland	15.60%	18.30%	20.40%	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%	25.00%
Michigan	10.00%	10.00%	12.50%	12.50%	15.00%	15.00%	15.00%	15.00%	15.00%	15.00%	15.00%	15.00%
New Jersey	15.99%	18.03%	19.97%	21.91%	23.85%	23.94%	24.03%	24.12%	24.21%	24.30%	24.39%	24.48%
North Carolina	6.00%	10.00%	10.00%	10.00%	12.50%	12.50%	12.50%	12.50%	12.50%	12.50%	12.50%	12.50%
Ohio	3.50%	4.50%	5.50%	6.50%	7.50%	8.50%	9.50%	10.50%	11.50%	12.50%	12.50%	12.50%
Pennsylvania	14.20%	14.70%	15.20%	15.70%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%	18.00%
Washington, D.C.	15.00%	16.50%	18.00%	20.00%	20.00%	20.00%	20.00%	23.00%	26.00%	29.00%	32.00%	35.00%
Jurisdiction with Voluntary Standard												
Indiana	4.00%	4.00%	7.00%	7.00%	7.00%	7.00%	7.00%	7.00%	10.00%	10.00%	10.00%	10.00%
Virginia	7.00%	7.00%	7.00%	7.00%	7.00%	12.00%	12.00%	12.00%	15.00%	15.00%	15.00%	15.00%
Jurisdiction with No Standard												
Kentucky	No Renewable Portfolio Standard											
Tennessee	No Renewable Portfolio Standard											
West Virginia	No Renewable Portfolio Standard											

¹⁰⁸ See Council of the District of Columbia. B21-0650 – Renewable Portfolio Standard Expansion Amendment Act of 2016. <<http://lims.dccouncil.us/Legislation/B21-0650>> (Accessed July 28, 2017).

¹⁰⁹ See Michigan Legislature. Senate Bill 0438 (2015) <<http://legislature.mi.gov/doc.aspx?2015-SB-0438>> (Accessed July 28, 2017).

¹¹⁰ This shows the total standard of renewable resources in all PJM jurisdictions, including Tier I, Tier II and Tier III resources.

specific technology types, such as waste coal units located in Pennsylvania, to qualify for renewable energy credits. By 2021, North Carolina’s RPS requires that 0.2 percent of power be generated using swine waste and that 900 GWh of power be produced by poultry waste.

Table 8-6 Additional renewable standards of PJM jurisdictions: 2017 to 2028

Jurisdiction		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Illinois	Wind Requirement	8.63%	9.75%	10.88%	12.00%	13.13%	14.25%	15.38%	16.50%	17.63%	18.75%	18.75%	18.75%
Illinois	Distributed Generation	0.12%	0.13%	0.15%	0.16%	0.18%	0.19%	0.21%	0.22%	0.24%	0.25%	0.25%	0.25%
Maryland	Tier II Standard	2.50%	2.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
New Jersey	Class II Standard	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
North Carolina	Swine Waste	0.07%	0.14%	0.14%	0.14%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
North Carolina	Poultry Waste (in GWh)	900	900	900	900	900	900	900	900	900	900	900	900
Pennsylvania	Tier II Standard	8.20%	8.20%	8.20%	8.20%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%	10.00%
Washington, D.C.	Tier II Standard	1.50%	1.00%	0.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 8-7 Solar renewable standards by percent of electric load for PJM jurisdictions: 2017 to 2028

Jurisdiction with RPS	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Delaware	1.50%	1.75%	2.00%	2.25%	2.50%	2.75%	3.00%	3.25%	3.50%	3.50%	3.50%	3.50%
Illinois	0.69%	0.78%	0.87%	0.96%	1.05%	1.14%	1.23%	1.32%	1.41%	1.50%	1.50%	1.50%
Maryland	1.15%	1.50%	1.95%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
Michigan	No Minimum Solar Requirement											
New Jersey	3.00%	3.20%	3.29%	3.38%	3.47%	3.56%	3.65%	3.74%	3.83%	3.92%	4.01%	4.10%
North Carolina	0.14%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
Ohio	0.15%	0.18%	0.22%	0.26%	0.30%	0.34%	0.38%	0.42%	0.46%	0.50%	0.50%	0.50%
Pennsylvania	0.29%	0.34%	0.39%	0.44%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%	0.50%
Washington, D.C.	0.98%	1.15%	1.35%	1.58%	1.85%	2.18%	2.50%	2.60%	2.85%	3.15%	3.45%	3.75%
Jurisdiction with Voluntary Standard												
Indiana	No Minimum Solar Requirement											
Virginia	No Minimum Solar Requirement											
Jurisdiction with No Standard												
Kentucky	No Renewable Portfolio Standard											
Tennessee	No Renewable Portfolio Standard											
West Virginia	No Renewable Portfolio Standard											

Some PJM jurisdictions have specific solar resource RPS requirements. These solar requirements are included in the total requirements shown in Table 8-5 but must be met by solar RECs (SRECs) only. Table 8-7 shows the percent of retail electric load that must be served by solar energy resources under

each PJM jurisdictions’ RPS by year. Delaware, Illinois, Maryland, New Jersey, North Carolina, Ohio, Pennsylvania, and Washington, DC have requirements for the proportion of load to be served by solar. Pennsylvania and Delaware allow only solar photovoltaic resources to fulfill their solar requirements. Solar thermal units like solar hot water heaters that do not generate electricity are considered Tier II. Indiana, Kentucky, Michigan, Tennessee, Virginia, and West Virginia have no specific solar standards. In 2017, New Jersey has the most stringent solar standard in PJM, requiring that 3.0 percent of retail electricity sales within the state be served by solar resources. As Table 8-7 shows, by 2028, New Jersey will continue to have the most stringent standard, requiring that at least 4.10 percent of load be served by solar.

Figure 8-2 and Figure 8-3 show the percent of retail electric load that must be served by Tier I resources and Tier 2 Resources in each PJM jurisdiction with a mandatory RPS. Figure 8-2 shows the percent of retail load that must be met with Tier I resources only. Because states that do not group eligible technologies into tiers generally classify eligible technologies in their RPS that are identical to Tier I resources, they are included in Figure 8-2. Figure 8-3 shows the percent of retail load that must be met with all eligible technologies, including Tier I, Tier II and alternative energy resources in all PJM jurisdictions with RPS. States with higher percent requirements for renewable and alternative energy resources are shaded darker. Jurisdictions with no standards or with only voluntary renewable standards are shaded gray. Pennsylvania’s RPS illustrates the need to differentiate between percent

requirements for Tier I and Tier II resources separately. Like all other PJM states with mandatory RPS, the Pennsylvania RPS identifies solar photovoltaic, solar thermal, wind, geothermal, biomass, and low-impact hydropower as Tier I resources. The Pennsylvania RPS identifies waste coal, demand side management, large-scale hydropower, integrated gasification combined cycle, clean coal and municipal solid waste as eligible Tier II resources. The 14.2 percent number in Figure 8-3 overstates the percent of retail electric load in Pennsylvania that must be served by renewable energy resources.

Figure 8-2 Map of retail electric load shares under RPS – Tier I resources only: 2017

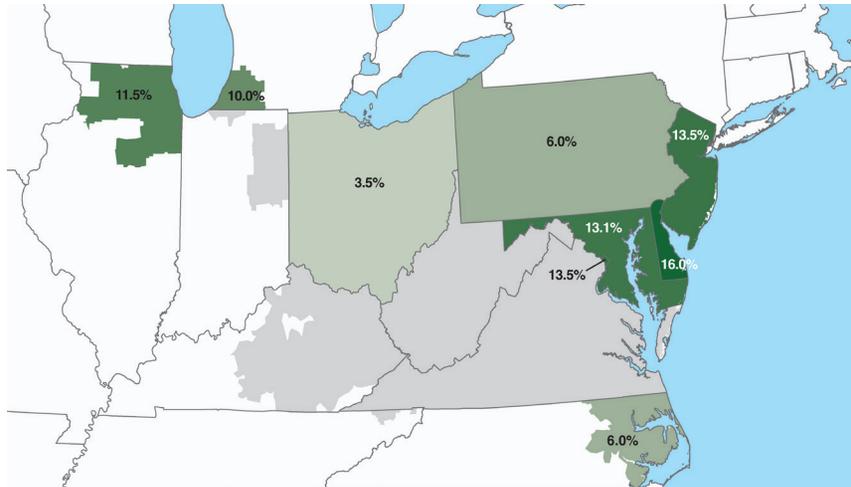
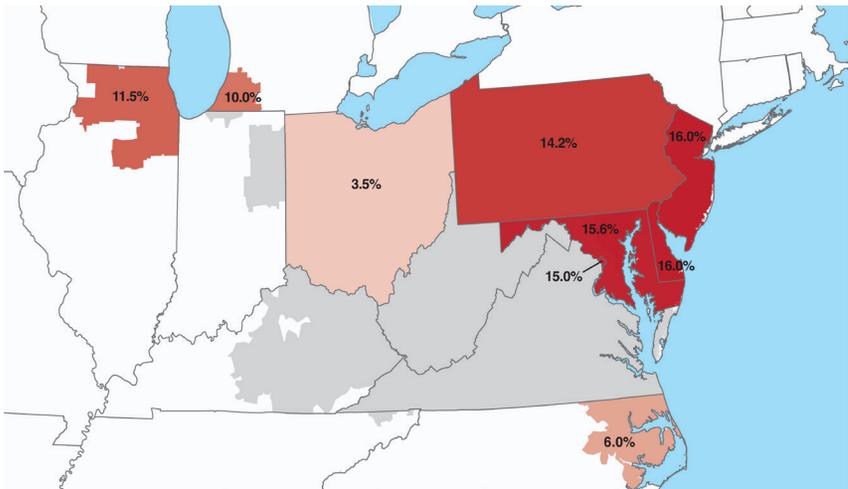


Figure 8-3 Map of retail electric load shares under RPS – Tier I and Tier II resources: 2017



Under the existing state renewable portfolio standards, approximately 8.4 percent of PJM load must be served by Tier I and Tier II renewable and alternative energy resources in 2017 and, if the proportion of load among states remains constant, 14.8 percent of PJM load must be served by renewable and alternative energy resources in 2028 under defined RPS rules. Approximately 6.3 percent of PJM load must be served by Tier I renewables in 2017 and, if the proportion of load among states remains constant, 12.6 percent of PJM load must be served by Tier I renewables in 2028 under defined RPS rules.

In jurisdictions with RPS, load serving entities must either generate power from eligible technologies identified in their jurisdictions’ RPS or purchase RECs from resources classified as eligible technologies. Table 8-8 shows renewable resource generation by jurisdiction and resource type for the first nine months of 2017. Wind output was 12,916.5 GWh of 22,344.1 Tier I GWh, or 57.8 percent, in the PJM footprint. As shown in Table 8-8, 38,303.0 GWh were generated by renewable resources, including both Tier II and Tier I renewable credits, of which, Tier I resources accounted for 58.3 percent. Total

wind and solar generation was 2.3 percent of total generation in PJM for the first nine months of 2017, total renewable generation was 4.5 percent of total generation in PJM and was 6.3 percent if coal and solid waste resources in the Tier II RECs programs are included. Landfill gas, solid waste and waste coal were 12,695.2 GWh of renewable resource generation or 33.1 percent of the total Tier I and Tier II.

Table 8-8 Renewable resource generation by jurisdiction and renewable resource type (GWh): January 1 through September 30, 2017

Jurisdiction	Tier I					Tier II				Total Credit GWh
	Landfill Gas	Run-of-River Hydro	Solar	Wind	Total Tier I Credit	Pumped-Storage Hydro	Solid Waste	Waste Coal	Total Tier II Credit	
Delaware	28.6	0.0	0.0	0.0	28.6	0.0	0.0	0.0	0.0	28.6
Illinois	135.0	0.0	12.6	5,797.8	5,945.4	0.0	0.0	0.0	0.0	5,945.4
Indiana	34.8	30.2	14.0	2,845.7	2,924.7	0.0	0.0	0.0	0.0	2,924.7
Kentucky	0.0	418.5	0.0	0.0	418.5	0.0	0.0	0.0	0.0	418.5
Maryland	64.6	1,683.5	103.7	411.1	2,262.8	0.0	482.2	0.0	482.2	2,745.1
Michigan	23.9	48.5	6.6	0.0	79.0	0.0	0.0	0.0	0.0	79.0
New Jersey	210.1	13.2	467.9	8.4	699.6	334.1	993.9	0.0	1,328.1	2,027.7
North Carolina	0.0	443.2	363.7	355.8	1,162.7	0.0	0.0	0.0	0.0	1,162.7
Ohio	250.9	170.3	1.0	1,064.7	1,487.0	0.0	0.0	0.0	0.0	1,487.0
Pennsylvania	629.8	2,416.7	20.7	2,433.0	5,500.2	1,476.3	1,038.6	5,450.6	7,965.5	13,465.7
Tennessee	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Virginia	433.3	287.1	130.3	0.0	850.7	3,264.2	248.3	2,670.6	6,183.0	7,033.7
Washington, D.C.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
West Virginia	0.0	984.9	0.0	0.0	984.9	0.0	0.0	0.0	0.0	984.9
Total	1,811.0	6,496.1	1,120.5	12,916.5	22,344.1	5,074.6	2,763.0	8,121.2	15,958.9	38,303.0
Percent of Renewable Generation	4.7%	17.0%	2.9%	33.7%	58.3%	13.2%	7.2%	21.2%	41.7%	100.0%
Percent of Total Generation	0.3%	1.1%	0.2%	2.1%	3.7%	0.8%	0.5%	1.3%	2.6%	6.3%

Figure 8-4 shows the average hourly output by fuel type for January 1 through September 30 of 2014 through 2017. Tier I includes landfill gas, run-of-river hydro, solar and wind resources, as defined by the relevant states. Tier II includes pumped storage, solid waste and waste coal resources, as defined by the relevant states. Other includes biomass, miscellaneous, heavy oil, light oil, coal gas, propane, diesel, distributed generation, other biogas, kerosene and batteries.¹¹¹

¹¹¹ 2017 State of the Market Report for PJM, January through September, Section 3: Energy Market, Table 3-9.

Figure 8-4 Average hourly output by fuel type: January 1 through September 30, 2014 through 2017

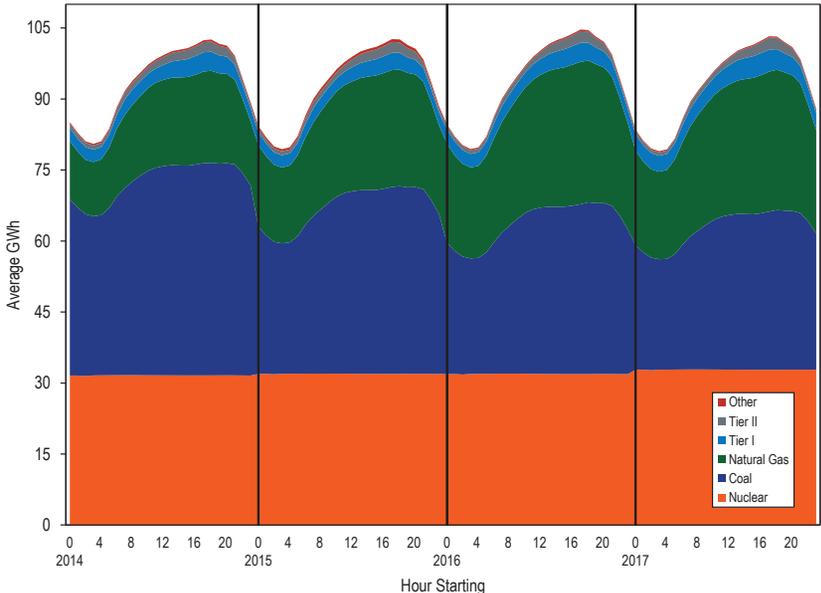


Table 8-9 shows the capacity of renewable resources in PJM by jurisdiction, as defined by primary fuel type. This capacity includes coal and natural gas units that have a renewable fuel as an alternative fuel, and thus are able to earn renewable energy credits based on the fuel used to generate energy. For example, a coal generator that can also burn waste coal to generate power could list the alternative fuel as waste coal. A REC is only generated when using the fuel listed as Tier I or Tier II. New Jersey has the largest amount of solar capacity in PJM, 477.8 MW, or 47.2 percent of the total solar capacity. New Jersey’s SREC prices were the highest in 2009 at \$673 per REC, and in 2017 are at \$227 per REC. Wind resources are located primarily in western PJM, in Illinois and Indiana, which include 4,488.7 MW, or 57.5 percent of the total wind capacity.

Table 8-9 PJM renewable capacity by jurisdiction (MW): September 30, 2017

Jurisdiction	Landfill		Natural Gas	Oil	Pumped-Storage Hydro	Run-of-River Hydro	Solar	Solid Waste	Waste Coal	Wind	Total
	Coal	Gas									
Delaware	0.0	8.1	1,797.0	13.0	0.0	0.0	0.0	0.0	0.0	0.0	1,818.1
Illinois	0.0	74.3	360.0	0.0	0.0	0.0	9.0	0.0	0.0	2,846.4	3,289.7
Indiana	0.0	8.0	0.0	0.0	0.0	8.2	10.1	0.0	0.0	1,602.4	1,628.7
Iowa	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	185.0	185.0
Kentucky	0.0	0.0	0.0	0.0	0.0	166.0	0.0	0.0	0.0	0.0	166.0
Maryland	0.0	25.1	0.0	69.0	0.0	494.4	93.5	128.2	0.0	190.0	1,000.2
Michigan	0.0	8.0	0.0	0.0	0.0	13.9	4.6	0.0	0.0	0.0	26.5
Missouri	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	146.0	146.0
New Jersey	0.0	77.7	0.0	0.0	453.0	11.5	477.8	162.0	0.0	4.5	1,186.4
North Carolina	0.0	0.0	0.0	0.0	0.0	352.5	291.2	0.0	0.0	208.0	851.7
Ohio	11,080.0	63.4	0.0	156.0	0.0	119.1	1.1	0.0	0.0	503.8	11,923.4
Pennsylvania	0.0	201.8	2,346.0	0.0	1,269.0	893.3	19.5	345.8	1,611.0	1,367.2	8,053.6
Tennessee	0.0	0.0	0.0	0.0	0.0	52.0	0.0	50.0	0.0	0.0	102.0
Virginia	0.0	222.1	0.0	17.0	5,166.2	350.5	105.4	444.9	585.0	0.0	6,891.1
West Virginia	0.0	5.4	0.0	0.0	0.0	257.9	0.0	0.0	165.0	686.3	1,114.6
PJM Total	11,080.0	693.8	4,503.0	255.0	6,888.2	2,719.2	1,012.2	1,130.9	2,361.0	7,739.5	38,382.8

Table 8-10 shows renewable capacity registered in the PJM generation attribute tracking system (GATS). This includes solar capacity of 3,765.3 MW of which 1,674.0 MW is in New Jersey. These resources can earn renewable energy credits, and can be used to fulfill the renewable portfolio standards in PJM jurisdictions. Some of this capacity is located in jurisdictions outside PJM, but may qualify for specific renewable energy credits in some PJM jurisdictions. This includes both solar generation located inside PJM but not PJM units, and generation connected to other RTOs outside PJM.

Table 8–10 Renewable capacity by jurisdiction, non-PJM units registered in GATS (MW), on September 30, 2017¹¹²

Jurisdiction	Coal	Hydroelectric	Landfill	Natural	Other	Other	Solar	Solid	Wind	Total
			Gas	Gas	Gas	Waste				
Alabama	0.0	0.0	0.0	0.0	0.0	0.0	0.0	141.5	0.0	141.5
Arkansas	0.0	135.0	0.0	0.0	18.0	0.0	0.0	0.0	0.0	153.0
Delaware	0.0	0.0	2.2	0.0	0.0	0.0	93.2	0.0	2.1	97.5
Georgia	0.0	0.0	0.0	0.0	0.0	0.0	38.7	258.9	0.0	297.6
Illinois	0.0	21.4	76.9	0.0	0.6	0.0	54.1	0.0	302.8	455.8
Indiana	0.0	0.0	49.6	0.0	5.2	94.6	65.4	0.0	180.0	394.8
Iowa	0.0	0.0	0.0	0.0	0.0	0.0	3.2	0.0	236.7	239.8
Kentucky	600.0	162.2	18.6	0.0	0.4	0.0	16.6	93.0	0.0	890.8
Louisiana	0.0	0.0	0.0	0.0	0.0	0.0	0.0	129.2	0.0	129.2
Maryland	65.0	0.0	12.7	129.0	0.0	0.0	716.8	15.0	0.3	938.8
Michigan	55.0	1.3	3.2	0.0	0.0	0.0	3.2	31.0	0.0	93.7
Missouri	0.0	0.0	5.6	0.0	0.0	0.0	19.5	0.0	451.0	476.1
New Jersey	0.0	0.0	53.1	0.0	8.3	0.0	1,674.0	0.0	5.0	1,740.4
New York	0.0	12.0	0.0	0.0	0.0	0.0	0.4	0.0	0.0	12.4
North Carolina	0.0	242.5	0.0	0.0	0.0	0.0	471.3	151.5	0.0	865.3
North Dakota	0.0	0.0	360.0	0.0	0.0	0.0	0.0	0.0	0.0	360.0
Ohio	0.0	1.0	33.6	92.6	16.4	32.4	170.3	92.8	35.1	474.2
Pennsylvania	109.7	31.7	45.2	91.0	15.2	5.0	286.1	68.6	3.3	655.6
Tennessee	0.0	52.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	52.0
Texas	0.0	0.0	0.0	0.0	0.0	0.0	0.0	57.7	0.0	57.7
Virginia	0.0	18.2	12.1	0.0	0.9	0.0	107.3	287.6	0.0	426.1
West Virginia	0.0	9.0	0.0	0.0	0.0	0.0	0.4	44.6	0.0	54.0
Wisconsin	0.0	0.0	0.0	0.0	0.0	0.0	3.6	0.0	0.0	3.6
District of Columbia	0.0	0.0	0.0	0.0	10.0	0.0	41.2	0.0	0.0	51.2
Total	829.7	686.2	672.8	312.6	74.9	132.0	3,765.3	1,371.4	1,216.4	9,061.2

Renewable energy credit markets are markets related to the production and purchase of wholesale power, but are not subject to FERC regulation or any other market regulation or oversight. RECs markets are, as an economic fact, integrated with PJM markets including energy and capacity markets, but are not formally recognized as part of PJM markets. Revenues from RECs markets are revenues for PJM resources earned in addition to revenues earned from the sale of the same MWh in PJM markets. FERC has found that such costs can be appropriately considered in the rates established through the operation of

112 See PJM – EIS (Environmental Information Services), Generation Attribute Tracking System, "Renewable Generators Registered in GATS," <<https://gats.pjm-eis.com/gats2/PublicReports/RenewableGeneratorsRegisteredinGATS>> (Accessed October 4, 2017).

wholesale organized markets.¹¹³ This decision is an important recognition of the integration of the RECs markets and the other PJM markets.

Delaware, North Carolina, Michigan and Virginia allow various types of renewable resources to earn multiple RECs per MWh, though typically one REC is equal to one MWh. For example, Delaware provided a three MWh REC for each MWh produced by in-state customer sited photovoltaic generation and fuel cells using renewable fuels that are installed on or before December 31, 2014.¹¹⁴ This is equivalent to providing a REC price equal to three times its stated value per MWh. PJM Environmental Information Services (EIS), an unregulated subsidiary of PJM, operates the generation attribute tracking system (GATS), which is used by many jurisdictions to track these renewable energy credits.¹¹⁵

In addition to GATS, there are several other REC tracking systems used by states in the PJM footprint. Illinois, Indiana and Ohio use both GATS and M-RETS, the REC tracking system for resources located in the Midcontinent ISO, to track the sales of RECs used to fulfill their RPS requirements. Michigan and North Carolina have created their own state-wide tracking systems, MIRECS and NC-RETS, through which all RECs used to satisfy these states' RPS requirements must ultimately be traded. Table 8–11 shows the REC tracking systems used by each state within the PJM footprint.

113 See 146 FERC ¶ 61,084 at P 32 ("We disagree with Exelon's argument that the Production Tax Credit and Renewable Energy Credits should be considered [out-of-market (OOM)] revenues. The relevant, Commission-approved Tariff provision defines OOM revenues as any revenues that are (i) not tradable throughout the New England Control Area or that are restricted to resources within a particular state or other geographic sub-region; or (ii) not available to all resources of the same physical type within the New England Control Area, regardless of the resource owner.[footnote omitted] Neither Production Tax Credit nor Renewable Energy Credits revenues fall within this definition. We also find that ISO-NE's use of an inflation rate in determining the price of Renewable Energy Credits is a reasonable estimate of Renewable Energy Credits for the 2018-2019 Capacity Commitment Period.")

114 See DSIRE, NC Clean Energy Technology Center. Delaware Renewable Portfolio Standard, <<http://programs.dsireusa.org/system/program/detail/1231>> (Accessed October 23, 2017).

115 GATS publishes details on every renewable generator registered within the PJM footprint and aggregate emissions of renewable generation, but does not publish generation data by unit and does not make unit data available to the MMU.

Table 8-11 REC Tracking systems in PJM states with renewable portfolio standards

Jurisdiction with RPS	REC Tracking System Used	
Delaware	PJM-GATS	
Illinois	PJM-GATS	M-RETS
Maryland	PJM-GATS	
Michigan		MIRECS
New Jersey	PJM-GATS	
North Carolina		NC-RETS
Ohio	PJM-GATS	M-RETS
Pennsylvania	PJM-GATS	
Washington, D.C.	PJM-GATS	
Jurisdiction with Voluntary Standard		
Indiana	PJM-GATS	M-RETS
Virginia	PJM-GATS	

All PJM states with renewable portfolio standards have specified geographical restrictions governing the source of RECs to satisfy states' standards. Table 8-12 describes these restrictions. Indiana, Illinois, Michigan, and Ohio all have provisions in their renewables standards that require all or a portion of RECs used to comply with states' standards to be generated by in-state resources. North Carolina has provisions that require RECs to be purchased from in-state resources but Dominion, the only utility located in both North Carolina and PJM, is exempt from these provisions.

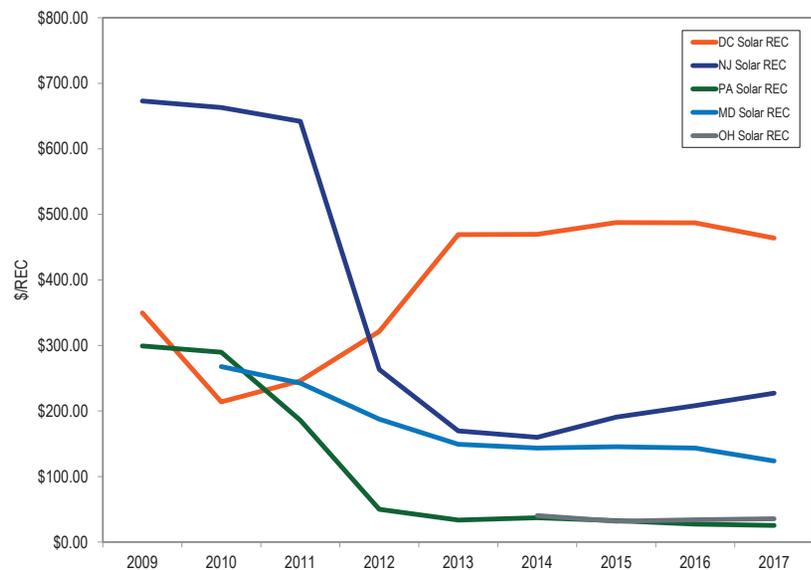
Pennsylvania requires that RECs used for compliance with its RPS are produced from resources located within the PJM footprint. Virginia requires that every load serving entity that chooses to participate in its voluntary renewable energy standard purchase RECs from the control area or RTO in which it is located. Delaware requires that RECs used for compliance with its RPS are produced from resources located within the PJM footprint or resources located elsewhere if these resources can demonstrate that the power they produce is directly deliverable to Delaware. The District of Columbia, Maryland and New Jersey allow RECs to be purchased from resources located within PJM in addition to large areas that adjoin PJM for compliance with their standards.

Table 8-12 Geographic restrictions on REC purchases for renewable portfolio standard compliance in PJM states

State with RPS	RPS Contains In-state Provision	Geographical Requirements for RPS Compliance
Delaware	No	RECs must be purchased from resources located either within PJM or from resources outside of PJM that are directly deliverable into Delaware.
Illinois	Yes	All RECs must first be purchased from resources located within Illinois or resources located in a state directly adjoining Illinois. If there are insufficient RECs from Illinois and adjoining states to fulfill the RPS requirements, utilities may purchase RECs from anywhere.
Maryland	No	RECs must come from within PJM, 10-30 miles offshore the coast of Maryland or from a control area adjacent to PJM that is capable of delivering power into PJM.
Michigan	Yes	RECs must either come from resources located within Michigan or anywhere in the service territory of retail electric provider in Michigan that is not an alternative electric supplier. There are many exceptions to these requirements (see Michigan S.B. 213).
New Jersey	No	RECs must either be purchased from resources located within PJM or from resources located outside of PJM for which the energy associated with the REC is delivered to PJM via dynamic scheduling.
North Carolina	Yes	Dominion, the only utility located in both the state of North Carolina and PJM, may purchase RECs from anywhere. Other utilities in North Carolina not located in PJM are subject to different REC requirements (see G.S. 62-113.8).
Ohio	Yes	All RECs must be generated from resources that are either located in the state of Ohio or have the capability to deliver power directly into Ohio. Any renewable facility located in state contiguous to Ohio has been deemed deliverable into the state of Ohio. If a renewable resource is located outside of this range, then it must demonstrate deliverability to the Public Utilities Commission of Ohio.
Pennsylvania	No	RECs must be purchased from resources located anywhere within PJM.
Washington, D.C.	No	RECs must be purchased from either a PJM state or a state adjacent with PJM. A PJM state is defined as any state with a portion of their geographical boundary within the footprint of PJM. An adjacent state is defined as a state that lies next to a PJM state, i.e. SC, GA, AL, AR, IA, NY, MO, MS, and WI.
State with Voluntary Standard		
Indiana	Yes	At least 50 percent of RECs must be purchased from resources located within Indiana.
Virginia	No	RECs must be purchased from the RTO or control area in which the participating utility is a member.

RECs do not need to be consumed during the year of production which creates multiple prices for a REC based on the year of origination. RECs typically have a shelf life of five years until they cannot be used to satisfy a state's RPS requirement. The REC price figures take the average price for each vintage of REC, regardless of when the REC is consumed. REC prices are required to be publicly disclosed in Maryland, Pennsylvania and the District of Columbia, but in the other states REC prices are not publicly available. Figure 8-5 shows the average solar REC (SREC) price by jurisdiction for 2009 through September 30, 2017. New solar generating units built in New Jersey to satisfy its RPS requirement lowered the SREC price. The average NJ SREC prices dropped from \$673 per SREC in 2009 to \$227 per SREC in the first nine months of 2017. The limited supply of solar facilities in Washington, DC compared to the RPS requirement resulted in higher SREC prices. The average Washington, D.C. SREC price increased from \$197 per SREC in 2011 to \$464 per SREC in the first nine months of 2017.¹¹⁶

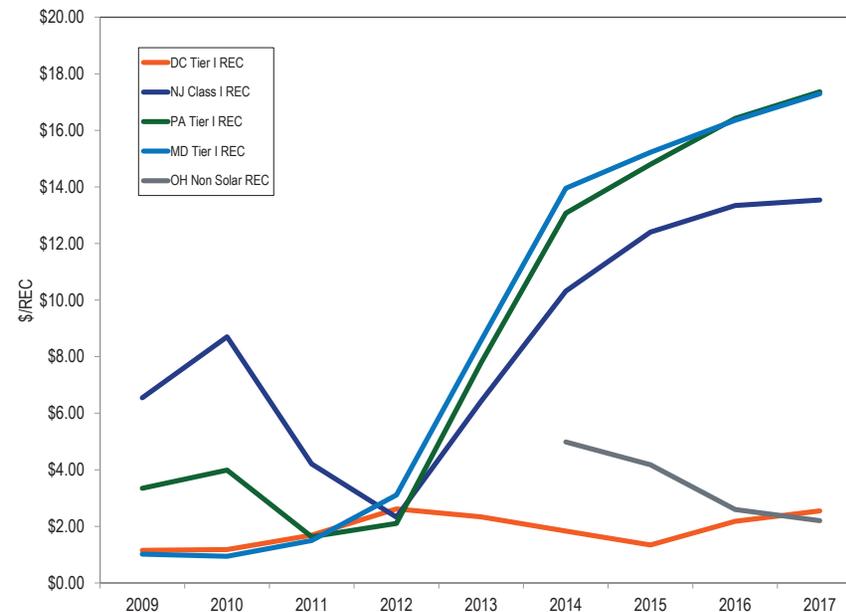
Figure 8-5 Average SREC price by jurisdiction: January 1, 2009 through September 30, 2017



116 Solar REC average price information obtained through Evomarkets, <<http://www.evomarkets.com>> (Accessed October 24, 2017).

Figure 8-6 shows the average Tier I REC price by jurisdiction from 2009 through the first nine months of 2017. Tier I REC prices are lower than SREC prices.

Figure 8-6 Average Tier I REC price by jurisdiction: January 1, 2009 through September 30, 2017



Tier II prices are lower than SREC and Tier I REC prices. Figure 8-7 shows the average Tier II REC price by jurisdiction for 2009 through the first nine months of 2017. Pennsylvania had the lowest Tier II REC prices at \$0.06 per REC while New Jersey had the highest Tier II REC prices at \$5.76 per REC.¹¹⁷

117 Tier II REC price information obtained through Evomarkets <<http://www.evomarkets.com>> (Accessed October 24, 2017). There were not any reported cleared purchases for January 1, through September 30, 2017, for DC Tier II REC or MD Tier II RECs.

Figure 8-7 Average Tier II REC price by jurisdiction: January 1, 2009 through September 30, 2017¹¹⁸

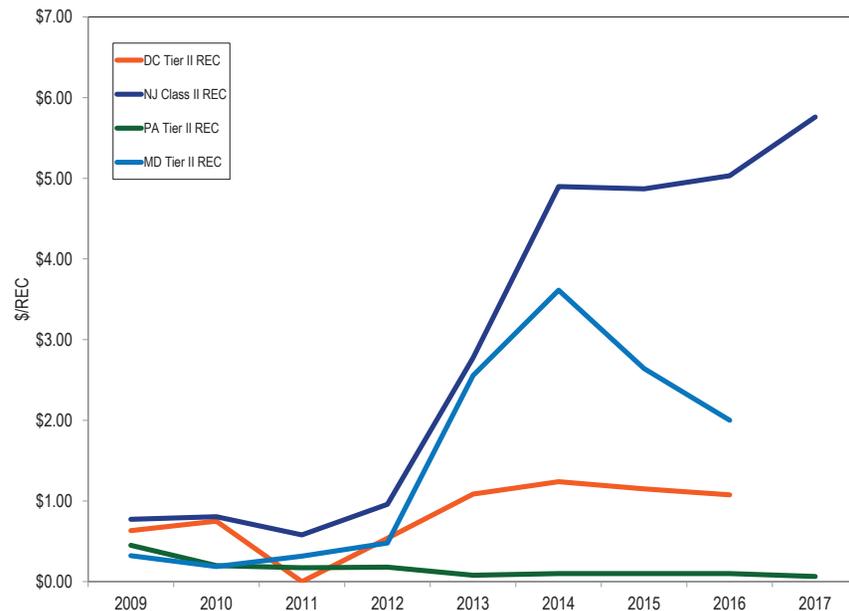


Table 8-13 shows the impact of a range of carbon prices on the cost per MWh of producing energy from three basic unit types.^{119 120} For example, if the price of carbon were \$50 per ton, the short run marginal costs would increase by \$27.60 per MWh for a new combustion turbine (CT) unit, \$19.54 per MWh for a new combined cycle (CC) unit and \$47.57 per MWh for a new coal plant (CP).

Table 8-13 also illustrates the effective cost of carbon included in the price of a REC or SREC. For example, the price of an SREC in New Jersey in the first nine months of 2017 was \$227 per MWh. The SREC price is paid in addition to the energy price paid at the time the solar energy is produced. If the MWh

produced by the solar resource resulted in avoiding the production of a MWh from a CT, the value of carbon reduction implied by the SREC price is a carbon price of \$400 per ton. This result also assumes that the entire value of the SREC was based on reduced carbon emissions. The SREC price consistent with a carbon price of \$50 per ton, assuming that a MWh from a CT is avoided, is \$27.60 per MWh.

Table 8-13 Carbon price per MWh by unit type

Unit Type	Carbon Price per MWh						
	Carbon \$5/ton	Carbon \$10/ton	Carbon \$15/ton	Carbon \$50/ton	Carbon \$100/ton	Carbon \$200/ton	Carbon \$400/ton
CT	\$2.76	\$5.52	\$8.28	\$27.60	\$55.21	\$110.41	\$220.82
CC	\$1.95	\$3.91	\$5.86	\$19.54	\$39.07	\$78.14	\$156.29
CP	\$4.76	\$9.51	\$14.27	\$47.57	\$95.13	\$190.26	\$380.53

PJM jurisdictions have various methods for complying with required renewable portfolio standards. If a retail supplier is unable to comply with the renewable portfolio standards required by the jurisdiction, suppliers may make alternative compliance payments, with varying standards, to cover any shortfall between the RECs required by the state and those the retail supplier actually purchased. In New Jersey, solar alternative compliance payments are \$308.00 per MWh.¹²¹ Pennsylvania requires that the alternative compliance payment for solar credits be 200 percent of the average market value of solar RECs sold in the RTO. For all states with an alternative compliance payment, the alternative compliance payment creates a cap on REC prices. Illinois requires that 50 percent of the state's renewable portfolio standard be met through alternative compliance payments. In Michigan and North Carolina, there are no pre-established values for alternative compliance payments. The public utility commissions in Michigan and North Carolina have the discretionary power to assess what a load serving entity must pay for any RPS shortfalls.

Table 8-14 shows the alternative compliance standards for RPS in PJM jurisdictions.

¹¹⁸ Tier II REC price information obtained through Evomarkets <<http://www.evomarkets.com>> (Accessed October 24, 2017). There were not any reported cleared purchases for January 1, through March 31, 2017 for DC Tier II REC, PA Tier II REC or MD Tier II RECs.

¹¹⁹ Heat rates from: 2016 State of the Market Report for PJM, Volume 2, Section 7: Net Revenue, p 283, Table 7-4.

¹²⁰ Carbon emissions rates from: Table A.3. Carbon Dioxide Uncontrolled Emission Factors, Energy Information Administration, <https://www.eia.gov/electricity/annual/html/epa_a_03.html> (Accessed October 24, 2017).

¹²¹ See Database of State Incentives for Renewables & Efficiency (DSIRE), New Jersey Incentives/ Policies for Renewables & Efficiency, "Solar Renewables Energy Certificates (SRECs)," <<http://programs.dsireusa.org/system/program/detail/5687>> (Accessed October 24, 2017).

Table 8-14 Renewable alternative compliance payments in PJM jurisdictions: September 30, 2017^{122 123}

Jurisdiction with RPS	Standard Alternative Compliance (\$/MWh)	Tier II Alternative Compliance (\$/MWh)	Solar Alternative Compliance (\$/MWh)
Delaware	\$25.00		\$400.00
Illinois	\$1.89		
Maryland	\$37.50	\$15.00	\$195.00
Michigan	No specific penalties		
New Jersey	\$50.00		\$308.00
North Carolina	No specific penalties: At the discretion of the NC Utility Commission		
Ohio	\$50.24		\$250.00
Pennsylvania	\$45.00	\$45.00	200% market value
Washington, D.C.	\$50.00	\$10.00	\$500.00
Jurisdiction with Voluntary Standard			
Indiana	Voluntary standard - No Penalties		
Virginia	Voluntary standard - No Penalties		
Jurisdiction with No Standard			
Kentucky	No standard		
Tennessee	No standard		
West Virginia	No standard		

Load serving entities participating in mandatory RPS programs in PJM jurisdictions must submit compliance reports to the relevant jurisdiction's public utility commission. In their submitted compliance reports, load serving entities must indicate the quantity of MWh that they have generated using eligible renewable or alternative energy resources. They must also identify the quantity of RECs they may have purchased to make up for renewable energy generation shortfalls or to comply with RPS provisions requiring that they purchase RECs. The public utility commissions then release RPS compliance reports to the public. The RPS compliance reports are released with a lag of up to three years. It is therefore impossible to know the current level of RPS compliance in PJM jurisdictions. As of September 30, 2017, Delaware, New Jersey and the District of Columbia have published a compliance report

¹²² See PJM – EIS (Environmental Management System). "Program Information," <<http://www.pjm-eis.com/>> (Accessed October 24, 2017).

¹²³ See DSIRE, "Database of State Incentives for Renewables & Efficiency, "Policies & Incentives by State," <<http://www.dsireusa.org/>> (Accessed October 24, 2017).

for 2016 and compliance reports for the year 2015 are available for Illinois, Maryland, Michigan, North Carolina, Ohio and Pennsylvania.^{124 125 126}

One jurisdiction where RPS compliance costs have raised concerns is the District of Columbia. According to the District of Columbia Public Service Commission's 2015 annual RPS compliance report, electric retailers have been able to meet the allotted standards for Tier I and II resources but have struggled to meet the standard for solar resources. Due to a combination of insufficient supply of eligible solar resources in the District and increasing percentages of load that must be served by solar resources, total solar alternative compliance payments in the District of Columbia have increased from \$0.70 million in 2013 to a high of \$19.9 million in 2015.¹²⁷ Compliance payments for 2016 were \$15.2 million. The amount of solar RECs retired in 2016 was 62,173, an increase of 62.9 percent over the amount of solar RECs retired in 2015.¹²⁸

Emissions Controlled Capacity and Renewables in PJM Markets

Emission Controlled Capacity in the PJM Region

Environmental regulations affect decisions about emission control investments in existing units, investment in new units and decisions to retire units lacking emission controls.¹²⁹ Many PJM units burning fossil fuels have installed emission control technology.

Coal has the highest SO₂ emission rate, while natural gas and diesel oil have lower SO₂ emission rates.¹³⁰ Of the current 61,618.1 MW of coal capacity in

¹²⁴ RPS compliance reports are available on jurisdictions' public utilities commissions' websites.

¹²⁵ The Lawrence Berkeley National Laboratory, a subsidiary of the US Department of Energy, actively keeps track of compliance reports and data on their website. See the report "U.S. Renewables Portfolio Standards: 2016 Annual Status Report (PDF)" and "RPS Compliance Data (XLSX)" available on their website. <<https://emp.lbl.gov/projects/renewables-portfolio/>> (Accessed October 19, 2017).

¹²⁶ The Clean Energy States Alliance tracks all completed RPS compliance reports on their website: <<http://cesa.org/projects/state-federal-rps-collaborative/state-rps-annual-reports-and-compliance-reports/#MD>> (Accessed October 19, 2017).

¹²⁷ See the Public Service Commission of the District of Columbia's "Report on the Renewable Energy Portfolio Standard for Compliance Year 2015." <http://www.dcpsc.org/getmedia/901b3c18-4859-435d-ae1a-ca296584c26b/aharris_542016_831_1_FC_-_945_-_2016_-_E_-_REPORT.aspx> (May 2, 2016).

¹²⁸ See the Public Service Commission of the District of Columbia's "Report on the Renewable Energy Portfolio Standard for Compliance Year 2016." <http://www.dcpsc.org/getmedia/1806a06a-51de-4d4d-aa5a-e0cdd0517ecb/ReportREPS2017_050117.aspx>. (May 1, 2017).

¹²⁹ See EPA. "National Ambient Air Quality Standards (NAAQS)," <<https://www.epa.gov/criteria-air-pollutants/naaqs-table>> (Accessed October 1, 2016).

¹³⁰ Diesel oil includes number 1, number 2, and ultra-low sulfur diesel. See EPA. "Electronic Code of Federal Regulations, Title 40, Chapter 1, Subchapter C, Part 72, Subpart A Section 72.2," <http://www.ecfr.gov/cgi-bin/text-idx?SID=4f18612541a393473efb13acb879d470&mc=t&node=se40.18.72_12&rgn=div8> (Accessed October 1, 2016).

PJM, 57,212.0 MW of capacity, 92.8 percent, has some form of FGD (flue-gas desulfurization) technology to reduce SO₂ emissions. Table 8-15 shows SO₂ emission controls by fossil fuel fired units in PJM.^{131 132 133}

Table 8-15 SO₂ emission controls by fuel type (MW): September 30, 2017¹³⁴

	SO ₂ Controlled	No SO ₂ Controls	Total	Percent Controlled
Coal	57,212.0	4,406.1	61,618.1	92.8%
Diesel Oil	0.0	5,949.6	5,949.6	0.0%
Natural Gas	0.0	55,412.3	55,412.3	0.0%
Other	325.0	4,920.7	5,245.7	6.2%
Total	57,537.0	70,688.7	128,225.7	44.9%

NO_x emission control technology is used by all fossil fuel fired unit types. Of current fossil fuel fired units in PJM, 120,042.0 MW, 93.6 percent, of 128,225.7 MW of capacity in PJM, have emission controls for NO_x. Table 8-16 shows NO_x emission controls by unit type in PJM. While most units in PJM have NO_x emission controls, many of these controls may need to be upgraded in order to meet each state’s emission compliance standards based on whether a state is part of CSAPR, CAIR, Acid Rain Program (ARP) or a combination of the three. Future NO_x compliance standards will require select catalytic converters (SCRs) or selective non-catalytic reduction (SCNRs) for coal steam units, as well as SCRs or water injection technology for peaking combustion turbine units.¹³⁵

Table 8-16 NO_x emission controls by fuel type (MW): September 30, 2017

	NO _x Controlled	No NO _x Controls	Total	Percent Controlled
Coal	60,678.8	939.3	61,618.1	98.5%
Diesel Oil	2,207.6	3,742.0	5,949.6	37.1%
Natural Gas	54,355.9	1,056.4	55,412.3	98.1%
Other	2,799.7	2,446.0	5,245.7	53.4%
Total	120,042.0	8,183.7	128,225.7	93.6%

131 See EPA, "Air Market Programs Data," <<http://ampd.epa.gov/ampd/>> (Accessed October 20, 2017).
 132 Air Markets Programs Data is submitted quarterly. Generators have 60 days after the end of the quarter to submit data, and all data is considered preliminary and subject to change until it is finalized in June of the following year.
 133 The total MW for each fuel type are less than the 183,593.6 reported in Section 5: Capacity, because EPA data on controls could not be matched to some PJM units. "Air Markets Program Data," <<http://ampd.epa.gov/ampd/QueryToolic.html>> (Accessed October 20, 2017).
 134 The "other" category includes petroleum coke, wood, process gas, residual oil, other gas, and other oil. The EPA's "other" category does not have strict definitions for inclusion.
 135 See EPA, "Mercury and Air Toxics Standards, Cleaner Power Plants," <<https://www.epa.gov/mats/cleaner-power-plants#controls>> (Accessed October 1, 2016).

Most coal units in PJM have particulate controls. Typically, technologies such as electrostatic precipitators (ESP) or fabric filters (baghouses) are used to reduce particulate matter from coal steam units.¹³⁶ Fabric filters work by allowing the flue gas to pass through a tightly woven fabric which filters out the particulates. Table 8-17 shows particulate emission controls by unit type in PJM. In PJM, 61,284.1 MW, 99.5 percent, of all coal steam unit MW, have some type of particulate emissions control technology, as of September 30, 2017. Most coal steam units in PJM have particulate emission controls in the form of ESPs, but many units have also installed baghouse technology, or a combination of an FGD and SCR to meet the state and federal emissions limits established by the MATS EPA regulations.¹³⁷ Currently, 143 of the 159 coal steam units have baghouse or FGD technology installed, representing 56,297 MW out of the 61,618.1 MW total coal capacity, or 91.4 percent.

Table 8-17 Particulate emission controls by fuel type (MW): September 30, 2017

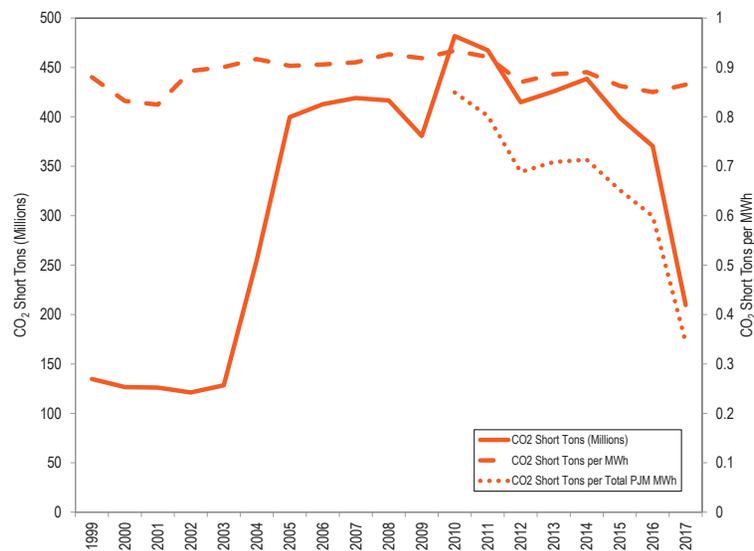
	Particulate Controlled	No Particulate Controls	Total	Percent Controlled
Coal	61,284.1	334.0	61,618.1	99.5%
Diesel Oil	0.0	5,949.6	5,949.6	0.0%
Natural Gas	2,786.0	52,626.3	55,412.3	5.0%
Other	3,102.0	2,143.7	5,245.7	59.1%
Total	67,172.1	61,053.6	128,225.7	52.4%

Figure 8-8 shows the total CO₂ short ton emissions (in millions) and the CO₂ short ton emissions per MWh within PJM, for all CO₂ emitting units, for the first nine months of each year from 1999 to 2017, as well as the CO₂ short ton emissions per MWh of total generation within PJM for the first nine months of 2010 to 2017.¹³⁸ Since 1999 the amount of CO₂ produced per MWh was at a minimum of 0.82 short tons per MWh in the first nine months of 2001, and a maximum of 0.93 short tons per MWh in the first nine months of 2010. In the first nine months of 2017, CO₂ emissions were 0.87 short tons per MWh. Total PJM generation increased from 618,380.2 GWh in the first nine months of 2016 to 609,284.8 GWh in the first nine months of 2017, while

136 See EPA, "Air Pollution Control Technology Fact Sheet," <<https://www3.epa.gov/ttn/catc/dir1/ff-pulse.pdf>> (Accessed October 1, 2017).
 137 On April 14, 2016, the EPA issued a final finding regarding the Mercury and Air Toxics Standards. See EPA, "Regulatory Actions," <<https://www.epa.gov/mats/regulatory-actions-final-mercury-and-air-toxics-standards-mats-power-plants>> (Accessed October 1, 2017).
 138 Unless otherwise noted, emissions are measured in short tons. A short ton is 2,000 pounds.

CO₂ produced decreased from 370.4 million tons in the first nine months of 2016 to 209.5 million tons in the first nine months of 2017.¹³⁹ The reduction in CO₂ emissions was primarily the result of a decrease in the use of coal for generation. Figure 8-9 shows the total on peak hour and off peak hour CO₂ short ton emissions (in millions) and the CO₂ short ton emissions per MWh within PJM, for all CO₂ emitting units, for the first nine months of each year from 1999 to 2017. Since 1999 the amount of CO₂ produced per MWh during off peak hours was at a minimum of 0.83 short tons per MWh in the first nine months of 2001, and a maximum of 0.95 short tons per MWh in the first nine months of 2010. Since 1999 the amount of CO₂ produced per MWh during on peak hours was at a minimum of 0.82 short tons per MWh in the first nine months of 2001, and a maximum of 0.92 short tons per MWh in the first nine months of 2010. In the first nine months of 2017, CO₂ emissions were 0.88 short tons per MWh and 0.85 short tons per MWh for off and on peak hours.

Figure 8-8 CO₂ emissions by year (millions of short tons), by PJM units: January through September, 1999 through 2017¹⁴⁰



¹³⁹ See *State of the Market Report for PJM: January through September*, Section 3: Energy Market, Table 3-9.
¹⁴⁰ The emissions are calculated from the continuous emission monitoring system (CEMS) data from generators located within the PJM footprint.

Figure 8-9 CO₂ emissions during on and off peak hours by year (millions of short tons), by PJM units: January through September, 1999 through 2017¹⁴¹

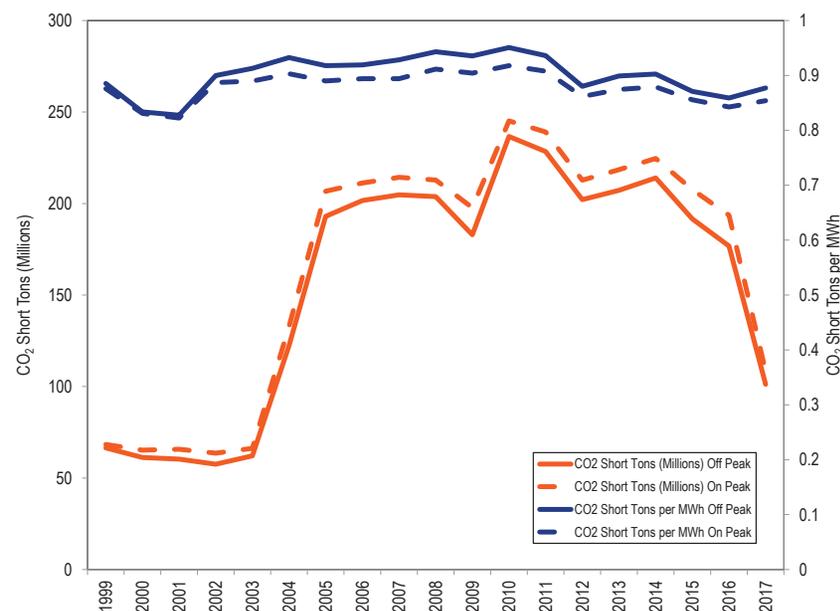


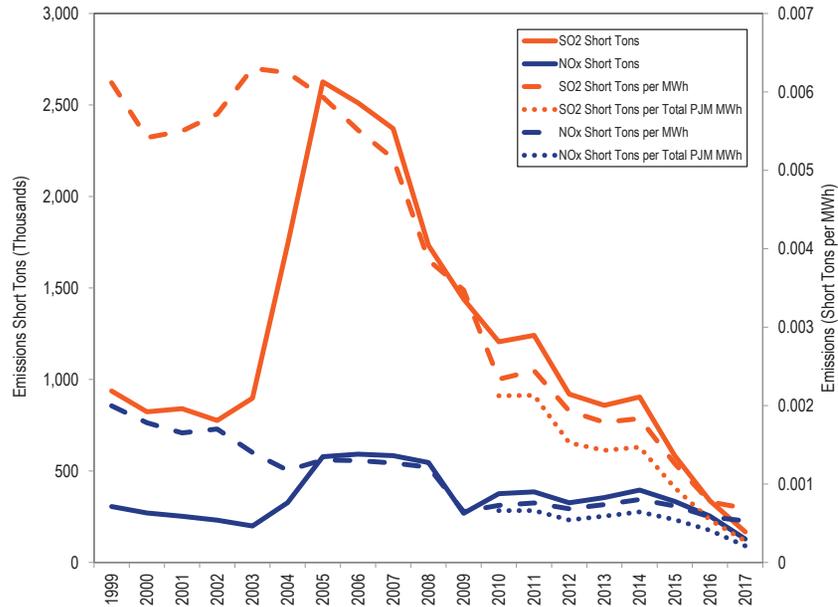
Figure 8-10 shows the total SO₂ and NO_x short ton emissions (in thousands) and the short ton emissions per MWh from emitting resources within PJM, for all SO₂ and NO_x emitting units, for the first nine months of each year from 1999 to 2017, as well as the SO₂ and NO_x short ton emissions per MWh of total generation within PJM for the first nine months of 2010 to 2017. Since 1999 the amount of SO₂ produced per MWh was at a minimum of 0.000690 short tons per MWh in the first nine months of 2017, and a maximum of 0.006300 short tons per MWh in the first nine months of 2003. Since 1999, the amount of NO_x produced per MWh was at a minimum of 0.000531 short tons per MWh in the first nine months of 2017, and a maximum of 0.001998 short tons per MWh in the first nine months of 1999. In the first nine months of 2017, SO₂ emissions were 0.000690 short tons per MWh and NO_x emissions were 0.000530 short tons per MWh. The consistent decline in SO₂ and NO_x

¹⁴¹ The emissions are calculated from the continuous emission monitoring system (CEMS) data from generators located within the PJM footprint.

emissions starting in 2006 is the result of a decline in the use of coal from 2006 to 2017.

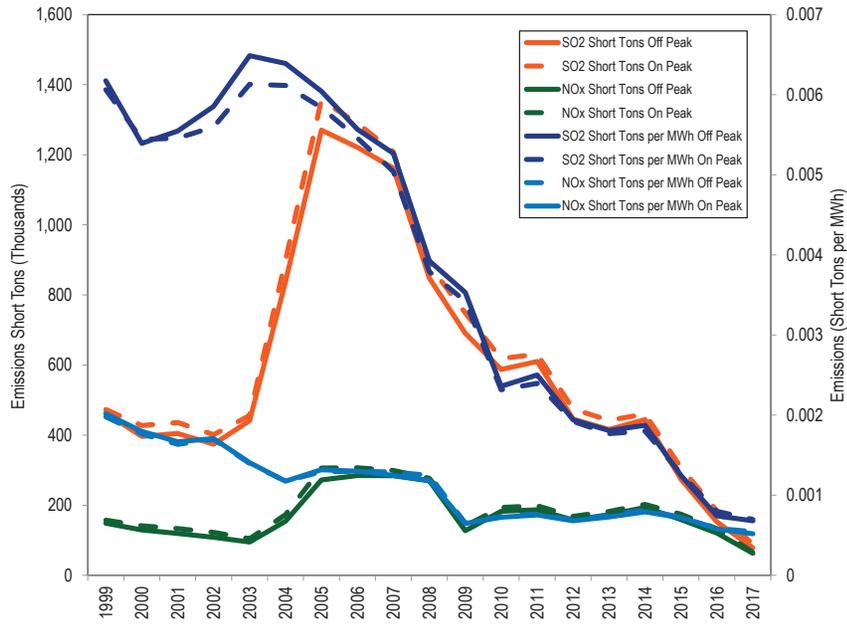
Figure 8-11 shows the total on peak hour and off peak hour SO₂ and NO_x short ton emissions (in thousands) and the short ton emissions per MWh from emitting resources within PJM, for all SO₂ and NO_x emitting units, for the first nine months of each year from 1999 to 2017. Since 1999 the amount of SO₂ produced per MWh during off peak hours was at a minimum of 0.000681 short tons per MWh in the first nine months of 2017, and a maximum of 0.006487 short tons per MWh in the first nine months of 2003. Since 1999 the amount of SO₂ produced per MWh during on peak hours was at a minimum of 0.000698 short tons per MWh in the first nine months of 2017, and a maximum of 0.006130 short tons per MWh in the first nine months of 2003. Since 1999, the amount of NO_x produced per MWh during off peak hours was at a minimum of 0.000545 short tons per MWh in the first nine months of 2017, and a maximum of 0.001979 short tons per MWh in the first nine months of 1999. Since 1999, the amount of NO_x produced per MWh during on peak hours was at a minimum of 0.000518 short tons per MWh in the first nine months of 2017, and a maximum of 0.002016 short tons per MWh in the first nine months of 1999. In the first nine months of 2017, SO₂ emissions were 0.000681 short tons per MWh and 0.000698 short tons per MWh for off and on peak hours. In the first nine months of 2017, NO_x emissions were 0.000545 short tons per MWh and 0.000518 short tons per MWh for off and on peak hours.

Figure 8-10 SO₂ and NO_x emissions by year (thousands of short tons), by PJM units: January through September, 1999 through 2017¹⁴²



¹⁴² The emissions are calculated from the continuous emission monitoring system (CEMS) data from generators located within the PJM footprint.

Figure 8-11 SO₂ and NO_x emissions during on and off peak hours by year (thousands of short tons), by PJM units: January through September, 1999 through 2017¹⁴³



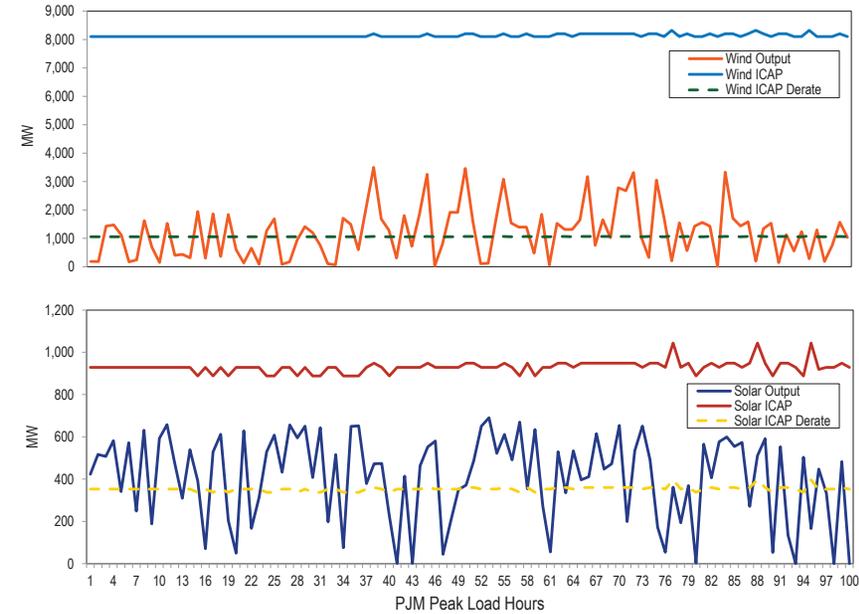
Wind and Solar Peak Hour Output

The capacity of solar and wind resources are derated for the PJM capacity market based on expected performance during high load hours. Figure 8-12 shows the wind and solar output during the top 100 load hours in PJM for the first nine months of 2017. The top 100 load hours in PJM during the nine months of 2017 are within PJM defined peak load periods. The hours are in descending order by load. The solid lines are the total ICAP of wind or solar PJM resources. The dashed lines are the total ICAP of wind and solar PJM resources derated to 13 and 38 percent. The actual output of the wind and solar resources during the top 100 peak load hours are above and below the derated values. Wind output was above the derated ICAP for 56 hours and

¹⁴³ The emissions are calculated from the continuous emission monitoring system (CEMS) data from generators located within the PJM footprint.

below the derated ICAP for 44 hours of the top 100 peak load hours of the first nine months of 2017. Wind output was above the derated ICAP 4,735 hours and below the derated ICAP for 1,816 hours for the first nine months of 2017. The wind capacity factor for the top 100 peak load hours of the first nine months of 2017 is 14.8 percent. Solar output was above the derated ICAP for 65 hours and below the derated ICAP for 35 hours of the top 100 peak load hours of the first nine months of 2017. Solar output was above the derated ICAP 1,633 hours and below the derated ICAP for 4,918 hours for the first nine months of 2017. The solar capacity factor for the top 100 peak load hours of the first nine months of 2017 is 43.9 percent.

Figure 8-12 Wind and solar output during the top 100 peak load hours in PJM: January 1 through September 30, 2017



Wind Units

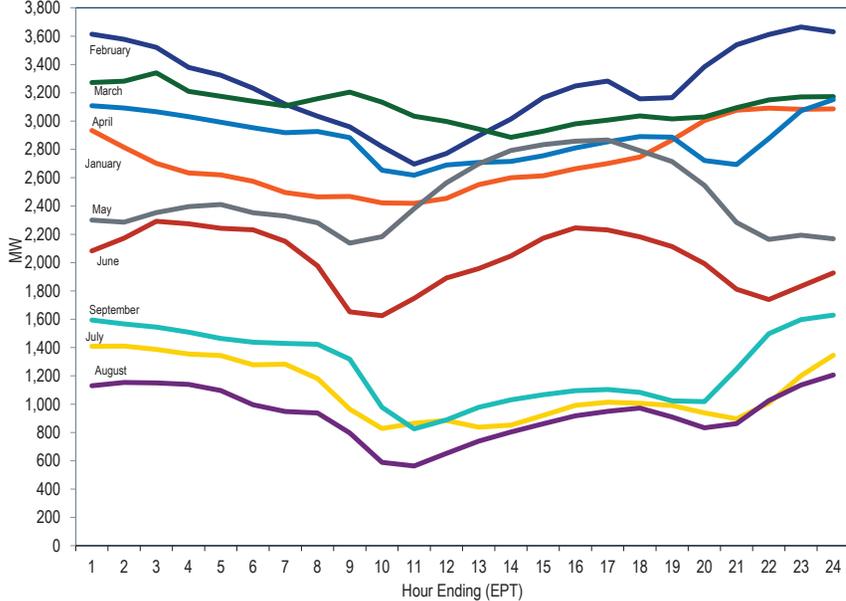
Table 8-18 shows the capacity factor of wind units in PJM. In the first nine months of 2017, the capacity factor of wind units in PJM was 27.6 percent. Wind units that were capacity resources had a capacity factor of 28.3 percent and an installed capacity of 7,293 MW. Wind units that were classified as energy only had a capacity factor of 18.9 percent and an installed capacity of 809 MW. Wind capacity in RPM is derated to 13 percent of nameplate capacity for the capacity market, and energy only resources are not included in the capacity market.¹⁴⁴

Table 8-18 Capacity factor of wind units in PJM: January 1 through September 30, 2017¹⁴⁵

Type of Resource	Capacity Factor	Installed Capacity (MW)
Energy-Only Resource	18.9%	809
Capacity Resource	28.3%	7,293
All Units	27.6%	8,102

Figure 8-13 shows the average hourly real-time generation of wind units in PJM, by month for the first nine months of 2017. The hour with the highest average output, 3,664.6 MW, occurred in February, and the hour with the lowest average output, 563.6 MW, occurred in August. Wind output in PJM is generally higher in off-peak hours and lower in on-peak hours.

Figure 8-13 Average hourly real-time generation of wind units in PJM: January 1 through September 30, 2017



¹⁴⁴ Wind resources are derated to 13 percent unless demonstrating higher availability during peak periods.
¹⁴⁵ Capacity factor is calculated based on online date of the resource.

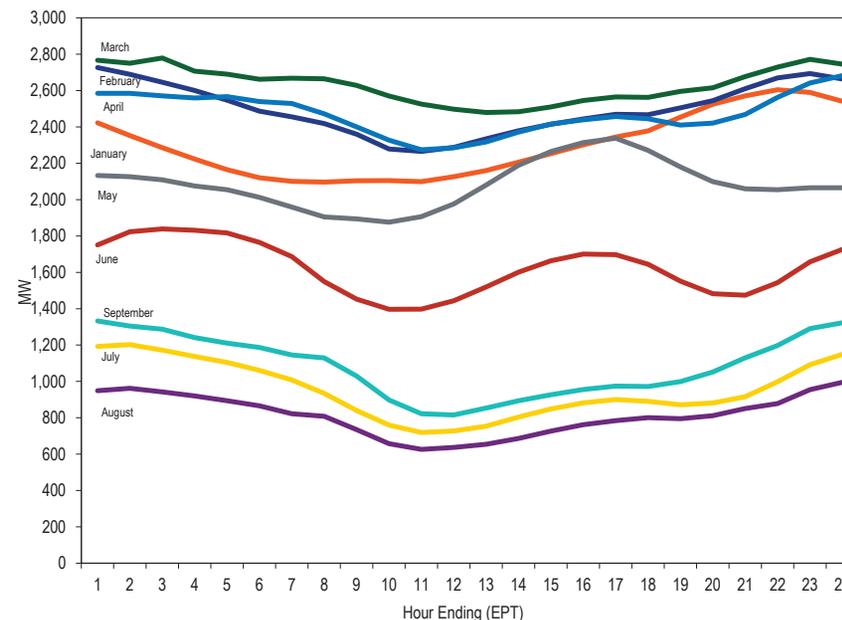
Table 8-19 shows the generation and capacity factor of wind units in each month of 2016 through June 2017.

Table 8-19 Capacity factor of wind units in PJM by month: January 1, 2016 through September 30, 2017

Month	2016		2017	
	Generation (MWh)	Capacity Factor	Generation (MWh)	Capacity Factor
January	2,095,618.0	40.5%	2,017,530.0	34.4%
February	1,925,470.3	39.8%	2,178,634.3	41.1%
March	1,781,561.4	34.5%	2,305,239.3	39.4%
April	1,587,976.6	31.7%	2,072,016.5	36.5%
May	1,230,631.9	23.6%	1,825,473.3	31.1%
June	1,029,071.2	19.7%	1,457,848.4	25.7%
July	691,689.6	12.8%	811,917.7	13.8%
August	603,498.4	11.2%	693,511.0	11.7%
September	1,017,658.6	19.5%	910,624.7	15.8%
October	1,647,392.1	30.5%		
November	1,851,353.3	34.7%		
December	2,254,119.4	39.4%		
Annual	17,716,040.8	28.1%	14,272,795.0	27.6%

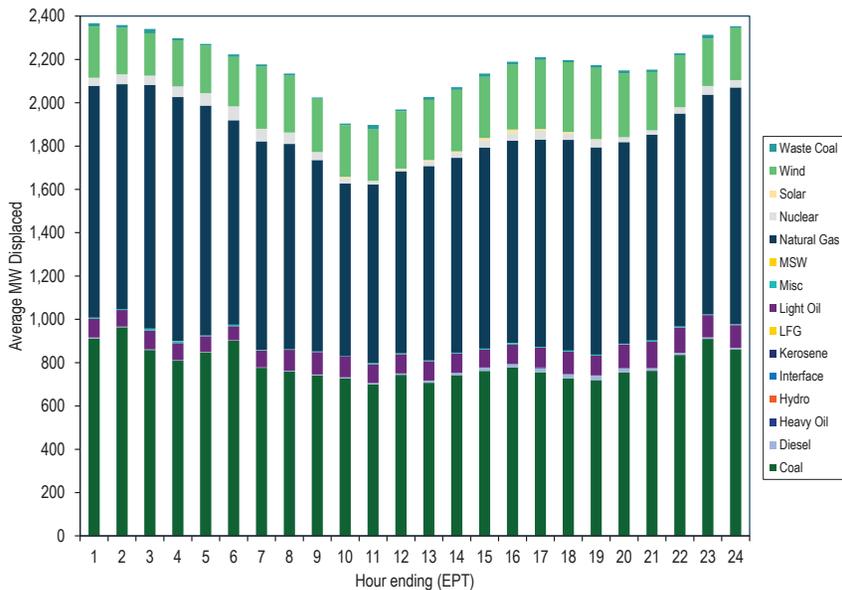
Wind units that are capacity resources are required, like all capacity resources except Demand Resources, to offer the energy associated with their cleared capacity in the Day-Ahead Energy Market and in the Real-Time Energy Market. Wind units may offer noncapacity related wind energy at their discretion. Figure 8-14 shows the average hourly day-ahead generation offers of wind units in PJM, by month. The hourly day-ahead generation offers of wind units in PJM may vary.

Figure 8-14 Average hourly day-ahead generation of wind units in PJM: January 1 through September 30, 2017



Output from wind turbines displaces output from other generation types. This displacement affects the output of marginal units in PJM. The magnitude and type of effect on marginal unit output depends on the level of the wind turbine output, its location, time and duration. One measure of this displacement is based on the mix of marginal units when wind is producing output. Figure 8-15 shows the hourly average proportion of marginal units by fuel type mapped to the hourly average MW of real-time wind generation in the first nine months of 2017. This is not an exact measure of displacement because it is not based on a redispatch of the system without wind resources. When wind appears as the displaced fuel at times when wind resources were on the margin this means that there was no displacement for those hours.

Figure 8-15 Marginal fuel at time of wind generation in PJM: January 1 through September 30, 2017



Solar Units

Solar units in PJM may be in front of or behind the meter. The data reported include all PJM solar units that are in front of the meter. As shown in Table 8-10, there are 3,765.3 MW capacity of solar registered in GATS that are not PJM capacity or energy resources. Some behind the meter generation exists in clusters, such as community solar farms, and serves dedicated customers. Such customers may or may not be located at the same node on the transmission system as the solar farm. When behind the meter generation and its associated load are at separate nodes, loads should pay for the appropriate level of transmission service, and should not be permitted to escape their proper financial responsibility through badly designed rules, such as rules for netting.

Table 8-20 shows the capacity factor of solar units in PJM. In the first nine months of 2017, the capacity factor of solar units in PJM was 19.8 percent. Solar units that were capacity resources had a capacity factor of 20.0 percent and an installed capacity of 814 MW. Solar units that were classified as energy only had a capacity factor of 17.8 percent and an installed capacity of 229 MW. Solar capacity in RPM is derated to 38 percent of nameplate capacity for the capacity market, and energy only resources are not included in the capacity market.¹⁴⁶

Table 8-20 Capacity factor of solar units in PJM: January 1 through September 30, 2017

Type of Resource	Capacity Factor	Installed Capacity (MW)
Energy-Only Resource	17.8%	229
Capacity Resource	20.0%	814
All Units	19.8%	1,044

Solar output differs from month to month, based on seasonal variation and daylight hours during the month. Figure 8-16 shows the average hourly real-time generation of solar units in PJM, by month. Solar generation in PJM is highest during the hours of 11:00 through 13:00 EPT.

¹⁴⁶ Solar resources are derated to 38 percent unless demonstrating higher availability during peak periods.

Figure 8-16 Average hourly real-time generation of solar units in PJM: January 1 through September 30, 2017

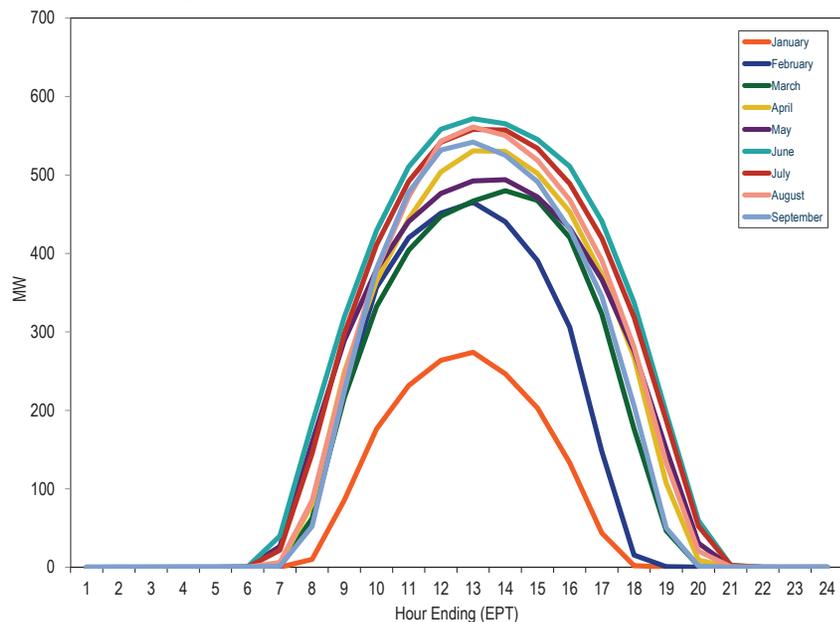


Table 8-21 shows the generation and capacity factor of solar units in each month of 2016 through September 2017.

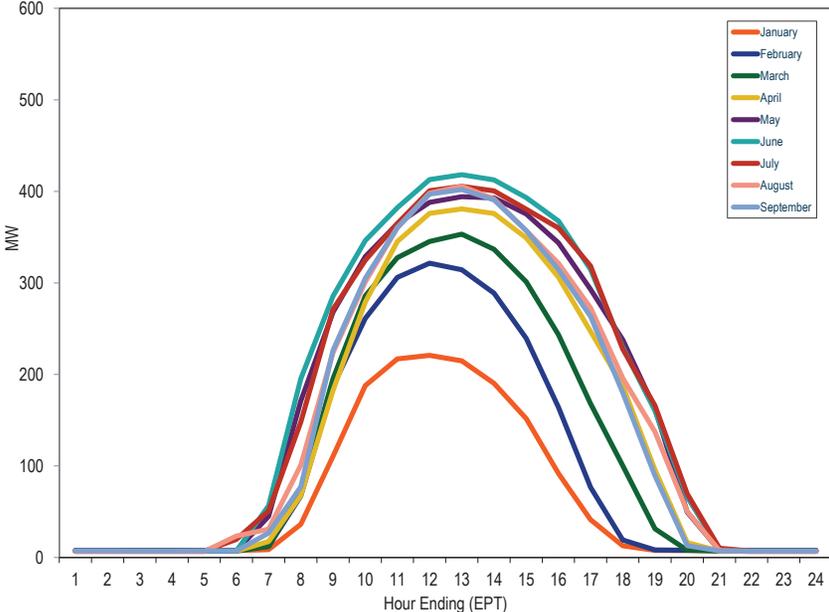
Table 8-21 Capacity factor of solar units in PJM by month: January 1, 2016 through September 30, 2017

Month	2016		2017	
	Generation (MWh)	Capacity Factor	Generation (MWh)	Capacity Factor
January	38,858.7	10.8%	47,815.8	8.5%
February	43,770.8	12.6%	84,421.3	16.6%
March	73,745.6	19.1%	109,800.2	19.5%
April	85,867.1	22.8%	122,145.1	21.9%
May	77,453.7	19.8%	128,233.9	21.6%
June	101,147.1	26.0%	146,098.3	25.4%
July	101,146.3	25.1%	144,230.9	23.8%
August	99,167.5	24.5%	132,800.0	21.9%
September	74,093.9	18.7%	117,493.3	20.0%
October	67,357.0	16.4%		
November	57,259.6	14.4%		
December	38,424.5	9.4%		
Annual	858,291.9	18.4%	1,033,038.9	20.0%

Solar units that are capacity resources are required, like all capacity resources except Demand Resources, to offer the energy associated with their cleared capacity in the Day-Ahead Energy Market and in the Real-Time Energy Market. Solar units may offer noncapacity related solar energy at their discretion. Figure 8-17 shows the average hourly day-ahead generation offers of solar units in PJM, by month.¹⁴⁷

¹⁴⁷ The average day-ahead generation of solar units in PJM is greater than 0 for hours when the sun is down due to some solar units being paired with landfill units.

Figure 8-17 Average hourly day-ahead generation of solar units in PJM: January 1 through September 30, 2017



Interchange Transactions

PJM market participants import energy from, and export energy to, external regions continuously. The transactions involved may fulfill long-term or short-term bilateral contracts or respond to price differentials. The external regions include both market and nonmarket balancing authorities.

Overview

Interchange Transaction Activity

- **Aggregate Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, PJM was a monthly net exporter of energy in the Real-Time Energy Market in all months.¹ In the first nine months of 2017, the real-time net interchange of -17,891.2 GWh was lower than the net interchange of -3,112.0 GWh in the first nine months of 2016.
- **Aggregate Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, PJM was a monthly net exporter of energy in the Day-Ahead Energy Market in all months. In the first nine months of 2017, the total day-ahead net interchange of -14,655.8 GWh was lower than net interchange of -6,423.9 GWh in the first nine months of 2016.
- **Aggregate Imports and Exports in the Day-Ahead and the Real-Time Energy Market.** In the first nine months of 2017, gross imports in the Day-Ahead Energy Market were 177.8 percent of gross imports in the Real-Time Energy Market (127.4 percent in the first nine months of 2016). In the first nine months of 2017, gross exports in the Day-Ahead Energy Market were 122.2 percent of the gross exports in the Real-Time Energy Market (135.5 percent in the first nine months of 2016).
- **Interface Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, there were net scheduled exports at 10 of PJM's 20 interfaces in the Real-Time Energy Market.
- **Interface Pricing Point Imports and Exports in the Real-Time Energy Market.** In the first nine months of 2017, there were net scheduled

exports at 10 of PJM's 18 interface pricing points eligible for real-time transactions in the Real-Time Energy Market.²

- **Interface Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, there were net scheduled exports at 11 of PJM's 20 interfaces in the Day-Ahead Energy Market.
- **Interface Pricing Point Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, there were net scheduled exports at 12 of PJM's 19 interface pricing points eligible for day-ahead transactions in the Day-Ahead Energy Market.
- **Up to Congestion Interface Pricing Point Imports and Exports in the Day-Ahead Energy Market.** In the first nine months of 2017, up to congestion transactions were net exports at four of PJM's 19 interface pricing points eligible for day-ahead transactions in the Day-Ahead Market.
- **Inadvertent Interchange.** In the first nine months of 2017, net scheduled interchange was -17,891 GWh and net actual interchange was -18,042 GWh, a difference of 151 GWh. In the first nine months of 2016, the difference was 1,003 GWh. This difference is inadvertent interchange.
- **Loop Flows.** In the first nine months of 2017, the Wisconsin Energy Corporation (WEC) interface had the largest loop flows of any interface with -1,766 GWh of net scheduled interchange and 6,380 GWh of net actual interchange, a difference of 8,146 GWh. In the first nine months of 2017, the SouthIMP interface pricing point had the largest loop flows of any interface pricing point with 6,888 GWh of net scheduled interchange and 17,532 GWh of net actual interchange, a difference of 10,644 GWh.

Interactions with Bordering Areas

PJM Interface Pricing with Organized Markets

- **PJM and MISO Interface Prices.** In the first nine months of 2017, the direction of the hourly flow was consistent with the real-time hourly price differences between the PJM/MISO Interface and the MISO/PJM Interface in 60.1 percent of the hours.

¹ Calculated values shown in Section 9, "Interchange Transactions," are based on unrounded, underlying data and may differ from calculations based on the rounded values in the tables.

² There is one interface pricing point eligible for day-ahead transaction scheduling only (NIPSCO).

- **PJM and New York ISO Interface Prices.** In the first nine months of 2017, the direction of the hourly flow was consistent with the real-time hourly price differences between the PJM/NYIS Interface and the NYISO/PJM proxy bus in 52.0 percent of the hours.
- **Neptune Underwater Transmission Line to Long Island, New York.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was consistent with the real-time hourly price differences between the PJM Neptune Interface and the NYISO Neptune bus in 57.1 percent of the hours.
- **Linden Variable Frequency Transformer (VFT) Facility.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was consistent with the real-time hourly price differences between the PJM Linden Interface and the NYISO Linden bus in 52.1 percent of the hours.
- **Hudson DC Line.** In the first nine months of 2017, the hourly flow (PJM to NYISO) was consistent with the real-time hourly price differences between the PJM Hudson Interface and the NYISO Hudson bus in 0.1 percent of the hours.³

Interchange Transaction Issues

- **PJM Transmission Loading Relief Procedures (TLRs).** PJM issued three TLRs of level 3a or higher in the first nine months of 2017, compared to eight such TLRs issued in the first nine months of 2016.
- **Up to congestion.** There was an increase in up to congestion volume starting in December 2015, coincident with the expiration of the fifteen month limit on the payment of prior uplift charges.⁴ The average number of up to congestion bids submitted in the Day-Ahead Energy Market decreased by 0.4 percent, from 147,586 bids per day in the first nine months of 2016 to 146,930 bids per day in the first nine months of 2017. The average cleared volume of up to congestion bids submitted in the Day-Ahead Energy Market increased by 6.7 percent, from 820,224 MWh

per day in the first nine months of 2016, to 875,065 MWh per day in the first nine months of 2017.

- **45 Minute Schedule Duration Rule.** Effective May 19, 2014, PJM removed the 45 minute scheduling duration rule in response to FERC Order No. 764.⁵ PJM and the MMU issued a statement indicating ongoing concern about market participants' scheduling behavior, and a commitment to address any scheduling behavior that raises operational or market manipulation concerns.⁷

Recommendations

- The MMU recommends that PJM implement rules to prevent sham scheduling. The MMU recommends that PJM apply after the fact market settlement adjustments to identified sham scheduling segments to ensure that market participants cannot benefit from sham scheduling. (Priority: High. First reported 2012. Status: Not adopted. Stakeholder process.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would prohibit market participants from breaking transactions into smaller segments to defeat the interface pricing rule by concealing the true source or sink of the transaction. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM implement a validation method for submitted transactions that would require market participants to submit transactions on paths that reflect the expected actual power flow in order to reduce unscheduled loop flows. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM end the practice of maintaining outdated definitions of interface pricing points, eliminate the NIPSCO, Southeast and Southwest interface pricing points from the Day-Ahead and Real-Time Energy Markets and, with VACAR, assign the transactions created under the reserve sharing agreement to the SouthIMP/EXP pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)

³ The Hudson line was out of service for all hours in the first nine months of 2017. In the first nine months of 2017, there were five hours with less than 1 MW of unscheduled flow across the Hudson line.

⁴ 148 FERC ¶ 61,144 (2014). *Order Instituting Section 206 Proceeding and Establishing Procedures*. 16 U.S.C. § 824e.

⁵ *Integration of Variable Energy Resources*, Order No. 764, 139 FERC ¶ 61,246 (2012), *order on reh'g*, Order No. 764-A, 141 FERC ¶ 61231 (2012).

⁶ See Letter Order, Docket No. ER14-381-000 (June 30, 2014).

⁷ See joint statement of PJM and the MMU re Interchange Scheduling issued July 29, 2014, at: http://www.monitoringanalytics.com/reports/Market_Messages/Messages/PJM_IMM_Statement_on_Interchange_Scheduling_20140729.pdf.

- The MMU recommends that PJM eliminate the IMO interface pricing point, and assign the transactions that originate or sink in the IESO balancing authority to the MISO interface pricing point. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM monitor, and adjust as necessary, the weights applied to the components of the interfaces to ensure that the interface prices reflect ongoing changes in system conditions. The MMU also recommends that PJM review the mappings of external balancing authorities to individual interface pricing points to reflect changes to the impact of the external power source on PJM tie lines as a result of system topology changes. The MMU recommends that this review occur at least annually. (Priority: Low. First reported 2009. Status: Not adopted.)
- The MMU requests that, in order to permit a complete analysis of loop flow, FERC and NERC ensure that the identified data are made available to market monitors as well as other industry entities determined appropriate by FERC. (Priority: Medium. First reported 2003. Status: Not adopted.)
- The MMU recommends that PJM explore an interchange optimization solution with its neighboring balancing authorities that would remove the need for market participants to schedule physical transactions across seams. Such a solution would include an optimized, but limited, joint dispatch approach that uses supply curves and treats seams between balancing authorities as constraints, similar to other constraints within an LMP market. (Priority: Medium. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM permit unlimited spot market imports as well as unlimited nonfirm point-to-point willing to pay congestion imports and exports at all PJM interfaces in order to improve the efficiency of the market. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM immediately provide the required 12-month notice to Duke Energy Progress (DEP) to unilaterally terminate the Joint Operating Agreement. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJMSettlement Inc. immediately request a credit evaluation from all companies that engaged in up to congestion transactions between September 8, 2014, and December 31, 2015. If PJM has the authority, PJM should ensure that the potential exposure to uplift for that period be included as a contingency in the companies' calculations for credit levels and/or collateral requirements. If PJM does not have the authority to take such steps, PJM should request guidance from FERC. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that the emergency interchange cap be replaced with a market based solution. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that the submission deadline for real-time dispatchable transactions be modified from 1800 on the day prior, to three hours prior to the requested start time, and that the minimum duration be modified from one hour to 15 minutes. These changes would give PJM a more flexible product that could be used to meet load in the most economic manner. (Priority: Medium. First reported 2014. Status: Adopted partially, 2015.)
- The MMU recommends that PJM and MISO work together to align interface pricing definitions, using the same number of external buses and selecting buses in close proximity on either side of the border with comparable bus weights. (Priority: Medium. First reported 2012. Status: Adopted 2017.)

Conclusion

Transactions between PJM and multiple balancing authorities in the Eastern Interconnection are part of a single energy market. While some of these balancing authorities are termed market areas and some are termed nonmarket areas, all electricity transactions are part of a single energy market. Nonetheless, there are significant differences between market and nonmarket areas. Market areas, like PJM, include essential features such as locational marginal pricing, financial congestion offsets (FTRs and ARRs in PJM) and transparent, least cost, security constrained economic dispatch for all available

generation. Nonmarket areas do not include these features. The market areas are extremely transparent and the nonmarket areas are not transparent.

The MMU's recommendations related to transactions with external balancing authorities all share the goal of improving the economic efficiency of interchange transactions. The standard of comparison is an LMP market. In an LMP market, redispatch based on LMP and competitive generator offers results in an efficient dispatch and efficient prices. The goal of designing interchange transaction rules should be to match the outcomes that would exist in an LMP market.

Interchange Transaction Activity

Charges and Credits Applied to Interchange Transactions

Interchange transactions are subject to various charges and credits. These charges and credits are dependent on whether the interchange transaction is submitted in the Real-Time or Day-Ahead Energy Market, the type of transaction, the transmission service used and whether the transaction is an import, export or wheel. Table 9-1 shows the billing line items that represent the charges and credits applied to real-time and day-ahead interchange transactions.⁸

⁸ For an explanation and current rate for each billing line item, see "Customer Guide to PJM Billing," (August 1, 2017) <<http://www.pjm.com/~media/markets-ops/settlements/custgd.ashx>>.

Table 9-1 Charges and credits applied to interchange transactions

Billing Item	Real-Time Transactions				Day-Ahead Transactions				Up to Congestion
	Import (Firm or Non Firm)	Import (Spot in)	Export	Wheel	Import (Firm or Non Firm)	Import (Spot in)	Export	Wheel	
Firm or Non-Firm Point-to-Point Transmission Service	X		X ¹	X ¹	X		X ¹	X ¹	
Spot Import Service		X ²				X ²			
Day-ahead Spot Market Energy					X	X	X		
Balancing Spot Market Energy	X	X	X						
Day-ahead Transmission Congestion					X	X	X	X	X
Balancing Transmission Congestion	X	X	X	X					X
Day-ahead Transmission Losses					X	X	X	X	X
Balancing Transmission Losses	X	X	X	X					X
PJM Scheduling, System Control and Dispatch Service - Control Area Administration	X		X	X	X		X	X	
PJM Scheduling, System Control and Dispatch Service - Market Support	X	X	X		X	X	X		X
PJM Scheduling, System Control and Dispatch Service - Advanced Second Control Center	X	X	X	X	X	X	X	X	X
PJM Scheduling, System Control and Dispatch Service - Market Support Offset	X	X	X		X	X	X		X
PJM Settlement, Inc.	X	X	X		X	X	X		X
Market Monitoring Unit (MMU) Funding	X	X	X		X	X	X		X
FERC Annual Recovery	X		X	X	X		X	X	
Organization of PJM States, Inc. (OPSI) Funding	X		X	X	X		X	X	
Synchronous Condensing			X				X		
Transmission Owner Scheduling, System Control and Dispatch Service	X		X	X	X		X	X	
Reactive Supply and Voltage Control from Generation and Other Sources Service	X		X	X	X		X	X	
Day-ahead Operating Reserve					X	X	X		
Balancing Operating Reserve	X	X	X						
Black Start Service	X		X	X	X		X	X	
Marginal Loss Surplus Allocation (for those paying for transmission service only)			X				X		

¹ No charge if Point of Delivery is MISO

² No charge for spot in transmission

Aggregate Imports and Exports

In the first nine months of 2017, PJM was a monthly net exporter of energy in the Real-Time Energy Market in all months (Figure 9-1).⁹ In the first nine months of 2017, the total real-time net interchange of -17,891.2 GWh was lower than the net interchange of -3,112.0 GWh in the first nine months of 2016. The large difference in net interchange volumes from the first nine months of 2016 to the first nine months of 2017 was primarily a result of the requirement for external capacity resources to be pseudo tied into PJM. Prior to June 1, 2016, these units were dynamically scheduled into PJM or

were block scheduled into PJM and were part of scheduled interchange as imports. Pseudo tied units are treated as internal generation and therefore do not affect interchange volume. The reduction of the import volume based on the switch to pseudo tie status contributed to the shift from importing to exporting interchange, as the previously scheduled imports became internal generation. In the first nine months of 2017, the peak month for net exporting interchange was July, -2,559.2 GWh; in the first nine months of 2016 it was September, -2,758.6 GWh. Gross monthly export volumes in the first nine months of 2017 averaged 3,429.4 GWh compared to 3,347.2 GWh in the first

⁹ Calculated values shown in Section 9, "Interchange Transactions," are based on unrounded, underlying data and may differ from calculations based on the rounded values in the tables.

nine months of 2016, while gross monthly imports in the first nine months of 2017 averaged 1,441.5 GWh compared to 3,001.4 GWh in the first nine months of 2016.

In the first nine months of 2017, PJM was a monthly net exporter of energy in the Day-Ahead Energy Market in all months (Figure 9-1). In the first nine months of 2017, the total day-ahead net interchange of -14,655.8 GWh was lower than the net interchange of -6,423.9 GWh in the first nine months of 2016. The implementation of the pseudo-tied units on June 1, 2016, also impacted the day-ahead interchange totals. Prior to June 1, 2016, some external units were able to meet their day-ahead must offer requirements by submitting day-ahead energy schedules. When those external units became pseudo-tied units in PJM, they were required to offer into the Day-Ahead Energy Market through the Markets Gateway application. These offers replaced the day-ahead energy schedules that those units had submitted in the form of import transactions. The removal of these day-ahead transactions resulted in approximately 96.0 percent of the difference in the day-ahead net interchange totals in the first nine months of 2017 compared to the first nine months of 2016. In the first nine months of 2017, the peak month for net exporting interchange was August, -2,236.3 GWh; in the first nine months of 2016 it was August, -2,418.0 GWh. Gross monthly export volumes in the first nine months of 2017 averaged 4,191.3 GWh compared to 4,536.7 GWh in the first nine months of 2016, while gross monthly imports in the first nine months of 2017 averaged 2,562.9 GWh compared to 3,001.4 GWh in the first nine months of 2016.

Figure 9-1 shows real-time and day-ahead import, export and net interchange volumes. The day-ahead totals include fixed, dispatchable and up to congestion transaction totals. The net interchange of up to congestion transactions are represented by the orange line.

In the first nine months of 2017, gross imports in the Day-Ahead Energy Market were 177.8 percent of gross imports in the Real-Time Energy Market (127.4 percent in the first nine months of 2016). In the first nine months of 2017, gross exports in the Day-Ahead Energy Market were 122.2 percent

of gross exports in the Real-Time Energy Market (135.5 percent in the first nine months of 2016). In the first nine months of 2017, net interchange was -14,655.8 GWh in the Day-Ahead Energy Market and -17,891.2 GWh in the Real-Time Energy Market compared to -6,423.9 GWh in the Day-Ahead Energy Market and -3,112.0 GWh in the Real-Time Energy Market in the first nine months of 2016.

Transactions in the Day-Ahead Energy Market create financial obligations to deliver in the Real-Time Energy Market and to pay operating reserve charges based on differences between the transaction MW and price differences in the Day-Ahead and Real-Time Energy Markets.¹⁰ In the first nine months of 2017, the total day-ahead gross imports and exports were higher than the real-time gross imports and exports, the day-ahead imports net of up to congestion transactions were less than the real-time imports, and the day-ahead exports net of up to congestion transactions were less than real-time exports.

¹⁰ Up to congestion transactions create financial obligations to deliver in real time, but do not pay operating reserve charges.

Figure 9-1 PJM real-time and day-ahead scheduled imports and exports: January 1 through September 30, 2017

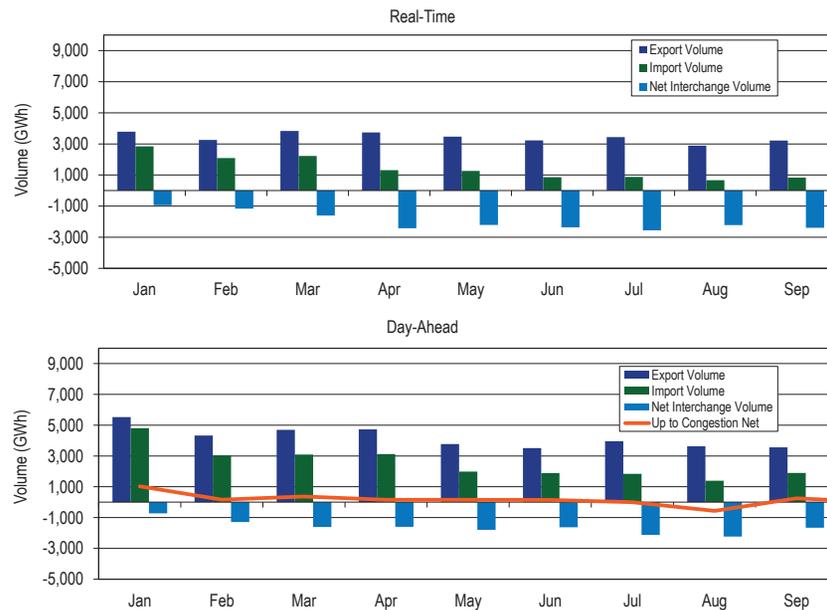
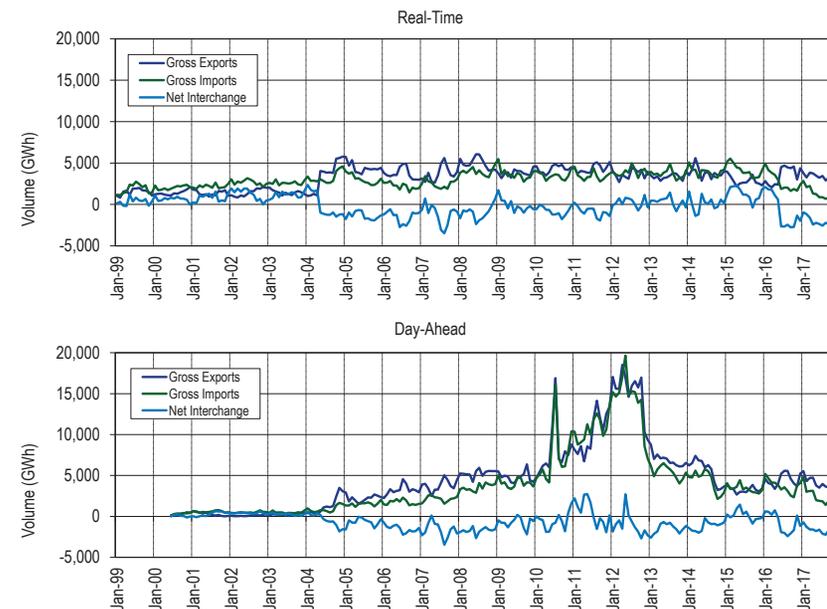


Figure 9-2 shows the real-time and day-ahead import and export volume for PJM from 1999 through September 30, 2017. PJM shifted from a consistent net importer of energy to relatively consistent net exporter of energy in 2004 in both the Real-Time and Day-Ahead Energy Markets, coincident with the expansion of the PJM footprint that included the integrations of Commonwealth Edison, American Electric Power and Dayton Power and Light into PJM. The net direction of power flows is generally a function of price differences net of transactions costs. Since the modification of the up to congestion product in September 2010, up to congestion transactions have played a significant role in power flows between PJM and external balancing authorities in the Day-Ahead Energy Market. On November 1, 2012, PJM eliminated the requirement that every up to congestion transaction include an interface pricing point as either the source or sink. As a result, the volume of import and export up to congestion transactions decreased, and the volume

of internal up to congestion transactions increased. While the gross import and export volumes in the Day-Ahead Energy Market decreased, PJM has remained primarily a net exporter in the Day-Ahead Energy Market. The requirement for external capacity resources to be pseudo tied into PJM has affected the real-time and day-ahead import volumes. Prior to June 1, 2016, these units were dynamically scheduled into PJM or were block scheduled into PJM and were part of scheduled interchange as imports. Pseudo tied units are treated as internal generation and therefore do not affect interchange volume. The reduction of the import volume based on the switch to pseudo tie status contributed to PJM remaining a primary net exporter in the Real-Time and Day-Ahead Energy Markets.

Figure 9-2 PJM real-time and day-ahead scheduled import and export transaction volume history: January 1, 1999 through September 30, 2017



Real-Time Interface Imports and Exports

In the Real-Time Energy Market, scheduled imports and exports are defined by the scheduled path, which is the transmission path a market participant selects from the original source to the final sink. These scheduled flows are measured at each of PJM's interfaces with neighboring balancing authorities. Table 9-17 includes a list of active interfaces in the first nine months of 2017. Figure 9-3 shows the approximate geographic location of the interfaces. In the first nine months of 2017, PJM had 20 interfaces with neighboring balancing authorities. While the Linden (LIND) Interface, the Hudson (HUDS) Interface and the Neptune (NEPT) Interface are separate from the NYIS Interface, all four are interfaces between PJM and the NYISO. Similarly, there are ten separate interfaces that make up the MISO Interface between PJM and MISO. Table 9-2 through Table 9-4 show the Real-Time Energy Market scheduled interchange totals at the individual NYISO interfaces, as well as with the NYISO as a whole. Similarly, the scheduled interchange totals at the individual interfaces between PJM and MISO are shown, as well as with MISO as a whole. Net scheduled interchange in the Real-Time Energy Market is shown by interface for the first nine months of 2017 in Table 9-2, while gross scheduled imports and exports are shown in Table 9-3 and Table 9-4.

In the Real-Time Energy Market, in the first nine months of 2017, there were net scheduled exports at 10 of PJM's 20 interfaces. The top three net exporting interfaces in the Real-Time Energy Market accounted for 61.3 percent of the total net scheduled exports: PJM/Cinergy (CIN) with 28.6 percent, PJM/Eastern Alliant Energy (ALTE) with 17.8 percent and PJM/Neptune (NEPT) with 14.9 percent of the net scheduled export volume. The four separate interfaces that connect PJM to the NYISO (PJM/NYIS, PJM/NEPT, PJM/HUDS and PJM/Linden (LIND)) together represented 26.0 percent of the total net PJM scheduled exports in the Real-Time Energy Market. There were net scheduled exports in the Real-Time Energy Market at six of the ten separate interfaces that connect PJM to MISO. Those six exporting interfaces represented 73.4 percent of the total net PJM scheduled exports in the Real-Time Energy Market. Eight PJM interfaces had net scheduled imports, with the top three importing interfaces accounting for 85.4 percent of the total net scheduled

imports: PJM/DUK (DUK) with 31.7 percent, PJM/LG&E Energy, L.L.C. (LGEE) with 27.6 percent and PJM/Ameren-Illinois (AMIL) with 26.0 percent of the net scheduled import volume.¹¹ The four separate interfaces that connect PJM to the NYISO (PJM/NYIS, PJM/NEPT, PJM/HUDS and PJM/Linden (LIND)) had net scheduled exports in the Real-Time Energy Market. In the first nine months of 2017, there were net imports in the Real-Time Energy Market at three of the ten separate interfaces that connect PJM to MISO. Those three interfaces represented 26.2 percent of the total net PJM scheduled imports in the Real-Time Energy Market.

Table 9-2 Real-time scheduled net interchange volume by interface (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPL	(15.7)	27.0	(8.6)	(3.5)	42.3	33.6	46.3	17.2	74.7	213.3
CPLW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
DUK	453.7	315.0	373.3	133.3	134.2	104.0	69.4	(95.7)	91.1	1,578.2
LGEE	225.2	95.7	169.3	172.9	172.0	125.6	171.0	142.7	100.9	1,375.1
MISO	(522.8)	(806.3)	(1,370.5)	(2,217.0)	(2,525.1)	(1,982.3)	(2,110.0)	(1,729.2)	(2,227.1)	(15,490.3)
ALTE	(39.0)	(349.6)	(429.9)	(388.1)	(522.3)	(434.6)	(710.2)	(553.9)	(635.2)	(4,062.8)
ALTW	0.4	0.5	0.0	0.0	0.1	0.1	(0.9)	0.0	0.6	0.8
AMIL	376.2	223.5	212.9	114.2	138.9	60.8	50.7	27.0	90.6	1,294.8
CIN	(319.6)	(282.3)	(560.3)	(1,189.0)	(1,112.7)	(948.6)	(787.7)	(530.2)	(803.5)	(6,533.9)
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	(18.4)	(35.9)	(34.8)	(103.3)	(151.2)	(105.6)	(114.4)	(115.8)	(157.1)	(836.5)
MEC	(472.9)	(402.7)	(410.5)	(375.1)	(488.6)	(311.5)	(316.1)	(247.4)	(291.3)	(3,316.2)
MECS	100.4	(20.8)	56.0	43.5	(162.3)	(52.1)	(52.2)	(42.6)	(147.3)	(277.5)
NIPS	0.0	8.6	0.0	0.0	(1.6)	0.0	0.1	0.0	0.0	7.1
WEC	(149.9)	52.5	(203.8)	(319.1)	(225.3)	(190.8)	(179.4)	(266.2)	(283.9)	(1,766.1)
NYISO	(1,336.9)	(1,045.2)	(823.5)	(486.9)	(69.1)	(575.2)	(608.2)	(534.7)	(461.9)	(5,941.6)
HUDS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	(222.2)	(157.9)	(147.5)	(106.6)	(79.5)	(58.8)	(47.6)	(57.1)	(71.3)	(948.4)
NEPT	(484.9)	(419.9)	(444.6)	(349.7)	(122.5)	(388.9)	(427.2)	(441.0)	(336.6)	(3,415.3)
NYIS	(629.8)	(467.4)	(231.5)	(30.6)	132.9	(127.5)	(133.3)	(36.7)	(54.0)	(1,577.8)
OVEC	(20.8)	(17.5)	(18.3)	(12.5)	(13.2)	(12.2)	(13.4)	(13.4)	(12.3)	(133.7)
TVA	273.9	268.0	70.2	(12.2)	45.3	(60.4)	(114.3)	(7.7)	44.7	507.6
Total	(943.5)	(1,163.3)	(1,608.2)	(2,425.9)	(2,213.6)	(2,366.9)	(2,559.2)	(2,220.7)	(2,389.9)	(17,891.2)

¹¹ In the Real-Time Energy Market, two PJM interfaces had a net interchange of zero (PJM/City Water Light & Power (CWLP) and PJM/Hudson (HUDS)).

**Table 9-3 Real-time scheduled gross import volume by interface (GWh):
January 1 through September 30, 2017**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPL	7.2	39.3	5.9	28.6	109.0	83.0	85.6	71.7	120.4	550.7
CPLW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
DUK	519.8	382.9	428.6	187.8	157.6	174.4	165.9	93.7	157.2	2,267.8
LGEE	225.2	99.6	171.7	172.9	191.9	125.8	171.0	143.1	128.6	1,429.7
MISO	992.0	562.9	793.9	345.6	383.2	225.7	214.9	138.3	193.6	3,850.1
ALTE	267.9	0.0	25.0	13.7	35.0	8.0	54.7	39.6	6.6	450.5
ALTW	0.4	0.5	0.0	0.0	0.1	0.1	0.4	0.0	0.6	2.2
AMIL	377.8	224.6	219.5	114.3	139.2	61.1	50.7	28.3	100.9	1,316.4
CIN	115.5	100.8	328.5	78.1	118.1	31.3	8.5	3.7	6.1	790.6
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	30.7	13.0	39.0	8.1	1.5	5.3	2.2	0.2	0.6	100.6
MEC	26.7	31.5	40.4	36.1	31.7	41.0	32.0	35.6	43.8	318.8
MECS	173.0	27.8	141.5	95.4	45.4	76.0	63.5	29.5	32.7	684.8
NIPS	0.0	8.6	0.0	0.0	0.0	0.0	0.1	0.0	0.0	8.7
WEC	0.0	156.1	0.0	0.0	12.2	2.9	2.6	1.3	2.3	177.5
NYISO	788.6	694.5	674.5	424.5	249.2	192.1	194.0	183.0	158.0	3,558.4
HUDS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	0.3	1.3	6.0	1.8	16.2	10.9	9.9	12.5	8.3	67.0
NEPT	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.1	0.3
NYIS	788.4	693.2	668.4	422.8	232.9	181.2	184.0	170.5	149.6	3,491.0
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TVA	305.5	311.7	150.9	155.2	168.4	63.4	45.5	42.0	74.0	1,316.7
Total	2,838.3	2,090.8	2,225.4	1,314.7	1,259.4	864.3	876.9	671.9	831.9	12,973.6

**Table 9-4 Real-time scheduled gross export volume by interface (GWh):
January 1 through September 30, 2017**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPL	22.9	12.2	14.5	32.1	66.8	49.4	39.3	54.5	45.7	337.4
CPLW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUK	66.2	67.9	55.3	54.5	23.4	70.4	96.4	189.4	66.1	689.6
LGEE	0.0	3.9	2.4	0.1	19.9	0.2	0.1	0.4	27.7	54.7
MISO	1,514.8	1,369.2	2,164.4	2,562.7	2,908.3	2,208.0	2,324.9	1,867.5	2,420.7	19,340.4
ALTE	306.9	349.6	454.9	401.8	557.4	442.6	764.9	593.6	641.7	4,513.3
ALTW	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.0	1.4
AMIL	1.6	1.1	6.6	0.1	0.3	0.3	0.0	1.3	10.3	21.6
CIN	435.1	383.1	888.8	1,267.1	1,230.8	979.9	796.2	533.9	809.6	7,324.6
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	49.1	48.9	73.8	111.4	152.7	110.9	116.7	116.0	157.7	937.1
MEC	499.6	434.2	450.9	411.3	520.3	352.5	348.1	283.0	335.1	3,635.1
MECS	72.6	48.6	85.5	51.9	207.7	128.1	115.7	72.1	180.0	962.3
NIPS	0.0	0.0	0.0	0.0	1.6	0.0	0.0	0.0	0.0	1.6
WEC	149.9	103.6	203.8	319.1	237.5	193.7	182.0	267.6	286.2	1,943.5
NYISO	2,125.5	1,739.7	1,498.0	911.4	318.3	767.2	802.2	717.7	619.9	9,500.0
HUDS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	222.4	159.2	153.5	108.3	95.7	69.7	57.5	69.6	79.5	1,015.4
NEPT	484.9	419.9	444.6	349.7	122.6	388.9	427.4	441.0	336.7	3,415.7
NYIS	1,418.2	1,160.6	899.9	453.4	100.0	308.7	317.3	207.1	203.7	5,068.9
OVEC	20.8	17.5	18.3	12.5	13.2	12.2	13.4	13.4	12.3	133.7
TVA	31.5	43.7	80.8	167.4	123.1	123.8	159.8	49.7	29.3	809.1
Total	3,781.8	3,254.1	3,833.6	3,740.6	3,473.0	3,231.2	3,436.1	2,892.6	3,221.7	30,864.8

Real-Time Interface Pricing Point Imports and Exports

Interfaces differ from interface pricing points. An interface is a point of interconnection between PJM and a neighboring balancing authority which market participants may designate as a path on which scheduled imports or exports will flow.¹² An interface pricing point defines the price at which transactions are priced, and is based on the path of the actual, physical transfer of energy. While a market participant designates a scheduled path from a generation control area (GCA) to a load control area (LCA), this path reflects the scheduled path as defined by the transmission reservations only, and may not reflect how the energy actually flows from the GCA to LCA. For example, the import transmission path from LG&E Energy, L.L.C. (LGEE), through MISO and into PJM would show the transfer of power into PJM at the

¹² There are multiple paths between any generation and load balancing authority. Market participants select the path based on transmission service availability and the transmission costs for moving energy from generation to load and interface prices.

PJM/MISO Interface based on the scheduled path of the transaction. However, the physical flow of energy does not enter the PJM footprint at the PJM/MISO Interface, but enters PJM at the southern boundary. For this reason, PJM prices an import with the GCA of LGEE at the SouthIMP interface pricing point rather than the MISO pricing point.

Interfaces differ from interface pricing points. The challenge is to create interface prices, composed of external pricing points, which accurately represent the locational price impact of flows between PJM and external sources of energy and that reflect the underlying economic fundamentals across balancing authority borders.¹³

Transactions can be scheduled to an interface based on a contract transmission path, but pricing points are developed and applied based on the estimated electrical impact of the external power source on PJM tie lines, regardless of the contract transmission path.¹⁴ PJM establishes prices for transactions with external balancing authorities by assigning interface pricing points to individual balancing authorities based on the generation control area and load control area as specified on the NERC Tag. Dynamic interface pricing calculations use actual system conditions to determine a set of weights for each external pricing point in an interface price definition. The weights are designed so that the interface price reflects actual system conditions. However, the weights are an approximation given the complexity of the transmission network outside PJM and the dynamic nature of power flows. Table 9-18 presents the interface pricing points used in the first nine months of 2017. On September 16, 2014, PJM updated the mappings of external balancing authorities to individual pricing points. The MMU recommends that PJM review these mappings, at least annually, to reflect the fact that changes to the system topology can affect the impact of external power sources on PJM.

The interface pricing method implies that the weighting factors reflect the actual system flows in a dynamic manner. In fact, the weightings are static,

and are modified by PJM only occasionally.¹⁵ The MMU recommends that PJM monitor, and adjust as necessary, the weights applied to the components of the interfaces to ensure that the interface prices reflect ongoing changes in system conditions.

The contract transmission path only reflects the path of energy into or out of PJM to one neighboring balancing authority. The NERC Tag requires the complete path to be specified from the generation control area (GCA) to the load control area (LCA), but participants do not always do so. The NERC Tag path is used by PJM to determine the interface pricing point that PJM assigns to the transaction. This approach will correctly identify the interface pricing point only if the market participant provides the complete path in the Tag. This approach will not correctly identify the interface pricing point if the market participant breaks the transaction into portions, each with a separate Tag. The breaking of transactions into portions can be a way to manipulate markets and the result of such behavior can be incorrect and noncompetitive pricing of transactions.

There are several pricing points mapped to the region south of PJM. The SouthIMP and SouthEXP pricing points serve as the default pricing point for transactions at the southern border of PJM. The CPLEEXP, CPLEIMP, DUKEXP, DUKIMP, NCMPEEXP and NCMPEIMP were also established to account for various special agreements with neighboring balancing areas, and PJM continued to use the Southwest pricing point for certain grandfathered transactions which have since expired.¹⁶

In the Real-Time Energy Market, in the first nine months of 2017, there were net scheduled exports at 10 of PJM's 18 interface pricing points eligible for real-time transactions.¹⁷ The top three net exporting interface pricing points in the Real-Time Energy Market accounted for 88.8 percent of the total net scheduled exports: PJM/MISO with 70.1 percent, PJM/NEPTUNE with 12.8 percent and PJM/NYIS with 6.0 percent of the net scheduled export volume. The four separate interface pricing points that connect PJM to the NYISO

¹³ See the *2007 State of the Market Report for PJM*, Volume II, Appendix D, "Interchange Transactions," for a more complete discussion of the development of pricing points.

¹⁴ See "Interface Pricing Point Assignment Methodology," (August 28, 2014) <<http://www.pjm.com/~media/etools/exschedule/interface-pricing-point-assignment-methodology.ashx>>. PJM periodically updates these definitions on its website.

¹⁵ On June 1, 2015, PJM began using a dynamic weighting factor in the calculation for the Ontario Interface Pricing Point.

¹⁶ The MMU does not believe that it is appropriate to allow the use of the Southwest pricing point for grandfathered transactions, and recommends that no further such agreements be entered into.

¹⁷ There is one interface pricing point eligible for day-ahead transaction scheduling only (NIPSCO).

(PJM/NYIS, PJM/NEPTUNE, PJM/HUDSONTP and PJM/LINDENVFT) together represented 22.3 percent of the total net PJM scheduled exports in the Real-Time Energy Market. Five PJM interface pricing points had net scheduled imports, with two importing interface pricing points accounting for 88.3 percent of the total net scheduled imports: PJM/SouthIMP with 78.2 percent and PJM/North Carolina Municipal Power Authority (NCMPAIMP) with 10.2 percent of the net scheduled import volume.¹⁸

Table 9-5 Real-time scheduled net interchange volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	222.1	127.6	231.4	21.6	97.7	34.7	64.6	47.1	(3.4)	843.5
MISO	(1,466.3)	(1,322.5)	(2,082.4)	(2,463.0)	(2,813.6)	(2,116.8)	(2,266.7)	(1,818.1)	(2,359.1)	(18,708.5)
NORTHWEST	0.1	(0.2)	(0.1)	0.0	(0.1)	0.0	0.0	0.0	(0.5)	(0.8)
NYISO	(1,336.9)	(1,045.2)	(825.9)	(486.9)	(69.5)	(584.0)	(612.4)	(535.3)	(459.1)	(5,955.2)
HUDSONTP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LINDENVFT	(222.2)	(157.9)	(147.5)	(106.6)	(79.5)	(58.8)	(47.6)	(57.1)	(71.3)	(948.4)
NEPTUNE	(484.9)	(419.9)	(444.6)	(349.7)	(122.5)	(388.9)	(427.2)	(441.0)	(336.6)	(3,415.3)
NYIS	(629.8)	(467.4)	(233.8)	(30.6)	132.5	(136.3)	(137.5)	(37.2)	(51.3)	(1,591.4)
OVEC	(20.8)	(17.5)	(18.3)	(12.5)	(13.2)	(12.2)	(13.4)	(13.4)	(12.3)	(133.7)
Southern Imports	1,780.5	1,222.6	1,240.1	769.6	819.6	557.6	568.7	392.9	616.3	7,967.9
CPLEIMP	5.9	2.0	4.4	0.1	10.5	2.8	12.3	3.2	31.2	72.3
DUKIMP	11.1	6.0	35.2	38.4	10.4	5.9	1.0	0.8	3.0	111.8
NCMPAIMP	173.4	151.6	118.1	58.1	55.7	100.6	74.4	73.3	90.6	895.7
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHIMP	1,590.2	1,063.0	1,082.4	673.0	743.1	448.3	480.9	315.6	491.6	6,888.0
Southern Exports	(122.1)	(128.0)	(153.0)	(254.8)	(234.5)	(246.1)	(300.0)	(294.0)	(171.8)	(1,904.4)
CPLEEXP	(14.0)	(1.9)	(9.0)	(18.0)	(20.6)	(18.1)	(7.2)	(8.4)	(5.7)	(103.0)
DUKEXP	(28.3)	(40.7)	(7.4)	(12.3)	(1.6)	(18.3)	(43.9)	(71.8)	(19.2)	(243.6)
NCMPAEXP	0.0	0.0	0.0	0.0	(0.1)	0.0	0.0	0.0	(0.4)	(0.5)
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEXP	(79.8)	(85.4)	(136.6)	(224.5)	(212.2)	(209.7)	(248.8)	(213.8)	(146.5)	(1,557.3)
Total	(943.5)	(1,163.3)	(1,608.2)	(2,425.9)	(2,213.6)	(2,366.9)	(2,559.2)	(2,220.7)	(2,389.9)	(17,891.2)

¹⁸ In the Real-Time Energy Market, three PJM interface pricing points had a net interchange of zero (HUDSONTP, Southeast and Southwest).

Table 9-6 Real-time scheduled gross import volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	222.3	127.6	231.6	25.7	97.8	34.7	64.7	47.1	3.2	854.7
MISO	46.7	46.1	81.7	94.8	93.3	88.8	53.7	49.4	54.8	609.4
NORTHWEST	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1
NYISO	788.6	694.5	672.0	424.5	248.7	183.3	189.8	182.4	157.6	3,541.5
HUDSONTP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LINDENVFT	0.3	1.3	6.0	1.8	16.2	10.9	9.9	12.5	8.3	67.0
NEPTUNE	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.1	0.3
NYIS	788.4	693.2	666.0	422.8	232.4	172.4	179.8	169.9	149.3	3,474.1
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Southern Imports	1,780.5	1,222.6	1,240.1	769.6	819.6	557.6	568.7	392.9	616.3	7,967.9
CPLEIMP	5.9	2.0	4.4	0.1	10.5	2.8	12.3	3.2	31.2	72.3
DUKIMP	11.1	6.0	35.2	38.4	10.4	5.9	1.0	0.8	3.0	111.8
NCMPAIMP	173.4	151.6	118.1	58.1	55.7	100.6	74.4	73.3	90.6	895.7
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHIMP	1,590.2	1,063.0	1,082.4	673.0	743.1	448.3	480.9	315.6	491.6	6,888.0
Southern Exports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	2,838.3	2,090.8	2,225.4	1,314.7	1,259.4	864.3	876.9	671.9	831.9	12,973.6

Table 9-7 Real-time scheduled gross export volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	0.3	0.1	0.1	4.0	0.1	0.0	0.1	0.0	6.6	11.3
MISO	1,513.0	1,368.6	2,164.2	2,557.8	2,906.9	2,205.6	2,320.4	1,867.5	2,413.8	19,317.8
NORTHWEST	0.0	0.2	0.1	0.0	0.1	0.0	0.0	0.0	0.5	0.9
NYISO	2,125.5	1,739.7	1,497.9	911.4	318.2	767.2	802.2	717.7	616.8	9,496.7
HUDSONTP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LINDENVFT	222.4	159.2	153.5	108.3	95.7	69.7	57.5	69.6	79.5	1,015.4
NEPTUNE	484.9	419.9	444.6	349.7	122.6	388.9	427.4	441.0	336.7	3,415.7
NYIS	1,418.2	1,160.6	899.8	453.4	99.9	308.7	317.3	207.1	200.6	5,065.6
OVEC	20.8	17.5	18.3	12.5	13.2	12.2	13.4	13.4	12.3	133.7
Southern Imports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Southern Exports	122.1	128.0	153.0	254.8	234.5	246.1	300.0	294.0	171.8	1,904.4
CPLEEXP	14.0	1.9	9.0	18.0	20.6	18.1	7.2	8.4	5.7	103.0
DUKEXP	28.3	40.7	7.4	12.3	1.6	18.3	43.9	71.8	19.2	243.6
NCMPAEXP	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.4	0.5
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEXP	79.8	85.4	136.6	224.5	212.2	209.7	248.8	213.8	146.5	1,557.3
Total	3,781.8	3,254.1	3,833.6	3,740.6	3,473.0	3,231.2	3,436.1	2,892.6	3,221.7	30,864.8

Day-Ahead Interface Imports and Exports

In the Day-Ahead Energy Market, as in the Real-Time Energy Market, scheduled imports and exports are determined by the scheduled path, which is the transmission path a market participant selects from the original source to the final sink. Entering external energy transactions in the Day-Ahead Energy Market requires fewer steps than in the Real-Time Energy Market. Market participants need to acquire a valid, willing to pay congestion (WPC) OASIS reservation to prove that their day-ahead schedule could be supported in the Real-Time Energy Market.¹⁹ Day-ahead energy market schedules need to be cleared through the day-ahead energy market process in order to become an approved schedule. The day-ahead energy market transactions are financially

¹⁹ Effective September 17, 2010, up to congestion transactions no longer required a willing to pay congestion transmission reservation.

binding, but will not physically flow unless they are also submitted in the Real-Time Energy Market. In the Day-Ahead Energy Market, a market participant is not required to acquire a ramp reservation, a NERC Tag, or to go through a neighboring balancing authority checkout process.

There are three types of day-ahead external energy transactions: fixed; up to congestion; and dispatchable.²⁰

In the Day-Ahead Energy Market, transaction sources and sinks are determined solely by market participants. In Table 9-8, Table 9-9, and Table 9-10, the scheduled interface designation is determined by the transmission reservation that was acquired and associated with the day-ahead market transaction, and does not bear any necessary relationship to the pricing point designation selected at the time the transaction is submitted to PJM in real time. For example, if market participants want to import energy from the Southwest Power Pool (SPP) to PJM, they are likely to choose a scheduled path with the fewest transmission providers along the path and therefore the lowest transmission costs for the transaction, regardless of whether the resultant path is related to the physical flow of power. The lowest cost transmission path runs from SPP, through MISO, and into PJM, requiring only three transmission reservations, two of which are available at no cost (MISO transmission would be free based on the regional through and out rates, and the PJM transmission would be free, if using spot import transmission). Any other transmission path entering PJM, where the generating control area is to the south, would require the market participant to acquire transmission through nonmarket balancing authorities, and thus incur additional transmission costs. PJM's interface pricing method recognizes that transactions sourcing in SPP and sinking in PJM will create flows across the southern border and prices those transactions at the SouthIMP interface price. As a result, a market participant who plans to submit a transaction from SPP to PJM may have a transmission reservation with a point of receipt of MISO and a point of delivery of PJM but may select

²⁰ See the 2010 State of the Market Report for PJM, Volume 2, Section 4, "Interchange Transactions," for details.

SouthIMP as the import pricing point when submitting the transaction in the Day-Ahead Energy Market. In the scheduled interface tables, the import transaction would appear as scheduled through the MISO Interface, and in the scheduled interface pricing point tables, the import transaction would appear as scheduled through the SouthIMP/EXP interface pricing point, which reflects the expected power flow.

Table 9-8 through Table 9-10 show the day-ahead scheduled interchange totals at the individual interfaces. Net scheduled interchange in the Day-Ahead Energy Market is shown by interface for the first nine months of 2017 in Table 9-8, while gross scheduled imports and exports are shown in Table 9-9 and Table 9-10.

Table 9-8 Day-ahead scheduled net interchange volume by interface (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPLE	(11.2)	7.5	(3.2)	0.7	41.3	77.4	77.5	76.6	121.0	387.7
CPLW	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.1
DUK	330.8	281.6	312.4	81.2	12.4	56.1	70.0	10.2	14.3	1,169.1
LGEE	0.0	0.3	0.0	11.1	14.6	0.0	0.0	0.0	0.0	26.0
MISO	(934.0)	(867.5)	(1,469.1)	(1,395.5)	(1,781.1)	(1,232.6)	(1,517.0)	(1,118.0)	(1,586.8)	(11,901.6)
ALTE	(225.7)	(280.7)	(378.9)	(268.1)	(461.2)	(351.6)	(693.8)	(453.4)	(508.5)	(3,622.0)
ALTW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
AMIL	0.0	0.0	(5.8)	0.0	0.0	0.0	0.0	0.0	1.5	(4.3)
CIN	(129.5)	(93.6)	(459.9)	(537.0)	(518.7)	(335.0)	(283.1)	(183.8)	(419.7)	(2,960.2)
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	0.0	(2.3)	(13.0)	(5.8)	(15.1)	(25.7)	0.0	(0.8)	0.0	(62.5)
MEC	(496.4)	(433.1)	(428.2)	(408.3)	(509.6)	(345.3)	(340.3)	(290.9)	(333.1)	(3,585.0)
MECS	8.1	(18.7)	(66.9)	(41.3)	(150.7)	(81.1)	(110.0)	(70.5)	(159.8)	(690.8)
NIPS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
WEC	(90.5)	(39.2)	(116.4)	(135.0)	(125.8)	(93.9)	(89.8)	(118.7)	(167.3)	(976.7)
NYISO	(1,181.0)	(894.0)	(768.1)	(389.8)	(161.0)	(599.9)	(665.4)	(614.7)	(446.8)	(5,720.7)
HUDS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	(33.1)	(21.7)	(20.1)	(14.6)	(17.4)	(11.1)	(17.8)	(12.8)	(10.5)	(159.2)
NEPT	(489.6)	(412.1)	(445.4)	(351.7)	(131.4)	(393.1)	(441.9)	(464.2)	(348.3)	(3,477.5)
NYIS	(658.3)	(460.2)	(302.6)	(23.5)	(12.2)	(195.7)	(205.7)	(137.7)	(88.0)	(2,083.9)
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TVA	38.4	19.7	(48.6)	(61.5)	(73.7)	(70.4)	(86.9)	(21.5)	(10.1)	(314.7)
Total without Up To Congestion	(1,757.1)	(1,452.4)	(1,976.5)	(1,753.7)	(1,947.6)	(1,769.4)	(2,121.8)	(1,667.3)	(1,908.4)	(16,354.1)
Up To Congestion	1,032.7	160.6	369.8	155.9	151.8	144.1	(0.0)	(569.1)	252.4	1,698.3
Total	(724.4)	(1,291.8)	(1,606.7)	(1,597.8)	(1,795.8)	(1,625.3)	(2,121.8)	(2,236.3)	(1,655.9)	(14,655.8)

In the Day-Ahead Energy Market, in the first nine months of 2017, there were net scheduled exports at 11 of PJM's 20 interfaces. The top three net exporting interfaces in the Day-Ahead Energy Market accounted for 59.6 percent of the total net scheduled exports: PJM/Eastern Alliant Energy (ALTE) with 20.2 percent, PJM/MidAmerican Energy Company (MEC) with 20.0 percent and PJM/Neptune (NEPT) with 19.4 percent of the net scheduled export volume. The four separate interfaces that connect PJM to the NYISO (PJM/NYIS, PJM/NEPT, PJM/HUDS and PJM/Linden (LIND)) together represented 31.9 percent of the total net PJM scheduled exports in the Day-Ahead Energy Market. In the first nine months of 2017, there were net exports in the Day-Ahead Energy Market at seven of the ten separate interfaces that connect PJM to MISO. Those seven interfaces represented 66.4 percent of the total net PJM exports in the Day-Ahead Energy Market. Four PJM interfaces had net scheduled imports, with the top importing interface, PJM/DUK, accounting for 73.9

percent of the net import volume. The four interfaces that connect PJM to the NYISO (PJM/NYIS, PJM/NEPT, PJM/HUDS and PJM/Linden (LIND)) together had net scheduled exports in the Day-Ahead Energy Market. In the first nine months of 2017, there were net imports in the Day-Ahead Energy Market at none of the ten separate interfaces that connect PJM to MISO.²¹

²¹ In the Day-Ahead Energy Market, five PJM interfaces had a net interchange of zero (PJM/Western Alliant Energy (ALTW), PJM/City Water Light & Power (CWLP), PJM/Northern Indiana Public Service Company (NIPS), PJM/Hudson (HUDS) and PJM/Ohio Valley Electric Cooperative (OVEC)).

Table 9-9 Day-ahead scheduled gross import volume by interface (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPLC	5.4	17.8	5.2	23.5	95.1	111.1	104.9	103.4	135.1	601.5
CPLW	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.1
DUK	342.3	281.6	322.6	88.6	12.4	56.5	71.5	11.5	14.7	1,201.6
LGEE	0.0	0.3	0.0	11.1	14.6	0.0	0.0	0.0	0.0	26.0
MISO	54.3	11.3	15.2	1.3	1.4	3.7	1.3	1.9	1.5	91.8
ALTE	0.0	0.0	0.0	0.0	0.0	2.0	0.8	0.7	0.0	3.5
ALTW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
AMIL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	1.5
CIN	2.6	0.0	0.0	0.0	0.0	0.2	0.0	0.4	0.0	3.2
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
MEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
MECS	51.6	11.3	15.2	1.3	1.4	1.5	0.5	0.8	0.0	83.6
NIPS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
WEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NYISO	645.8	571.7	496.6	295.4	15.5	7.2	0.7	0.8	16.6	2,050.3
HUDD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	0.0	0.2	0.5	0.2	0.9	1.2	0.4	0.1	1.4	4.9
NEPT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NYIS	645.8	571.5	496.1	295.2	14.6	6.0	0.3	0.6	15.2	2,045.4
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TVA	41.9	43.8	0.9	22.1	0.8	0.0	0.0	0.0	0.0	109.5
Total without Up To Congestion	1,089.7	926.4	840.6	442.0	139.7	178.5	178.4	117.5	167.9	4,080.7
Up To Congestion	3,714.6	2,109.4	2,253.9	2,684.1	1,843.1	1,708.3	1,659.4	1,277.7	1,734.8	18,985.2
Total	4,804.3	3,035.8	3,094.4	3,126.1	1,982.7	1,886.8	1,837.8	1,395.1	1,902.7	23,065.9

**Table 9-10 Day-ahead scheduled gross export volume by interface (GWh):
January 1 through September 30, 2017**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
CPLP	16.6	10.3	8.3	22.8	53.8	33.8	27.4	26.7	14.1	213.7
CPLW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUK	11.5	0.0	10.2	7.3	0.0	0.4	1.6	1.2	0.4	32.6
LGEE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
MISO	988.3	878.8	1,484.3	1,396.8	1,782.5	1,236.2	1,518.3	1,119.9	1,588.3	11,993.4
ALTE	225.7	280.7	378.9	268.1	461.2	353.6	694.6	454.1	508.5	3,625.5
ALTW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
AMIL	0.0	0.0	5.8	0.0	0.0	0.0	0.0	0.0	0.0	5.8
CIN	132.1	93.6	459.9	537.0	518.7	335.2	283.1	184.2	419.7	2,963.4
CWLP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IPL	0.0	2.3	13.0	5.8	15.1	25.7	0.0	0.8	0.0	62.5
MEC	496.4	433.1	428.2	408.3	509.6	345.3	340.3	290.9	333.1	3,585.0
MECS	43.6	29.9	82.1	42.6	152.1	82.6	110.5	71.3	159.8	774.4
NIPS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
WEC	90.5	39.2	116.4	135.0	125.8	93.9	89.8	118.7	167.3	976.7
NYISO	1,826.9	1,465.7	1,264.7	685.2	176.5	607.1	666.0	615.5	463.4	7,771.0
HUDD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LIND	33.1	21.9	20.6	14.8	18.4	12.3	18.2	13.0	11.9	164.1
NEPT	489.6	412.1	445.4	351.7	131.4	393.1	441.9	464.2	348.3	3,477.5
NYIS	1,304.2	1,031.7	798.7	318.7	26.8	201.7	206.0	138.3	103.2	4,129.3
OVEC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TVA	3.5	24.1	49.5	83.6	74.5	70.4	86.9	21.5	10.1	424.1
Total without Up To Congestion	2,846.8	2,378.9	2,817.0	2,195.8	2,087.3	1,947.9	2,300.2	1,784.7	2,076.3	20,434.8
Up To Congestion	2,681.9	1,948.8	1,884.1	2,528.2	1,691.3	1,564.3	1,659.4	1,846.7	1,482.3	17,286.9
Total	5,528.6	4,327.6	4,701.1	4,723.9	3,778.6	3,512.2	3,959.6	3,631.4	3,558.6	37,721.7

Day-Ahead Interface Pricing Point Imports and Exports

Table 9-11 through Table 9-16 show the day-ahead scheduled interchange totals at the interface pricing points. In the first nine months of 2017, up to congestion transactions accounted for 82.3 percent of all scheduled import MW transactions and 45.8 percent of all scheduled export MW transactions in the Day-Ahead Energy Market. The day-ahead net scheduled interchange in the first nine months of 2017, including up to congestion transactions, is shown by interface pricing point in Table 9-11. Scheduled up to congestion transactions by interface pricing point in the first nine months of 2017 are shown in Table 9-12. Day-ahead gross scheduled imports and exports,

including up to congestion transactions, are shown in Table 9-13 and Table 9-15, while gross scheduled import and export up to congestion transactions are shown in Table 9-14 and Table 9-16.

There is one interface pricing point eligible for day-ahead transaction scheduling only (NIPSCO). The NIPSCO interface pricing point was created when the individual balancing authorities that integrated to form MISO still operated independently. Transactions sourcing or sinking in the NIPSCO balancing authority were eligible to receive the real-time NIPSCO interface pricing point. After the formation of the MISO RTO, all real-time transactions sourcing or sinking in NIPSCO are represented on the NERC Tag as sourcing or sinking in MISO, and thus receive the MISO interface pricing point in the Real-Time Energy Market. For this reason, it was no longer possible to receive the NIPSCO interface pricing point in the Real-Time Energy Market after the integration of NIPSCO into MISO.

After NIPSCO integrated into MISO on May 1, 2004, PJM kept the NIPSCO interface pricing point for the purpose of facilitating the long term day-ahead positions created at the NIPSCO Interface prior to the integration. However, the NIPSCO interface pricing point remains an eligible interface pricing point in the PJM Day-Ahead Energy Market today, and is available for all market participants to use as the pricing point for day-ahead imports, exports and wheels, INCs, DEC and up to congestion transactions. The NIPSCO interface pricing point continues to also be used as an eligible source or sink for new FTRs.

In the first nine months of 2017, the day-ahead net scheduled interchange at the NIPSCO interface pricing point was -4,565.9 GWh (Table 9-11). Table 9-12 shows that all -4,565.9 GWh of day-ahead net scheduled interchange submitted at the NIPSCO interface pricing point were made up of up to

congestion transactions. While there is no corresponding interface pricing point available for real-time transaction scheduling, a real-time LMP is still calculated. This real-time price is used for balancing the deviations between the Day-Ahead and Real-Time Energy Markets.

PJM consolidated the Southeast and Southwest interface pricing points to a single interface pricing point with separate import and export prices (SouthIMP and SouthEXP) on October 31, 2006. At that time, the real-time Southeast and Southwest interface pricing points remained only to support certain grandfathered agreements with specific generating units and to price energy under the reserve sharing agreement with VACAR. The reserve sharing agreement allows for the transfer of energy during emergencies. Interchange transactions created as part of the reserve sharing agreement are currently settled at the Southeast interface price. PJM also kept the day-ahead Southeast and Southwest interface pricing points to facilitate long-term day-ahead positions that were entered prior to the consolidation.

Maintaining outdated definitions of interface pricing points is unnecessary, inconsistent with the tariff and creates artificial opportunities for gaming by virtual transactions and FTRs. The MMU recommends that PJM end the practice of maintaining outdated definitions of interface pricing points, eliminate the NIPSCO, Southeast and Southwest interface pricing points from the Day-Ahead and Real-Time Energy Markets and, with VACAR, assign the transactions created under the reserve sharing agreement to the SouthIMP/EXP pricing point.

In the Day-Ahead Energy Market, in the first nine months of 2017, there were net scheduled exports at 12 of PJM's 19 interface pricing points eligible for day-ahead transactions. The top three net exporting interface pricing points in the Day-Ahead Energy Market accounted for 61.1 percent of the total net scheduled exports: PJM/MISO with 28.4 percent, PJM/NIPSCO with 19.3 percent and PJM/NEPTUNE with 13.4 percent of the net scheduled export volume. The four separate interface pricing points that connect PJM to the NYISO (PJM/NYIS, PJM/NEPTUNE, PJM/HUDSONTP and PJM/LINDENVFT) together represented 19.0 percent of the total net PJM scheduled exports in

the Day-Ahead Energy Market (the PJM/HUDSONTP interface pricing point had net scheduled imports). Seven PJM interface pricing points had net scheduled imports, with three importing interface pricing points accounting for 83.6 percent of the total net scheduled imports: PJM/Ohio Valley Electric Corporation (OVEC) with 35.9 percent, PJM/Southeast with 30.8 percent and PJM/SOUTHIMP with 16.9 percent of the net import volume. The four separate interface pricing points that connect PJM to the NYISO (PJM/NYIS, PJM/NEPTUNE, PJM/HUDSONTP and PJM/LINDENVFT) together had net scheduled exports in the Day-Ahead Energy Market. However, the PJM/HUDSONTP interface pricing points had net scheduled imports that represented 2.5 percent of the total PJM net scheduled imports in the Day-Ahead Energy Market.

In the Day-Ahead Energy Market, in the first nine months of 2017, up to congestion transactions had net scheduled exports at four of PJM's 19 interface pricing points eligible for day-ahead transactions. The top two net exporting interface pricing points eligible for up to congestion transactions accounted for 84.8 percent of the total net up to congestion scheduled exports: PJM/NIPSCO with 50.8 percent and PJM/Southwest with 34.0 percent of the net scheduled export up to congestion volume. The four separate interface pricing points that connect PJM to the NYISO (PJM/NYIS, PJM/NEPTUNE, PJM/HUDSONTP and PJM/LINDENVFT) together had net scheduled import up to congestion transactions in the Day-Ahead Energy Market. Nine PJM interface pricing points had net scheduled up to congestion imports, with the top three importing interface pricing points accounting for 73.0 percent of the total net up to congestion imports: PJM/OVEC with 30.4 percent, PJM/Southeast with 26.1 percent and PJM/MISO with 16.5 percent of the net import up to congestion volume. The four separate interface pricing points that connect PJM to the NYISO (PJM/NYIS, PJM/NEPTUNE, PJM/HUDSONTP and PJM/LINDENVFT) together represented 13.5 percent of the total net scheduled up to congestion exports in the Day-Ahead Energy Market.²²

²² In the Day-Ahead Energy Market, six PJM interface pricing points (PJM/CPLIIMP, PJM/DUKIMP, PJM/NCMPAIMP, PJM/CPLIEXP, PJM/DUKEXP and PJM/NCMPAEXP) had up to congestion net interchange of zero.

Table 9-11 Day-ahead scheduled net interchange volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	134.8	(25.0)	(202.5)	(168.7)	16.5	85.6	(26.9)	(38.9)	(33.5)	(258.6)
MISO	(100.3)	(259.5)	(931.6)	(465.3)	(1,129.3)	(814.2)	(1,146.5)	(789.3)	(1,095.6)	(6,731.7)
NIPSCO	(950.4)	(289.9)	(344.8)	(769.6)	(455.1)	(328.1)	(565.2)	(557.6)	(305.3)	(4,565.9)
NORTHWEST	(370.1)	(455.6)	(326.7)	(204.6)	(452.9)	(270.5)	(323.6)	(248.2)	(240.4)	(2,892.5)
NYISO	(838.4)	(756.8)	(759.1)	(316.6)	(46.1)	(293.9)	(446.4)	(512.9)	(307.2)	(4,277.4)
HUDSONTP	191.8	24.8	(57.5)	(10.6)	(22.9)	53.8	48.1	3.9	(7.0)	224.4
LINDENVFT	(58.5)	(43.6)	(28.0)	(14.5)	11.0	28.3	4.1	(5.5)	17.6	(89.1)
NEPTUNE	(482.9)	(387.4)	(386.8)	(291.1)	(126.5)	(347.3)	(403.4)	(416.3)	(340.4)	(3,182.1)
NYIS	(488.9)	(350.5)	(286.8)	(0.4)	92.4	(28.7)	(95.2)	(95.0)	22.6	(1,230.6)
OVEC	742.4	64.9	497.4	390.0	445.9	157.3	443.1	262.0	248.9	3,252.0
Southern Imports	1,418.8	988.4	996.3	786.4	552.3	542.6	600.9	423.0	704.3	7,012.9
CPLEIMP	5.4	3.2	5.2	0.0	5.7	2.5	0.1	1.5	0.0	23.4
DUKIMP	8.2	26.9	19.6	8.5	4.6	0.5	1.2	2.4	24.0	95.9
NCMPAIMP	175.1	152.1	149.9	93.2	90.6	134.1	108.0	108.9	126.1	1,138.0
SOUTHEAST	424.7	377.5	439.6	347.8	235.7	255.8	283.4	204.9	312.9	2,882.3
SOUTHWEST	376.6	125.7	164.6	186.6	87.4	74.0	81.7	66.3	177.8	1,340.5
SOUTHIMP	428.8	303.1	217.5	150.3	128.3	75.8	126.6	38.9	63.5	1,532.8
Southern Exports	(761.1)	(558.4)	(535.7)	(849.5)	(727.2)	(704.2)	(657.0)	(774.5)	(627.2)	(6,194.7)
CPLEEXP	(15.8)	(9.8)	(7.7)	(21.7)	(50.8)	(32.5)	(27.0)	(26.3)	(13.7)	(205.3)
DUKEXP	0.0	0.0	0.0	(2.2)	0.0	(0.4)	(1.6)	0.0	0.0	(4.1)
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	(0.4)	(0.4)
SOUTHEAST	(13.3)	(21.9)	(9.7)	(7.2)	(15.2)	(5.3)	(7.3)	(8.3)	(7.4)	(95.6)
SOUTHWEST	(576.6)	(401.3)	(332.9)	(631.8)	(447.8)	(516.1)	(427.0)	(579.1)	(487.0)	(4,399.5)
SOUTHEXP	(155.4)	(125.4)	(185.4)	(186.6)	(213.4)	(149.9)	(194.2)	(160.8)	(118.8)	(1,489.8)
Total	(724.4)	(1,291.8)	(1,606.7)	(1,597.8)	(1,795.8)	(1,625.3)	(2,121.8)	(2,236.3)	(1,655.9)	(14,655.8)

Table 9-12 Up to congestion scheduled net interchange volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	83.2	(36.3)	(217.7)	(170.0)	15.1	84.2	(27.4)	(39.7)	(32.6)	(341.3)
MISO	404.5	198.9	127.9	544.6	171.1	88.1	30.7	38.6	160.3	1,764.7
NIPSCO	(950.4)	(289.9)	(344.8)	(769.6)	(455.1)	(328.1)	(565.2)	(557.6)	(305.3)	(4,565.9)
NORTHWEST	110.7	(35.1)	98.1	182.3	29.2	61.2	16.7	42.7	92.0	597.8
NYISO	342.6	137.2	9.0	73.2	114.9	306.0	218.9	101.8	142.4	1,446.1
HUDSONTP	191.8	24.8	(57.5)	(10.6)	(22.9)	53.8	48.1	3.9	(7.0)	224.4
LINDENVFT	(25.4)	(22.0)	(7.9)	0.1	28.4	39.4	21.9	7.4	28.2	70.1
NEPTUNE	6.8	24.7	58.6	60.7	4.8	45.8	38.4	47.9	7.8	295.4
NYIS	169.4	109.7	15.8	23.1	104.6	167.0	110.5	42.7	113.4	856.2
OVEC	742.4	64.9	497.4	390.0	445.9	157.3	443.1	262.0	248.9	3,252.0
Southern Imports	1,029.2	645.0	667.6	641.1	429.4	374.9	424.4	308.2	549.3	5,069.1
CPLEIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	424.7	377.5	439.6	347.8	235.7	255.8	283.4	204.9	312.9	2,882.3
SOUTHWEST	376.6	125.7	164.6	186.6	87.4	74.0	81.7	66.3	177.8	1,340.5
SOUTHIMP	227.9	141.8	63.4	106.7	106.3	45.2	59.4	37.0	58.6	846.3
Southern Exports	(729.5)	(524.0)	(467.7)	(735.7)	(598.9)	(599.6)	(541.1)	(725.1)	(602.7)	(5,524.3)
CPLEEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	(13.3)	(21.9)	(9.7)	(7.2)	(15.2)	(5.3)	(7.1)	(8.3)	(7.4)	(95.4)
SOUTHWEST	(576.6)	(401.3)	(332.9)	(631.8)	(447.8)	(516.1)	(427.0)	(579.1)	(487.0)	(4,399.5)
SOUTHEXP	(139.5)	(100.8)	(125.0)	(96.7)	(136.0)	(78.2)	(107.1)	(137.7)	(108.3)	(1,029.4)
Total Interfaces	1,032.7	160.6	369.8	155.9	151.8	144.1	(0.0)	(569.1)	252.4	1,698.3
INTERNAL	28,699.9	24,147.9	24,822.8	25,401.8	22,243.3	18,460.3	20,816.1	20,420.0	18,835.2	203,847.3
Total	29,732.6	24,308.5	25,192.6	25,557.7	22,395.1	18,604.3	20,816.0	19,851.0	19,087.7	205,545.6

Table 9-13 Day-ahead scheduled gross import volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	213.7	67.9	56.5	26.6	54.0	172.1	82.4	37.9	44.5	755.5
MISO	753.3	402.1	343.1	762.1	329.3	234.9	187.1	205.8	313.6	3,531.3
NIPSCO	60.1	158.5	137.7	127.2	108.1	66.6	10.3	21.9	62.2	752.4
NORTHWEST	398.3	184.1	261.1	340.7	190.8	256.9	190.0	221.0	223.0	2,266.0
NYISO	1,156.1	863.3	651.2	541.3	215.3	391.8	261.2	147.2	228.0	4,455.2
HUDSONTP	231.3	106.6	12.7	11.4	17.4	86.2	53.0	7.4	17.9	544.0
LINDENVFT	17.4	13.7	21.7	108.6	55.3	50.0	34.7	14.7	50.0	366.1
NEPTUNE	36.2	39.1	64.9	81.6	14.9	56.7	41.0	50.5	19.7	404.6
NYIS	871.2	703.8	551.8	339.6	127.6	199.0	132.6	74.5	140.4	3,140.6
OVEC	804.0	371.6	648.6	541.9	533.0	221.8	506.0	338.4	327.1	4,292.4
Southern Imports	1,418.8	988.4	996.3	786.4	552.3	542.6	600.9	423.0	704.3	7,012.9
CPLEIMP	5.4	3.2	5.2	0.0	5.7	2.5	0.1	1.5	0.0	23.4
DUKIMP	8.2	26.9	19.6	8.5	4.6	0.5	1.2	2.4	24.0	95.9
NCMPAIMP	175.1	152.1	149.9	93.2	90.6	134.1	108.0	108.9	126.1	1,138.0
SOUTHEAST	424.7	377.5	439.6	347.8	235.7	255.8	283.4	204.9	312.9	2,882.3
SOUTHWEST	376.6	125.7	164.6	186.6	87.4	74.0	81.7	66.3	177.8	1,340.5
SOUTHIMP	428.8	303.1	217.5	150.3	128.3	75.8	126.6	38.9	63.5	1,532.8
Southern Exports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	4,804.3	3,035.8	3,094.4	3,126.1	1,982.7	1,886.8	1,837.8	1,395.1	1,902.7	23,065.9

Table 9-14 Up to congestion scheduled gross import volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	162.1	56.6	41.2	25.3	52.6	170.7	81.9	37.1	44.5	672.0
MISO	750.7	402.1	343.1	762.1	329.3	232.7	186.3	204.7	313.6	3,524.6
NIPSCO	60.1	158.5	137.7	127.2	108.1	66.6	10.3	21.9	62.2	752.4
NORTHWEST	398.3	184.1	261.1	340.7	190.8	256.9	190.0	221.0	223.0	2,266.0
NYISO	510.2	291.6	154.5	245.9	199.8	384.6	260.5	146.4	215.1	2,408.7
HUDSONTP	231.3	106.6	12.7	11.4	17.4	86.2	53.0	7.4	17.9	544.0
LINDENVFT	17.4	13.5	21.2	108.4	54.4	48.8	34.3	14.6	48.7	361.2
NEPTUNE	36.2	39.1	64.9	81.6	14.9	56.7	41.0	50.5	19.7	404.6
NYIS	225.4	132.3	55.7	44.4	113.1	193.0	132.3	73.8	128.9	1,099.0
OVEC	804.0	371.6	648.6	541.9	533.0	221.8	506.0	338.4	327.1	4,292.4
Southern Imports	1,029.2	645.0	667.6	641.1	429.4	374.9	424.4	308.2	549.3	5,069.1
CPLEIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	424.7	377.5	439.6	347.8	235.7	255.8	283.4	204.9	312.9	2,882.3
SOUTHWEST	376.6	125.7	164.6	186.6	87.4	74.0	81.7	66.3	177.8	1,340.5
SOUTHIMP	227.9	141.8	63.4	106.7	106.3	45.2	59.4	37.0	58.6	846.3
Southern Exports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Interfaces	3,714.6	2,109.4	2,253.9	2,684.1	1,843.1	1,708.3	1,659.4	1,277.7	1,734.8	18,985.2

Table 9–15 Day-ahead scheduled gross export volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	78.9	92.8	259.0	195.3	37.5	86.5	109.4	76.7	78.0	1,014.1
MISO	853.6	661.6	1,274.7	1,227.4	1,458.7	1,049.2	1,333.6	995.1	1,409.1	10,263.0
NIPSCO	1,010.4	448.4	482.5	896.7	563.2	394.8	575.5	579.5	367.4	5,318.3
NORTHWEST	768.5	639.7	587.9	545.4	643.7	527.4	513.6	469.1	463.4	5,158.6
NYISO	1,994.5	1,620.1	1,410.3	857.9	261.3	685.7	707.6	660.0	535.2	8,732.6
HUDSONTP	39.5	81.8	70.2	22.0	40.3	32.4	4.9	3.5	24.9	319.5
LINDENVFT	75.9	57.3	49.7	123.1	44.3	21.6	30.6	20.2	32.4	455.2
NEPTUNE	519.0	426.6	451.7	372.7	141.5	403.9	444.4	466.8	360.1	3,586.7
NYIS	1,360.1	1,054.4	838.6	340.0	35.3	227.7	227.8	169.5	117.8	4,371.2
OVEC	61.6	306.7	151.2	151.9	87.1	64.5	62.9	76.4	78.2	1,040.4
Southern Imports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Southern Exports	761.1	558.4	535.7	849.5	727.2	704.2	657.0	774.5	627.2	6,194.7
CPLEEXP	15.8	9.8	7.7	21.7	50.8	32.5	27.0	26.3	13.7	205.3
DUKEXP	0.0	0.0	0.0	2.2	0.0	0.4	1.6	0.0	0.0	4.1
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.4
SOUTHEAST	13.3	21.9	9.7	7.2	15.2	5.3	7.3	8.3	7.4	95.6
SOUTHWEST	576.6	401.3	332.9	631.8	447.8	516.1	427.0	579.1	487.0	4,399.5
SOUTHEXP	155.4	125.4	185.4	186.6	213.4	149.9	194.2	160.8	118.8	1,489.8
Total	5,528.6	4,327.6	4,701.1	4,723.9	3,778.6	3,512.2	3,959.6	3,631.4	3,558.6	37,721.7

Table 9-16 Up to congestion scheduled gross export volume by interface pricing point (GWh): January 1 through September 30, 2017

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
IMO	78.9	92.8	259.0	195.3	37.5	86.5	109.4	76.7	77.1	1,013.2
MISO	346.2	203.3	215.2	217.5	158.2	144.6	155.6	166.1	153.3	1,759.9
NIPSCO	1,010.4	448.4	482.5	896.7	563.2	394.8	575.5	579.5	367.4	5,318.3
NORTHWEST	287.6	219.2	163.1	158.5	161.6	195.7	173.4	178.3	130.9	1,668.3
NYISO	167.6	154.4	145.5	172.7	84.8	78.6	41.6	44.6	72.7	962.6
HUDSONTP	39.5	81.8	70.2	22.0	40.3	32.4	4.9	3.5	24.9	319.5
LINDENVFT	42.8	35.5	29.1	108.3	26.0	9.4	12.4	7.2	20.5	291.1
NEPTUNE	29.4	14.5	6.4	21.0	10.1	10.9	2.6	2.6	11.8	109.2
NYIS	56.0	22.6	39.9	21.3	8.5	26.0	21.8	31.2	15.5	242.8
OVEC	61.6	306.7	151.2	151.9	87.1	64.5	62.9	76.4	78.2	1,040.4
Southern Imports	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
CPLEIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHWEST	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHIMP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Southern Exports	729.5	524.0	467.7	735.7	598.9	599.6	541.1	725.1	602.7	5,524.3
CPLEEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
DUKEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NCMPAEXP	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
SOUTHEAST	13.3	21.9	9.7	7.2	15.2	5.3	7.1	8.3	7.4	95.4
SOUTHWEST	576.6	401.3	332.9	631.8	447.8	516.1	427.0	579.1	487.0	4,399.5
SOUTHEXP	139.5	100.8	125.0	96.7	136.0	78.2	107.1	137.7	108.3	1,029.4
Total Interfaces	2,681.9	1,948.8	1,884.1	2,528.2	1,691.3	1,564.3	1,659.4	1,846.7	1,482.3	17,286.9

Table 9-17 Active real-time and day-ahead scheduling interfaces: January 1 through September 30, 2017²³

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
ALTE	Active								
ALTW	Active								
AMIL	Active								
CIN	Active								
CPLW	Active								
CPLW	Active								
DUK	Active								
HUDS	Active								
IPL	Active								
LGEE	Active								
LIND	Active								
MEC	Active								
MECS	Active								
NEPT	Active								
NIPS	Active								
NYIS	Active								
OVEC	Active								
TVA	Active								
WEC	Active								

²³ On July 2, 2012, Duke Energy Corp. (DUK) completed a merger with Progress Energy Inc. (CPLW and CPLW). As of September 30, 2017, DUK, CPLW and CPLW continued to operate as separate balancing authorities, and are still defined as distinct interfaces in the PJM energy market.

Figure 9-3 PJM's footprint and its external day-ahead and real-time scheduling interfaces

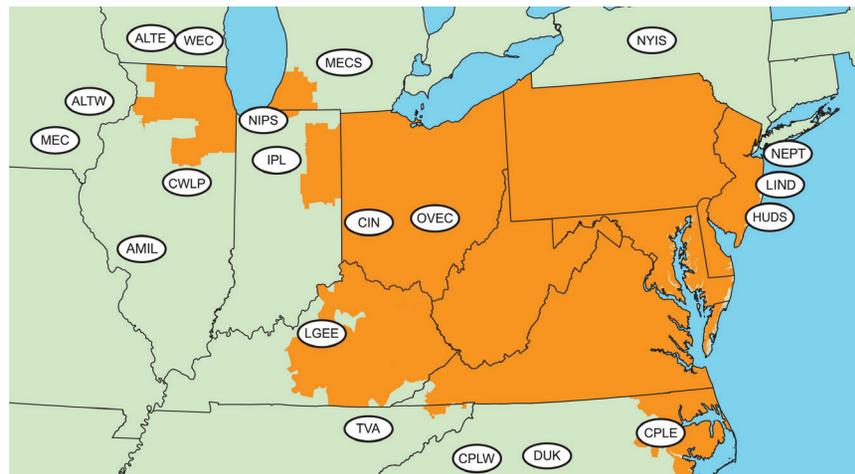


Table 9-18 Active day-ahead and real-time scheduled interface pricing points: January 1 through September 30, 2017²⁴

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
CPLEEXP	Active								
CPLEIMP	Active								
DUKEXP	Active								
DUKIMP	Active								
HUDSONTP	Active								
LINDENVFT	Active								
MISO	Active								
NCMPAEXP	Active								
NCMPAIMP	Active								
NEPTUNE	Active								
NIPSCO	Active								
Northwest	Active								
NYIS	Active								
Ontario IESO	Active								
OVEC	Active								
Southeast	Active								
SOUTHEXP	Active								
SOUTHIMP	Active								
Southwest	Active								

²⁴ The NIPSCO interface pricing point is valid only in the Day-Ahead Energy Market.

Loop Flows

Actual energy flows are the real-time metered power flows at an interface for a defined period. The comparable scheduled flows are the real-time power flows scheduled at an interface for a defined period. Inadvertent interchange is the difference between the total actual flows for the PJM system (net actual interchange) and the total scheduled flows for the PJM system (net scheduled interchange) for a defined period. Loop flows are the difference between actual and scheduled power flows at a specific interface. Loop flows can exist at the same time that inadvertent interchange is zero. For example, actual imports could exceed scheduled imports at one interface and actual exports could exceed scheduled exports at another interface by the same amount. The result is loop flow, despite the fact that system actual and scheduled power flow net to a zero difference.²⁵

Loop flow results, in part, from a mismatch between incentives to use a particular scheduled transmission path and the market-based price differentials at interface pricing points that result from the actual physical flows on the transmission system.

PJM's approach to interface pricing attempts to match prices with physical power flows and their impacts on the transmission system. For example, if market participants want to import energy from the Southwest Power Pool (SPP) to PJM, they are likely to choose a scheduled path with the fewest transmission providers along the path and therefore the lowest transmission costs for the transaction, regardless of whether the resultant path is related to the physical flow of power. The lowest cost transmission path runs from SPP, through MISO, and into PJM, requiring only three transmission reservations, two of which are available at no cost (MISO transmission would be free based on the regional through and out rates, and the PJM transmission would be free, if using spot import transmission). Any other transmission path entering PJM, where the generating control area is to the south, would require the market participant to acquire transmission through nonmarket balancing authorities, and thus incur additional transmission costs. PJM's interface pricing method recognizes that transactions sourcing in SPP and sinking in

PJM will create flows across the southern border and prices those transactions at the SouthIMP interface price. As a result, the transaction is priced appropriately, but a difference between scheduled and actual flows is created at PJM's borders. For example, if a 100 MW transaction were submitted, there would be 100 MW of scheduled flow at the PJM/MISO interface border, but there would be no actual flows on the interface. Correspondingly, there would be no scheduled flows at the PJM/Southern interface border, but there would be 100 MW of actual flows on the interface. In the first nine months of 2017, there were net scheduled flows of 2,389 GWh through MISO that received an interface pricing point associated with the southern interface but there were no net scheduled flows across the southern interface that received the MISO interface pricing point.

In the first nine months of 2017, net scheduled interchange was -17,891 GWh and net actual interchange was -18,042 GWh, a difference of 151 GWh. In the first nine months of 2016, net scheduled interchange was -3,112 GWh and net actual interchange was -2,109 GWh, a difference of 1,003 GWh. This difference is inadvertent interchange. PJM attempts to minimize the amount of accumulated inadvertent interchange by continually monitoring and correcting for inadvertent interchange. PJM can reduce the accumulation of inadvertent interchange using unilateral or bilateral paybacks.²⁶

Table 9-19 shows that in the first nine months of 2017, the Wisconsin Energy Corporation (WEC) interface had the largest loop flows of any interface with -1,766 GWh of net scheduled interchange and 6,380 GWh of net actual interchange, a difference of 8,146 GWh.

²⁵ See the 2012 State of the Market Report for PJM, Volume 2, Section 8, "Interchange Transactions," for a more detailed discussion.

²⁶ See PJM, "Manual 12: Balancing Operations," Rev. 36 (February 1, 2017).

Table 9–19 Net scheduled and actual PJM flows by interface (GWh): January 1 through September 30, 2017

	Actual	Net Scheduled	Difference (GWh)
CPLE	2,606	213	2,393
CPLW	(1,019)	0	(1,019)
DUK	535	1,578	(1,043)
LGEE	2,314	1,375	939
MISO	(22,378)	(15,490)	(6,888)
ALTE	(3,785)	(4,063)	278
ALTW	(1,555)	1	(1,556)
AMIL	(532)	1,295	(1,827)
CIN	(7,324)	(6,534)	(790)
CWLP	(112)	0	(112)
IPL	(778)	(837)	59
MEC	(2,573)	(3,316)	744
MECS	(5,930)	(277)	(5,653)
NIPS	(6,170)	7	(6,177)
WEC	6,380	(1,766)	8,146
NYISO	(6,424)	(5,942)	(482)
HUDES	0	0	0
LIND	(948)	(948)	0
NEPT	(3,415)	(3,415)	0
NYIS	(2,060)	(1,578)	(482)
OVEC	1,788	(134)	1,922
TVA	4,535	508	4,028
Total	(18,042)	(17,891)	(151)

Every external balancing authority is mapped to an import and export interface pricing point. The mapping is designed to reflect the physical flow of energy between PJM and each balancing authority. The net scheduled values for interface pricing points are defined as the MWh of scheduled transactions that will receive the interface pricing point based on the external balancing authority mapping.²⁷ For example, the MWh for a transaction whose transmission path is SPP through MISO and into PJM would be reflected in the SouthIMP interface pricing point net schedule totals because SPP is mapped to the SouthIMP interface pricing point. The actual flow on an

²⁷ The terms balancing authority and control area are used interchangeably in this section. The NERC Tag applications maintained the terminology of generation control area (GCA) and load control area (LCA) after the implementation of the NERC functional model. The NERC functional model classifies the balancing authority as a reliability service function, with, among other things, the responsibility for balancing generation, demand and interchange balance. See "Reliability Functional Model," <http://www.nerc.com/files/Functional_Model_V4_CLEAN_2008Dec01.pdf>. (August 2008)

interface pricing point is defined as the metered flow across the transmission lines that are included in the interface pricing point.

The differences between the scheduled MWh mapped to a specific interface pricing point and actual power flows at the interface pricing points provide a better measure of loop flows than differences at the interfaces. The scheduled transactions are mapped to interface pricing points based on the expected flow from the generation balancing authority and load balancing authority, whereas scheduled transactions are assigned to interfaces based solely on the OASIS path that the market participants reflect the transmission path into or out of PJM to one neighboring balancing authority. Power flows at the interface pricing points provide a more accurate reflection of where scheduled power flows actually enter or leave the PJM footprint based on the complete transaction path.

Table 9-20 shows the net scheduled and actual PJM flows by interface pricing point. The CPLEEXP, CPLEIMP, DUKEXP, DUKIMP, NCMPAEXP, and NCMPAIMP interface pricing points were created as part of operating agreements with external balancing authorities, and reflect the same physical ties as the SouthIMP and SouthEXP interface pricing points.

Because the SouthIMP and SouthEXP interface pricing points are the same physical point, if there are net actual exports from the PJM footprint to the southern region, by definition, there cannot be net actual imports into the PJM footprint from the southern region and therefore there will not be actual flows at the SouthIMP interface pricing point. In the case of PJM's southern border, loop flows can be analyzed by comparing the net scheduled and net actual flows as a sum of the pricing points, rather than the individual pricing points. To accurately calculate the loop flows from the southern region, the net actual flows from the southern region are compared to the net scheduled flows from the southern region. The net actual flows from the southern region are determined by summing the total southern import actual flows (17,532 GWh) and the total southern export actual flows (-8,560 GWh) for 8,972 GWh of net imports. The net scheduled flows from the southern region are determined by summing the total southern import scheduled flows (7,968 GWh) and the total

southern export scheduled flows (-1,904 GWh) for 6,064 GWh of net imports. In the first nine months of 2017, the loop flows at the southern region were the difference between the southern region net scheduled flows (6,064 GW) and the southern region net actual flows (8,972 GWh) for a total of 2,908 GWh of loop flows.

The IMO interface pricing point with the Ontario IESO was created to reflect the fact that transactions that originate or sink in the Ontario Independent Electricity System Operator (IMO) balancing authority create physical flows that are split between the MISO and NYISO interface pricing points depending on transmission system conditions, so a mapping to a single interface pricing point does not reflect the actual flows. PJM created the IMO interface pricing point to reflect the actual power flows across both the MISO/PJM and NYISO/PJM interfaces. The IMO does not have physical ties with PJM because it is not contiguous. Table 9-20 shows actual flows associated with the IMO interface pricing point as zero because there is no PJM/IMO Interface. The actual flows between IMO and PJM are included in the actual flows at the MISO and NYISO interface pricing points.

Table 9-20 Net scheduled and actual PJM flows by interface pricing point (GWh): January 1 through September 30, 2017

	Actual	Net Scheduled	Difference (GWh)
IMO	0	843	(843)
MISO	(22,378)	(18,708)	(3,670)
NORTHWEST	0	(1)	1
NYISO	(6,424)	(5,955)	(469)
HUDSONTP	0	0	0
LINDENVFT	(948)	(948)	(0)
NEPTUNE	(3,415)	(3,415)	0
NYIS	(2,060)	(1,591)	(469)
OVEC	1,788	(134)	1,922
Southern Imports	17,532	7,968	9,564
CPLEIMP	0	72	(72)
DUKIMP	0	112	(112)
NCMPAIMP	0	896	(896)
SOUTHEAST	0	0	0
SOUTHWEST	0	0	0
SOUTHIMP	17,532	6,888	10,644
Southern Exports	(8,560)	(1,904)	(6,656)
CPLEEXP	0	(103)	103
DUKEXP	0	(244)	244
NCMPAEXP	0	(0)	0
SOUTHEAST	0	0	0
SOUTHWEST	0	0	0
SOUTHEXP	(8,560)	(1,557)	(7,003)
Total	(18,042)	(17,891)	(151)

Table 9-21 shows the net scheduled and actual PJM flows by interface pricing point, with adjustments made to the MISO and NYISO scheduled interface pricing points based on the quantities of scheduled interchange where transactions from the IMO entered the PJM energy market. For example, Table 9-23 shows that 829 of the 843 GWh (98.5 percent) of gross scheduled transactions that were mapped to the IMO interface pricing point were scheduled as imports through MISO, and 14 of the 843 GWh (1.5 percent) were scheduled as imports through the NYISO.

Table 9-21 shows that in the first nine months of 2017, the SouthIMP interface pricing point had the largest loop flows of any interface pricing point with

6,888 GWh of net scheduled interchange and 17,532 GWh of net actual interchange, a difference of 10,644 GWh.

Table 9-21 Net scheduled and actual PJM flows by interface pricing point (GWh) (Adjusted for IMO Scheduled Interfaces): January 1 through September 30, 2017

	Actual	Net Scheduled	Difference (GWh)
MISO	(22,378)	(17,879)	(4,500)
NORTHWEST	0	(1)	1
NYISO	(6,424)	(5,942)	(482)
HUDSONTP	0	0	0
LINDENVFT	(948)	(948)	(0)
NEPTUNE	(3,415)	(3,415)	0
NYIS	(2,060)	(1,578)	(482)
OVEC	1,788	(134)	1,922
Southern Imports	17,532	7,968	9,564
CPLEIMP	0	72	(72)
DUKIMP	0	112	(112)
NCMPAIMP	0	896	(896)
SOUTHEAST	0	0	0
SOUTHWEST	0	0	0
SOUTHIMP	17,532	6,888	10,644
Southern Exports	(8,560)	(1,904)	(6,656)
CPLEEXP	0	(103)	103
DUKEXP	0	(244)	244
NCMPAEXP	0	(0)	0
SOUTHEAST	0	0	0
SOUTHWEST	0	0	0
SOUTHEXP	(8,560)	(1,557)	(7,003)
Total	(18,042)	(17,891)	(151)

PJM attempts to ensure that external energy transactions are priced appropriately through the assignment of interface prices based on the expected actual flow from the generation balancing authority (source) and load balancing authority (sink) as specified on the NERC Tag. Assigning prices in this manner is a reasonable approach to ensuring that transactions receive or pay the PJM market value of the transaction based on expected flows, but this method does not address loop flow issues.

Loop flows remain a significant concern for the efficiency of the PJM market. Loop flows can have negative impacts on the efficiency of markets with explicit locational pricing, including impacts on locational prices, on FTR revenue adequacy and on system operations, and can be evidence of attempts to game the markets.

The MMU recommends that PJM implement a validation method for submitted transactions that would prohibit market participants from breaking transactions into smaller segments to defeat the interface pricing rule and receive higher prices (for imports) or lower prices (for exports) from PJM resulting from the inability to identify the true source or sink of the transaction. If all of the Northeast ISOs and RTOs implemented validation to prohibit the breaking of transactions into smaller segments, the level of Lake Erie loop flow would be reduced.

The MMU also recommends that PJM implement a validation method for submitted transactions that would require market participants to submit transactions on paths that reflect the expected actual power flow in order to reduce unscheduled loop flows.

Table 9-22 shows the net scheduled and actual PJM flows by interface and interface pricing point. This table shows the interface pricing points that were assigned to energy transactions that had paths at each of PJM's interfaces. For example, Table 9-22 shows that in the first nine months of 2017, the majority of imports to the PJM energy market for which a market participant specified Cinergy as the interface with PJM based on the scheduled transmission path, had a generation control area mapped to the IMO Interface, and thus actual flows were assigned the IMO interface pricing point (338 GWh). The majority of exports from the PJM energy market for which a market participant specified Cinergy as the interface with PJM based on the scheduled transmission path had a load control area for which the actual flows would leave the PJM energy market at the MISO Interface, and were assigned the MISO interface pricing point (-7,107 GWh).

Table 9-22 Net scheduled and actual PJM flows by interface and interface pricing point (GWh): January 1 through September 30, 2017

Interface	Interface Pricing Point	Actual	Net Scheduled	Difference (GWh)	Interface	Interface Pricing Point	Actual	Net Scheduled	Difference (GWh)
ALTE		(3,785)	(4,063)	278	IPL		(778)	(837)	59
	IMO	0	153	(153)		IMO	0	69	(69)
	MISO	(3,785)	(4,500)	715		MISO	(778)	(916)	138
	SOUTHIMP	0	283	(283)		SOUTHEXP	0	(0)	0
ALTW		(1,555)	1	(1,556)		SOUTHIMP	0	11	(11)
	IMO	0	1	(1)	LGEE		2,314	1,375	939
	MISO	(1,555)	(1)	(1,555)		SOUTHEXP	(4,660)	(55)	(4,605)
AMIL		(532)	1,295	(1,827)		SOUTHIMP	6,974	1,430	5,544
	MISO	(532)	(5)	(527)	LIND		(948)	(948)	0
	SOUTHIMP	0	1,299	(1,299)		LINDENVFT	(948)	(948)	0
CIN		(7,324)	(6,534)	(790)	MEC		(2,573)	(3,316)	744
	IMO	0	338	(338)		IMO	0	1	(1)
	MISO	(7,324)	(7,107)	(217)		MISO	(2,573)	(3,318)	746
	NORTHWEST	0	(1)	1		SOUTHEXP	0	(3)	3
	SOUTHEXP	0	(6)	6		SOUTHIMP	0	5	(5)
	SOUTHIMP	0	242	(242)	MECS		(5,930)	(277)	(5,653)
CPL		2,606	213	2,393		IMO	0	267	(267)
	CPLLEXP	0	(103)	103		MISO	(5,930)	(934)	(4,996)
	CPLIMP	0	72	(72)		SOUTHEXP	0	(4)	4
	DUKEXP	0	(0)	0		SOUTHIMP	0	393	(393)
	DUKIMP	0	9	(9)	NEPT		(3,415)	(3,415)	0
	NCMPAIMP	0	342	(342)		NEPTUNE	(3,415)	(3,415)	0
	SOUTHEXP	(1,361)	(234)	(1,127)	NIPS		(6,170)	7	(6,177)
	SOUTHIMP	3,967	128	3,839		MISO	(6,170)	7	(6,177)
CPLW		(1,019)	0	(1,019)		SOUTHIMP	0	0	(0)
	NCMPAIMP	0	0	(0)	NYIS		(2,060)	(1,578)	(482)
	SOUTHEXP	(1,049)	0	(1,049)		IMO	0	14	(14)
	SOUTHIMP	30	0	30		NYIS	(2,060)	(1,591)	(469)
CWLP		(112)	0	(112)	OVEC		1,788	(134)	1,922
	MISO	(112)	0	(112)		OVEC	1,788	(134)	1,922
DUK		535	1,578	(1,043)	TVA		4,535	508	4,028
	DUKEXP	0	(243)	243		SOUTHEXP	(924)	(809)	(115)
	DUKIMP	0	103	(103)		SOUTHIMP	5,459	1,317	4,142
	NCMPAEXP	0	(0)	0	WEC		6,380	(1,766)	8,146
	NCMPAIMP	0	553	(553)		MISO	6,380	(1,935)	8,316
	SOUTHEXP	(567)	(446)	(121)		SOUTHIMP	0	169	(169)
	SOUTHIMP	1,102	1,611	(509)	Grand Total		(18,042)	(17,891)	(151)
HUDS		0	0	0					
	HUDSONTP	0	0	0					

Table 9-23 shows the net scheduled and actual PJM flows by interface pricing point and interface. The grouping is reversed from Table 9-22. Table 9-23 shows the interfaces where transactions were scheduled which received the individual interface pricing points. For example, Table 9-23 shows that in the first nine months of 2017, the majority of imports to the PJM energy market for which a market participant specified a generation control area for which it was assigned the MISO interface pricing point, had a path that entered the PJM energy market at the NIPS Interface (7 GWh). The majority of exports from the PJM energy market for which a market participant specified a load control area for which it was assigned the MISO interface pricing point, had a path that exited the PJM energy market at the CIN Interface (-7,107 GWh).

Table 9-23 Net scheduled and actual PJM flows by interface pricing point and interface (GWh): January 1 through September 30, 2017

Interface Pricing Point	Interface	Actual	Net Scheduled	Difference (GWh)	Interface Pricing Point	Interface	Actual	Net Scheduled	Difference (GWh)
CPLEEXP		0	(103)	103	NCMPAIMP		0	896	(896)
	CPLE	0	(103)	103		CPLE	0	342	(342)
CPLEIMP		0	72	(72)		CPLW	0	0	(0)
	CPLE	0	72	(72)		DUK	0	553	(553)
DUKEXP		0	(244)	244	NEPTUNE		(3,415)	(3,415)	0
	CPLE	0	(0)	0		NEPT	(3,415)	(3,415)	0
	DUK	0	(243)	243	NORTHWEST		0	(1)	1
DUKIMP		0	112	(112)		CIN	0	(1)	1
	CPLE	0	9	(9)	NYIS		(2,060)	(1,591)	(469)
	DUK	0	103	(103)		NYIS	(2,060)	(1,591)	(469)
HUDSONTP		0	0	0	OVEC		1,788	(134)	1,922
	HUDS	0	0	0		OVEC	1,788	(134)	1,922
IMO		0	843	(843)	SOUTHEXP		(8,560)	(1,557)	(7,003)
	ALTE	0	153	(153)		CIN	0	(6)	6
	ALTW	0	1	(1)		CPLE	(1,361)	(234)	(1,127)
	CIN	0	338	(338)		CPLW	(1,049)	0	(1,049)
	IPL	0	69	(69)		DUK	(567)	(446)	(121)
	MEC	0	1	(1)		IPL	0	(0)	0
	MECS	0	267	(267)		LGEE	(4,660)	(55)	(4,605)
	NYIS	0	14	(14)		MEC	0	(3)	3
LINDENVFT		(948)	(948)	0		MECS	0	(4)	4
	LIND	(948)	(948)	0		TVA	(924)	(809)	(115)
MISO		(22,378)	(18,708)	(3,670)	SOUTHIMP		17,532	6,888	10,644
	ALTE	(3,785)	(4,500)	715		ALTE	0	283	(283)
	ALTW	(1,555)	(1)	(1,555)		AMIL	0	1,299	(1,299)
	AMIL	(532)	(5)	(527)		CIN	0	242	(242)
	CIN	(7,324)	(7,107)	(217)		CPLE	3,967	128	3,839
	CWLP	(112)	0	(112)		CPLW	30	0	30
	IPL	(778)	(916)	138		DUK	1,102	1,611	(509)
	MEC	(2,573)	(3,318)	746		IPL	0	11	(11)
	MECS	(5,930)	(934)	(4,996)		LGEE	6,974	1,430	5,544
	NIPS	(6,170)	7	(6,177)		MEC	0	5	(5)
	WEC	6,380	(1,935)	8,316		MECS	0	393	(393)
NCMPAEXP		0	(0)	0		NIPS	0	0	(0)
	DUK	0	(0)	0		TVA	5,459	1,317	4,142
						WEC	0	169	(169)
					Grand Total		(18,042)	(17,891)	(151)

Data Required for Full Loop Flow Analysis

Loop flows are defined as the difference between actual and scheduled power flows at one or more specific interfaces. The differences between actual and scheduled power flows can be the result of a number of underlying causes. To adequately investigate the causes of loop flows, complete data are required.

Loop flows exist because electricity flows on the path of least resistance regardless of the path specified by contractual agreement or regulatory prescription. Loop flows can arise from transactions scheduled into, out of or around a balancing authority on contract paths that do not correspond to the actual physical paths on which energy flows. Outside of LMP-based energy markets, energy is scheduled and paid for based on contract path, without regard to the path of the actual energy flows. Loop flows can also result from actions within balancing authorities.

Loop flows are a significant concern. Loop flows can have negative impacts on the efficiency of markets with explicit locational pricing, including impacts on locational prices, on FTR revenue adequacy and on system operations, and can be evidence of attempts to game such markets. Loop flows also have poorly understood impacts on nonmarket areas. In general, the detailed sources of the identified differences between scheduled and actual flows remain unclear as a result of incomplete or inadequate access to the required data.

A complete analysis of loop flow could provide additional insight that could lead to enhanced overall market efficiency and clarify the interactions among market and nonmarket areas. A complete analysis of loop flow would improve the overall transparency of electricity transactions. There are areas with transparent markets, and there are areas with less

transparent markets (nonmarket areas), but these areas together comprise a market, and overall market efficiency would benefit from the increased transparency that would derive from a better understanding of loop flows.

For a complete loop flow analysis, several types of data are required from all balancing authorities in the Eastern Interconnection. The Commission recently required access to NERC Tag data. In addition to the Tag data, actual tie line data, dynamic schedule and pseudo-tie data are required in order to analyze the differences between actual and scheduled transactions. ACE data, market flow impact data and generation and load data are required in order to understand the sources, within each balancing authority, of loop flows that do not result from differences between actual and scheduled transactions.²⁸

NERC Tag Data

An analysis of loop flow requires knowledge of the scheduled path of energy transactions. NERC Tag data includes the scheduled path and energy profile of the transactions, including the Generation Control Area (GCA), the intermediate Control Areas, the Load Control Area (LCA) and the energy profile of all transactions. Additionally, complete tag data include the identity of the specific market participants. FERC Order No. 771 required access to NERC Tag data for the Commission, regional transmission organizations, independent system operators and market monitoring units.²⁹

Actual Tie Line Flow Data

An analysis of loop flow requires knowledge of the actual path of energy transactions. Currently, a very limited set of tie line data is made available via the NERC IDC and the Central Repository for Curtailments (CRC) website. Additionally, the available tie line data, and the data within the IDC, are presented as information on a screen, which does not permit analysis of the underlying data.

²⁸ It is requested that all data be made available in downloadable format in order to make analysis possible. A data viewing tool alone is not adequate.

²⁹ 141 FERC ¶ 61,235 (2012). *Availability of E-Tag Information to Commission Staff*.

Dynamic Schedule and Pseudo-Tie Data

Dynamic schedule and pseudo ties represent another type of interchange transaction between balancing authorities. While dynamic schedules are required to be tagged, the tagged profile is only an estimate of what energy is expected to flow. Dynamic schedules are implemented within each balancing authority's Energy Management System (EMS), with the current values shared over Inter-Control Center Protocol (ICCP) links. By definition, the dynamic schedule scheduled and actual values will always be identical from a balancing authority standpoint, and the tagged profile should be removed from the calculation of loop flows to eliminate double counting of the energy profile. Dynamic schedule data from all balancing authorities are required in order to account for all scheduled and actual flows.

Pseudo-ties are similar to dynamic schedules in that they represent a transaction between balancing authorities and are handled within the EMS systems and data are shared over the ICCP. Pseudo-ties only differ from dynamic schedules in how the generating resource is modeled within the balancing authorities' ACE equations. Dynamic schedules are modeled as resources located in one area serving load in another, while pseudo-ties are modeled as resources in one area moved to another area. Unlike dynamic schedules, pseudo-tie transactions are not required to be tagged. Pseudo-tie data from all balancing authorities are required in order to account for all scheduled and actual flows.

Area Control Error (ACE) Data

Area Control Error (ACE) data provides information about how well each balancing authority is matching their generation with their load. This information, combined with the scheduled and actual interchange values will show whether an individual balancing authority is pushing on or leaning on the interconnection, contributing to loop flows.

NERC makes real-time ACE graphs available on their Reliability Coordinator Information System (RCIS) website. This information is presented only in graphical form, and the underlying data is not available for analysis.

Market Flow Impact Data

In addition to interchange transactions, internal dispatch can also affect flows on balancing authorities' tie lines. The impact of internal dispatch on tie lines is called market flow. Market flow data are imported in the IDC, but there is only limited historical data, as only market flow data related to TLR levels 3 or higher are required to be made available via a Congestion Management Report (CMR). The remaining data are deleted.

There is currently a project in development through the NERC Operating Reliability Subcommittee (ORS) called the Market Flow Impact Tool. The purpose of this tool is to make visible the impacts of dispatch on loop flows. The MMU supports the development of this tool, and requests that FERC and NERC ensure that the underlying data are provided to market monitors and other approved entities.

Generation and Load Data

Generation data (both real-time scheduled generation and actual output) and load data would permit analysis of the extent to which balancing authorities are meeting their commitments to serve load. If a balancing authority is not meeting its load commitment with adequate generation, the result is unscheduled flows across the interconnections to establish power balance.

Market areas are transparent in providing real-time load while nonmarket areas are not. For example, PJM posts real-time load via its eDATA application. Most nonmarket balancing authorities provide only the expected peak load on their individual web sites. Data on generation are not made publicly available, as this is considered market sensitive information.

The MMU requests, that in order to permit a complete analysis of loop flow, FERC and NERC ensure that the identified data are made available to market monitors as well as other industry entities determined appropriate by FERC.

PJM and MISO Interface Prices

If interface prices were defined in a comparable manner by PJM and MISO, and if time lags were not built into the rules governing interchange transactions, then prices at the interfaces would be expected to be very close and the level of transactions would be expected to be related to any price differentials. The fact that these conditions do not exist is important in explaining the observed relationship between interface prices and inter-RTO power flows, and those price differentials.

Both the PJM/MISO and MISO/PJM interface pricing points represent the value of power at the relevant border, as determined in each market. In both cases, the interface price is the price at which transactions are settled. For example, a transaction into PJM from MISO would receive the PJM/MISO interface price upon entering PJM, while a transaction into MISO from PJM would receive the MISO/PJM interface price. PJM and MISO use network models to determine these prices and to attempt to ensure that the prices are consistent with the underlying electrical flows.

Under the PJM/MISO Joint Operating Agreement, the two RTOs mutually determine a set of transmission facilities on which both RTOs have an impact, and therefore jointly operate to those constraints. These jointly controlled facilities are M2M (Market to Market) flowgates. When a M2M constraint binds, PJM's LMP calculations at the buses that make up PJM's MISO interface pricing point, as well as for all buses in the PJM model, are based on the PJM model's distribution factors of the selected buses to the binding M2M constraint and PJM's shadow price of the binding M2M constraint. MISO's LMP calculations at the buses that make up MISO's PJM interface pricing point are based on the MISO model's distribution factors of the selected buses to the binding M2M constraint and MISO's shadow price of the binding M2M constraint.

Prior to June 1, 2014, the PJM interface definition for MISO consisted of nine buses located near the middle of the MISO system and not at the border between the RTOs. The MISO interface definition for PJM currently consists of all PJM generator buses which are spread across the entire PJM system. The

interface definitions led to questions about the level of congestion included in interchange pricing.^{30 31}

PJM modified the definition of the PJM/MISO interface price effective June 1, 2014. PJM's new MISO interface pricing point includes 10 equally weighted buses that are close to the PJM/MISO border. The 10 buses were selected based on PJM's analysis that showed that over 80 percent of the hourly tie line flows between PJM and MISO occurred on ten ties composed of MISO and PJM monitored facilities. On June 1, 2017, MISO modified their MISO/PJM interface definition to match PJM's PJM/MISO interface definition.

Real-Time and Day-Ahead PJM/MISO Interface Prices

In the first nine months of 2017, the direction of flow was consistent with price differentials in 60.1 percent of the hours. Table 9-24 shows the number of hours and average hourly price differences between the PJM/MISO Interface and the MISO/PJM Interface based on LMP differences and flow direction. Figure 9-4 shows the underlying hourly variability in prices. There are a number of relevant measures of variability, including the number of times the price differential fluctuates between positive and negative, the standard deviation of individual prices and of price differences and the absolute value of the price differences (Table 9-30).

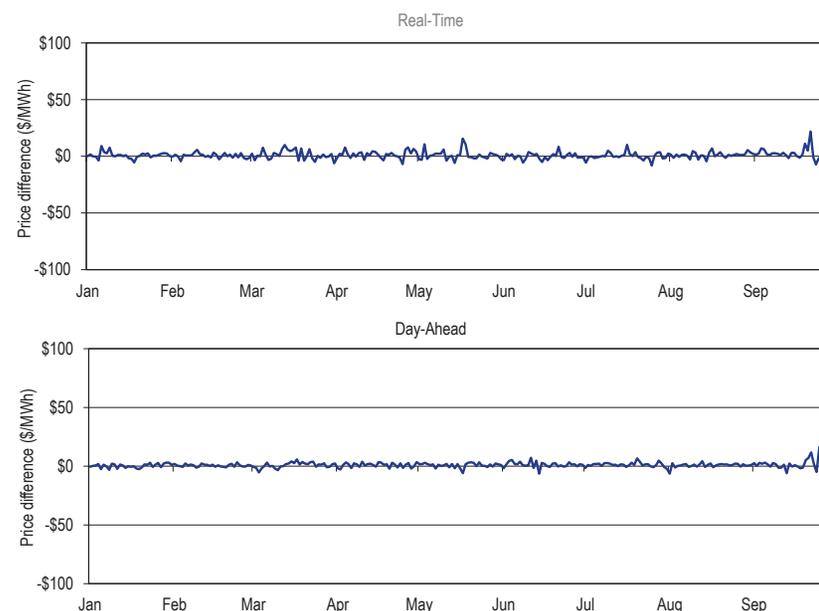
Table 9-24 PJM and MISO flow based hours and average hourly price differences: January 1 through September 30, 2017

LMP Difference	Flow Direction	Number of Hours	Average Hourly Price Difference
MISO/PJM LMP > PJM/MISO LMP	Total Hours	3,941	\$5.02
	Consistent Flow (PJM to MISO)	3,937	\$5.02
	Inconsistent Flow (MISO to PJM)	4	\$9.76
	No Flow	0	\$0.00
PJM/MISO LMP > MISO/PJM LMP	Total Hours	2,610	\$5.25
	Consistent Flow (MISO to PJM)	2	\$0.65
	Inconsistent Flow (PJM to MISO)	2,608	\$5.26
	No Flow	0	\$0.00

³⁰ See "LMP Aggregate Definitions," (September 13, 2017) <<http://www.pjm.com/~media/markets-ops/energy/lmp-model-info/lmp-aggregate-definitions.ashx>>. PJM periodically updates these definitions on its web site. See <<http://www.pjm.com>>.

³¹ Based on information obtained from MISO's extranet <<http://extranet.midwestiso.org>> (Accessed October 18, 2017).

Figure 9-4 Real-time and day-ahead daily hourly average price difference (MISO/PJM Interface minus PJM/MISO Interface): January 1 through September 30, 2017



Distribution and Prices of Hourly Flows at the PJM/MISO Interface

In the first nine months of 2017, the direction of hourly energy flows was consistent with PJM and MISO interface price differentials in 3,939 hours (60.1 percent of all hours), and was inconsistent with price differentials in 2,612 hours (39.9 percent of all hours). Table 9-25 shows the distribution of hourly energy flows between PJM and MISO based on the price differences between the PJM/MISO and MISO/PJM prices. Of the 2,612 hours where flows were in a direction inconsistent with price differences, 1,886 of those hours (72.2 percent) had a price difference greater than or equal to \$1.00 and 719 of those hours (27.5 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$206.86. Of the 3,939

hours where flows were consistent with price differences, 3,014 of those hours (76.5 percent) had a price difference greater than or equal to \$1.00 and 873 of all such hours (22.2 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$298.16.

Table 9-25 Distribution of hourly flows that are consistent and inconsistent with price differences between PJM and MISO: January 1 through September 30, 2017

Price Difference Range (Greater Than or Equal To)	Inconsistent Hours	Percent of Inconsistent Hours	Consistent Hours	Percent of Consistent Hours
\$0.00	2,612	100.0%	3,939	100.0%
\$1.00	1,886	72.2%	3,014	76.5%
\$5.00	719	27.5%	873	22.2%
\$10.00	363	13.9%	399	10.1%
\$15.00	218	8.3%	229	5.8%
\$20.00	141	5.4%	161	4.1%
\$25.00	103	3.9%	113	2.9%
\$50.00	18	0.7%	40	1.0%
\$75.00	5	0.2%	23	0.6%
\$100.00	2	0.1%	12	0.3%
\$200.00	1	0.0%	2	0.1%
\$300.00	0	0.0%	0	0.0%
\$400.00	0	0.0%	0	0.0%
\$500.00	0	0.0%	0	0.0%

Distribution and Prices of Hourly Flows at the PJM/MISO Interface After June 1, 2017, MISO/PJM Interface Pricing Point Modification

MISO modified the definition of the MISO/PJM Interface, to match the existing PJM/MISO Interface, effective June 1, 2017. The new interface definition includes ten equally weighted buses that are close to the PJM/MISO border. In the four months of operation under the new interface pricing definition, the direction of hourly energy flows was consistent with PJM and MISO interface price differentials in 1,723 of the 2,928 hours (58.8 percent of all hours), and was inconsistent with price differentials in 1,205 of the 2,928 hours (41.2 percent of all hours). Table 9-26 shows the distribution of hourly energy flows between PJM and MISO based on the price differences between the PJM/

MISO and MISO/PJM prices from June 1, 2017, through September 30, 2017. Of the 1,205 hours where flows were in a direction inconsistent with price differences, 873 of those hours (72.4 percent) had a price difference greater than or equal to \$1.00 and 349 of those hours (29.0 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$206.86. Of the 1,723 hours where flows were consistent with price differences, 1,302 of those hours (75.6 percent) had a price difference greater than or equal to \$1.00 and 361 of all such hours (21.0 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$298.16.

Table 9-26 Distribution of hourly flows that are consistent and inconsistent with price differences between PJM and MISO: June 1 through September 30, 2017

Price Difference Range (Greater Than or Equal To)	Inconsistent Hours	Percent of Inconsistent Hours	Consistent Hours	Percent of Consistent Hours
\$0.00	1,205	100.0%	1,723	100.0%
\$1.00	873	72.4%	1,302	75.6%
\$5.00	349	29.0%	361	21.0%
\$10.00	189	15.7%	166	9.6%
\$15.00	105	8.7%	90	5.2%
\$20.00	70	5.8%	69	4.0%
\$25.00	55	4.6%	50	2.9%
\$50.00	10	0.8%	22	1.3%
\$75.00	5	0.4%	14	0.8%
\$100.00	2	0.2%	8	0.5%
\$200.00	1	0.1%	2	0.1%
\$300.00	0	0.0%	0	0.0%
\$400.00	0	0.0%	0	0.0%
\$500.00	0	0.0%	0	0.0%

PJM and NYISO Interface Prices

If interface prices were defined in a comparable manner by PJM and the NYISO, if identical rules governed external transactions in PJM and the NYISO, if time lags were not built into the rules governing such transactions and if no risks were associated with such transactions, then prices at the interfaces would be expected to be very close and the level of transactions would be expected to be related to any price differentials. The fact that none of these conditions

exists is important in explaining the observed relationship between interface prices and inter-RTO/ISO power flows, and those price differentials.³²

PJM and NYISO each calculate an interface LMP using network models including distribution factor impacts. Prior to May 1, 2017, PJM used two buses within NYISO to calculate the PJM/NYIS interface pricing point LMP. The NYISO uses proxy buses to calculate interface prices with neighboring balancing authorities. A proxy bus is a single bus, located outside the NYISO footprint, which represents generation and load in a neighboring balancing authority area. The NYISO models imports from PJM as generation at the Keystone proxy bus, delivered to the NYISO reference bus with the assumption that 32 percent of the flow will enter the NYISO across the free flowing A/C ties, 32 percent will enter the NYISO across the Ramapo PARs, 21 percent will enter the NYISO across the ABC PARs and 15 percent will enter the NYISO across the J/K PARs. The NYISO models exports to PJM as being delivered to load at the Keystone proxy bus, sourced from the NYISO reference bus with the assumption that 32 percent of the flow will enter PJM across the free flowing A/C ties, 32 percent will enter PJM across the Ramapo PARs, 21 percent will enter PJM across the ABC PARs and 15 percent will enter PJM across the J/K PARs.

The PJM/NYIS interface definition using two buses was created to include the impact of the ConEd wheeling agreement. The ConEd wheeling agreement ended on May 1, 2017. The end of the wheeling agreement meant that the expected actual power flows would change and therefore the definition of the interface price needed to change. Effective May 1, 2017, PJM replaced the old PJM/NYIS interface price definition. The new PJM/NYIS interface price is based on four buses within NYISO. The four buses were chosen based on a power flow analysis of transfers between PJM and the NYISO and the resultant distribution of flows across the free flowing A/C ties.

Real-Time and Day-Ahead PJM/NYISO Interface Prices

In the first nine months of 2017, the relationship between prices at the PJM/NYIS Interface and at the NYISO/PJM proxy bus and the relationship between

interface price differentials and power flows continued to be affected by differences in institutional and operating practices between PJM and the NYISO. The direction of flow was consistent with price differentials in 52.0 percent of the hours in the first nine months of 2017. Table 9-27 shows the number of hours and average hourly price differences between the PJM/NYIS Interface and the NYIS/PJM proxy bus based on LMP differences and flow direction. Figure 9-5 shows the underlying hourly variability in prices. There are a number of relevant measures of variability, including the number of times the price differential fluctuates between positive and negative, the standard deviation of individual prices and of price differences and the absolute value of the price differences (Table 9-30).

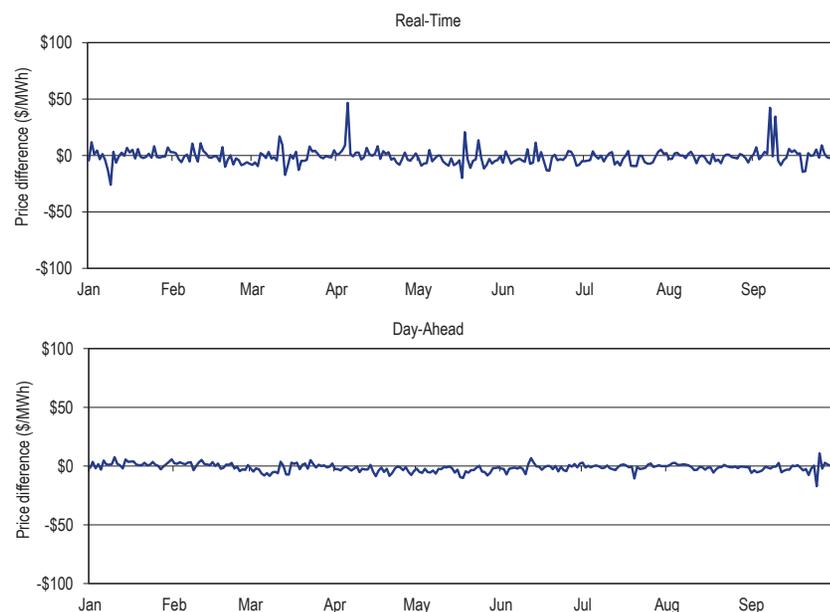
Table 9-27 PJM and NYISO flow based hours and average hourly price differences: January 1 through September 30, 2017³³

LMP Difference	Flow Direction	Number of Hours	Average Hourly Price Difference
	Total Hours	2,406	\$10.36
NYIS/PJM proxy bus LBMP > PJM/NYIS LMP	Consistent Flow (PJM to NYIS)	1,908	\$10.53
	Inconsistent Flow (NYIS to PJM)	498	\$9.70
	No Flow	0	\$0.00
	Total Hours	4,145	\$7.85
PJM/NYIS LMP > NYIS/PJM proxy bus LBMP	Consistent Flow (NYIS to PJM)	1,499	\$7.91
	Inconsistent Flow (PJM to NYIS)	2,646	\$7.81
	No Flow	0	\$0.00

³² See the 2012 State of the Market Report for PJM, Volume 2, Section 8, "Interchange Transactions," for a more detailed discussion.

³³ The NYISO Locational Based Marginal Price (LBMP) is the equivalent term to PJM's Locational Marginal Price (LMP).

Figure 9-5 Real-time and day-ahead daily hourly average price difference (NY/PJM proxy - PJM/NYIS Interface): January 1 through September 30, 2017



Distribution and Prices of Hourly Flows at the PJM/NYISO Interface

In the first nine months of 2017, the direction of hourly energy flows was consistent with PJM/NYISO and NYISO/PJM price differences in 3,407 hours (52.0 percent of all hours), and was inconsistent with price differences in 3,144 hours (48.0 percent of all hours). Table 9-28 shows the distribution of hourly energy flows between PJM and NYISO based on the price differences between the PJM/NYISO and NYISO/PJM prices. Of the 3,144 hours where flows were in a direction inconsistent with price differences, 2,748 of those hours (87.4 percent) had a price difference greater than or equal to \$1.00 and 1,462 of all those hours (46.5 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$152.30. Of the 3,407 hours where flows were consistent with price differences, 2,972 of

those hours (87.2 percent) had a price difference greater than or equal to \$1.00 and 1,533 of all such hours (45.0 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$970.61.

Table 9-28 Distribution of hourly flows that are consistent and inconsistent with price differences between PJM and NYISO: January 1 through September 30, 2017

Price Difference Range (Greater Than or Equal To)	Inconsistent Hours	Percent of Inconsistent Hours	Consistent Hours	Percent of Consistent Hours
\$0.00	3,144	100.0%	3,407	100.0%
\$1.00	2,748	87.4%	2,972	87.2%
\$5.00	1,462	46.5%	1,533	45.0%
\$10.00	687	21.9%	737	21.6%
\$15.00	400	12.7%	383	11.2%
\$20.00	265	8.4%	261	7.7%
\$25.00	193	6.1%	198	5.8%
\$50.00	52	1.7%	81	2.4%
\$75.00	22	0.7%	38	1.1%
\$100.00	8	0.3%	28	0.8%
\$200.00	0	0.0%	12	0.4%
\$300.00	0	0.0%	5	0.1%
\$400.00	0	0.0%	4	0.1%
\$500.00	0	0.0%	2	0.1%

Distribution and Prices of Hourly Flows at the PJM/NYIS Interface After May 1, 2017, PJM/NYIS Interface Pricing Point Modification

PJM modified the definition of the PJM/NYIS Interface effective May 1, 2017. In the first five months of operation under the new interface pricing definition, the direction of hourly energy flows was consistent with PJM and NYIS interface price differentials in 1,956 of the 3,672 hours (53.3 percent of all hours), and was inconsistent with price differentials in 1,716 of the 3,672 hours (46.7 percent of all hours). Table 9-29 shows the distribution of hourly energy flows between PJM and NYIS based on the price differences between the PJM/NYIS and NYIS/PJM prices from May 1, 2017 through September 30, 2017. Of the 1,716 hours where flows were in a direction inconsistent with price differences, 1,489 of those hours (86.8 percent) had a price difference

greater than or equal to \$1.00 and 741 of those hours (43.2 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$116.42. Of the 1,956 hours where flows were consistent with price differences, 1,722 of those hours (88.0 percent) had a price difference greater than or equal to \$1.00 and 894 of all such hours (45.7 percent) had a price difference greater than or equal to \$5.00. The largest price difference with such flows was \$968.99.

Table 9-29 Distribution of hourly flows that are consistent and inconsistent with price differences between PJM and NYIS: May 1 through September 30, 2017

Price Difference Range (Greater Than or Equal To)	Inconsistent Hours	Percent of Inconsistent Hours	Consistent Hours	Percent of Consistent Hours
\$0.00	1,716	100.0%	1,956	100.0%
\$1.00	1,489	86.8%	1,722	88.0%
\$5.00	741	43.2%	894	45.7%
\$10.00	341	19.9%	419	21.4%
\$15.00	197	11.5%	207	10.6%
\$20.00	132	7.7%	133	6.8%
\$25.00	92	5.4%	95	4.9%
\$50.00	28	1.6%	41	2.1%
\$75.00	14	0.8%	20	1.0%
\$100.00	5	0.3%	15	0.8%
\$200.00	0	0.0%	9	0.5%
\$300.00	0	0.0%	4	0.2%
\$400.00	0	0.0%	3	0.2%
\$500.00	0	0.0%	1	0.1%

Summary of Interface Prices between PJM and Organized Markets

Some measures of the real-time and day-ahead PJM interface pricing with MISO and with the NYISO are summarized and compared in Table 9-30, including average prices and measures of variability.

Table 9-30 PJM, NYISO and MISO real-time and day-ahead border price averages: January 1 through September 30, 2017

Description	Real-Time		Day-Ahead	
	NYISO	MISO	NYISO	MISO
Average Hourly Price				
PJM Price at ISO Border	\$27.38	\$26.83	\$27.86	\$26.97
ISO Price at PJM Border	\$26.22	\$27.76	\$26.64	\$27.92
Difference at Border (PJM-ISO)	\$1.16	(\$0.93)	\$1.22	(\$0.95)
Average Absolute Value of Hourly Difference at Border	\$8.77	\$5.11	\$3.37	\$2.48
Sign Changes per Day	6	7	3.5	3.7
Standard Deviation				
PJM Price at ISO Border	\$17.13	\$14.78	\$10.78	\$9.00
ISO Price at PJM Border	\$26.65	\$16.84	\$10.35	\$8.89
Difference at Border (PJM-ISO)	\$25.38	\$12.27	\$5.16	\$3.98

Neptune Underwater Transmission Line to Long Island, New York

The Neptune Line is a 65 mile direct current (DC) merchant 230 kV transmission line, with a capacity of 660 MW, providing a direct connection between PJM (Sayreville, New Jersey), and NYISO (Nassau County on Long Island). Schedule 14 of the PJM Open Access Transmission Tariff provides that power flows will only be from PJM to New York. The flows were consistent with price differentials in 57.1 percent of the hours in the first nine months of 2017. Table 9-31 shows the number of hours and average hourly price differences between the PJM/NEPT Interface and the NYIS/Neptune bus based on LMP differences and flow direction.

Table 9-31 PJM and NYISO flow based hours and average hourly price differences (Neptune): January 1 through September 30, 2017

LMP Difference	Flow Direction	Number of Hours	Average Hourly Price Difference
NYIS/Neptune Bus LBMP > PJM/NEPT LMP	Total Hours	3,792	\$13.75
	Consistent Flow (PJM to NYIS)	3,740	\$13.74
	Inconsistent Flow (NYIS to PJM)	0	\$0.00
	No Flow	52	\$14.11
PJM/NEPT LMP > NYIS/Neptune Bus LBMP	Total Hours	2,759	\$7.70
	Consistent Flow (NYIS to PJM)	0	\$0.00
	Inconsistent Flow (PJM to NYIS)	2,705	\$7.67
	No Flow	54	\$9.00

To move power from PJM to NYISO using the Neptune Line, two PJM transmission service reservations are required. A transmission service reservation is required from the PJM Transmission System to the Neptune HVDC Line (“Out Service”) and another transmission service reservation is required on the Neptune HVDC line (“Neptune Service”).³⁴ The PJM Out Service is covered by normal PJM OASIS business operations.³⁵ The Neptune Service falls under the provisions for controllable merchant facilities, Schedule 14 of the PJM Tariff. The Neptune Service is also acquired on the PJM OASIS.

Table 9-32 Percent of scheduled interchange across the Neptune line by primary rights holder: July 1, 2007 through September 30, 2017

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
January	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
February	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
March	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
April	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
May	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
June	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
July	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
August	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
September	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
October	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
November	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
December	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	

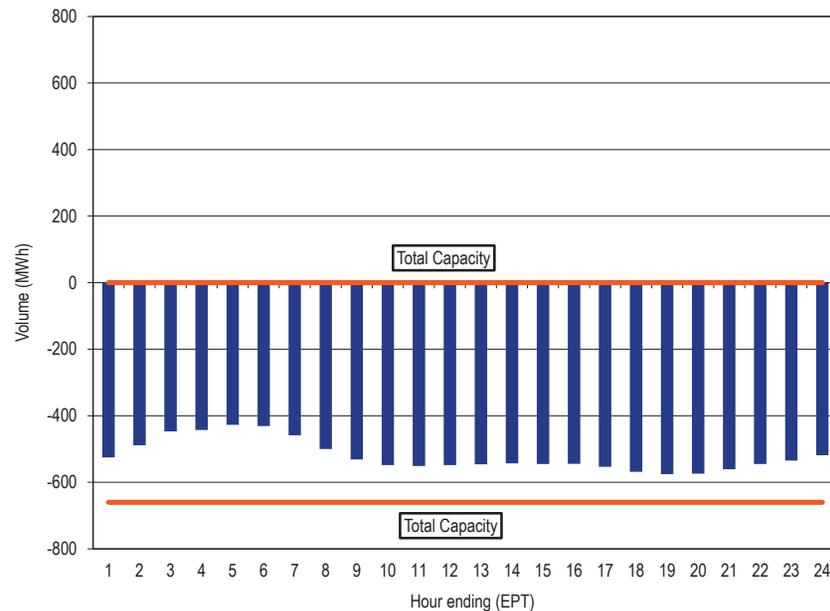
³⁴ See OASIS “PJM Business Practices for Neptune Transmission Service,” <<http://www.pjm.com/~media/etools/oasis/merch-trans-facilities/neptune-oasis-Business-practices-doc-clean.ashx>>.

³⁵ See OASIS “Regional Transmission and Energy Scheduling Practices,” (October 3, 2017) <<http://www.pjm.com/~media/etools/oasis/regional-practices-clean-pdf.ashx>>.

Neptune Service is owned by a primary rights holder, and any nonfirm service that is not used (as defined by a schedule on a NERC Tag) may be released either voluntarily by the primary rights holder or by default by PJM. The primary rights holder may elect to voluntarily release monthly, weekly, daily or hourly firm or nonfirm service. Voluntarily releasing the service allows for the primary rights holder to specify a rate to be charged for the released service. If the primary rights holder does not elect to voluntarily release nonfirm service, and does not use the service, the available transmission will be released by default at 12:00, one business day before the start of service. On September 30, 2017, the rate for the nonfirm service released by default was \$10 per MWh. The primary rights holder remains obligated to pay for the released service unless a second transmission customer acquires the released service.

Table 9-32 shows the percent of scheduled interchange across the Neptune Line by the primary rights holder since commercial operations began in July, 2007. Table 9-32 shows that in the first nine months of 2017, the primary rights holder was responsible for 100 percent of the scheduled interchange across the Neptune Line in all months. Figure 9-6 shows the hourly average flow across the Neptune Line for the first nine months of 2017.

Figure 9-6 Neptune hourly average flow: January 1 through September 30, 2017



Linden Variable Frequency Transformer (VFT) facility

Table 9-33 PJM and NYISO flow based hours and average hourly price differences (Linden): January 1 through September 30, 2017

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
January	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
February	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
March	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
April	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	99.99%	100.00%	100.00%
May	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
June	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
July	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
August	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
September	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
October	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
November	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
December	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	

The Linden VFT facility is a controllable AC merchant transmission facility, with a capacity of 300 MW, providing a direct connection between PJM (Linden, New Jersey) and NYISO (Staten Island, New York). The flows were consistent with price differentials in 52.1 percent of the hours in the first nine months of 2017. Table 9-33 shows the number of hours and average hourly price differences between the PJM/LIND Interface and the NYIS/Linden bus based on LMP differences and flow direction.

To move power from PJM to NYISO on the Linden VFT Line, two PJM transmission service reservations are required. A transmission service reservation is required from the PJM Transmission System to the Linden VFT (“Out Service”) and another transmission service reservation is required on the Linden VFT (“Linden VFT Service”).³⁶ The PJM Out Service is covered by normal PJM OASIS business operations.³⁷ The Linden VFT Service falls under the provisions for controllable merchant facilities, Schedule 16 and Schedule 16-A of the PJM Tariff. The Linden VFT Service is also acquired on the PJM OASIS.

Linden VFT Service is owned by a primary rights holder, and any nonfirm service that is not used (as defined by a schedule on a NERC Tag) may be released either voluntarily by the primary rights holder or by default by PJM. The primary rights holder may elect to voluntarily release monthly, weekly, daily or hourly firm or nonfirm service. Voluntarily releasing the service allows for the primary rights holder to specify a rate to be charged for the released service. If the primary rights holder elects to not voluntarily release nonfirm service, and does not use the service, the available transmission will be released by default at 12:00, one business day before the start of service. On September 30, 2017, the rate for the nonfirm service released by default was \$6.00 per MWh. The primary rights holder remains obligated to pay

³⁶ See OASIS “PJM Business Practices for Linden VFT Transmission Service,” <<http://www.pjm.com/~media/etools/oasis/merch-trans-facilities/linden-vft-oasis-Business-practices-doc-clean.ashx>>.

³⁷ See OASIS “Regional Transmission and Energy Scheduling Practices,” (October 3, 2017) <<http://www.pjm.com/~media/etools/oasis/regional-practices-clean-doc.ashx>>.

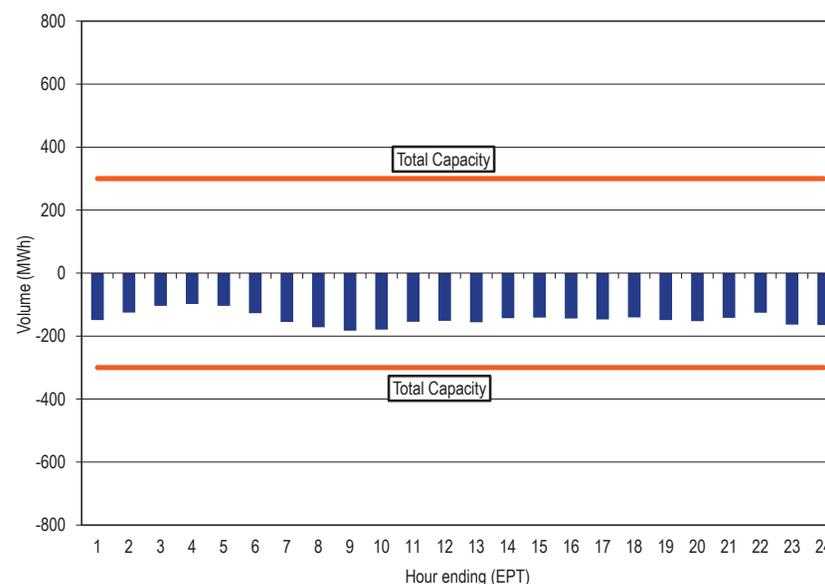
for the released service unless a second transmission customer acquires the released service.

Table 9-34 shows the percent of scheduled interchange across the Linden VFT Line by the primary rights holder since commercial operations began in November, 2009. Table 9-34 shows that in the first nine months of 2017, the primary rights holder was responsible for 100 percent of the scheduled interchange across the Linden VFT Line in all months. Figure 9-7 shows the hourly average flow across the Linden VFT Line for the first nine months of 2017.

Table 9-34 Percent of scheduled interchange across the Linden VFT Line by primary rights holder: November 1, 2009 through September 30, 2017

	2009	2010	2011	2012	2013	2014	2015	2016	2017
January	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	70.53%	100.00%
February	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	94.95%	100.00%
March	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	96.46%	100.00%
April	NA	99.97%	100.00%	100.00%	100.00%	99.98%	100.00%	49.32%	100.00%
May	NA	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
June	NA	100.00%	100.00%	100.00%	100.00%	27.27%	100.00%	100.00%	100.00%
July	NA	100.00%	100.00%	100.00%	100.00%	29.56%	100.00%	100.00%	100.00%
August	NA	100.00%	100.00%	100.00%	100.00%	82.46%	100.00%	100.00%	100.00%
September	NA	100.00%	100.00%	100.00%	100.00%	81.68%	100.00%	100.00%	100.00%
October	NA	100.00%	100.00%	100.00%	100.00%	100.00%	35.05%	100.00%	
November	100.00%	100.00%	100.00%	100.00%	99.86%	100.00%	61.45%	100.00%	
December	100.00%	100.00%	100.00%	98.22%	100.00%	100.00%	84.57%	100.00%	

Figure 9-7 Linden hourly average flow: January 1 through September 30, 2017³⁸



Hudson Direct Current (DC) Merchant Transmission Line

The Hudson direct current (DC) Line is a bidirectional merchant 230 kV transmission line, with a capacity of 673 MW, providing a direct connection between PJM (Public Service Electric and Gas Company’s (PSE&G) Bergen 230 kV Switching Station located in Ridgefield, New Jersey) and NYISO (Consolidated Edison’s (Con Ed) W. 49th Street 345 kV Substation in New York City). The connection is a submarine cable system. While the Hudson DC Line is a bidirectional line, power flows are only from PJM to New York because the Hudson Transmission Partners, LLC have only requested withdrawal rights (320 MW of firm withdrawal rights, and 353 MW of nonfirm withdrawal rights). The flows were consistent with price differentials in 0.1 percent of the hours in the first nine months of 2017. Table 9-35 shows the number of hours

³⁸ The Linden VFT Line is a bidirectional facility. The “Total Capacity” lines represent the maximum amount of interchange possible in either direction. These lines were included to maintain a consistent scale, for comparison purposes, with the Neptune DC Tie Line.

and average hourly price differences between the PJM/HUDS Interface and the NYIS/Hudson bus based on LMP differences and flow direction.

Table 9-35 PJM and NYISO flow based hours and average hourly price differences (Hudson): January 1 through September 30, 2017³⁹

LMP Difference	Flow Direction	Number of Hours	Average Hourly Price Difference
NYIS/Hudson Bus LBMP > PJM/HUDS LMP	Total Hours	3,439	\$10.67
	Consistent Flow (PJM to NYIS)	5	\$18.55
	Inconsistent Flow (NYIS to PJM)	0	\$0.00
	No Flow	3,434	\$10.66
PJM/HUDS LMP > NYIS/Hudson Bus LBMP	Total Hours	3,112	\$7.42
	Consistent Flow (NYIS to PJM)	0	\$0.00
	Inconsistent Flow (PJM to NYIS)	0	\$0.00
	No Flow	3,109	\$7.42

To move power from PJM to NYISO on the Hudson Line, two PJM transmission service reservations are required. A transmission service reservation is required from the PJM Transmission System to the Hudson Line (“Out Service”) and another transmission service reservation is required on the Hudson Line (“Hudson Service”).⁴⁰ The PJM Out Service is covered by normal PJM OASIS business operations.⁴¹ The Hudson Service falls under the provisions for controllable merchant facilities, Schedule 17 of the PJM Tariff. The Hudson Service is also acquired on the PJM OASIS.

Hudson Service is owned by a primary rights holder, and any nonfirm service that is not used (as defined by scheduled on a NERC Tag) may be released either voluntarily by the primary rights holder or by default by PJM. The primary rights holder may elect to voluntarily release monthly, weekly, daily or hourly firm or nonfirm service. Voluntarily releasing the service allows for the primary rights holder to specify a rate to be charged for the released service. If the primary rights holder elects to not voluntarily release nonfirm service, and does not use the service, the available transmission will be released by default at 12:00, one business day before the start of service. On September 30, 2017,

³⁹ The Hudson line was out of service for all hours in the first nine months of 2017. In the first nine months of 2017, there were five hours with less than 1 MW of unscheduled flow across the Hudson line.

⁴⁰ See OASIS “PJM Business Practices for Hudson Transmission Service,” <<http://www.pjm.com/~media/etools/oasis/merch-trans-facilities/http-Business-practices.ashx>>.

⁴¹ See OASIS “Regional Transmission and Energy Scheduling Practices,” (October 3, 2017) <<http://www.pjm.com/~media/etools/oasis/regional-practices-clean-doc.ashx>>.

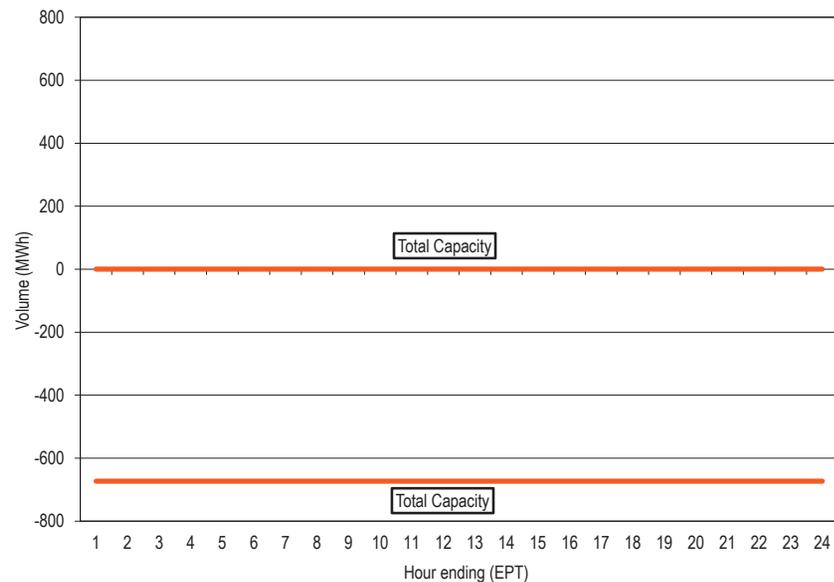
the rate for the nonfirm service released by default was \$10 per MWh. The primary rights holder remains obligated to pay for the released service unless a second transmission customer acquires the released service.

Table 9-36 shows the percent of scheduled interchange across the Hudson Line by the primary rights holder since commercial operations began in May, 2013. Table 9-36 shows that in the first nine months of 2017, there was no scheduled interchange across the Hudson Line. Figure 9-8 shows the hourly average flow across the Hudson Line for the first nine months of 2017.

Table 9-36 Percent of scheduled interchange across the Hudson Line by primary rights holder: May 1, 2013 through September 30, 2017

	2013	2014	2015	2016	2017
January	NA	51.22%	16.27%	100.00%	NA
February	NA	49.00%	14.67%	NA	NA
March	NA	40.40%	71.88%	NA	NA
April	NA	100.00%	100.00%	NA	NA
May	100.00%	26.87%	100.00%	100.00%	NA
June	100.00%	5.89%	59.72%	100.00%	NA
July	100.00%	18.51%	84.34%	NA	NA
August	100.00%	75.17%	65.48%	NA	NA
September	100.00%	75.31%	78.73%	NA	NA
October	100.00%	99.71%	18.65%	100.00%	
November	85.57%	99.60%	24.67%	100.00%	
December	28.32%	1.68%	100.00%	NA	

Figure 9-8 Hudson hourly average flow: January 1 through September 30, 2017



Interchange Activity During High Load Hours

The PJM metered system peak load during the first nine months of 2017 was 142,387 MW in the HE 1700 on July 19, 2017. PJM did not declare any emergency alerts, warnings or actions in that hour. PJM did not make any emergency energy purchases or sales in that hour. During the month of July 2017, PJM was a net scheduled exporter of energy in all hours. During July, 2017, the average hourly scheduled exports were 3,440 MW (representing 3.4 percent of the average hourly load of 99,787 MW in July 2017). PJM was a net exporter of energy in all hours on July 19, 2017, with average hourly scheduled exports of -3,781 MW.

Operating Agreements with Bordering Areas

To improve reliability and reduce potential seams issues, PJM and its neighbors have developed operating agreements. These agreements include operating agreements with MISO and the NYISO, a reliability agreement with TVA, an operating agreement with Duke Energy Progress, Inc., a reliability coordination agreement with VACAR South, a balancing authority operations agreement with the Wisconsin Electric Power Company (WEC) and a Northeastern planning coordination protocol with NYISO and ISO New England.

Table 9-37 shows a summary of the elements included in each of the operating agreements PJM has with its bordering areas.

Table 9-37 Summary of elements included in operating agreements with bordering areas

Agreement:	PJM-MISO	PJM-NYISO	PJM-TVA	PJM-DEP	PJM-VACAR	PJM-WEP	Northeastern Protocol
Data Exchange							
Real-Time Data	YES	YES	YES	YES	YES	YES	NO
Projected Data	YES	YES	YES	YES	NO	NO	NO
SCADA Data	YES	YES	YES	YES	NO	NO	NO
EMS Models	YES	YES	YES	YES	NO	NO	YES
Operations Planning Data	YES	YES	YES	YES	NO	NO	YES
Available Flowgate Capability Data	YES	YES	YES	YES	NO	NO	YES
Near-Term System Coordination							
Operating Limit Violation Assistance	YES	YES	YES	YES	YES	NO	NO
Over/Under Voltage Assistance	YES	YES	YES	YES	YES	NO	NO
Emergency Energy Assistance	YES	YES	NO	YES	YES	NO	NO
Outage Coordination	YES	YES	YES	YES	YES	NO	NO
Long-Term System Coordination	YES	YES	YES	YES	NO	NO	YES
Congestion Management Process							
ATC Coordination	YES	YES	YES	YES	NO	NO	NO
Market Flow Calculations	YES	YES	YES	NO	NO	NO	NO
Firm Flow Entitlements	YES	YES	YES	NO	NO	NO	NO
Market to Market Redispatch	YES - Redispatch	YES - Redispatch	NO	YES - Dynamic Schedule	NO	NO	NO
Joint Checkout Procedures	YES	YES	YES	YES	NO	YES	NO

PJM-MISO = MISO/PJM Joint Operating Agreement

PJM-NYISO = New York ISO/PJM Joint Operating Agreement

PJM-TVA = Joint Reliability Coordination Agreement Between PJM - Tennessee Valley Authority (TVA)

PJM-DEP = Duke Energy Progress (DEP) - PJM Joint Operating Agreement

PJM-VACAR = PJM-VACAR South Reliability Coordination Agreement

PJM-WEP = Balancing Authority Operations Coordination Agreement Between Wisconsin Electric Power Company and PJM Interconnection, LLC

Northeastern Protocol = Northeastern ISO-Regional Transmission Organization Planning Coordination Protocol

PJM and MISO Joint Operating Agreement⁴²

The Joint Operating Agreement between MISO and PJM Interconnection, L.L.C. was executed on December 31, 2003. The PJM/MISO JOA includes provisions for market based congestion management that, for designated flowgates within MISO and PJM, allow for redispatch of units within the PJM and MISO regions to jointly manage congestion on these flowgates and to assign the costs of congestion management appropriately. In 2012, MISO

⁴² See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.," (December 11, 2008) <<http://www.pjm.com/media/documents/merged-tariffs/miso-joa.pdf>>.

and PJM initiated a joint stakeholder process to address issues associated with the operation of the markets at the seam.⁴³

Under the market to market rules, the organizations coordinate pricing at their borders. PJM and MISO each calculate an interface LMP using network models including distribution factor impacts. PJM uses 10 buses along the PJM/MISO border to calculate the PJM/MISO interface pricing point LMP. Prior to June 1, 2017, MISO used all of the PJM generator buses in its model of the PJM system in its calculation of the MISO/PJM interface pricing point.⁴⁴ On June 1, 2017, MISO modified their MISO/PJM interface definition to match PJM's PJM/MISO interface definition.⁴⁵

An operating entity is an entity that operates and controls a portion of the bulk transmission system with the goal of ensuring reliable energy interchange between generators, loads and other operating entities.⁴⁶ Coordinated flowgates are identified to determine which flowgates an operating entity impacts

significantly. This set of flowgates may then be used in the congestion management process. An operating entity will conduct sensitivity studies to determine which flowgates are significantly impacted by the flows of the operating entity's control zones (historic control areas that existed in the IDC). An operating entity identifies these flowgates by performing five studies to determine which flowgates the operating entity will monitor and help control.

⁴³ See "PJM/MISO Joint and Common Market Initiative," <<http://www.pjm.com/committees-and-groups/stakeholder-meetings/pjm-miso-joint-common.aspx>>.

⁴⁴ See the 2012 State of the Market Report for PJM, Volume 2, Section 8, "Interchange Transactions," for a more detailed discussion.

⁴⁵ See "Joint and Common Market: MISO-PJM Interface Pricing Update," (November 15, 2016) <<http://www.pjm.com/~media/committees-groups/stakeholder-meetings/pjm-miso-joint-common/20161115/20161115-item-03a-interface-pricing-post-implementation.ashx>>.

⁴⁶ See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.," (December 11, 2008) <<http://www.pjm.com/media/documents/merged-tariffs/miso-joa.pdf>>.

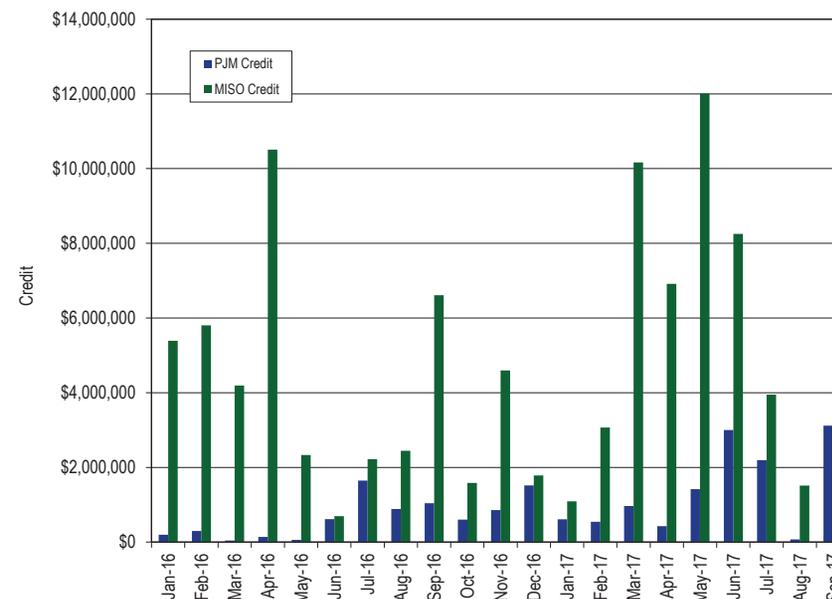
These studies include generation to load distribution factor studies, transfer distribution factor analysis and an external asynchronous resource study. An operating entity may also specify additional flowgates that have not passed any of the five studies to be coordinated flowgates where the operating entity expects to use the TLR process to manage congestion.⁴⁷ A reciprocal coordinated flowgate (RCF) is a CF that is monitored and controlled by PJM or MISO, on which both have significant impacts. Only RCFs are subject to the market to market congestion management process.

As of January 1, 2017, PJM had 150 flowgates eligible for M2M (Market to Market) coordination. In the first nine months of 2017, PJM added 20 flowgates and deleted 33 flowgates, leaving 137 flowgates eligible for M2M coordination as of September 30, 2017. As of January 1, 2017, MISO had 261 flowgates eligible for M2M coordination. In the first nine months of 2017, MISO added 102 flowgates and deleted 113 flowgates, leaving 250 flowgates eligible for M2M coordination as of September 30, 2017.

The firm flow entitlement (FFE) represents the amount of historic 2004 flow that each RTO had created on each 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 nonmonitoring 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 nonmonitoring RTO for congestion relief provided by the non-monitoring RTO based on the difference between the nonmonitoring RTO's market flow and their FFE. In the first nine months of 2017, market to market operations resulted in MISO and PJM redispatching units to control congestion on M2M flowgates and in the exchange of payments for this redispatch. Figure 9-9 shows credits for coordinated congestion management between PJM and MISO.

⁴⁷ See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.," (December 11, 2008) <<http://www.pjm.com/media/documents/merged-tariffs/miso-joa.pdf>>.

Figure 9-9 Credits for coordinated congestion management: January 1, 2016 through September 30, 2017⁴⁸



PJM and New York Independent System Operator Joint Operating Agreement (JOA)⁴⁹

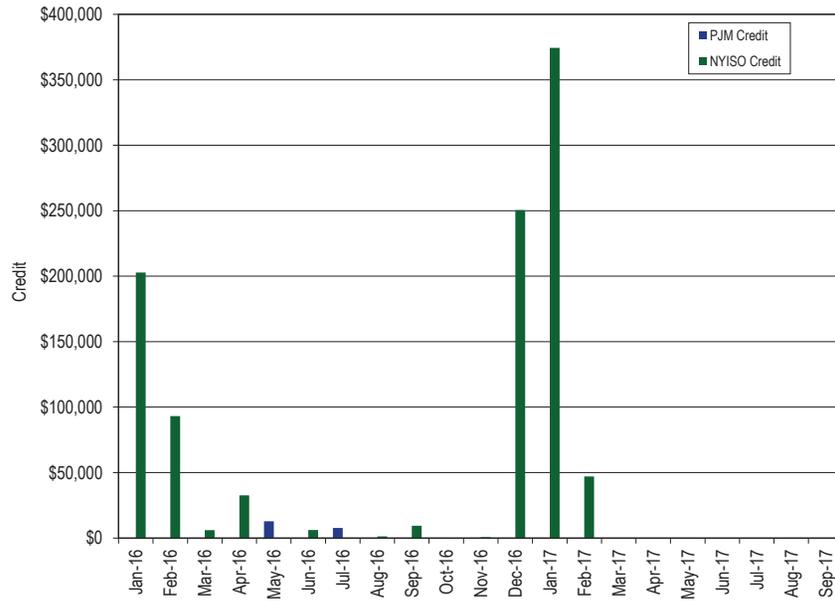
The Joint Operating Agreement between NYISO and PJM Interconnection, L.L.C. became effective on January 15, 2013. Under the market to market rules, the organizations coordinate pricing at their borders.

In the first nine months of 2017, market to market operations resulted in NYISO and PJM redispatching units to control congestion on M2M flowgates and in the exchange of payments for this redispatch. Figure 9-10 shows credits for coordinated congestion management between PJM and NYISO.

⁴⁸ The totals represented in this figure represent the settlements as of the time of this report and may not include adjustments or resettlements.

⁴⁹ See "New York Independent System Operator, Inc., Joint Operating Agreement with PJM Interconnection, L.L.C.," (June 21, 2017) <<http://www.pjm.com/~media/documents/agreements/nyiso-joa.aspx>>.

Figure 9-10 Credits for coordinated congestion management (flowgates): January 1, 2016 through September 30, 2017⁵⁰



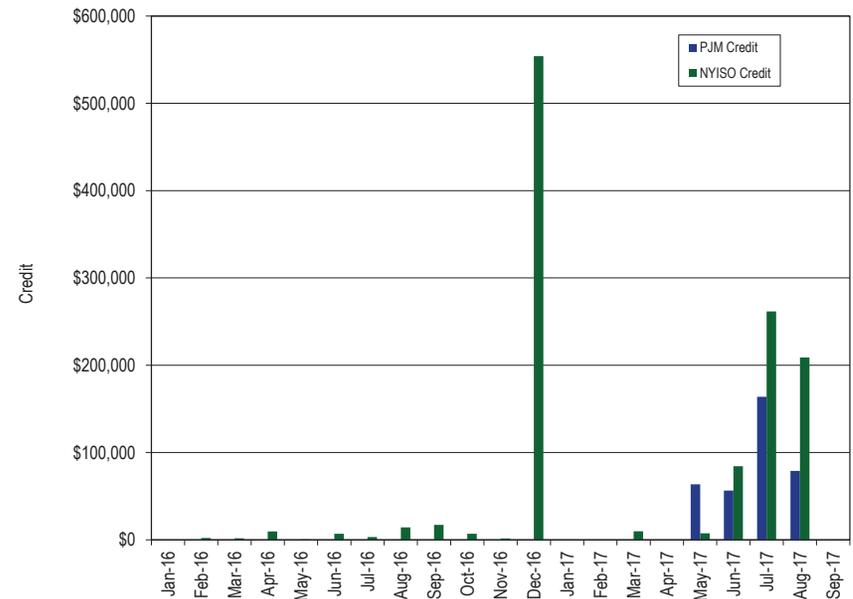
The M2M coordination process focuses on real-time market coordination to manage transmission limitations that occur on M2M flowgates in a cost effective manner. Coordination between NYISO and PJM includes not only joint redispatch, but also incorporates coordinated operation of the PARs that are located at the PJM/NYIS border. This real-time coordination results in an efficient economic dispatch solution across both markets to manage the real-time transmission constraints that impact both markets, focusing on the actual flows in real time to manage constraints.⁵¹ For each M2M flowgate, a PAR settlement will occur for each interval during coordinated operations. The PAR settlements are determined based on whether the measured real-time flow on each of the PARs is greater than or less than the calculated target value. If the actual flow is greater than the target flow, NYISO will make

⁵⁰ The totals represented in this figure represent the settlements as of the time of this report and may not include adjustments or resettlements.

⁵¹ See "New York Independent System Operator, Inc., Joint Operating Agreement with PJM Interconnection, LLC," (June 21, 2017) <<http://www.pjm.com/~media/documents/agreements/nyiso-joa.ashx>>.

a payment to PJM. This payment is calculated as the product of the M2M flowgate shadow price, the PAR shift factor and the difference between the actual and target PAR flow. If the actual flow is less than the target flow, PJM will make a payment to NYISO. This payment is calculated as the product of the M2M flowgate shadow price, the PAR shift factor and the difference between the target and actual PAR flow. Effective May 1, 2017, coincident with the termination of the ConEd wheel, PJM and NYISO began M2M coordination at all of the PARs along the PJM/NYISO seam. Prior to May 1, 2017, only the Ramapo PARs were included in the M2M process. In the first nine months of 2017, PAR settlements resulted in monthly payments from PJM to NYISO. Figure 9-11 shows the PAR credits for coordinated congestion management between PJM and NYISO.

Figure 9-11 Credits for coordinated congestion management (PARs): January 1, 2016 through September 30, 2017⁵²



⁵² The totals represented in this figure represent the settlements as of the time of this report and may not include adjustments or resettlements.

PJM and TVA Joint Reliability Coordination Agreement (JRCA)⁵³

The joint reliability coordination agreement (JRCA) executed on April 22, 2005, provides for the exchange of information and the implementation of reliability and efficiency protocols between TVA and PJM. The agreement also provides for the management of congestion and arrangements for both near-term and long-term system coordination. Under the JRCA, PJM and TVA honor constraints on the other's flowgates in their Available Transmission Capability (ATC) calculations. Additionally, market flows are calculated on reciprocal flowgates. When a constraint occurs on a reciprocal flowgate within TVA, PJM has the option to redispatch generation to reduce market flow, and therefore alleviate the constraint. Unlike the M2M procedure between MISO and PJM, this redispatch does not result in M2M payments. However, electing to redispatch generation within PJM can avoid potential market disruption by curtailing transactions under the Transmission Line Loading Relief (TLR) procedure to achieve the same relief. The agreement remained in effect in the first nine months of 2017.

PJM and Duke Energy Progress, Inc. Joint Operating Agreement⁵⁴

On September 9, 2005, the FERC approved a JOA between PJM and Progress Energy Carolinas, Inc. (PEC), with an effective date of July 30, 2005. As part of this agreement, both parties agreed to develop a formal congestion management protocol (CMP). On February 2, 2010, PJM and PEC filed a revision to the JOA to include a CMP.⁵⁵ On January 20, 2011, the Commission conditionally accepted the compliance filing. On July 2, 2012, Duke Energy and Progress Energy Inc. completed a merger. At that time, Progress Energy Carolinas Inc., now a subsidiary of Duke, changed its name to Duke Energy Progress (DEP).

⁵³ See "Joint Reliability Coordination Agreement Among and Between PJM Interconnection, LLC, and Tennessee Valley Authority," (October 15, 2014) <<http://www.pjm.com/~media/documents/agreements/joint-reliability-coordination-agreement-miso-pjm-tva.ashx>>.

⁵⁴ See "Amended and Restated Joint Operating Agreement Among and Between PJM Interconnection, LLC, and Duke Energy Progress Inc.," (December 3, 2014) <<http://www.pjm.com/media/documents/merged-tariffs/progress-joa.pdf>>.

⁵⁵ See *PJM Interconnection, LLC and Progress Energy Carolinas, Inc.* Docket No. ER10-713-000 (February 2, 2010).

The PJM/DEP JOA states that the Marginal Cost Proxy Method (MCPM) will be used in the determination of the CPLEIMP and CPLEEXP interface price. Section 2.6A (2) of the PJM Tariff describes the process of calculating the interface price under the MCPM. Under the MCPM, PJM compares the individual bus LMP (as calculated by PJM) for each DEP generator in the PJM model with a telemetered output greater than zero MW to the marginal cost for that generator.

For the CPLEIMP price (imports to PJM), PJM uses the lowest LMP of any generator bus in the DEP balancing authority area, with an output greater than zero MW that has an LMP less than its marginal cost for each five minute interval. If no generator with an output greater than zero MW has an LMP less than its marginal cost, then the import price is the average of the bus LMPs for the set of generators in the DEP area with an output greater than zero MW that PJM determines to be the marginal units in the DEP area for that five minute interval. PJM determines the marginal units in the DEP area by summing the output of the units serving load in the DEP area in ascending order by the units' marginal costs until the sum equals the real time load in the DEP area. Units in the DEP area with marginal costs at or above that of the last unit included in the sum are the marginal units for the DEP area for that interval.

PJM calculates the CPLEEXP price for exports from PJM to DEP as the highest LMP of any generator bus in the DEP area with an output greater than zero MW (excluding nuclear and hydro units) that has an LMP greater than its marginal cost in the 5 minute interval.⁵⁶ If no generator with an output greater than zero MW has an LMP greater than its marginal cost, then the export price will be the average of the bus LMPs for the set of generators with an output greater than zero MW that PJM determines to be the marginal units in the same manner as described for the CPLEIMP interface price. The hourly integrated import and export prices are the average of all of the 5 minute intervals in each hour.

⁵⁶ The MMU has objected to the omission of nuclear and hydro units from the calculation. This omission is not included in the definition of the MCPM interface pricing method in the PJM Tariff, but is included as a special condition in the PJM/DEP JOA. The MMU does not believe it is appropriate to exclude these units from the calculation as these units could be considered marginal and impact the prices.

The MCPM calculation is based on the DEP units modeled in the PJM market that have an output greater than zero, and only uses the units whose output exceeds the reported DEP real-time load. When new units are added to the DEP footprint, and existing units in the DEP footprint retire, PJM does not have complete data to calculate the interface price. These new units can impact the interface price in several ways. By not having the additional units modeled, these units cannot be considered to be marginal units, and therefore cannot set price. For the import price, if the PJM calculated LMP of one of the new units were to be lower than any currently modeled unit, then PJM's CPLEIMP pricing point would be lower, and PJM would pay less for imports. If the PJM calculated LMP of one of the new units were to be higher than any currently modeled unit, then PJM's CPLEEXP pricing point would be higher, and PJM would receive more for exports.

Not maintaining a current set of units in the DEP footprint in PJM's network model limits PJM's ability to recognize which units are marginal and it is often not possible to calculate the CPLEIMP and CPLEEXP interface prices using the MCPM. By not maintaining a complete set of units in the DEP footprint, the reported output of the modeled units are often insufficient to cover the reported real time load, and therefore no units are considered marginal. When this occurs, the MMU believes that the CPLEIMP and CPLEEXP pricing points should revert to the SOUTHIMP and SOUTHEXP interface prices, but this has not happened. When this occurs, PJM uses the high-low interface pricing method as described in Section 2.6A (1) of the PJM Tariff. The MMU does not believe that this is appropriate, and does not see the basis for this approach in either the PJM Tariff or the PJM/DEP JOA.

On July 2, 2012, Duke Energy and Progress Energy Inc. completed a merger. While the individual companies planned to operate separately for a period of time, they have a joint dispatch agreement, and a joint open access transmission tariff.⁵⁷ On October 3, 2014, Duke Energy Progress (DEP) and PJM submitted revisions to the JOA to include a new Appendix B, update references to DEP's current legal name, and incorporate other revisions.⁵⁸ The

MMU submitted a protest to this filing noting that the existing JOA depends on the specific characteristics of PEC as a standalone company, and the assumptions reflected in the current JOA no longer apply under the DEP joint dispatch agreement.⁵⁹ As noted in the 2010 filing, "the terms and conditions of the bilateral agreement among PEC and PJM are grounded in an appreciation of their systems as they exist at the time of the effective date of the JOA, but they fully expect that evolving circumstances, protocols and requirements will require that they negotiate, in good faith, a response to such changes."⁶⁰ The joint dispatch agreement changed the unique operational relationship that existed when the congestion management protocol was established. However, the merged company has not engaged in discussions with PJM as to whether the congestion management protocol that was "tailored to their [PJM and PEC] unique operational relationship" is still appropriate, or whether the congestion management protocol needs to be revised. The existing JOA does not apply to the merged company and should be terminated.

Article 14 of the JOA provides details of the PJM/DEP congestion management agreement (CMA). The purpose of the CMA is to allow "DEP to quickly respond to the LMP values sent by PJM to DEP. This quick response will help manage the congestion on the PJM transmission system by maintaining flows within established limits and stabilizing PJM LMP values, and will help reduce the need to use the TLR process to relieve the congestion by maintaining power flows within established reliability limits." Congestion is managed by using a dynamic schedule between CPLE and PJM. DEP responds to the dynamic pricing signal sent by PJM by increasing generation, which creates energy flow in the direction from CPLE to PJM or by decreasing generation, which creates energy flow in the direction from PJM to CPLE. The dynamic schedule calls for more DEP generation when the DEP marginal cost of online generation is less than the CPLE LMP, and it calls for less DEP generation when the DEP marginal cost exceeds the CPLE LMP. The economic energy flow on the dynamic schedule reduces congestion.

⁵⁷ See "Duke Energy Carolinas, LLC, Carolina Power & Light tariff filing," Docket No. ER12-1338-000 (July 12, 2012) and "Duke Energy Carolinas, LLC, Carolina Power & Light Joint Dispatch Agreement filing," Docket No. ER12-1343-000 (July 11, 2012).

⁵⁸ See *Duke Energy Progress, Inc. and PJM Interconnection, LLC*, Docket No. ER15-29-000 (October 3, 2014).

⁵⁹ See Protest and Motion for Rehearing of the Independent Market Monitor for PJM in Docket No. ER15-29-000 (October 24, 2014).

⁶⁰ Joint Motion for Leave to Answer and Answer of PJM Interconnection, L.L.C. and Progress Energy Carolinas, Inc., Docket No. ER10-713-000 (March 10, 2010) at 2. Section 3.3 of the PJM-Progress JOA.

The amount of congestion relief is limited by the amount of energy that can flow on the dynamic schedule. Several factors determine this limit, including: the physical limitations of DEP's units; ATC limits on the transmission path between CPLE and PJM; the actual confirmed transmission acquired in advance by DEP. Section 14.4.1 of the JOA states that:

The transmission service used on the DEP transmission system to support the process described in this Article will be a non-firm point to point reservation from DEP to PJM made by DEP. The Dynamic Schedule will be limited to the point to point reservation. The transmission service used on the PJM transmission system will be network secondary service.

In the first nine months of 2017, DEP acquired the required transmission service in only 949 of the 6,551 hours (14.5 percent of all hours), with an average capacity of approximately 145 MW. At most, DEP could have increased their generation to help manage constraints via a sale of power to PJM 14.5 percent of the time in the first nine months of 2017, and the maximum redispatch would have been only 145 MW, on average.

A CMA that can only be used in 14.5 percent of all hours is not an effective approach to congestion management. The MMU recommends that PJM immediately provide the required 12-month notice to DEP to unilaterally terminate the Joint Operating Agreement.

PJM and VACAR South Reliability Coordination Agreement⁶¹

On May 23, 2007, PJM and VACAR South (comprised of Duke Energy Carolinas, LLC (DUK), DEP, South Carolina Public Service Authority (SCPSA), Southeast Power Administration (SEPA), South Carolina Energy and Gas Company (SCE&G) and Yadkin Inc. (a part of Alcoa)) entered into a reliability coordination agreement which provides for system and outage coordination, emergency procedures and the exchange of data. The parties meet on a yearly basis. The agreement remained in effect in the first nine months of 2017.

⁶¹ See "PJM-VACAR South RC Agreement," (November 7, 2014) <<http://www.pjm.com/~media/documents/agreements/executed-pjm-vacar-rc-agreement.ashx>>.

Balancing Authority Operations Coordination Agreement between Wisconsin Electric Power Company (WEC) and PJM Interconnection, LLC⁶²

The Balancing Authority Operations Coordination Agreement executed on July 20, 2013, provides for the exchange of information between WEC and PJM. The purpose of the data exchange is to allow for the coordination of balancing authority actions to ensure the reliable operation of the systems. The agreement remained in effect in the first nine months of 2017.

Northeastern ISO-Regional Transmission Organization Planning Coordination Protocol⁶³

The Northeastern ISO-RTO Planning Coordination Protocol executed on December 8, 2004, provides for the exchange of information among PJM, NYISO and ISO New England. The purpose of the data exchange is to allow for the long-term planning coordination among and between the ISOs and RTOs in the Northeast. The agreement remained in effect in the first nine months of 2017.

Interface Pricing Agreements with Individual Balancing Authorities

PJM consolidated the Southeast and Southwest interface pricing points to a single interface with separate import and export prices (SouthIMP and SouthEXP) on October 31, 2006.

The PJM/DEP JOA allows for the CPLEIMP and CPLEEXP interface pricing points to be calculated using the Marginal Cost Proxy Pricing method.⁶⁴ The DUKIMP, DUKEXP, NCMPAIMP and NCMPAEXP interface pricing points are calculated based on the high-low pricing method as defined in Section 2.6A (1) of the PJM Tariff.

⁶² See "Balancing Authority Operations Coordination Agreement between Wisconsin Electric Power Company and PJM Interconnection, LLC," (July 20, 2013) <<http://www.pjm.com/~media/documents/agreements/balancing-authority-operations-coordination-agreement.ashx>>.

⁶³ See "Northeastern ISO/RTO Planning Coordination Protocol," (December 8, 2004) <<http://www.pjm.com/~media/documents/agreements/northeastern-iso-rto-planning-coordination-protocol.ashx>>.

⁶⁴ See *PJM Interconnection, LLC*, Docket No. ER10-2710-000 (September 17, 2010).

Table 9-38 shows the real-time LMP calculated per the PJM/DEP JOA and the high/low pricing method used by Duke and NCMPA for the first nine months of 2017. The values shown in Table 9-38 are the average LMP over only the hours in the first nine months of 2017, where interchange transactions settled at those pricing points. The difference between the LMP under these agreements and PJM's SouthIMP LMP ranged from -\$0.33 with Duke to \$0.10 with NCMPA.⁶⁵ This means that under the specific interface pricing agreements Duke would receive, on average, \$0.33 less for importing energy into PJM than if they were to receive the SouthIMP pricing point. In the first nine months of 2017, market participants received \$83,501 less for importing energy using these pricing points than they would have if they were to have received the SouthIMP pricing point. The difference between the LMP under these agreements and PJM's SouthEXP LMP ranged from \$0.27 with Duke to \$1.59 with PEC. This means that under the specific interface pricing agreements PEC would pay, on average, \$1.59 more for exporting energy from PJM than they would have if they were to pay the SouthEXP pricing point. In the first nine months of 2017, market participants paid \$304,619 more for exporting energy using these pricing points than they would have if they were to have paid the SouthEXP pricing point.

Table 9-38 Real-time average hourly LMP comparison for Duke, PEC and NCMPA: January 1 through September 30, 2017

	Import LMP	Export LMP	SOUTHIMP	SOUTHEXP	Difference IMP LMP - SOUTHIMP	Difference EXP LMP - SOUTHEXP
Duke	\$32.54	\$24.74	\$32.87	\$24.47	(\$0.33)	\$0.27
PEC	\$32.65	\$31.94	\$32.64	\$30.35	\$0.01	\$1.59
NCMPA	\$26.65	\$26.74	\$26.56	\$26.08	\$0.10	\$0.66

Table 9-39 shows the day-ahead LMP calculated per the PJM/DEP JOA and the high/low pricing method used by Duke and NCMPA for the first nine months of 2017. The values shown in Table 9-39 are the average LMP over only the hours in the first nine months of 2017, where interchange transactions settled at those pricing points. The difference between the LMP under these agreements and PJM's SouthIMP LMP ranged from \$0.07 with Duke to \$0.58 with PEC. This means that under the specific interface pricing agreements

⁶⁵ The Progress Energy Carolinas (PEC) LMP is defined as the Carolina Power and Light (East) (CPLE) pricing point.

PEC would receive, on average, \$0.58 more for importing energy into PJM than if they were to receive the SouthIMP pricing point. In the first nine months of 2017, market participants received \$251,109 more for importing energy using these pricing points than they would have if they were to have received the SouthIMP pricing point. The difference between the LMP under these agreements and PJM's SouthEXP LMP ranged from \$0.75 with NCMPA to \$1.21 with Duke. This means that under the specific interface pricing agreements Duke would pay, on average, \$1.21 more for exporting energy from PJM than if they were to pay the SouthEXP pricing point. In the first nine months of 2017, market participants paid \$240,764 more for exporting energy using these pricing points than they would have if they were to have paid the SouthEXP pricing point.

Table 9-39 Day-ahead average hourly LMP comparison for Duke, PEC and NCMPA: January 1 through September 30, 2017

	Import LMP	Export LMP	SOUTHIMP	SOUTHEXP	Difference IMP LMP - SOUTHIMP	Difference EXP LMP - SOUTHEXP
Duke	\$34.88	\$40.12	\$34.82	\$38.91	\$0.07	\$1.21
PEC	\$29.27	\$32.32	\$28.69	\$31.27	\$0.58	\$1.05
NCMPA	\$28.06	\$30.18	\$27.84	\$29.43	\$0.22	\$0.75

It is not clear that agreements between PJM and neighboring external entities, in which those entities receive some of the benefits of the PJM LMP market without either integrating into an LMP market or applying LMP internally, are in the best interest of PJM's market participants. In the case of the DEP JOA for example, the merger between Progress and Duke has resulted in a single, combined entity where one part of that entity (Duke Energy Progress) is engaged in congestion management with PJM while the other part of the entity (Duke) is not.

Other Agreements with Bordering Areas

Consolidated Edison Company of New York, Inc. (Con Edison) Wheeling Contracts

To help meet the demand for power in New York City, Con Edison uses electricity generated in upstate New York and wheeled through New Jersey on lines controlled by PJM.⁶⁶ This wheeled power creates loop flow across the PJM system. The Con Edison contracts governing the New Jersey path evolved during the 1970s and were the subject of a Con Edison complaint to the FERC in 2001.⁶⁷

After years of litigation concerning whether or on what terms Con Edison's protocol would be renewed, PJM filed a settlement on February 23, 2009, on behalf of the parties to resolve remaining issues with these contracts and their proposed rollover of the agreements under the OATT.⁶⁸ By order issued September 16, 2010, the Commission approved this settlement, which extended Con Edison's special protocol indefinitely.⁶⁹ The Commission approved transmission service agreements that provided for Con Edison to take firm point-to-point service going forward under the OATT. The Commission rejected objections raised first by NRG and FERC trial staff, and later by the MMU, that this arrangement is discriminatory and inconsistent with the Commission's open access transmission policy.⁷⁰ The settlement defined Con Edison's cost responsibility for upgrades included in the PJM Regional Transmission Expansion Plan. Con Edison was responsible for required transmission enhancements, and must pay the associated charges during the term of its service, and any subsequent roll over of the service.⁷¹ Con Edison's rolled over service became effective on May 1, 2012. At that time, Con Edison became responsible for the entire 1,000 MW of transmission service and all associated charges and credits.

⁶⁶ See the *2017 Quarterly State of the Market Report for PJM: January through September*, Section 4 – "Energy Market Uplift" for the operating reserve credits paid to maintain the power flow established in the Con Edison wheeling contracts.

⁶⁷ See the *2012 State of the Market Report for PJM*, Volume 2, Section 8, "Interchange Transactions," for a more detailed discussion.

⁶⁸ See FERC Docket Nos. ER08-858-000, et al. The settling parties are the New York Independent System Operator, Inc. (NYISO), Con Ed, PSE&G, PSE&G Energy Resources & Trading LLC and the New Jersey Board of Public Utilities.

⁶⁹ 132 FERC ¶ 61,221 (2010).

⁷⁰ See, e.g., Motion to Intervene Out-of-Time and Comments of the Independent Market Monitor for PJM in Docket No. ER08-858-000, et al. (May 11, 2010).

⁷¹ The terms of the settlement state that Con Edison shall have no liability for transmission enhancement charges prior to the commencement of, or after the termination of, the term of the rolled over service.

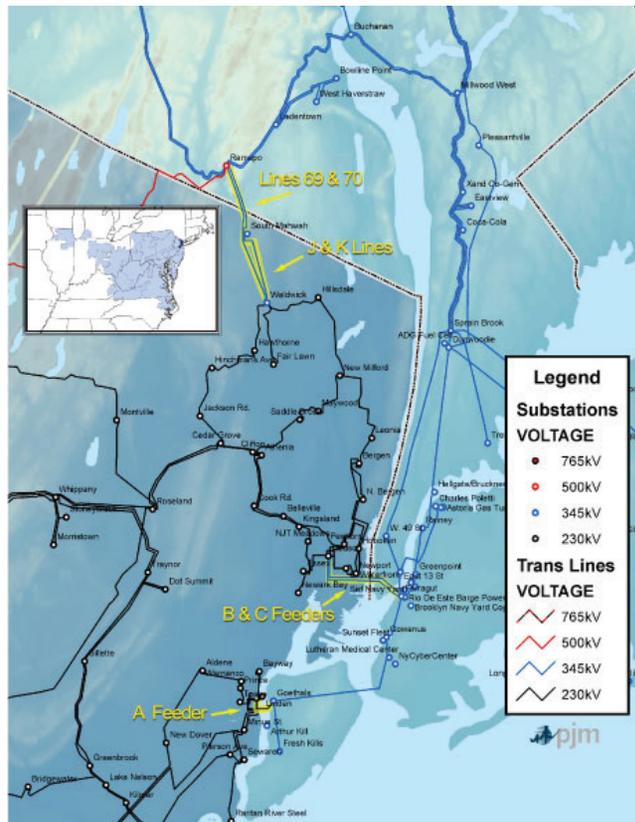
The Con Edison protocol modeled a fixed MW level flowing from NYISO to PJM over the JK (Ramapo - Waldwick) Interface, and from PJM to NYISO over the ABC (Hudson - Farragut and Linden - Goethals) Interface (See Figure 9-12).

On April 28, 2016, Con Edison announced its intent to terminate its 1,000 MW long-term firm point-to-point transmission service, effective May 1, 2017. Upon termination of the transmission reservation, the Con Edison protocol would also be terminated. On October 4, 2016, the NYISO and PJM issued a draft white paper to begin discussions for developing alternative designs for using the ABC and JK interfaces upon expiration of the Con Edison protocol effective May 1, 2017.⁷² The draft white paper proposal included modifications to the existing PJM-NY AC Proxy Bus definition to include the JK and ABC lines and the inclusion of the JK and ABC lines in the market-to-market PAR coordination process. The proposal also includes provisions for determining the target flows over the JK and ABC interfaces. The proposed target flows will be based on a static interchange percentage and will continue to include a percentage of the Rockland Electric Company (RECO) load. Additionally, the PJM and NYISO proposal also includes an operational base flow (OBF) of 400 MW from NYISO to PJM over the JK Interface and 400 MW from PJM to NYISO over the ABC Interface. On May 1, 2017, the Con Edison protocol was terminated and the new protocol, as described in the December 19, 2016, "*Con Ed/PSEG Wheel Replacement Proposal*" was implemented.⁷³

⁷² See "*Con Ed/PSEG Wheel Replacement Proposal*," (December 19, 2016) which can be accessed at: <<http://www.pjm.com/~media/library/reports-notices/special-reports/20161004-coned-pseg-wheel-replacement-proposal.ashx>>.

⁷³ See "*Con Ed/PSEG Wheel Replacement Proposal*," (December 19, 2016) which can be accessed at: <<http://www.pjm.com/~media/library/reports-notices/special-reports/20161004-coned-pseg-wheel-replacement-proposal.ashx>>.

Figure 9-12 Con Edison Protocol



Interchange Transaction Issues

Hudson Transmission Partners (HTP) and Linden VFT Requests to Convert Firm Transmission Withdrawal Rights (FTWR) to Non Firm Transmission Withdrawal Rights (NFTWR)

In 2014, cost allocations for RTEP projects included the Bergen-Linden Corridor (BLC) project. PSEG explained:

[The BLC project] is designed to replace the existing 138kV transmission system from Bergen to Linden with a double circuit 345kV transmission system. PJM determined that this new transmission system is necessary to ensure reliable electric service, eliminate anticipated transmission constraints, and respond to PJM/Federal Energy Regulatory Commission (FERC)-mandated infrastructure expansion. The project will eliminate electric system capacity issues in Northern New Jersey, providing better power quality in the region.

Using the solution-based DFAX cost allocation method, PJM initially allocated BLC's estimated costs: \$720 million to Con Edison; \$103 million to HTP; \$10 million to Linden VFT; no costs to Neptune; and \$88 million to PSEG. To avoid its share of the cost allocation, Con Edison elected to terminate its 1,000 MW of long-term firm transmission service (the Con Ed Wheel) effective April 30, 2017. PJM reallocated the costs: \$634 million to HTP; \$132 million to Linden VFT; and the remaining \$128 million to PSEG. The Commission denied complaints about the cost allocation, ruling that PJM applied the Commission accepted regional cost allocation method.

In June 2017, HTP and Linden separately initiated the process to amend their interconnection service agreements to reflect the conversion of FTWRs to NFTWRs in an apparent effort to avoid paying their allocated share of the RTEP cost allocations. On June 2, 2017, HTP sent a letter to PJM and PSEG requesting that their original Interconnection Service Agreement (ISA) be amended to reflect the conversion of their 320 MW of FTWRs to NFTWRs.

On June 22, 2017, PSEG notified PJM and HTP that it did not agree to the ISA amendment. Because PSEG did not agree to the amendment to the ISA, HTP requested that PJM file an unexecuted amended interconnection service agreement with the Commission to convert their FTWRs to NFTWRs. Similarly, at the request of Linden VFT, PJM also filed an unexecuted amended ISA to convert their FTWRs to NFTWRs.⁷⁴ On September 8, 2017, the Commission rejected the amended ISA and instituted a proceeding “to examine the justness and reasonableness of HTP being unable to convert its Firm Transmission Withdrawal Rights to Non-Firm Transmission Withdrawal Rights.”

Linden has already requested PJM long-term firm transmission through the long-term firm queue. PJM’s Initial Study Long-Term Firm Transmission Service notes:

... For the purpose of this study, and as requested by the Customer, PJM assumed FERC approval to amend the pre-existing Linden VFT Interconnection Service Agreements (Queue # U2-077 and W1-001) and resulting termination of the associated firm rights.

Linden has requested that PJM provide an initial study with the assumption that FERC approves the termination of their FTWRs. Linden VFT apparently expects to maintain the ability to export capacity to NYISO from PJM with the same level of transmission service level they currently have under the FTWR construct while avoiding payment of their RTEP cost allocations. Linden VFT has obtained assurance from NYISO that NFTWRs in conjunction with firm point to point transmission service from PJM to the Linden VFT point of delivery, will allow Linden VFT to continue to export capacity from PJM to NYISO exactly as they did with FTWRs.

HTP has, to date, only requested conversion of its FTWRs to NFTWRs. Neptune was not allocated any RTEP costs and has not requested a change in service.

The claim that Linden and/or HTP could use NFTWRs in conjunction with firm point to point transmission to continue to export capacity from PJM to NYISO while avoiding RTEP costs is not correct.

⁷⁴ See *PJM Interconnection, LLC*, Docket No. ER17-2267-000 (August 9, 2017).

Section 232.2 of the OATT states: (emphasis added):

... A Transmission Interconnection Customer that is granted Firm Transmission Withdrawal Rights and/or transmission customers that have a Point of Delivery at the Border of PJM where the Transmission System interconnects with the Merchant D.C. Transmission Facilities may be responsible for a reasonable allocation of transmission upgrade costs added to the Regional Transmission Expansion Plan after such Transmission Interconnection Customer’s Queue Position is established, in accordance with Section 3E and Schedule 12 of the Tariff..

Section 232.2 of the OATT explicitly requires the same RTEP cost allocation when a transmission customer has FTWRs and when a transmission customer has “a Point of Delivery at the Border of PJM where the Transmission System interconnects with the Merchant D.C. Transmission Facilities.” That is the situation here. Linden is structured as a controllable AC line which is functionally the same as a DC tie line. Identical treatment of RTEP costs is appropriate because the service is the same. Linden, if it relinquishes its FTWRs and instead uses firm point to point transmission service from PJM to the Linden VFT point of delivery and NFTWRs across the Linden VFT Line, would have the same service before and after the change. These two methods would be appropriately treated the same under Section 232.2, and HTP, if it follows Linden VFT’s approach also would be treated the same.

If HTP and/or Linden convert their FTWRs to NFTWRs and acquire long-term firm point to point transmission service from PJM to the point of interconnection with their DC tie line, HTP and/or Linden would continue to be assigned a portion of the RTEP cost responsibilities. But such assignment requires PJM to modify Schedule 12 of the OATT to include the options defined in Section 232.2. Once Schedule 12 is modified, HTP and/or Linden would become eligible to export capacity from PJM to the NYISO over their DC tie lines. Section 232.2 of the PJM Tariff combined with the NYISO deliverability requirements for capacity imports makes this explicit. This outcome would be just and reasonable.

It would not be just and reasonable to permit HTP and/or Linden to retain the same capacity export service with a different name and avoid an allocation of RTEP costs.

PJM Transmission Loading Relief Procedures (TLRs)

TLRs are called to control flows on electrical facilities when economic redispatch cannot solve overloads on those facilities. TLRs are called to control flows related to external balancing authorities, as redispatch within an LMP market can generally resolve overloads on internal transmission facilities.

The number of PJM issued TLRs of level 3a or higher decreased from eight in the first nine months of 2016 to three in the first nine months of 2017.⁷⁵ The number of different flowgates for which PJM declared a TLR 3a or higher was one in the first nine months of 2016 and one in the first nine months of 2017. The total MWh of transactions curtailed decreased by 94.3 percent from 106,848 MWh in the first nine months of 2016 to 6,140 MWh in the first nine months of 2017.

The number of MISO issued TLRs of level 3a or higher decreased from 64 in the first nine months of 2016 to 59 in the first nine months of 2017. The number of different flowgates for which MISO declared a TLR 3a or higher increased from 17 in the first nine months of 2016 to 21 in the first nine months of 2017. The total MWh of transaction curtailments decreased by 50.2 percent from 120,461 MWh in the first nine months of 2016 to 59,953 MWh in the first nine months of 2017.

The number of NYISO issued TLRs of level 3a or higher was one in the first nine months of 2016 and one in the first nine months of 2017. The number of different flowgates for which NYISO declared a TLR 3a or higher was one in the first nine months of 2016 and one in the first nine months of 2017. The total MWh of transaction curtailments decreased by 100.0 percent from 217 MWh in the first nine months of 2016 to 0 MWh in the first nine months of 2017.

⁷⁵ TLR Level 3a is the first level of TLR that results in the curtailment of transactions. See the *2016 State of the Market Report for PJM*, Volume 2, Appendix E, "Interchange Transactions," for a more complete discussion of TLR levels.

Table 9-40 PJM MISO, and NYISO TLR procedures: January 1, 2014 through September 30, 2017

Month	Number of TLRs Level 3 and Higher			Number of Unique Flowgates That Experienced TLRs			Curtailment Volume (MWh)		
	PJM	MISO	NYISO	PJM	MISO	NYISO	PJM	MISO	NYISO
Jan-14	3	19	0	3	10	0	1,852	11,683	0
Feb-14	0	29	1	0	10	1	0	33,189	991
Mar-14	0	11	0	0	7	0	0	14,842	0
Apr-14	0	6	0	0	3	0	0	1,233	0
May-14	0	9	0	0	4	0	0	53,153	0
Jun-14	0	19	0	0	7	0	0	24,614	0
Jul-14	1	13	1	1	6	1	317	26,616	0
Aug-14	0	7	0	0	3	0	0	6,319	0
Sep-14	1	11	0	1	4	0	935	87,296	0
Oct-14	1	5	0	1	5	0	1,386	20,581	0
Nov-14	0	10	0	0	6	0	0	23,736	0
Dec-14	2	2	0	2	2	0	1,792	1,264	0
Jan-15	2	8	1	1	4	1	7,293	626	2,261
Feb-15	6	11	2	2	6	1	37,222	9,173	331
Mar-15	8	0	1	3	0	1	14,704	0	435
Apr-15	2	6	0	2	3	0	1,033	23,518	0
May-15	1	8	0	1	2	0	961	12,048	0
Jun-15	1	20	0	1	4	0	205	42,063	0
Jul-15	2	10	0	2	4	0	1,360	9,796	0
Aug-15	0	9	0	0	3	0	0	7,041	0
Sep-15	0	6	0	0	4	0	0	5,789	0
Oct-15	0	4	0	0	4	0	0	4,212	0
Nov-15	0	2	0	0	2	0	0	1,797	0
Dec-15	0	4	0	0	1	0	0	875	0
Jan-16	6	0	0	1	0	0	83,752	0	0
Feb-16	2	0	0	1	0	0	23,096	0	0
Mar-16	0	5	0	0	3	0	0	6,556	0
Apr-16	0	6	0	0	2	0	0	2,034	0
May-16	0	6	0	0	4	0	0	5,360	0
Jun-16	0	5	1	0	2	1	0	18,121	217
Jul-16	0	18	0	0	8	0	0	38,815	0
Aug-16	0	16	0	0	3	0	0	30,181	0
Sep-16	0	8	0	0	4	0	0	19,394	0
Oct-16	0	3	0	0	2	0	0	1,702	0
Nov-16	0	9	0	0	3	0	0	5,622	0
Dec-16	1	1	0	1	1	0	443	0	0
Jan-17	3	1	0	1	1	0	6,140	255	0
Feb-17	0	8	0	0	2	0	0	10,566	0
Mar-17	0	9	0	0	4	0	0	7,954	0
Apr-17	0	10	0	0	7	0	0	16,422	0
May-17	0	11	0	0	8	0	0	7,292	0
Jun-17	0	13	0	0	6	0	0	8,576	0
Jul-17	0	0	1	0	0	1	0	0	0
Aug-17	0	3	0	0	2	0	0	2,449	0
Sep-17	0	4	0	0	3	0	0	6,439	0

Table 9-41 Number of TLRs by TLR level by reliability coordinator: January 1 through September 30, 2017⁷⁶

Year	Reliability	3a	3b	4	5a	5b	6	Total
	Coordinator							
2017	MISO	34	13	0	7	5	0	59
	NYIS	1	0	0	0	0	0	1
	ONT	1	0	0	0	0	0	1
	PJM	2	1	0	0	0	0	3
	SOCO	1	3	0	0	0	0	4
	SWPP	23	2	0	32	12	0	69
	TVA	8	10	0	2	4	0	24
	VACS	0	2	0	0	0	0	2
	Total		70	31	0	41	21	0

Up to Congestion

The original purpose of up to congestion transactions (UTC) was to allow market participants to submit a maximum congestion charge, up to \$25 per MWh, they were willing to pay on an import, export or wheel through transaction in the Day-Ahead Energy Market. This product was offered as a tool for market participants to limit their congestion exposure on scheduled transactions in the Real-Time Energy Market.⁷⁷

Following the elimination of the requirement to procure and pay for transmission for up to congestion transactions effective September 17, 2010, the volume of transactions increased dramatically.

Up to congestion transactions impact the day-ahead dispatch and unit commitment. Despite that, up to congestion transactions do not pay operating reserves charges. Up to congestion transactions also negatively affect FTR funding.⁷⁸

⁷⁶ Southern Company Services, Inc. (SOCO) is the reliability coordinator covering a portion of Mississippi, Alabama, Florida and Georgia. Southwest Power Pool (SWPP) is the reliability coordinator for SPP. VACAR-South (VACS) is the reliability coordinator covering a portion of North Carolina and South Carolina.

⁷⁷ See the *2012 State of the Market Report for PJM*, Volume 2, Section 8, "Interchange Transactions," for a more detailed discussion.

⁷⁸ See the *2017 Quarterly State of the Market Report for PJM: January through September*, Section 13: FTRs and ARR, "FTR Forfeitures" for more information on up to congestion transaction impacts on FTRs.

On August 29, 2014, FERC issued an Order which created an obligation for UTCs to pay any uplift determined to be appropriate in the Commission review, effective September 8, 2014.⁷⁹

As a result of the requirement to pay uplift charges and the uncertainty about the level of the required uplift charges, market participants reduced up to congestion trading effective September 8, 2014. There was an increase in up to congestion volume starting in December 2015, coincident with the expiration of the fifteen month limit on the payment of prior uplift charges (Figure 9-13). Section 206(b) of the Federal Power Act states that "...the Commission may order refunds of any amounts paid, for the period subsequent to the refund effective date through a date fifteen months after such refund effective date..."⁸⁰

The average number of up to congestion bids submitted in the Day-Ahead Energy Market decreased by 0.4 percent, from 147,586 bids per day in the first nine months of 2016 to 146,930 bids per day in the first nine months of 2017. The average cleared volume of up to congestion bids submitted in the Day-Ahead Energy Market increased by 6.7 percent, from 820,224 MWh per day in the first nine months of 2016, to 875,065 MWh per day in the first nine months of 2017.

⁷⁹ 148 FERC ¶ 61,144 (2014).

⁸⁰ 16 U.S.C. § 824e.

Figure 9-13 Monthly up to congestion cleared bids in MWh: January 1, 2005 through September 30, 2017

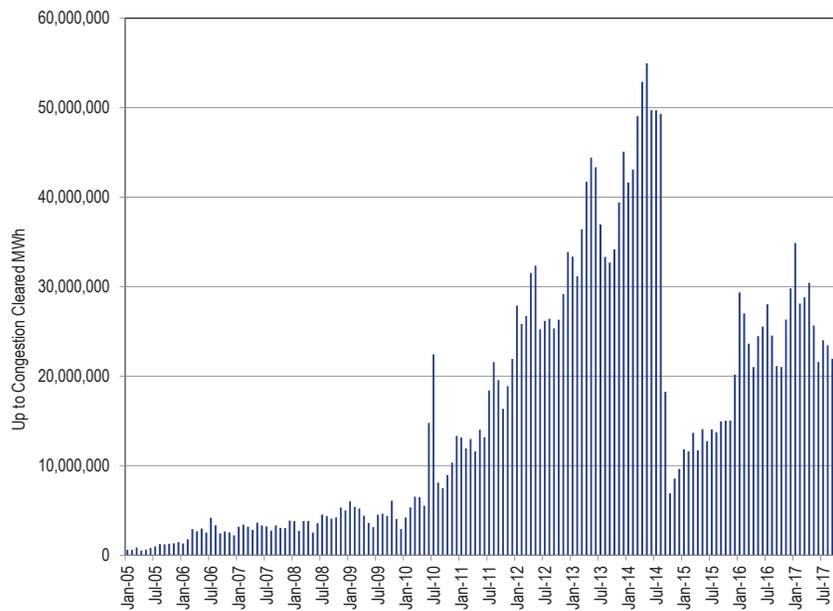


Table 9-42 Monthly volume of cleared and submitted up to congestion bids: January 1, 2016 through September 30, 2017⁸¹

Month	Bid MW					Bid Volume				
	Import	Export	Wheel	Internal	Total	Import	Export	Wheel	Internal	Total
Jan-16	11,319,511	7,453,438	1,014,763	80,909,489	100,697,200	477,343	219,598	39,513	3,737,937	4,474,391
Feb-16	12,155,175	7,740,113	1,363,163	85,132,591	106,391,042	422,382	228,823	42,609	3,306,154	3,999,968
Mar-16	11,714,639	7,934,801	1,415,976	88,260,658	109,326,075	382,177	225,473	36,332	3,131,152	3,775,134
Apr-16	9,823,079	6,559,076	1,305,759	74,723,429	92,411,342	397,591	189,981	29,138	3,760,097	4,376,807
May-16	9,513,613	6,823,576	1,095,593	71,945,618	89,378,399	404,406	207,483	32,187	3,824,204	4,468,280
Jun-16	10,535,566	7,229,295	934,909	90,318,486	109,018,256	393,040	205,237	34,318	3,980,024	4,612,619
Jul-16	11,954,606	10,034,200	1,573,690	111,637,376	135,199,873	432,142	273,349	36,430	4,583,276	5,325,197
Aug-16	11,435,407	7,826,884	1,203,704	89,117,338	109,583,333	396,134	258,077	33,330	4,352,104	5,039,645
Sep-16	8,865,500	7,188,474	793,894	76,390,509	93,238,378	286,637	236,555	29,616	3,813,679	4,366,487
Oct-16	7,621,317	6,486,553	725,041	75,471,554	90,304,464	292,479	268,611	35,720	4,237,454	4,834,264
Nov-16	9,347,175	7,739,170	1,092,482	83,836,320	102,015,146	361,868	273,254	32,322	4,613,501	5,280,945
Dec-16	9,648,240	7,976,967	856,973	91,141,019	109,623,199	446,573	295,302	29,569	5,778,358	6,549,802
Jan-17	12,071,248	10,779,934	1,022,748	122,301,537	146,175,467	503,193	359,899	34,470	6,725,774	7,623,336
Feb-17	11,420,648	8,942,116	608,065	118,800,901	139,771,730	394,062	268,571	27,086	4,894,155	5,583,874
Mar-17	9,158,336	9,968,026	595,492	102,176,604	121,898,458	284,402	289,574	24,835	4,046,536	4,645,347
Apr-17	8,427,340	9,544,151	576,134	91,517,521	110,065,146	243,246	286,654	28,526	3,777,591	4,336,017
May-17	6,914,185	5,793,561	532,000	73,575,991	86,815,737	210,223	210,292	21,746	3,246,035	3,688,296
Jun-17	5,490,865	6,038,899	632,947	68,528,243	80,690,953	194,713	191,222	20,606	3,077,217	3,483,758
Jul-17	6,613,969	6,050,326	639,026	74,941,744	88,245,065	203,947	198,230	19,463	3,378,819	3,800,459
Aug-17	6,749,590	6,674,135	718,858	77,129,276	91,271,858	191,589	188,708	11,951	3,374,088	3,766,336
Sep-17	6,762,933	6,905,161	652,672	72,767,743	87,088,509	172,092	169,393	11,818	2,831,072	3,184,375
TOTAL	1,416,636,429	1,336,972,802	91,243,215	4,907,490,298	7,752,342,745	37,377,059	31,462,514	2,455,597	193,214,553	264,509,723

⁸¹ See the 2016 State of the Market Report for PJM, Volume 2, Appendix E, "Interchange Transactions," for the monthly volume of cleared and submitted up to congestion bids: 2009 through 2016.

Table 9-42 Monthly volume of cleared and submitted up to congestion bids: January 1, 2016 through September 30, 2017 (continued)

Month	Cleared MW					Cleared Volume				
	Import	Export	Wheel	Internal	Total	Import	Export	Wheel	Internal	Total
Jan-16	2,944,505	2,026,327	274,430	24,103,637	29,348,899	170,082	69,173	10,390	1,577,269	1,826,914
Feb-16	2,719,184	2,001,418	244,646	22,049,244	27,014,492	126,889	67,289	9,850	1,251,383	1,455,411
Mar-16	2,370,270	2,001,360	198,400	19,061,805	23,631,834	105,098	65,977	8,070	1,085,479	1,264,624
Apr-16	2,348,160	1,264,954	204,465	17,214,976	21,032,555	140,346	48,085	7,067	1,740,662	1,936,160
May-16	2,209,309	1,882,586	235,696	20,137,089	24,464,680	156,256	64,333	6,665	1,987,586	2,214,840
Jun-16	2,178,050	1,871,788	153,654	21,334,532	25,538,023	128,728	62,438	6,906	1,621,997	1,820,069
Jul-16	2,335,606	2,109,811	237,917	23,341,287	28,024,621	120,775	79,269	7,902	1,587,513	1,795,459
Aug-16	1,914,794	2,139,929	183,616	20,303,066	24,541,404	91,351	85,598	7,902	1,522,203	1,707,054
Sep-16	1,706,788	1,572,221	150,834	17,714,998	21,144,842	76,662	74,123	8,808	1,502,828	1,662,421
Oct-16	1,387,294	1,065,855	133,639	18,431,481	21,018,269	84,852	78,316	10,892	1,768,967	1,943,027
Nov-16	2,772,101	1,323,987	292,429	21,932,490	26,321,007	142,207	69,987	8,539	1,889,760	2,110,493
Dec-16	2,904,123	1,857,750	182,373	24,882,966	29,827,212	163,420	96,565	6,814	2,375,795	2,642,594
Jan-17	3,478,967	2,446,235	235,641	28,699,881	34,860,725	153,756	106,883	6,710	2,387,196	2,654,545
Feb-17	2,020,772	1,860,138	88,621	24,147,889	28,117,419	91,586	76,129	5,506	1,648,658	1,821,879
Mar-17	2,106,568	1,736,786	147,294	24,822,836	28,813,485	87,599	86,494	5,157	1,509,134	1,688,384
Apr-17	2,507,486	2,351,550	176,621	25,401,805	30,437,462	81,365	93,895	6,981	1,435,787	1,618,028
May-17	1,716,363	1,564,608	126,693	22,243,327	25,650,992	70,481	70,024	5,163	1,314,020	1,459,688
Jun-17	1,572,832	1,428,776	135,513	18,460,280	21,597,400	62,478	61,569	3,893	1,168,823	1,296,763
Jul-17	1,546,229	1,546,263	113,165	20,816,061	24,021,719	60,457	68,847	3,371	1,262,370	1,395,045
Aug-17	1,177,158	1,746,210	100,492	20,420,033	23,443,893	58,192	75,898	3,032	1,299,202	1,436,324
Sep-17	1,632,026	1,379,580	102,737	18,835,214	21,949,558	66,178	54,143	3,205	1,129,589	1,253,115
TOTAL	465,798,225	441,567,229	29,210,921	1,356,954,725	2,293,531,101	14,053,627	11,843,822	817,997	71,407,334	98,122,780

In the first nine months of 2017, the cleared MW volume of up to congestion transactions was comprised of 7.4 percent imports, 6.7 percent exports, 0.5 percent wheeling transactions and 85.3 percent internal transactions. Less than 0.1 percent of the up to congestion transactions had matching real-time energy market transactions.

Up to Congestion Credit Risk

On August 29, 2014, FERC issued an order which created an obligation for up to congestion transactions (UTCs) to pay any uplift determined to be appropriate after Commission review, effective from September 8, 2014.⁸² As of September 30, 2017, the Commission has not ruled on whether up to congestion transactions will be charged for uplift accrued during this time. On January 19, 2017, a notice of proposed rulemaking was issued to address UTC

uplift for all RTOs/ISOs.⁸³ The outcome of the investigation in PJM will be held in abeyance pending the outcome of the NOPR proceeding.⁸⁴

During the 15 month refund period of September 8, 2014, through December 7, 2015, 185,303,891 MWh of up to congestion transactions cleared the day-ahead market and are subject to potential uplift charges for that period. Based on the volume of cleared up to congestion transactions and the potential uplift obligation on a per MWh basis, the obligation to pay is estimated to be between \$18.5 million and \$370.6 million. As potential obligations, this exposure creates a credit risk for those UTC traders who engaged in UTC transactions during this period. Table 9-43 shows the levels of credit risk associated with the cleared up to congestion transactions, depending on the uplift charge that may be imposed on these transactions.

⁸³ 158 FERC ¶ 61,047.

⁸⁴ 158 FERC ¶ 61,038 at P 3 (2017).

⁸² 148 FERC ¶ 61,144 (2014).

Table 9-43 Credit risk associated with varying levels of potential uplift: September 8, 2014 through December 7, 2015

Uplift (\$/MWh)	Credit risk if uplift is applied to both sides of UTC
\$0.05	\$18,530,389
\$0.10	\$37,060,778
\$0.15	\$55,591,167
\$0.20	\$74,121,556
\$0.25	\$92,651,945
\$0.30	\$111,182,334
\$0.35	\$129,712,724
\$0.40	\$148,243,113
\$0.45	\$166,773,502
\$0.50	\$185,303,891
\$0.55	\$203,834,280
\$0.60	\$222,364,669
\$0.65	\$240,895,058
\$0.70	\$259,425,447
\$0.75	\$277,955,836
\$0.80	\$296,486,225
\$0.85	\$315,016,614
\$0.90	\$333,547,003
\$0.95	\$352,077,393
\$1.00	\$370,607,782

PJM market participants that cleared UTCs during the specified refund period of September 8, 2014 through December 7, 2015, would be responsible to pay uplift based on their cleared up to congestion volume and the uplift charge if FERC orders that UTCs pay such uplift charges. Analysis of the cleared up to congestion transactions during the refund period of September 8, 2014, through December 7, 2015, showed that the top 10 market participants would be responsible for 53.7 percent of the uplift.

The credit risk exposure to companies that traded UTCs during this period is substantial, including the possible bankruptcy of one or more companies if FERC orders that UTCs pay such uplift charges. The actual risk depends in significant part on how the companies have managed their potential exposure as they continued to trade UTCs with knowledge of the risks. These companies do not appear to have informed PJM of how or if they have managed this exposure.

The total uplift amount has already been paid by other PJM members. Thus, the risk to other PJM members has been realized. The risk that UTC traders will not be able to cover their credit exposure otherwise related to their trading activity is addressed by existing PJM credit policies. If a UTC trader went into bankruptcy as a result of the uplift risk, the exposure to other PJM members is that they will not be repaid the level of uplift that should have been paid by UTC transactions.

Absent further Commission action, the increase in UTC uplift payment risk appears to have ended as a result of the expiration of the fifteen month limit on the payment of prior uplift charges.⁸⁵

Attachment Q: PJM Credit Policy of the PJM Open Access Transmission Tariff provides that:

Each Participant is also required to provide with its application information as to any known Material litigation, commitments or contingencies as well as any prior bankruptcy declarations or Material defalcations by the Participant or its predecessors, subsidiaries or Affiliates, if any. These disclosures shall be made upon application, upon initiation or change, and at least annually thereafter, or as requested by PJMSettlement.⁸⁶

The MMU recommends that PJMSettlement Inc. immediately request a credit evaluation from all companies that engaged in up to congestion transactions during the refund period of September 8, 2014, through December 7, 2015. To the full extent of its authority, PJM should ensure that the potential exposure to uplift for that period be included as a contingency in the companies' calculations for credit levels and/or collateral requirements. PJM should also calculate the UTC uplift charge contingency in a manner appropriate for the evaluation of any contingency. By definition, assessing a contingency requires a reasonable exercise of discretion. PJM should develop a reasonable assessment of the risk associated with the UTC uplift allocation and the appropriate approach to managing this risk. Zero risk is not within a

⁸⁵ 16 U.S.C. § 824e.

⁸⁶ See OATT Attachment Q § I.A.4.

reasonable range. The MMU recognizes that the exact amount of the exposure is not known. If PJM does not have the authority to take such steps, PJM should request guidance from FERC.

Sham Scheduling

Sham scheduling refers to a scheduling method under which a market participant breaks a single transaction, from generation balancing authority (source) to load balancing authority (sink), into multiple segments. Sham scheduling hides the actual source of generation from the load balancing authority. When unable to identify the source of the energy, the load balancing authority cannot see how the power will flow to the load, which can create loop flows and result in inaccurate pricing for transactions.

For example, if the generation balancing authority (source) is NYISO, and the load balancing authority (sink) is PJM, the transaction would be priced, in the PJM energy market, at the PJM/NYIS Interface regardless of the submitted path. However, if a market participant were to break the transaction into multiple segments, one on the NYIS-ONT path, and a second segment on the ONT-MISO-PJM path, the market participant would conceal the true source (NYISO) from PJM, and PJM would price the transaction as if its source were Ontario (the ONT interface price).

Sham scheduling can also be achieved by submitting a transaction that is in the opposite direction of a portion of a larger transaction schedule.

For example, market participants can submit one transaction with multiple segments among balancing authorities and another transaction which offsets all or part of a segment of the first transaction. If a market participant submits two separate transactions, one on the ONT-MISO-PJM path, and a second on the PJM-MISO path, the result of these transactions would be a net scheduled transaction from ONT to MISO, as the MISO-PJM segment of the first transaction is offset by the PJM-MISO transaction. In this example, PJM is not required to raise or lower generation as a result of these transactions, as they would for an import or an export, and there are no associated power flows across PJM. Nonetheless, the market participant is paid the price difference

between the PJM/ONT interface pricing point and the PJM/MISO interface pricing point. The market participant would be paid the PJM/ONT interface pricing point for the first transaction (ONT to PJM import) and the market participant would pay the PJM/MISO interface pricing point for the second transaction (PJM to MISO export). If the PJM/ONT interface price were higher than the PJM/MISO interface price, the market participant would be paid a net profit from the PJM market even though there was no impact on PJM operations.

The MMU recommends that PJM implement rules to prevent sham scheduling. The MMU recommends that PJM apply after the fact market settlement adjustments to identified sham scheduling segments to ensure that market participants cannot benefit from sham scheduling.

Elimination of Ontario Interface Pricing Point

The PJM/IMO interface pricing point (Ontario) was created to reflect the fact that transactions that originate or sink in the IESO balancing authority create actual energy flows that are split between the MISO and NYISO interface pricing points. PJM created the PJM/IMO interface pricing point to reflect the actual power flows across both the MISO/PJM and NYISO/PJM interfaces. The IMO does not have physical ties with PJM because it is not contiguous.

Prior to June 1, 2015, the PJM/IMO interface pricing point was defined as the LMP at the IESO Bruce bus. The LMP at the Bruce bus includes a congestion and loss component across the MISO and NYISO balancing authorities.

The noncontiguous nature of the PJM/IMO interface pricing point creates opportunities for market participants to engage in sham scheduling activities. For example, a market participant can use two separate transactions to create a flow from Ontario to MISO. In this example, the market participant uses the PJM energy market as a temporary generation and load point by first submitting a wheeling transaction from Ontario, through MISO and into PJM, then by submitting a second transaction from PJM to MISO. These two transactions, combined, create an actual flow along the Ontario/MISO Interface. Through sham scheduling, the market participant receives settlements from PJM when

no changes in generation occur. This activity is similar to that observed when PJM had a Southwest and Southeast interface pricing point. During that time, market participants would use the PJM spot market as a temporary load and generation point to wheel transactions through the PJM energy market. This was done to take advantage of the price differences between the interfaces without providing the market benefits of congestion relief.

A new PJM/IMO interface price method was implemented on June 1, 2015. The new method uses a dynamic weighting of the PJM/MISO interface price and the PJM/NYIS interface price, based on the performance of the Michigan-Ontario PARs. When the absolute value of the actual flows on the PARs are greater than or equal to the absolute value of the scheduled flows on the PARs, and the scheduled and actual flows are in the same direction, the PJM/IMO interface price will be equal to the PJM/MISO interface price (i.e. 100 percent weighting on the PJM/MISO Interface). When actual flows on the PARs are in the opposite direction of the scheduled flows on the PARs, the PJM/IMO interface price will be equal to the PJM/NYIS interface price (i.e. 100 percent weighting on the PJM/NYIS Interface). When the absolute value of the actual flows on the PARs are less than or equal to the absolute value of the scheduled flows on the PARs, and the scheduled and actual flows are in the same direction, the PJM/IMO interface price will be a combination to the PJM/MISO interface price and the PJM/NYIS interface price. In this case the weightings of the PJM/MISO and PJM/NYIS interface prices are determined based on the scheduled and actual flows. For example, in a given interval, the scheduled flow on the Michigan-Ontario PARs is 1,000 MW, and the actual flow is 800 MW. If in that same interval, the PJM/MISO interface price is \$45.00 and the PJM/NYIS interface price \$30.00, the PJM/IMO interface price would be calculated with a weighting of 80 percent of the PJM/MISO interface price ($\$45.00 * 0.8$, or $\$36.00$) and 20 percent of the PJM/NYIS interface price ($\$30.00 * 0.2$, or $\$6.00$), for a PJM/IMO interface price of $\$42.00$.⁸⁷

The MMU believes that the new PJM/IMO interface price method is a step in the right direction towards pricing energy that sources or sinks in Ontario based on the path of the actual, physical transfer of energy. The MMU remains

⁸⁷ See "IMO Interface Definition Methodology Report," presented to the MIC (February 11, 2015) <<http://www.pjm.com/~media/committees-groups/committees/mic/20150211/20150211-item-08b-imo-interface-definition-methodology-report.ashx>>.

concerned about the assumption of PAR operations, and will continue to evaluate the impact of PARs on the scheduled and actual flows and the impacts on the PJM/IMO interface price. The MMU remains concerned about the potential for market participants to continue to engage in sham scheduling activities after the new method is implemented.

The MMU recommends that if the PJM/IMO interface price remains and with PJM's new method in place, that PJM implement additional business rules to remove the incentive to engage in sham scheduling activities using the PJM/IMO interface price. Such rules would prohibit the same market participant from scheduling an export transaction from PJM to any balancing authority while at the same time an import transaction is scheduled to PJM that receives the PJM/IMO interface price. PJM should also prohibit the same market participant from scheduling an import transaction to PJM from any balancing authority while at the same time an export transaction is scheduled from PJM that receives the PJM/IMO interface price.

In the first nine months of 2017, of the 843 GWh of the gross scheduled transactions between PJM and IESO, 829 GWh (98.5 percent) wheeled through MISO (see Table 9-23). The MMU recommends that PJM eliminate the PJM/IMO interface pricing point, and assign the transactions that originate or sink in the IESO balancing authority to the PJM/MISO interface pricing point.⁸⁸

PJM and NYISO Coordinated Interchange Transactions

Coordinated transaction scheduling (CTS) provides the option for market participants to submit intra-hour transactions between the NYISO and PJM that include an interface spread bid on which transactions are evaluated.⁸⁹ The evaluation is based on the forward-looking prices as determined by PJM's intermediate term security constrained economic dispatch tool (ITSCED) and the NYISO's real-time commitment (RTC) tool. PJM shares its PJM/NYISO interface price ITSCED results with the NYISO. The NYISO compares the PJM/NYISO interface price with its RTC calculated NYISO/PJM interface price. If the PJM and NYISO interface price spread is greater than the market participant's

⁸⁸ On October 1, 2013, a sub-group of PJM's Market Implementation Committee started stakeholder discussions to address this inconsistency in market pricing.

⁸⁹ PJM and the NYISO implemented CTS on November 4, 2014. 146 FERC ¶ 61,096 (2014).

CTS bid, the transaction is approved. If the PJM and NYISO interface price spread is less than the CTS bid, the transaction is denied.

The ITSCED application runs approximately every five minutes and each run produces forecast LMPs for the intervals approximately 30 minutes, 45 minutes, 90 minutes and 135 minutes ahead. Therefore, for each 15 minute interval, the various ITSCED solutions will produce 12 forecasted PJM/NYIS interface prices. To evaluate the accuracy of ITSCED forecasts, the forecasted PJM/NYIS interface price for each 15 minute interval from ITSCED was compared to the actual real-time interface LMP for the first nine months of 2017. Table 9-44 shows that over all 12 forecast ranges, ITSCED predicted the real-time PJM/NYIS interface LMP within the range of \$0.00 to \$5.00 in 40.1 percent of the intervals. In those intervals, the average price difference between the ITSCED forecasted LMP and the actual real-time LMP was \$1.62 per MWh. In 5.2 percent of all intervals, the absolute value of the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP was greater than \$20.00. The average price differences were \$84.89 when the price difference was greater than \$20.00, and \$70.45 when the price difference was greater than -\$20.00.

Table 9-44 Differences between forecast and actual PJM/NYIS interface prices: January 1 through September 30, 2017

Range of Price Differences	Percent of All Intervals	Average Price Difference
> \$20	2.2%	\$84.89
\$10 to \$20	3.8%	\$13.61
\$5 to \$10	7.5%	\$7.04
\$0 to \$5	40.1%	\$1.62
\$0 to -\$5	36.2%	\$1.53
-\$5 to -\$10	4.8%	\$6.95
-\$10 to -\$20	2.5%	\$14.07
< -\$20	3.0%	\$70.45

Table 9-45 shows how the accuracy of the ITSCED forecasted LMPs changes as the cases approach real-time. In the final ITSCED results prior to real time, in 75.8 percent of all intervals, the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP fell within +/- \$5.00

of the actual PJM/NYIS interface real-time LMP, compared to 75.1 percent in the 135 minute ahead ITSCED results.

Table 9-45 Differences between forecast and actual PJM/NYIS interface prices: January 1 through September 30, 2017

Range of Price Differences	~ 135 Minutes Prior to Real-Time		~ 90 Minutes Prior to Real-Time		~ 45 Minutes Prior to Real-Time		~ 30 Minutes Prior to Real-Time	
	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference
> \$20	1.4%	\$57.88	1.3%	\$64.71	1.4%	\$74.84	4.2%	\$72.75
\$10 to \$20	3.4%	\$13.54	3.5%	\$13.47	3.5%	\$13.52	4.4%	\$13.82
\$5 to \$10	6.8%	\$7.08	7.7%	\$6.99	7.2%	\$7.00	8.0%	\$7.08
\$0 to \$5	32.5%	\$1.70	42.4%	\$1.67	44.9%	\$1.56	44.5%	\$1.55
\$0 to -\$5	42.6%	\$1.74	34.8%	\$1.52	33.8%	\$1.38	31.3%	\$1.33
-\$5 to -\$10	6.6%	\$6.98	4.8%	\$6.92	4.2%	\$6.97	3.4%	\$6.95
-\$10 to -\$20	3.3%	\$13.98	2.4%	\$14.09	2.2%	\$14.18	1.8%	\$14.16
< -\$20	3.4%	\$87.04	3.1%	\$56.32	2.9%	\$57.36	2.3%	\$57.62

In 6.5 percent of the intervals in the thirty-minute ahead forecast, the absolute value of the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP was greater than \$20.00, the average price difference was \$72.75 when the price difference was greater than \$20.00, and \$57.62 when the price difference was greater than -\$20.00.

Table 9-46 and Table 9-47 show the monthly differences between forecasted and actual PJM/NYIS interface prices. Analysis of the data on a monthly basis shows that there is a decline in the accuracy of the ITSCED forecast ability during periods of cold and hot weather.

Table 9-46 Monthly Differences between forecast and actual PJM/NYIS interface prices (percent of intervals): January 1 through September 30, 2017

Interval	Range of Price Differences	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	YTD Avg
~ 30 Minutes Prior to Real-Time	> \$20	4.8%	1.3%	4.6%	4.8%	4.3%	4.0%	3.0%	3.8%	7.1%	4.2%
	\$10 to \$20	3.6%	1.2%	5.4%	3.9%	4.9%	4.0%	4.9%	4.7%	7.1%	4.4%
	\$5 to \$10	5.5%	4.1%	8.6%	9.0%	8.3%	5.5%	9.2%	9.5%	12.1%	8.0%
	\$0 to \$5	47.8%	50.6%	41.1%	44.0%	40.6%	45.1%	43.1%	46.8%	42.0%	44.5%
	\$0 to -\$5	31.0%	37.2%	31.2%	31.3%	32.6%	33.2%	32.2%	29.7%	23.7%	31.3%
	-\$5 to -\$10	3.1%	2.9%	2.7%	3.5%	5.2%	4.2%	2.6%	2.2%	3.8%	3.4%
	-\$10 to -\$20	1.3%	1.5%	2.8%	1.9%	1.6%	2.2%	2.1%	1.5%	1.4%	1.8%
	< -\$20	3.1%	1.2%	3.5%	1.6%	2.4%	1.7%	2.9%	1.8%	2.8%	2.3%
~ 45 Minutes Prior to Real-Time	> \$20	1.4%	0.1%	1.1%	1.4%	1.1%	1.7%	0.7%	1.3%	4.0%	1.4%
	\$10 to \$20	2.9%	0.7%	2.8%	3.1%	4.3%	3.0%	3.5%	3.8%	7.0%	3.5%
	\$5 to \$10	4.6%	2.7%	7.5%	7.7%	8.2%	6.0%	7.8%	8.7%	11.2%	7.2%
	\$0 to \$5	44.7%	48.3%	42.3%	45.9%	43.0%	44.4%	45.2%	48.4%	41.9%	44.9%
	\$0 to -\$5	36.8%	41.4%	33.4%	32.8%	33.5%	35.4%	34.0%	30.9%	26.5%	33.8%
	-\$5 to -\$10	4.3%	3.5%	5.3%	4.6%	5.5%	4.6%	2.9%	3.2%	3.6%	4.2%
	-\$10 to -\$20	1.6%	1.7%	3.2%	2.4%	1.7%	2.3%	2.3%	1.8%	2.4%	2.2%
	< -\$20	3.7%	1.6%	4.5%	2.1%	2.7%	2.6%	3.6%	1.9%	3.4%	2.9%
~ 90 Minutes Prior to Real-Time	> \$20	1.1%	0.0%	0.8%	1.1%	1.4%	1.4%	1.0%	1.3%	3.1%	1.3%
	\$10 to \$20	2.2%	0.8%	3.0%	3.1%	5.2%	3.2%	3.5%	3.6%	7.2%	3.5%
	\$5 to \$10	3.2%	3.1%	7.7%	8.7%	8.9%	6.8%	8.1%	9.0%	13.6%	7.7%
	\$0 to \$5	37.8%	43.7%	39.7%	46.5%	42.8%	43.8%	43.8%	44.8%	39.1%	42.4%
	\$0 to -\$5	44.1%	43.8%	34.5%	31.2%	31.0%	34.4%	34.8%	33.5%	26.3%	34.8%
	-\$5 to -\$10	4.9%	4.8%	6.4%	5.0%	6.2%	5.0%	2.8%	3.6%	4.5%	4.8%
	-\$10 to -\$20	2.8%	2.2%	3.3%	2.2%	1.7%	2.7%	2.3%	2.1%	2.4%	2.4%
	< -\$20	3.9%	1.6%	4.7%	2.2%	2.7%	2.8%	3.6%	2.0%	3.9%	3.1%
~ 135 Minutes Prior to Real-Time	> \$20	1.5%	0.2%	2.0%	0.8%	1.1%	1.3%	1.6%	1.7%	2.5%	1.4%
	\$10 to \$20	1.6%	1.3%	4.2%	1.7%	2.9%	3.7%	3.7%	5.1%	6.2%	3.4%
	\$5 to \$10	4.4%	3.9%	6.9%	5.0%	5.9%	5.4%	8.9%	8.9%	11.5%	6.8%
	\$0 to \$5	33.3%	40.6%	32.8%	29.2%	28.2%	29.6%	29.2%	37.3%	33.3%	32.5%
	\$0 to -\$5	46.9%	45.3%	37.4%	48.6%	45.6%	45.0%	45.6%	37.0%	31.9%	42.6%
	-\$5 to -\$10	5.2%	4.6%	8.1%	8.0%	9.7%	7.6%	4.6%	5.4%	6.3%	6.6%
	-\$10 to -\$20	3.2%	2.3%	3.8%	4.2%	3.4%	4.1%	2.6%	2.6%	3.4%	3.3%
	< -\$20	3.9%	1.7%	4.7%	2.6%	3.2%	3.3%	3.7%	2.0%	5.0%	3.4%

Table 9-47 Monthly differences between forecast and actual PJM/NYIS interface prices (average price difference): January 1 through September 30, 2017

Interval	Range of Price Differences										YTD
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Avg	
~ 30 Minutes Prior to Real-Time	> \$20	\$63.36	\$38.03	\$70.05	\$69.83	\$53.05	\$41.12	\$57.35	\$47.21	\$140.30	\$72.75
	\$10 to \$20	\$13.96	\$12.85	\$13.90	\$14.17	\$13.91	\$13.49	\$13.96	\$13.43	\$13.93	\$13.82
	\$5 to \$10	\$6.99	\$7.03	\$7.01	\$7.05	\$7.13	\$7.00	\$7.12	\$7.11	\$7.19	\$7.08
	\$0 to \$5	\$1.20	\$1.24	\$1.58	\$1.66	\$1.69	\$1.65	\$1.57	\$1.61	\$1.89	\$1.55
	\$0 to -\$5	\$1.07	\$1.12	\$1.48	\$1.39	\$1.48	\$1.38	\$1.26	\$1.37	\$1.45	\$1.33
	-\$5 to -\$10	\$6.92	\$7.14	\$6.72	\$7.30	\$6.95	\$6.60	\$6.89	\$7.06	\$7.02	\$6.95
	-\$10 to -\$20	\$13.76	\$13.84	\$14.60	\$14.17	\$13.92	\$14.33	\$14.62	\$13.44	\$14.10	\$14.16
< -\$20	\$48.79	\$61.42	\$61.04	\$49.11	\$60.04	\$45.27	\$49.75	\$36.99	\$94.25	\$57.62	
~ 45 Minutes Prior to Real-Time	> \$20	\$129.62	\$27.09	\$39.66	\$51.24	\$37.14	\$45.77	\$50.51	\$36.92	\$114.48	\$74.84
	\$10 to \$20	\$13.93	\$13.48	\$13.42	\$13.01	\$13.53	\$13.54	\$13.84	\$13.47	\$13.45	\$13.52
	\$5 to \$10	\$6.94	\$6.85	\$7.11	\$7.03	\$7.04	\$6.94	\$7.00	\$7.01	\$6.97	\$7.00
	\$0 to \$5	\$1.16	\$1.22	\$1.54	\$1.61	\$1.67	\$1.66	\$1.59	\$1.69	\$1.90	\$1.56
	\$0 to -\$5	\$1.09	\$1.21	\$1.49	\$1.40	\$1.56	\$1.44	\$1.39	\$1.41	\$1.54	\$1.38
	-\$5 to -\$10	\$7.05	\$7.01	\$6.87	\$7.21	\$6.84	\$6.82	\$6.90	\$6.98	\$7.16	\$6.97
	-\$10 to -\$20	\$13.89	\$13.71	\$14.01	\$14.15	\$14.49	\$14.94	\$14.66	\$14.78	\$13.10	\$14.18
< -\$20	\$55.02	\$54.95	\$61.58	\$51.42	\$52.98	\$43.12	\$46.48	\$39.67	\$95.92	\$57.36	
~ 90 Minutes Prior to Real-Time	> \$20	\$119.08	\$33.83	\$42.81	\$35.65	\$36.34	\$45.91	\$53.87	\$29.38	\$101.99	\$64.71
	\$10 to \$20	\$12.58	\$13.63	\$13.59	\$13.23	\$13.94	\$13.39	\$13.35	\$13.37	\$13.60	\$13.47
	\$5 to \$10	\$7.00	\$6.54	\$7.03	\$6.92	\$7.11	\$7.03	\$7.03	\$6.90	\$7.04	\$6.99
	\$0 to \$5	\$1.26	\$1.35	\$1.61	\$1.73	\$1.74	\$1.77	\$1.71	\$1.79	\$2.04	\$1.67
	\$0 to -\$5	\$1.30	\$1.39	\$1.61	\$1.53	\$1.70	\$1.63	\$1.53	\$1.49	\$1.69	\$1.52
	-\$5 to -\$10	\$6.98	\$7.01	\$6.99	\$6.99	\$6.83	\$6.80	\$6.80	\$6.80	\$7.03	\$6.92
	-\$10 to -\$20	\$14.12	\$13.90	\$13.95	\$13.58	\$13.52	\$14.47	\$14.84	\$14.25	\$13.99	\$14.09
< -\$20	\$56.42	\$59.93	\$60.23	\$50.61	\$56.61	\$45.65	\$47.14	\$37.02	\$79.87	\$56.32	
~ 135 Minutes Prior to Real-Time	> \$20	\$106.59	\$28.28	\$34.69	\$38.20	\$44.90	\$40.68	\$43.69	\$32.89	\$96.92	\$57.88
	\$10 to \$20	\$14.50	\$12.23	\$13.70	\$13.19	\$12.97	\$13.45	\$13.11	\$14.11	\$13.66	\$13.54
	\$5 to \$10	\$7.33	\$7.14	\$7.12	\$6.83	\$7.15	\$6.99	\$6.98	\$7.09	\$7.15	\$7.08
	\$0 to \$5	\$1.31	\$1.47	\$1.75	\$1.65	\$1.78	\$1.77	\$1.75	\$1.75	\$2.13	\$1.70
	\$0 to -\$5	\$1.45	\$1.56	\$1.72	\$1.84	\$1.99	\$1.86	\$1.76	\$1.73	\$1.76	\$1.74
	-\$5 to -\$10	\$7.06	\$7.18	\$7.08	\$6.92	\$6.95	\$7.05	\$6.62	\$6.75	\$7.20	\$6.98
	-\$10 to -\$20	\$14.00	\$13.85	\$13.79	\$13.64	\$13.94	\$14.70	\$14.44	\$13.60	\$13.76	\$13.98
< -\$20	\$56.09	\$54.70	\$58.99	\$47.95	\$143.53	\$246.97	\$47.26	\$37.10	\$79.39	\$87.04	

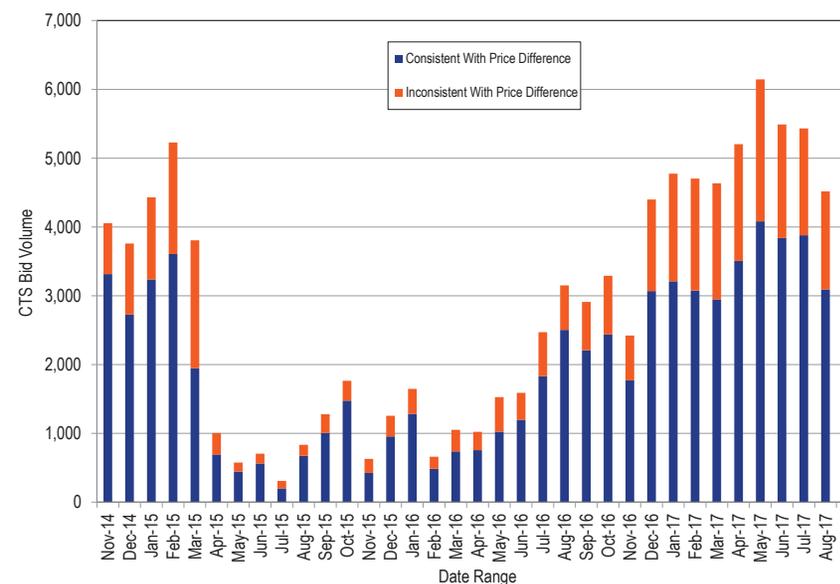
The NYISO uses PJM’s ITSCED forecasted LMPs to compare against the NYISO Real-Time Commitment (RTC) results in its evaluation of CTS transactions. The NYISO approves CTS (spread bid) transactions when the offered spread is less than or equal to the spread between the ITSCED forecast PJM/NYIS interface LMP and the NYISO RTC forecast NYIS/PJM interface LMP. The large differences between forecast and actual LMPs in the intervals closest to real-time could cause CTS transactions to be approved that would contribute to transactions being scheduled counter to real-time economic signals, and contribute to inefficient scheduling across the PJM/NYIS border.

CTS transactions are evaluated based on the spread bid, which limits the amount of price convergence that can occur. As long as balancing operating reserve charges are applied and CTS transactions are optional, the CTS proposal represents a small incremental step toward better interface pricing. The NYISO has a 75 minute bid submission deadline. While market participants have the option to specify bid data on 15 minute intervals, market participants must submit their bids 75 minutes prior to the requested transaction start time. The 75 minute bid submission deadline associated with scheduling energy transactions in the NYISO should be shortened. Reducing this deadline could significantly improve pricing efficiency at the PJM/NYISO border for non-CTS transactions and for CTS transactions as market participants would be able to adjust their bids in response to real-time price signals.

CTS transactions were evaluated for each 15 minute interval. From November 4, 2014, through September 30, 2017, 102,122 15 minute CTS schedules were approved through the CTS process based on the forecast LMPs. When the forecast LMPs for the approved intervals were compared to the hourly integrated real-time LMPs, the direction of the flow in 29,887 (29.3 percent) of the intervals was inconsistent with the differences in real-time PJM/NYISO and NYISO/PJM prices. For example, if a market participant submits a CTS transaction from NYISO to PJM with a spread bid of \$5.00, and NYISO’s forecasted PJM interface price was at least \$5.00 lower than PJM’s forecasted NYISO interface price, the transaction would be approved. For 29.3 percent of the approved transactions, the actual, real-time price differentials were in the opposite direction of the forecast differential. The actual, real-time

price differentials meant that the transactions would have been economic in the opposite direction. For 70.7 percent of the intervals, the forecast price differentials were consistent with real-time PJM/NYISO and NYISO/PJM price differences. Figure 9-14 shows the monthly volume of cleared PJM/NYIS CTS bids. Figure 9-14 also shows the percent of cleared bids that resulted in flows consistent and inconsistent with price differences.

Figure 9-14 Monthly cleared PJM/NYIS CTS bid volume: November 1, 2014 through September 30, 2017



The data reviewed show that ITSCED is not a highly accurate predictor of the real-time PJM/NYIS interface prices. If this remains true, it will limit the effectiveness of CTS in improving interface pricing between PJM and NYISO.

Reserving Ramp on the PJM/NYISO Interface

Prior to the implementation of CTS, PJM held ramp space for all transactions submitted between PJM and the NYISO as soon as the NERC Tag was approved.

At that time, once transactions were evaluated by the NYISO through their real-time market clearing process, any adjustments made to the submitted transactions would be reflected on the NERC Tags and the PJM ramp was adjusted accordingly.

As part of this process, PJM was often required to make adjustments to transactions on its other interfaces in order to bring total system ramp back to within its limit. The default ramp limit in PJM is +/- 1,000 MW. For example, the ramp in a given interval is currently -1,000 MW, consisting of 2,000 MW of imports from the NYISO to PJM and 3,000 MW of exports from PJM on its other interfaces. If, through the NYISO real-time market clearing process, the NYISO only approves 1,000 MW of the imports, the other 1,000 MW of import transactions from the NYISO would be curtailed. The ramp in this interval would then be -2,000 MW, consisting of the 1,000 MW of cleared imports from the NYISO to PJM and 3,000 MW of exports from PJM on its other interfaces. PJM would then be required to curtail an additional 1,000 MW of exports at its other interface to bring the limit back to within +/- 1,000. These curtailments were made on a last in first out basis as determined by the timestamp on the NERC Tag.

With the implementation of the CTS product with the NYISO, PJM modified how ramp is handled at the PJM/NYISO Interface. Effective November 4, 2014, PJM no longer holds ramp room for any transactions submitted between PJM and the NYISO at the time of submission. Only after the NYISO completes its real-time market clearing process, and communicates the results to PJM, does PJM perform a ramp evaluation on transactions scheduled with the NYISO. If, in the event the NYISO market clearing process would violate ramp, PJM would make additional adjustments based on a last-in first-out basis as determined by the timestamp on the NERC Tag. This process prevents the transactions scheduled at the PJM/NYISO interface from holding (or creating) ramp until NYISO has completed its economic evaluation and the transactions are approved through the NYISO market clearing process.

PJM and MISO Coordinated Interchange Transaction Proposal

PJM and MISO have proposed the implementation of coordinated interchange transactions, similar to the PJM/NYISO approach, through the Joint and Common Market Initiative. The coordinated transaction scheduling (CTS) proposal will provide the option for market participants to submit intra-hour transactions between the MISO and PJM that include an interface spread bid on which transactions are evaluated. Similar to the PJM/NYISO approach, the evaluation would be based, in part, on the forward-looking prices as determined by PJM's intermediate term security constrained economic dispatch tool (ITSCED). Unlike the PJM/NYISO CTS process in which the NYISO performs the evaluation, the PJM/MISO CTS process will use a joint clearing process in which both RTOs will share forward looking prices.

On February 3, 2017, as amended on February 28, 2017, PJM filed a request to revise the CTS implementation date from March 1, 2017 to October 3, 2017.⁹⁰ PJM requested the delay to accommodate the timing of other PJM market system enhancements with the enhancements needed to implement CTS. On March 30, 2017, the Commission approved the new implementation date of October 3, 2017.⁹¹

To evaluate the accuracy of ITSCED forecasts, the forecasted PJM/MISO interface price for each 15 minute interval from ITSCED was compared to the actual real-time interface LMP for the first nine months of 2017. Table 9-48 shows that over all 12 forecast ranges, ITSCED predicted the real-time PJM/MISO interface LMP within the range of \$0.00 to \$5.00 in 38.6 percent of all intervals. In those intervals, the average price difference between the ITSCED forecasted LMP and the actual real-time LMP was \$1.51. In 5.6 percent of all intervals, the absolute value of the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP was greater than \$20.00. The average price differences were \$71.68 when the price difference was greater than \$20.00, and \$65.94 when the price difference was greater than -\$20.00.

⁹⁰ See *PJM Interconnection, LLC*, Docket No. ER17-934-000 (February 3, 2017).

⁹¹ See Letter Order, Docket No. ER17-934-001 (March 30, 2017).

Table 9-48 Differences between forecast and actual PJM/MISO interface prices: January 1 through September 30, 2017

Range of Price Differences	Percent of All Intervals	Average Price Difference
> \$20	2.3%	\$71.68
\$10 to \$20	4.4%	\$13.70
\$5 to \$10	7.8%	\$7.07
\$0 to \$5	38.6%	\$1.51
\$0 to -\$5	36.0%	\$1.42
-\$5 to -\$10	4.8%	\$7.07
-\$10 to -\$20	2.9%	\$14.09
< -\$20	3.3%	\$65.94

Table 9-49 shows how the accuracy of the ITSCED forecasted LMPs change as the cases approach real-time. In the final ITSCED results prior to real time, in 74.0 percent of all intervals, the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP fell within +/- \$5.00 of the actual PJM/MISO interface real-time LMP, compared to 73.8 percent in the 135 minute ahead ITSCED results.

Table 9-49 Differences between forecast and actual PJM/MISO interface prices: January 1 through September 30, 2017

Range of Price Differences	~ 135 Minutes Prior to Real-Time		~ 90 Minutes Prior to Real-Time		~ 45 Minutes Prior to Real-Time		~ 30 Minutes Prior to Real-Time	
	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference	Percent of Intervals	Average Price Difference
> \$20	1.2%	\$37.17	1.6%	\$41.84	1.4%	\$58.01	4.2%	\$67.08
\$10 to \$20	3.8%	\$13.59	4.7%	\$13.67	3.9%	\$13.48	5.2%	\$13.95
\$5 to \$10	6.1%	\$7.09	8.3%	\$7.05	8.2%	\$7.03	8.4%	\$7.09
\$0 to \$5	28.4%	\$1.53	42.6%	\$1.52	44.6%	\$1.49	43.5%	\$1.49
\$0 to -\$5	45.4%	\$1.63	32.9%	\$1.35	32.4%	\$1.26	30.5%	\$1.23
-\$5 to -\$10	6.9%	\$7.05	4.2%	\$7.01	3.9%	\$7.08	3.5%	\$7.12
-\$10 to -\$20	4.1%	\$14.02	2.5%	\$14.02	2.5%	\$14.14	2.2%	\$14.09
< -\$20	4.1%	\$79.11	3.1%	\$53.65	3.1%	\$54.24	2.5%	\$54.42

In 6.7 percent of the intervals in the thirty-minute ahead forecast, the absolute value of the average price difference between the ITSCED forecasted LMP and the actual real-time interface LMP was greater than \$20.00, the average price differences were \$67.08 when the price difference was greater than \$20.00, and \$54.42 when the price difference was greater than -\$20.00.

Table 9-50 and Table 9-51 show the monthly differences between forecasted and actual PJM/MISO interface prices. Analysis of the data on a monthly basis shows that there is a decline in the accuracy of the ITSCED forecast ability during periods of cold and hot weather.

Table 9-50 Monthly Differences between forecast and actual PJM/MISO interface prices (percent of intervals): January 1 through September 30, 2017

Interval	Range of Price Differences	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	YTD Avg
~ 30 Minutes Prior to Real-Time	> \$20	3.4%	1.6%	5.3%	4.1%	4.5%	4.2%	4.1%	3.5%	7.2%	4.2%
	\$10 to \$20	3.4%	1.1%	6.2%	4.1%	6.5%	5.3%	6.1%	4.9%	9.1%	5.2%
	\$5 to \$10	5.7%	3.7%	10.3%	8.3%	10.5%	7.3%	7.9%	9.5%	12.4%	8.4%
	\$0 to \$5	48.7%	48.7%	39.0%	43.5%	36.3%	42.7%	42.3%	49.7%	40.5%	43.5%
	\$0 to -\$5	32.9%	39.9%	27.9%	32.4%	30.7%	30.5%	30.9%	26.9%	22.6%	30.5%
	-\$5 to -\$10	2.2%	2.8%	5.0%	4.3%	5.8%	3.6%	2.5%	2.1%	3.3%	3.5%
	-\$10 to -\$20	1.5%	0.9%	3.0%	2.1%	3.0%	3.2%	2.3%	1.7%	2.1%	2.2%
< -\$20	2.1%	1.3%	3.3%	1.2%	2.6%	3.1%	3.9%	1.8%	2.7%	2.5%	
~ 45 Minutes Prior to Real-Time	> \$20	0.7%	0.2%	1.7%	0.9%	1.3%	1.3%	1.2%	1.1%	3.9%	1.4%
	\$10 to \$20	2.7%	0.5%	4.2%	3.1%	5.4%	3.6%	4.1%	4.0%	7.1%	3.9%
	\$5 to \$10	5.0%	3.1%	9.3%	7.6%	11.6%	8.0%	8.0%	8.9%	11.9%	8.2%
	\$0 to \$5	47.0%	48.0%	41.9%	46.5%	38.6%	43.0%	45.2%	49.9%	41.7%	44.6%
	\$0 to -\$5	37.3%	42.6%	31.4%	33.8%	29.7%	32.2%	30.6%	29.6%	25.4%	32.4%
	-\$5 to -\$10	3.1%	2.7%	5.0%	4.0%	7.1%	3.9%	2.8%	2.4%	3.5%	3.9%
	-\$10 to -\$20	1.5%	1.2%	2.8%	2.3%	3.3%	3.8%	3.0%	2.0%	2.7%	2.5%
< -\$20	2.7%	1.7%	3.7%	1.7%	2.9%	4.1%	4.9%	2.2%	3.8%	3.1%	
~ 90 Minutes Prior to Real-Time	> \$20	1.1%	0.2%	2.2%	0.5%	1.8%	1.7%	1.9%	0.8%	3.8%	1.6%
	\$10 to \$20	2.4%	1.0%	4.8%	3.8%	7.7%	4.9%	5.0%	5.0%	7.7%	4.7%
	\$5 to \$10	3.9%	3.4%	9.6%	8.3%	13.1%	8.1%	7.8%	7.3%	12.7%	8.3%
	\$0 to \$5	40.5%	45.7%	39.6%	46.0%	36.7%	43.9%	43.7%	48.6%	39.1%	42.6%
	\$0 to -\$5	42.9%	43.3%	31.6%	33.0%	28.6%	29.8%	31.0%	31.2%	25.6%	32.9%
	-\$5 to -\$10	4.3%	3.4%	5.5%	4.5%	5.7%	3.9%	3.1%	3.0%	4.5%	4.2%
	-\$10 to -\$20	2.0%	1.3%	2.7%	2.3%	3.4%	3.6%	2.9%	1.8%	2.8%	2.5%
< -\$20	3.0%	1.7%	3.9%	1.6%	2.8%	4.2%	4.7%	2.3%	3.8%	3.1%	
~ 135 Minutes Prior to Real-Time	> \$20	1.6%	0.3%	2.5%	0.1%	1.0%	1.0%	1.8%	1.4%	1.4%	1.2%
	\$10 to \$20	3.6%	1.5%	5.5%	1.5%	4.1%	3.0%	4.1%	6.6%	4.1%	3.8%
	\$5 to \$10	4.9%	3.8%	8.5%	4.2%	6.9%	5.3%	6.9%	5.9%	7.9%	6.1%
	\$0 to \$5	31.9%	36.0%	29.6%	24.0%	20.5%	25.6%	25.8%	34.3%	28.1%	28.4%
	\$0 to -\$5	48.2%	51.6%	39.2%	54.0%	44.6%	46.3%	46.7%	41.2%	37.5%	45.4%
	-\$5 to -\$10	4.6%	4.1%	7.2%	9.2%	11.7%	6.5%	5.1%	5.6%	8.3%	6.9%
	-\$10 to -\$20	2.3%	1.1%	3.2%	4.7%	6.9%	6.3%	3.6%	2.4%	6.5%	4.1%
< -\$20	2.9%	1.7%	4.2%	2.2%	4.2%	6.1%	6.1%	2.7%	6.1%	4.1%	

Table 9-51 Monthly differences between forecast and actual PJM/MISO interface prices (average price difference): January 1 through September 30, 2017

Interval	Range of Price Differences										YTD
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Avg	
~ 30 Minutes Prior to Real-Time	> \$20	\$43.86	\$42.30	\$57.15	\$73.06	\$54.49	\$45.18	\$49.58	\$51.17	\$127.67	\$67.08
	\$10 to \$20	\$13.89	\$13.95	\$14.25	\$14.33	\$13.56	\$14.22	\$13.84	\$13.91	\$13.81	\$13.95
	\$5 to \$10	\$7.11	\$6.92	\$7.06	\$7.04	\$7.18	\$7.02	\$7.04	\$7.00	\$7.27	\$7.09
	\$0 to \$5	\$1.17	\$1.10	\$1.67	\$1.65	\$1.63	\$1.55	\$1.52	\$1.50	\$1.72	\$1.49
	\$0 to -\$5	\$0.99	\$1.03	\$1.48	\$1.32	\$1.52	\$1.21	\$1.13	\$1.11	\$1.35	\$1.23
	-\$5 to -\$10	\$7.19	\$6.96	\$7.12	\$6.98	\$7.30	\$7.08	\$7.08	\$7.20	\$7.02	\$7.12
	-\$10 to -\$20	\$14.04	\$14.32	\$14.02	\$13.99	\$14.02	\$13.82	\$14.84	\$13.94	\$14.02	\$14.09
< -\$20	\$60.49	\$50.06	\$54.83	\$44.68	\$55.11	\$39.63	\$63.84	\$48.03	\$61.84	\$54.42	
~ 45 Minutes Prior to Real-Time	> \$20	\$42.79	\$34.22	\$40.06	\$47.21	\$44.00	\$46.22	\$36.06	\$35.72	\$94.99	\$58.01
	\$10 to \$20	\$13.11	\$14.62	\$13.86	\$13.63	\$13.76	\$13.45	\$13.33	\$13.32	\$13.27	\$13.48
	\$5 to \$10	\$6.98	\$6.60	\$7.02	\$6.99	\$7.01	\$6.92	\$7.25	\$7.04	\$7.13	\$7.03
	\$0 to \$5	\$1.05	\$1.07	\$1.70	\$1.57	\$1.71	\$1.53	\$1.52	\$1.57	\$1.76	\$1.49
	\$0 to -\$5	\$1.01	\$1.11	\$1.44	\$1.35	\$1.51	\$1.27	\$1.20	\$1.15	\$1.39	\$1.26
	-\$5 to -\$10	\$7.09	\$6.91	\$6.83	\$7.17	\$7.07	\$7.31	\$7.07	\$7.13	\$7.21	\$7.08
	-\$10 to -\$20	\$13.69	\$13.42	\$13.91	\$13.98	\$13.93	\$14.42	\$14.48	\$14.63	\$14.13	\$14.14
< -\$20	\$57.60	\$47.03	\$55.84	\$44.82	\$57.31	\$38.84	\$60.24	\$46.43	\$68.27	\$54.24	
~ 90 Minutes Prior to Real-Time	> \$20	\$33.41	\$37.26	\$39.08	\$26.46	\$33.83	\$37.24	\$35.13	\$31.01	\$60.56	\$41.84
	\$10 to \$20	\$13.60	\$13.14	\$13.55	\$13.86	\$14.00	\$13.75	\$13.67	\$13.58	\$13.41	\$13.67
	\$5 to \$10	\$6.95	\$6.75	\$6.96	\$6.98	\$7.12	\$7.19	\$7.19	\$7.05	\$7.03	\$7.05
	\$0 to \$5	\$1.12	\$1.10	\$1.76	\$1.62	\$1.67	\$1.58	\$1.50	\$1.55	\$1.78	\$1.52
	\$0 to -\$5	\$1.11	\$1.23	\$1.48	\$1.41	\$1.69	\$1.34	\$1.26	\$1.32	\$1.51	\$1.35
	-\$5 to -\$10	\$7.00	\$6.84	\$6.79	\$6.95	\$7.18	\$7.17	\$7.15	\$6.92	\$7.09	\$7.01
	-\$10 to -\$20	\$14.11	\$13.10	\$13.80	\$13.69	\$13.55	\$14.45	\$14.85	\$14.13	\$13.91	\$14.02
< -\$20	\$55.41	\$47.69	\$52.80	\$46.60	\$57.07	\$39.14	\$63.01	\$45.80	\$65.01	\$53.65	
~ 135 Minutes Prior to Real-Time	> \$20	\$32.31	\$38.91	\$35.10	\$26.62	\$48.56	\$41.40	\$37.06	\$30.88	\$42.19	\$37.17
	\$10 to \$20	\$14.39	\$12.96	\$13.54	\$14.02	\$13.36	\$13.24	\$13.25	\$13.86	\$13.35	\$13.59
	\$5 to \$10	\$7.07	\$7.28	\$7.21	\$6.88	\$7.09	\$7.04	\$7.13	\$7.23	\$6.91	\$7.09
	\$0 to \$5	\$1.15	\$1.16	\$1.84	\$1.55	\$1.76	\$1.73	\$1.56	\$1.43	\$1.82	\$1.53
	\$0 to -\$5	\$1.26	\$1.39	\$1.65	\$1.81	\$1.97	\$1.74	\$1.59	\$1.56	\$1.73	\$1.63
	-\$5 to -\$10	\$6.90	\$6.82	\$6.86	\$7.04	\$7.15	\$7.16	\$7.05	\$7.06	\$7.23	\$7.05
	-\$10 to -\$20	\$13.64	\$12.97	\$14.00	\$14.19	\$13.46	\$14.70	\$14.52	\$13.82	\$13.96	\$14.02
< -\$20	\$56.50	\$46.86	\$52.01	\$42.91	\$126.92	\$147.79	\$58.06	\$43.87	\$65.61	\$79.11	

The data reviewed show that ITSCED is not a highly accurate predictor of the real-time PJM/MISO interface prices. If this remains true, it will limit the effectiveness of CTS in improving interface pricing between PJM and MISO.

Willing to Pay Congestion and Not Willing to Pay Congestion

When reserving nonfirm transmission, market participants have the option to choose whether or not they are willing to pay congestion. When the market participant elects to pay congestion, PJM operators redispatch the system if necessary to allow the energy transaction to continue to flow. The system redispatch often creates price separation across buses on the PJM system. The difference in LMPs between two buses in PJM is the congestion cost (and losses) that the market participant pays in order for their transaction to continue to flow.

The MMU recommended that PJM modify the not willing to pay congestion product to address the issues of uncollected congestion charges. The MMU recommended charging market participants for any congestion incurred while the transaction is loaded, regardless of their election of transmission service, and restricting the use of not willing to pay congestion transactions (as well as all other real-time external energy transactions) to transactions at interfaces.

On April 12, 2011, the PJM Market Implementation Committee (MIC) endorsed the changes recommended by the MMU. The elimination of internal sources and sinks on transmission reservations addressed most of the MMU concerns, as there can no longer be uncollected congestion charges for imports to PJM or exports from PJM. There is still potential exposure to uncollected congestion charges in wheel through transactions, and the MMU will continue to evaluate if additional mitigation measures would be appropriate to address this exposure.

Table 9-52 shows that since the inception of the business rule change on April 12, 2013, there was uncollected congestion in only one month, January 2016. The negative congestion means that market participants who used the not willing to pay congestion transmission option for their wheel through

transactions had transactions that flowed in the direction opposite to congestion. When market participants use the not willing to pay congestion product, it also means that they are not willing to receive congestion credits, which was the case in January 2016.

Table 9-52 Monthly uncollected congestion charges: January 1, 2010 through September 30, 2017

Month	2010	2011	2012	2013	2014	2015	2016	2017
Jan	\$148,764	\$3,102	\$0	\$5	\$0	\$0	(\$44)	\$0
Feb	\$542,575	\$1,567	(\$15)	\$249	\$0	\$0	\$0	\$0
Mar	\$287,417	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Apr	\$31,255	\$4,767	(\$68)	(\$3,114)	\$0	\$0	\$0	\$0
May	\$41,025	\$0	(\$27)	\$0	\$0	\$0	\$0	\$0
Jun	\$169,197	\$1,354	\$78	\$0	\$0	\$0	\$0	\$0
Jul	\$827,617	\$1,115	\$0	\$0	\$0	\$0	\$0	\$0
Aug	\$731,539	\$37	\$0	\$0	\$0	\$0	\$0	\$0
Sep	\$119,162	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Oct	\$257,448	(\$31,443)	(\$6,870)	\$0	\$0	\$0	\$0	\$0
Nov	\$30,843	(\$795)	(\$4,678)	\$0	\$0	\$0	\$0	\$0
Dec	\$127,176	(\$659)	(\$209)	\$0	\$0	\$0	\$0	\$0
Total	\$3,314,018	(\$20,955)	(\$11,789)	(\$2,860)	\$0	\$0	(\$44)	\$0

Spot Imports

Prior to April 1, 2007, PJM did not limit nonfirm service imports that were willing to pay congestion, including spot imports, secondary network service imports and bilateral imports using nonfirm point-to-point service. Spot market imports, nonfirm point-to-point and network services that are willing to pay congestion, all termed willing to pay congestion (WPC), were part of the PJM LMP energy market design implemented on April 1, 1998. Under this approach, market participants could offer energy into or bid to buy from the PJM spot market at the border/interface as price takers without restrictions based on estimated available transmission capability (ATC). Price and PJM system conditions, rather than ATC, were the only limits on interchange.

However, PJM has interpreted its JOA with MISO to require restrictions on spot imports and exports although MISO has not implemented a corresponding

restriction.⁹² The result is that the availability of spot import service is limited by ATC and not all spot transactions are approved. Spot import service (a network service) is provided at no charge to the market participant offering into the PJM spot market.

The spot import rules provide incentives to hoard spot import capability. In response to market participant complaints regarding the inability to acquire spot import service after this rule change on April 1, 2007, changes were made to the spot import service effective May 1, 2008.⁹³ These changes limited spot imports to only hourly reservations and caused spot import service to expire if not associated with a valid NERC Tag within two hours when reserved the day prior to the scheduled flow or within 30 minutes when reserved on the day of the scheduled flow.

These changes did not fully resolve the issue. In the *2008 State of the Market Report for PJM*, the MMU recommended that PJM reconsider whether a new approach to limiting spot import service is required or whether a return to the prior policy with an explicit system of managing related congestion is preferable. PJM and the MMU jointly addressed this issue through the stakeholder process, recommending that all unused spot import service be retracted if not tagged within 30 minutes from the queue time of the reservations intraday, and two hours when queued the day prior. On June 23, 2009, PJM implemented the new business rules.

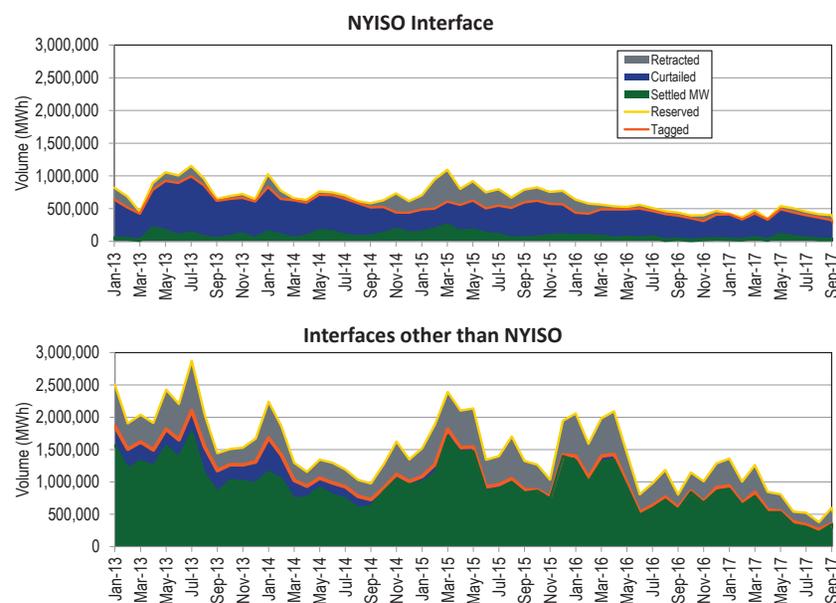
Figure 9-15 shows the spot import service use for the NYISO Interface, and for all other interfaces, from January 1, 2013 through September 30, 2017. The yellow line shows the total monthly MWh of spot import service reserved and the orange line shows the total monthly MWh of tagged spot import service. The gray shaded area between the yellow and orange lines represents the MWh of retracted spot import service and may represent potential hoarding volumes. This ATC was initially reserved, but not tagged (used). It is possible that in some instances the reserved transmission consisted of the only available ATC which could have been used by another market participant had

⁹² See OASIS "Modifications to the Practices of Non-Firm and Spot Market Import Service," (April 20, 2007) <<http://www.pjm.com/~media/etools/oasis/wpc-white-paper.ashx>>.

⁹³ See OASIS "Regional Transmission and Energy Scheduling Practices," (October 3, 2017) <<http://www.pjm.com/~media/etools/oasis/regional-practices-clean-pdf.ashx>>.

it not been reserved and not used. The blue shaded area between the orange line and green shaded area represents the MWh of curtailed transactions using spot import service. This area may also represent hoarding opportunities, particularly at the NYISO Interface. In this instance, it is possible that while the market participant reserved and scheduled the transmission, they may have submitted purposely uneconomic bids in the NYISO market so that their transaction would be curtailed, yet their transmission would not be retracted. The NYISO allows for market participants to modify their bids on an hourly basis, so these market participants can hold their transmission service and evaluate their bids hourly, while withholding the transmission from other market participants that may wish to use it. The green shaded area represents the total settled MWh of spot import service. Figure 9-15 shows that while there are proportionally fewer retracted MWh on the NYISO Interface than on all other interfaces, the NYISO has proportionally more curtailed MWh. This is a result of the NYISO market clearing process.

Figure 9-15 Spot import service use: January 1, 2013 through September 30, 2017



The MMU continues to recommend that PJM permit unlimited spot market imports (as well as all nonfirm point-to-point willing to pay congestion imports and exports) at all PJM interfaces.

Interchange Optimization

When PJM prices are higher than prices in surrounding balancing authorities, imports will flow into PJM until the prices are approximately equal. This is an appropriate market response to price differentials. Given the nature of interface pricing and the treatment of interface transactions, it is not possible for PJM system operators to reliably predict the quantity or sustainability of such imports. The inability to predict interchange volumes creates additional challenges for PJM dispatch in trying to meet loads, especially on high-load days. If all external transactions were submitted as real-time dispatchable transactions during emergency conditions, PJM would be able to include interchange transactions in its supply stack, and dispatch only enough interchange to meet the demand.

The MMU recommends that the submission deadline for real-time dispatchable transactions be modified from 1800 on the prior day to three hours prior to the requested start time, and that the minimum duration be modified from one hour to 15 minutes.⁹⁴ These changes would give PJM a more flexible product that could be used to meet load based on economic dispatch rather than guessing the sensitivity of the transactions to price changes.

In addition to changing prices, transmission line loading relief procedures (TLRs), market participants' curtailments for economic reasons, and external balancing authority curtailments affect the duration of interchange transactions.

The MMU recommends that PJM explore an interchange optimization solution with its neighboring balancing authorities that would remove the need for market participants to schedule physical transactions across seams. Such a solution would include an optimized, but limited, joint dispatch approach

that uses supply curves and treats seams between balancing authorities as constraints, similar to other constraints within an LMP market.

Interchange Cap During Emergency Conditions

An interchange cap is a limit on the level of interchange permitted for nondispatchable energy using spot import or hourly point-to-point transmission. An interchange cap is a nonmarket intervention which should be a temporary solution and should be replaced with a market-based solution as soon as possible. Since the approval of this process on October 30, 2014, PJM has not yet needed to implement an interchange cap.

The purpose of the interchange cap is to help ensure that actual interchange more closely meets operators' expectations of interchange levels when internal PJM resources, e.g. CTs or demand response, were dispatched to meet the peak load. Once these resources have been called on, PJM must honor their minimum operating constraints regardless of whether additional interchange then materializes. Therefore any interchange received in excess of what was expected can have a suppressive effect on energy and reserve pricing and result in increased uplift.

PJM will notify market participants of the possible use of the interchange cap the day before. The interchange cap will be implemented for the forecasted peak and surrounding hours during emergency conditions.

The interchange cap will limit the acceptance of spot import and hourly nonfirm point to point interchange (imports and exports) not submitted as real-time with price transactions once net interchange has reached the interchange cap value. Spot imports and hourly nonfirm point to point transactions submitted prior to the implementation of the interchange cap will not be limited. In addition, schedules with firm or network designated transmission service will not be limited either, regardless of whether net interchange is at or above the cap.

The calculation of the interchange cap is based on the operator expectation of interchange at the time the cap is calculated plus an additional margin.

⁹⁴ The minimum duration for a real-time dispatchable transaction was modified to 15 minutes as per FERC Order No. 764.

The margin is set at 700 MW, which is half of the largest contingency on the system. The additional margin also allows interchange to adjust to the loss of a unit or deviation between actual load and forecasted load. The interchange cap is based on the maximum sustainable interchange from PJM reliability studies.

45 Minute Schedule Duration Rule

PJM limits the change in interchange volumes on 15 minute intervals. These changes are referred to as ramp. The purpose of imposing a ramp limit is to help ensure the reliable operation of the PJM system. The 1,000 MW ramp limit per 15 minute interval was based on the availability of ramping capability by generators in the PJM system. The limit is consistent with the view that the available generation in the PJM system can only move 1,000 MW over any 15 minute period. The PJM ramp limit is designed to limit the change in the amount of imports or exports in each 15 minute interval to account for the physical characteristics of the generation to respond to changes in the level of imports and exports. For example, if at 0800 the sum of all external transactions were -3,000 MW (negative sign indicates net exporting), the limit for 0815 would be -2,000 MW to -4,000 MW. In other words, the starting or ending of transactions would be limited so that the overall change from the previous 15 minute period would not exceed 1,000 MW in either direction.

In 2008, there was an increase in 15 minute external energy transactions that caused swings in imports and exports submitted in response to intra-hour LMP changes. This activity was due to market participants' ability to observe price differences between RTOs in the first third of the hour, and predict the direction of the price difference on an hourly integrated basis. Large quantities of MW would then be scheduled between the RTOs for the last 15 minute interval to capture those hourly integrated price differences with relatively little risk of prices changing. This increase in interchange on 15 minute intervals created operational control issues, and in some cases led to an increase in uplift charges due to calling on resources with minimum run times greater than 15 minutes needed to support the interchange transactions. As a result, a new business rule was proposed and approved that required all transactions to be at least 45 minutes in duration.

On June 22, 2012, FERC issued Order No. 764, which required transmission providers to give transmission customers the option to schedule transmission service at 15 minute intervals to reflect more accurate power production forecasts, load and system conditions.⁹⁵ ⁹⁶ On April 17, 2014, FERC issued its order which found that PJM's 45 minute duration rule was inconsistent with Order No. 764.⁹⁷

PJM and the MMU issued a statement indicating ongoing concern about market participants' scheduling behavior, and a commitment to address any scheduling behavior that raises operational or market manipulation concerns.⁹⁸

MISO Multi-Value Project Usage Rate (MUR)

A multi-value project (MVP) is a project, as defined by MISO, that enables the reliable and economic delivery of energy in support of public policy needs, provides multiple types of regional economic value or provides a combination of regional reliability and economic value.⁹⁹ On July 15, 2010, MISO submitted revisions to the MISO Tariff to implement criteria for identifying and allocating the costs of MVPs.¹⁰⁰ On December 16, 2010, the Commission accepted the proposed MVP charge for export and wheel-through transactions, except for transactions that sink in PJM.¹⁰¹ The Commission stated that MISO had not shown that their proposal did not constitute a resumption of rate pancaking along the MISO-PJM seam. Following the December 16, 2010, Order, MISO began applying a multi-value usage rate (MUR) to monthly net actual energy withdrawals, export schedules and through schedules with the exception of transactions sinking in PJM. The MUR charge was applied to the relevant transactions in addition to the applicable transmission, ancillary service and network upgrade charges.

⁹⁵ *Integration of Variable Energy Resources*, Order No. 764, 139 FERC ¶ 61,246 (2012), order on reh'g, Order No. 764-A, 141 FERC ¶ 61231 (2012).

⁹⁶ Order No. 764 at P 51.

⁹⁷ See *Id.* at P 12.

⁹⁸ See joint statement of PJM and the MMU re Interchange Scheduling issued July 29, 2014 <http://www.monitoringanalytics.com/reports/Market_Messages/MarketMessages/PJM_IMM_Statement_on_Interchange_Scheduling_20140729.pdf>.

⁹⁹ See MISO. MTEP "Multi Value Project Portfolio Analysis," <<https://www.misoenergy.org/Planning/TransmissionExpansionPlanning/Pages/MVPAAnalysis.aspx>>.

¹⁰⁰ See Midwest Independent Transmission Operator Inc. filing, Docket No. ER10-1791-000 (July 15, 2010).

¹⁰¹ 133 FERC ¶ 61,221 (2010); order on reh'g, 137 FERC ¶ 61,074 (2011).

On June 7, 2014, the U.S. Court of Appeals for the Seventh Circuit granted a petition for review regarding the Commission's determination in the MVP Order and MVP Rehearing Order.¹⁰² The Court ordered the Commission to consider on remand whether, in light of current conditions, what if any limitations on export pricing to PJM by MISO are justified.¹⁰³ The Seventh Circuit highlighted the fact that at the time of the Commission's decision to prohibit rate pancaking on transactions between MISO and PJM, all of MISO's transmission projects were local and provided only local benefits.¹⁰⁴

On July 13, 2016, FERC issued an Order permitting MISO to collect charges associated with MVPs for all transactions sinking in PJM, effective immediately.¹⁰⁵ The July 13th Order noted that in light of "the development of large scale wind generation capable of serving both MISO's and its neighbors' energy policy requirements in the western areas of MISO; the reported need of PJM entities to access those resources; and the reported need for MISO to build new transmission facilities to deliver the output of those resources within MISO for export... it is appropriate to allow MISO to assess the MVP usage charge for transmission service used to export to PJM just as MISO assesses the MVP usage charge for transmission service used to export energy to other regions."¹⁰⁶ Table 9-53 shows the projected usage rate to be collected for all wheels through and exports from MISO, including those that sink in PJM, for 2017 through 2036.¹⁰⁷ It is not clear whether the MUR charge has affected interchange volumes from MISO into PJM.

Table 9-53 MISO Projected Multi Value Project Usage Rate: 2017 through 2036

Year	Total Indicative MVP Usage Rate (\$/MWh)
2017	\$1.39
2018	\$1.63
2019	\$1.84
2020	\$1.86
2021	\$1.90
2022	\$1.89
2023	\$1.88
2024	\$1.87
2025	\$1.84
2026	\$1.81
2027	\$1.78
2028	\$1.75
2029	\$1.72
2030	\$1.69
2031	\$1.66
2032	\$1.63
2033	\$1.60
2034	\$1.57
2035	\$1.54
2036	\$1.52

¹⁰² Illinois Commerce Commission, et al. v. FERC, 721 F.3d 764, 778-780 (7th Cir. 2013).

¹⁰³ *Id.* at 780.

¹⁰⁴ *Id.* at 779.

¹⁰⁵ 156 FERC ¶ 61,034 (2016).

¹⁰⁶ *Id.* at P 55.

¹⁰⁷ See MISO, "Schedule 26A Indicative Annual Charges," (August 29, 2016) <https://www.misoenergy.org/_layouts/miso/ecm/redirect.aspx?id=230305>.

Ancillary Service Markets

The FERC defined six ancillary services in Order No. 888: scheduling, system control and dispatch; reactive supply and voltage control from generation service; regulation and frequency response service; energy imbalance service; operating reserve—synchronized reserve service; and operating reserve—supplemental reserve service.¹ PJM provides scheduling, system control and dispatch and reactive on a cost basis. PJM provides regulation, energy imbalance, synchronized reserve, and supplemental reserve services through market mechanisms.² Although not defined by the FERC as an ancillary service, black start service plays a comparable role. Black start service is provided on the basis of formulaic rates or cost.

The MMU analyzed measures of market structure, conduct and performance for the PJM Synchronized Reserve Market, the PJM DASR Market, and the PJM Regulation Market for the first nine months of 2017.

Table 10-1 The Tier 2 Synchronized Reserve Market results were competitive

Market Element	Evaluation	Market Design
Market Structure: Regional Markets	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Mixed

- The Tier 2 Synchronized Reserve Market structure was evaluated as not competitive because of high levels of supplier concentration.
- Participant behavior was evaluated as competitive because the market rules require competitive, cost-based offers.
- Market performance was evaluated as competitive because the interaction of participant behavior with the market design results in competitive prices.
- Market design was evaluated as mixed. Market power mitigation rules result in competitive outcomes despite high levels of supplier concentration. However, tier 1 reserves are inappropriately compensated when the nonsynchronized reserve market clears with a nonzero price.

¹ 75 FERC ¶ 61,080 (1996).

² Energy imbalance service refers to the Real-Time Energy Market.

Table 10-2 The Day-Ahead Scheduling Reserve Market results were competitive

Market Element	Evaluation	Market Design
Market Structure	Not Competitive	
Participant Behavior	Mixed	
Market Performance	Competitive	Mixed

- The Day-Ahead Scheduling Reserve Market structure was evaluated as not competitive because market participants failed the three pivotal supplier test in 18.9 percent of all cleared hours in the first nine months of 2017.
- Participant behavior was evaluated as mixed because while most offers were equal to marginal costs, a significant proportion of offers reflected economic withholding.
- Market performance was evaluated as competitive because there were adequate offers in every hour to satisfy the requirement and the clearing prices reflected those offers, although there is concern about offers above the competitive level affecting prices. Offers above \$0.00 set the clearing price in 2,057 hours (31.4 percent).
- Market design was evaluated as mixed because the DASR product does not include performance obligations, and the three pivotal supplier test and appropriate market power mitigation should be added to the market to ensure that market power cannot be exercised at times of system stress.

Table 10-3 The Regulation Market results were competitive

Market Element	Evaluation	Market Design
Market Structure	Not Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Flawed

- The regulation market structure was evaluated as not competitive for the first nine months of 2017 because the PJM Regulation Market failed the three pivotal supplier (TPS) test in 89.9 percent of the hours in the first nine months of 2017.

- Participant behavior in the PJM Regulation Market was evaluated as competitive for the first nine months of 2017 because market power mitigation requires competitive offers when the three pivotal supplier test is failed and there was no evidence of generation owners engaging in noncompetitive behavior.
- Market performance was evaluated as competitive, despite significant issues with the market design.
- Market design was evaluated as flawed. The market design has failed to correctly incorporate a consistent implementation of the marginal benefit factor in optimization, pricing and settlement. The market results continue to include the incorrect definition of opportunity cost. The result is significantly flawed market signals to existing and prospective suppliers of regulation.

Overview

Primary Reserve

PJM's primary reserves are made up of resources, both synchronized and nonsynchronized, that can provide energy within 10 minutes. Primary reserve is PJM's implementation of the NERC 15-minute contingency reserve requirement.³

Market Structure

- **Supply.** Primary reserve is satisfied by both synchronized reserve (generation or demand response currently synchronized to the grid and available within 10 minutes), and nonsynchronized reserve (generation currently off-line but available to start and provide energy within 10 minutes).
- **Demand.** The PJM primary reserve requirement is 150 percent of the largest contingency. From January 8, 2015, through May 10, 2017, the primary reserve requirement in the RTO Zone was 2,175 MW of which 1,700 MW was required to be available within the Mid-Atlantic Dominion (MAD) Subzone. As of May 10, 2017, the MAD requirement was raised to

2,175 MW. Temporary adjustments to the primary reserve requirement can occur when grid maintenance or outages change the largest contingency. Demand for primary reserve was redefined as 150 percent of the hourly largest contingency on July 12, 2017. In the third quarter of 2017 the average primary reserve requirement was 2,199.2 MW in the RTO Zone and 2,184.9 MW in the MAD Subzone.

Tier 1 Synchronized Reserve

Synchronized reserve is provided by generators or demand response resources synchronized to the grid and capable of increasing output or decreasing load within 10 minutes. Synchronized reserve consists of tier 1 and tier 2 synchronized reserves.

Tier 1 synchronized reserve is part of primary reserve and is the capability of online resources following economic dispatch to ramp up in 10 minutes from their current output in response to a synchronized reserve event. There is no formal market for tier 1 synchronized reserve.

- **Supply.** No offers are made for tier 1 synchronized reserve. The market solution estimates tier 1 synchronized reserve as available 10-minute ramp from the energy dispatch. In the first nine months of 2017, there was an average hourly supply of 1,172.0 MW of tier 1 for the RTO Synchronized Reserve Zone, and an average hourly supply of 1,156.6 MW of tier 1 in the Mid-Atlantic Dominion Subzone.
- **Demand.** The synchronized reserve requirement is calculated hourly as the largest contingency within both the RTO Zone and the MAD Subzone. The requirement can be met with tier 1 or tier 2 synchronized reserves.
- **Tier 1 Synchronized Reserve Event Response.** Tier 1 synchronized reserve is paid when a synchronized reserve event occurs and it responds. When a synchronized reserve event is called, all tier 1 response is paid the average of five minute LMPs during the event, rather than hourly integrated LMP, plus \$50 per MW. This is the Synchronized Energy Premium Price.

Of the Degree of Generator Performance (DGP) adjusted tier 1 synchronized reserve MW estimated at market clearing, 60.1 percent actually responded

³ See PJM, "Manual 10: Pre-Scheduling Operations," Rev. 35 (January 1, 2017), p. 24.

during the six synchronized reserve events with duration of 10 minutes or longer in the first nine months of 2017.

- **Issues.** The competitive offer for tier 1 synchronized reserves is zero, as there is no incremental cost associated with the ability to ramp up from the current economic dispatch point and the appropriate payment for responding to an event is the five-minute LMP plus \$50 per MWh. A tariff change included in the shortage pricing tariff changes (October 1, 2012) added the requirement to pay tier 1 synchronized reserve the tier 2 synchronized reserve market clearing price whenever the nonsynchronized reserve market clearing price rises above zero. This requirement was unnecessary and inconsistent with efficient markets. The rationale for this change was and is unclear, but it has had a significant impact on the cost of tier 1 synchronized reserves, resulting in a windfall payment of \$89,719,045 to tier 1 resources in 2014, \$34,397,441 in 2015, \$4,948,084 in 2016, and \$1,995,133 in the first nine months of 2017.

Tier 2 Synchronized Reserve Market

Tier 2 synchronized reserve is part of primary reserve and is comprised of resources that are synchronized to the grid, that incur costs to be synchronized, that have an obligation to respond, that have penalties for failure to respond, and that must be dispatched in order to satisfy the synchronized reserve requirement.

When the synchronized reserve requirement cannot be met with tier 1 synchronized reserve, PJM uses a market to satisfy the balance of the requirement with tier 2 synchronized reserve. The Tier 2 Synchronized Reserve Market includes the PJM RTO Reserve Zone and a subzone, the Mid-Atlantic Dominion Reserve Subzone (MAD).

Market Structure

- **Supply.** In the first nine months of 2017, the supply of offered and eligible tier 2 synchronized reserve was 24,015.8 MW in the RTO Zone of which 6,726.4 MW (including 1,497.7 MW of DSR) was located in the MAD Subzone.

- **Demand.** The average hourly required synchronized reserve requirement was 1,522.8 MW in the RTO Reserve Zone and 1,514.8 MW for the Mid-Atlantic Dominion Reserve Subzone. The hourly average required tier 2 synchronized reserve was 455.1 MW in the MAD Subzone and 524.3 MW in the RTO.
- **Market Concentration.** Both the Mid-Atlantic Dominion Subzone Tier 2 Synchronized Reserve Market and the RTO Synchronized Reserve Zone Market were characterized by structural market power in the first nine months of 2017.

In the first nine months of 2017, the weighted average HHI for tier 2 synchronized reserve in the Mid-Atlantic Dominion Subzone was 5895, which is classified as highly concentrated. The MMU calculates that the three pivotal supplier test in the Mid-Atlantic Dominion Subzone would have been failed in 64.4 percent of hours.

In the first nine months of 2017, the weighted average HHI for cleared tier 2 synchronized reserve in the RTO Synchronized Reserve Zone was 6653, which is classified as highly concentrated. The MMU calculates that the three pivotal supplier test in the RTO Synchronized Reserve Zone would have been failed in 63.9 percent of hours.

Market Conduct

- **Offers.** There is a must offer requirement for tier 2 synchronized reserve. All nonemergency generation capacity resources are required to submit a daily offer for tier 2 synchronized reserve, unless the unit type is exempt. Tier 2 synchronized reserve offers from generating units are subject to an offer cap of marginal cost plus \$7.50 per MW, plus opportunity cost which is calculated by PJM. There has been less than complete compliance with the tier 2 synchronized reserve must offer requirement.

Market Performance

- **Price.** The weighted average price for tier 2 synchronized reserve for all cleared hours in the Mid-Atlantic Dominion (MAD) Subzone was \$3.34

per MW in the first nine months of 2017, a decrease of \$1.05 from the first nine months of 2016.

The weighted average price for tier 2 synchronized reserve for all cleared hours in the RTO Synchronized Reserve Zone was \$3.44 per MW in the first nine months of 2017, a decrease of \$0.91 from the first nine months of 2016.

Nonsynchronized Reserve Market

Nonsynchronized reserve is part of primary reserve and includes the RTO Reserve Zone and the Mid-Atlantic Dominion Reserve Subzone (MAD). Nonsynchronized reserve is comprised of nonemergency energy resources not currently synchronized to the grid that can provide energy within 10 minutes. Nonsynchronized reserve is available to fill the primary reserve requirement above the synchronized reserve requirement. Generation owners do not submit supply offers. PJM defines the demand curve for nonsynchronized reserve and PJM defines the supply curve based on nonemergency generation resources that are available to provide energy and can start in 10 minutes or less (based on offer parameters), and on the resource opportunity costs calculated by PJM.

Market Structure

- **Supply.** In the first nine months of 2017, the average hourly supply of eligible nonsynchronized reserve was 2,382.6 MW in the RTO Zone and 2,035.0 MW in MAD Subzone.
- **Demand.** Demand for nonsynchronized reserve equals the primary reserve requirement minus the tier 1 synchronized reserve estimate and minus the scheduled tier 2 synchronized reserve.⁴ In the RTO Zone, the market cleared an hourly average of 1,226.0 MW of nonsynchronized reserve in the first nine months of 2017. The MAD Subzone cleared an average of 863.0 MW in the first nine months of 2017.
- **Market Concentration.** In the first nine months of 2017, the weighted average HHI for cleared nonsynchronized reserve in the MAD Subzone

⁴ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017), p. 81. "Because Synchronized Reserve may be utilized to meet the Primary Reserve requirement, there is no explicit requirement for non-synchronized reserves."

was 3661 which is classified as highly concentrated. In the RTO Zone the weighted average HHI was 3657, which is also highly concentrated. The MMU calculates that the three pivotal supplier test would have been failed in 48.4 percent of hours in the MAD Subzone and zero hours in the RTO Zone.

Market Conduct

- **Offers.** Generation owners do not submit supply offers. Nonemergency generation resources that are available to provide energy and can start in 10 minutes or less are considered available for nonsynchronized reserves by the market solution software. PJM calculates the associated offer prices based on PJM calculations of resource specific opportunity costs.

Market Performance

- **Price.** The nonsynchronized reserve price is determined by the opportunity cost of the marginal nonsynchronized reserve unit. The nonsynchronized reserve weighted average price for all hours in both the RTO Reserve Zone and MAD Subzone was \$0.17 per MW in the first nine months of 2017. The price cleared above \$0.00 only 2.1 percent of hours.

Secondary Reserve

There is no NERC standard for secondary reserve. PJM defines secondary reserve as reserves (online or offline available for dispatch) that can be converted to energy in 30 minutes. PJM defines a secondary reserve requirement but does not have a goal to maintain this reserve requirement in real time.

PJM maintains a day-ahead, offer based market for 30-minute day-ahead secondary reserve. The Day-Ahead Scheduling Reserve Market (DASR) has no performance obligations except that a unit which clears the DASR market may not be on an outage in real time.⁵ If DASR units are on an outage in real time, the DASR payment is not made.

⁵ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017), p. 172.511.1.

Market Structure

- **Supply.** The DADR Market is a must offer market. Any resources that do not make an offer have their offer set to \$0.00 per MW. DADR is calculated by the day-ahead market solution as the lesser of the thirty minute energy ramp rate or the economic maximum MW minus the day-ahead dispatch point for all online units. In the first nine months of 2017, the average available hourly DADR was 36,567.3 MW.
- **Demand.** The DADR requirement for 2017 is 5.52 percent of peak load forecast, down from 5.70 percent in 2016. The average DADR MW purchased was 5,756.4 MW per hour in the first nine months of 2017, compared to the 6,345.0 MW per hour in the same time period of 2016.
- **Concentration.** In the first nine months of 2017, the MMU estimates that the DADR Market would have failed the three pivotal supplier test in 18.9 percent of hours.

Market Conduct

- **Withholding.** Economic withholding remains an issue in the DADR Market. The direct marginal cost of providing DADR is zero. PJM calculates the opportunity cost for each resource. All offers by resource owners greater than zero constitute economic withholding. In the first nine months of 2017, a daily average of 41.0 percent of units offered above \$0.00. A daily average of 11.7 percent of units offered above \$5.
- **DR.** Demand resources are eligible to participate in the DADR Market. Some demand resources have entered offers for DADR. No demand resources cleared the DADR market in the first nine months of 2017.

Market Performance

- **Price.** In the first nine months of 2017, the weighted average DADR price for all hours when the DASRMCP was above \$0.00 was \$3.10.

Regulation Market

The PJM Regulation Market is a real-time market. Regulation is provided by generation resources and demand response resources that qualify to follow one of two regulation signals, RegA or RegD. PJM jointly optimizes regulation with synchronized reserve and energy to provide all three products at least cost. The PJM regulation market design includes three clearing price components: capability; performance; and opportunity cost. The RegA signal is designed for energy unlimited resources with physically constrained ramp ability. The RegD signal is designed for energy limited resources with fast ramp rates. In the Regulation Market RegD MW are converted to effective MW using a marginal rate of substitution (MRTS), called a marginal benefit function (MBF). Correctly implemented, the MBF would be the marginal rate of technical substitution (MRTS) between RegA and RegD, holding the level of regulation service constant. The current market design is critically flawed as it has not properly implemented the MBF as an MRTS between RegA and RegD resource MW and the MBF has not been consistently applied in the optimization, clearing and settlement of the Regulation Market.

Market Structure

- **Supply.** In the first nine months of 2017, the average hourly eligible supply of regulation for nonramp hours was 1,135.6 performance adjusted MW (858.9 effective MW).⁶ This was a decrease of 79.4 performance adjusted MW (an increase of 9.4 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation for nonramp hours was 1,215.0 performance adjusted MW (849.6 effective MW). In the first nine months of 2017, the average hourly eligible supply of regulation for ramp hours was 1,423.0 performance adjusted MW (1,173.7 effective MW). This was an increase of 231.6 performance adjusted MW (225.5 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation was 1,191.4 performance adjusted MW (948.2 effective MW).

⁶ On peak and off peak hours are now designated as ramp and nonramp hours. The definitions change by season. See "Regulation requirement definition," <<http://www.pjm.com/~media/markets-ops/ancillary/regulation-requirement-definition.ashx>>.

- **Demand.** Prior to January 9, 2017, the hourly regulation demand was set to 525.0 effective MW for nonramp hours and 700.0 effective MW for ramp hours. Starting January 9, 2017, the hourly regulation demand was set to 525.0 effective MW for nonramp hours and 800.0 effective MW for ramp hours.
- **Supply and Demand.** The nonramp regulation requirement of 525.0 effective MW was provided by a combination of RegA and RegD resources equal to 491.6 hourly average MW in the first nine months of 2017. This is a decrease of 26.6 MW from the first nine months of 2016, when the average hourly total regulation cleared MW for nonramp hours were 518.3 MW. The ramp regulation requirement of 700.0 effective MW prior to January 9, 2017, and 800.0 effective MW after January 9, 2017, was provided by a combination of RegA and RegD resources equal to 718.8 hourly average MW in the first nine months of 2017. This is an increase of 80.9 MW from the first nine months of 2016, where the average hourly regulation cleared MW for ramp hours were 637.9 MW.

The ratio of the average hourly eligible supply of regulation to average hourly regulation demand for ramp hours was 1.98 in the first nine months of 2017. This is an increase of 6.1 percent from the first nine months of 2016, when the ratio was 1.87. The ratio of the average hourly eligible supply of regulation to average hourly regulation demand required for nonramp hours was 2.31 in the first nine months of 2017. This is a decrease of 1.6 percent from the first nine months of 2016, when the ratio was 2.35.

- **Market Concentration.** In the first nine months of 2017, the three pivotal supplier test was failed in 89.9 percent of hours. In the first nine months of 2017, the weighted average HHI of RegA resources was 2730, which is highly concentrated and the weighted average HHI of RegD resources was 1595, which is also highly concentrated. The weighted average HHI of all resources was 1144, which is moderately concentrated.

Market Conduct

- **Offers.** Daily regulation offer prices are submitted for each unit by the unit owner. Owners are required to submit a cost-based offer and may submit a price-based offer. Offers include both a capability offer and a performance offer. Owners must specify which signal type the unit will be following, RegA or RegD.⁷ In the first nine months of 2017, there were 215 resources following the RegA signal and 54 resources following the RegD signal.

Market Performance

- **Price and Cost.** The weighted average clearing price for regulation was \$15.70 per effective MW of regulation in the first nine months of 2017. This is a decrease of \$0.82 per MW, or 4.9 percent, from the weighted average clearing price of \$16.52 per MW in the first nine months of 2016. The weighted average cost of regulation in the first nine months of 2017 was \$21.68 per effective MW of regulation. This is an increase of \$2.69 per MW, or 14.2 percent, from the weighted average cost of \$18.99 per MW in the first nine months of 2016. The decrease in regulation price in the first nine months of 2017 resulted primarily from reductions in the opportunity cost component of the regulation clearing prices due to low energy prices in the first nine months of 2017 compared to the first nine months of 2016.
- **Prices.** RegD resources continue to be incorrectly compensated relative to RegA resources due to an inconsistent application of the marginal benefit factor in the optimization, assignment and settlement processes. If the Regulation Market were functioning efficiently, RegD and RegA resources would be paid the same price per effective MW. RegA resources are paid on the basis of dollars per effective MW of RegA. RegD resources are not paid in terms of dollars per effective MW of RegA because the marginal benefit factor is not used in settlements. When the marginal benefit factor is above 1.0, RegD resources are generally (depending on the mileage ratio) underpaid on a per effective MW basis. When the MBF is less than one, RegD resources are generally overpaid on a per effective MW

⁷ See the 2016 State of the Market Report for PJM, Volume 2, Appendix F "Ancillary Services Markets."

basis. Currently, the average MBF is less than 1.0, resulting in persistent overpayment of RegD resources that creates an artificial incentive for inefficient entry of RegD resources. The MBF averaged less than 1.0 in five of the first nine months of 2017, resulting in RegD resources being paid an average of \$14.1 million (385.3 percent) more than they should have in the first nine months of 2017. In each of the first nine months of 2016, the average MBF was less than 1.0, resulting in RegD resources being paid an average of \$11.02 million (1,855.6 percent) more than they should have been.

- Marginal Benefit Factor Function.** The marginal benefit factor (MBF) is intended to measure the operational substitutability of RegD resources for RegA resources. The marginal benefit factor function is incorrectly defined and applied in the PJM market clearing. Correctly defined, the MBF function represents the Marginal Rate of Technical Substitution (MRTS) between RegA and RegD. Correctly implemented, the MBF would be consistently applied in the Regulation Market clearing and settlement. The current incorrect and inconsistent implementation of the MBF function has resulted in the PJM Regulation Market over procuring RegD relative to RegA in most hours and in a consistently inefficient market signal to participants regarding the value of RegD to the market in every hour. This over procurement began to degrade the ability of PJM to control ACE in some hours while at the same time increasing the cost of regulation.⁸
- Changes to the Regulation Market.** On December 14, 2015, PJM changed the MBF curve in an attempt to reduce the over procurement of RegD. The modification to the marginal benefit curve did not correct the identified issues. PJM made additional changes which went into effect on January 9, 2017. These include changing the definition of nonramp and ramp hours based on the season, increasing the effective MW requirement during ramp hours from 700 MW to 800 MW, adjusting the currently independent RegA and RegD signals to be interdependent, and changing the 15-minute neutrality requirement of the RegD signal to a 30-minute

conditional neutrality requirement. The January 9 changes did not resolve the underlying issues. As a result of the changes implemented on January 9, 2017, the average daily payment per performance adjusted RegD MW increased by 57.2 percent, from \$10.01 between the January 1, 2016, through January 8, 2017, period (prior to the change in signal design), to \$15.74 between the January 9, 2017, through September 30, 2017, period (after the change in signal design). Effective July 31, 2017, PJM ended the use of excursion hours (hours ending 7:00, 8:00, 18:00-21:00), in which PJM had decided that more RegA was needed and PJM did not clear any RegD with an MBF less than 1.0.

Black Start Service

Black start service is required for the reliable restoration of the grid following a blackout. Black start service is the ability of a generating unit to start without an outside electrical supply, or is the demonstrated ability of a generating unit to automatically remain operating at reduced levels when disconnected from the grid (automatic load rejection or ALR).⁹

In the first nine months of 2017, total black start charges were \$46.9 million, including \$46.8 million in revenue requirement charges and \$0.182 million in operating reserve charges. Black start revenue requirements consist of fixed black start service costs, variable black start service costs, training costs, fuel storage costs, and an incentive factor. Black start operating reserve charges are paid to units scheduled in the Day-Ahead Energy Market or committed in real time to provide black start service under the ALR option or for black start testing. Black start zonal charges for the first nine months of 2017 ranged from \$0.05 per MW-day in the DLCO Zone (total charges were \$33,750) to \$4.27 per MW-day in the PENELEC Zone (total charges were \$3,016,578).

Reactive

Reactive service, reactive supply and voltage control are provided by generation and other sources of reactive power (measured in MVar). Reactive power helps maintain appropriate voltages on the transmission system and is **essential to the flow of real power** (measured in MW).

⁸ The issues associated with over procurement were brought before the PJM Operating Committee in May of 2015. Regulation Performance Impacts, PJM Operating Committee, (May 26, 2015), which can be accessed at: <<http://www.pjm.com/committees-and-groups/committees/oc.aspx>>.

⁹ OATT Schedule 1 § 1.3BB.

Reactive capability revenue requirements are based on FERC approved filings.¹⁰ Reactive service charges are paid to units that operate in real time outside of their normal range at the direction of PJM for the purpose of providing reactive service. Reactive service charges are paid for scheduling in the Day-Ahead Energy Market and committing units in real time that provide reactive service. In the first nine months of 2017, total reactive charges were \$249.5 million, a 12.6 percent increase from \$221.6 million in the first nine months of 2016. Reactive capability revenue requirement charges increased from \$220.8 million in the first nine months of 2016 to \$235.4 million in the first nine months of 2017 and reactive service charges increased from \$0.8 million in the first nine months of 2016 to \$14.0 million in the first nine months of 2017. Total reactive service charges in the first nine months of 2017 ranged from \$1,239 in the RECO Zone to \$31.9 million in the ComEd Zone.

Ancillary Services Costs per MWh of Load: January through September, 1999 through 2017

Table 10-4 shows PJM ancillary services costs for January through September, 1999 through 2017, per MWh of load. The rates are calculated as the total charges for the specified ancillary service divided by the total PJM real-time load in MWh. The scheduling, system control, and dispatch category of costs is comprised of PJM scheduling, PJM system control and PJM dispatch; owner scheduling, owner system control and owner dispatch; other supporting facilities; black start services; direct assignment facilities; and ReliabilityFirst Corporation charges. The cost per MWh of load in Table 10-4 is a different metric than the cost of each ancillary service per MW of that service. The cost per MWh of load includes the effects both of price changes per MW of the ancillary service and changes in total load.

¹⁰ OATT Schedule 2.

Table 10-4 History of ancillary services costs per MWh of Load: January through September, 1999 through 2017¹¹

Year (Jan-Sep)	Regulation	Scheduling, Dispatch and System Control	Reactive	Synchronized Reserve	Total
1999	\$0.16	\$0.22	\$0.25	\$0.00	\$0.63
2000	\$0.33	\$0.29	\$0.31	\$0.00	\$0.93
2001	\$0.55	\$0.70	\$0.22	\$0.00	\$1.47
2002	\$0.42	\$0.82	\$0.19	\$0.00	\$1.43
2003	\$0.53	\$1.01	\$0.23	\$0.13	\$1.90
2004	\$0.50	\$0.99	\$0.25	\$0.14	\$1.88
2005	\$0.78	\$0.73	\$0.26	\$0.11	\$1.88
2006	\$0.55	\$0.74	\$0.28	\$0.07	\$1.64
2007	\$0.65	\$0.72	\$0.27	\$0.06	\$1.70
2008	\$0.78	\$0.44	\$0.33	\$0.07	\$1.62
2009	\$0.36	\$0.34	\$0.36	\$0.04	\$1.10
2010	\$0.38	\$0.36	\$0.36	\$0.06	\$1.16
2011	\$0.36	\$0.36	\$0.38	\$0.09	\$1.19
2012	\$0.23	\$0.41	\$0.44	\$0.03	\$1.11
2013	\$0.27	\$0.41	\$0.67	\$0.03	\$1.38
2014	\$0.36	\$0.41	\$0.40	\$0.14	\$1.31
2015	\$0.25	\$0.41	\$0.36	\$0.12	\$1.14
2016	\$0.11	\$0.41	\$0.37	\$0.05	\$0.94
2017	\$0.13	\$0.47	\$0.44	\$0.06	\$1.10

Recommendations

- The MMU recommends that the Regulation Market be modified to incorporate a consistent application of the marginal benefit factor (MBF) throughout the optimization, assignment and settlement process. The MBF should be defined as the Marginal Rate of Technical Substitution (MRTS) between RegA and RegD. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that the lost opportunity cost in the ancillary services markets be calculated using the schedule on which the unit was scheduled to run in the energy market. (Priority: High. First reported 2010. Status: Not adopted.)

¹¹ Note: The totals in this table account for after the fact billing adjustments made by PJM and may not match totals presented in past reports.

- The MMU recommends that all data necessary to perform the Regulation Market three pivotal supplier test be saved so that the test can be replicated. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that, to prevent gaming, there be a penalty enforced in the Regulation Market as a reduction in performance score and/or a forfeiture of revenues when resource owners elect to deassign assigned regulation resources within the hour. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends market design changes to improve the performance of the Regulation Market, including use of a single five minute clearing price based on actual LMP and actual LOC, modifications to the LOC calculation, a software change to save some data elements necessary for verifying market outcomes, and further documentation of the implementation of the market design. (Priority: Medium. First reported 2010. Status: Partially adopted in 2012.)
- The MMU recommends that the rule requiring that tier 1 synchronized reserve resources are paid the tier 2 price when the nonsynchronized reserve price is above zero be eliminated immediately and that, under the current rule, tier 1 synchronized reserve resources not be paid the tier 2 price when they do not respond. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that the tier 2 synchronized reserve must offer requirement be enforced. The MMU recommends that PJM define a set of acceptable reasons why a unit can be made unavailable daily or hourly and require unit owners to select a reason in Markets Gateway whenever making a unit unavailable either daily or hourly or setting the offer MW to 0 MW. (Priority: Medium. First reported 2013. Status: Partially adopted.)
- The MMU recommends that PJM be more explicit and transparent about why tier 1 biasing is used in defining demand in the Tier 2 Synchronized Reserve Market. The MMU recommends that PJM define rules for estimating tier 1 MW, define rules for the use and amount of tier 1 biasing and identify the rule based reasons for each instance of biasing. (Priority: Medium. First reported 2012. Status: Not adopted.)
- The MMU recommends that the single clearing price for synchronized reserves be determined based on the actual five minute LMP and actual LOC and not the forecast LMP. (Priority: Low. First reported 2010. Status: Adopted, 2016.)
- The MMU recommends that no payments be made to tier 1 resources if they are deselected in the PJM market solution. The MMU also recommends that documentation of the Tier 1 synchronized reserve deselection process be published. (Priority: High. First reported 2014. Status: Adopted, 2014.)
- The MMU recommends that a reason code be attached to every hour in which PJM market operations adds additional DADR MW. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM modify the DADR Market to ensure that all resources cleared incur a real-time performance obligation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that the three pivotal supplier test and market power mitigation be incorporated in the DADR Market. (Priority: Low. First reported 2009. Status: Not adopted.)
- The MMU recommends that separate payments for reactive capability be eliminated and the cost of reactive capability be recovered in the capacity market. (Priority: Medium. First reported 2016. Status: Not adopted.)
- The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the minimum tank suction level (MTSL) be allocated to black start service. The MMU further recommends that the PJM tariff be updated to clearly state how the MTSL will be calculated for black start units sharing oil tanks. (Priority: Medium. New recommendation. Status: Not adopted.)

Conclusion

The current PJM Regulation Market design that incorporates two signals using two resource types was a result of Commission Order No. 755 and subsequent orders that required a flawed design.¹²

The current design of the PJM Regulation Market is significantly flawed. The market design has failed to correctly incorporate the marginal rate of technical substitution (MRTS) in market clearing and settlement. The market design uses the marginal benefit factor (MBF) to incorrectly represent the MRTS and uses a mileage ratio instead of the MBF in settlement. This failure to correctly and consistently incorporate the MRTS into the regulation market design has resulted in both underpayment and overpayment of RegD resources and in the over procurement of RegD resources in all hours. The market results continue to include the incorrect definition of opportunity cost. These issues have led to the MMU's conclusion that the regulation market design is flawed.

To address these flaws, the MMU and PJM developed a joint proposal which was approved by the PJM Members Committee on July 27, 2017. The PJM/MMU joint proposal addresses issues with the inconsistent application of the marginal benefit factor throughout the optimization and settlement process in the PJM Regulation Market.

The structure of the Tier 2 Synchronized Reserve Market has been evaluated and the MMU has concluded that these markets are not structurally competitive as they are characterized by high levels of supplier concentration and inelastic demand. As a result, these markets are operated with market clearing prices and with offers based on the marginal cost of producing the product plus a margin. As a result of these requirements, the conduct of market participants within these market structures has been consistent with competition, and the market performance results have been competitive. However, compliance with calls to respond to actual synchronized reserve events remains less than 100 percent. For the six spinning events 10 minutes or longer in 2016, the average tier 2 synchronized reserve response was 85.5 percent of all scheduled MW.

¹² *Frequency Regulation Compensation in the Organized Wholesale Power Markets*, Order No. 755, 137 FERC ¶ 61,064 at PP 197–200 (2011).

For the six spinning events 10 minutes or longer in the first nine months of 2017, the response was 87.6 percent of scheduled tier 2 MW.

The rule that requires payment of the tier 2 synchronized reserve price to tier 1 synchronized reserve resources when the nonsynchronized reserve price is greater than zero, is inefficient and results in a substantial windfall payment to the holders of tier 1 synchronized reserve resources. Tier 1 resources have no obligation to perform and pay no penalties if they do not perform, and tier 1 resources do not incur any costs when they are part of the tier 1 estimate in the market solution. Tier 1 resources are already paid for their response if they do respond. Tier 1 resources require no additional payment. If tier 1 resources wish to be paid as tier 2 resources, the rules provide the opportunity to make competitive offers in the tier 2 market and take on the associated obligations. Overpayment of tier 1 resources based on this rule added \$89.7 million to the cost of primary reserve in 2014, \$34.1 million in 2015, \$4.9 million in 2016, and \$2.0 million in the first nine months of 2017.

The benefits of markets are realized under these approaches to ancillary service markets. Even in the presence of structurally noncompetitive markets, there can be transparent, market clearing prices based on competitive offers that account explicitly and accurately for opportunity cost. This is consistent with the market design goal of ensuring competitive outcomes that provide appropriate incentives without reliance on the exercise of market power and with explicit mechanisms to prevent the exercise of market power.

The MMU concludes that the regulation market results were competitive, although the market design is flawed. The MMU concludes that the synchronized reserve market results were competitive. The MMU concludes that the DASR market results were competitive, although offers above the competitive level continue to affect prices.

Primary Reserve

NERC Performance Standard BAL-002-1, Disturbance Control Performance, requires PJM to carry sufficient contingency reserve to recover from a sudden loss of load (disturbance) within 15 minutes. The NERC requirement is 100 percent compliance and status must be reported quarterly. PJM implements this contingency reserve requirement using primary reserves.¹³ PJM maintains 10 minute reserves (primary reserve) to ensure reliability in the event of disturbances. PJM's primary reserves are made up of resources, both synchronized and nonsynchronized, that can provide energy within 10 minutes.

Market Structure

Demand

PJM requires that 150 percent of the largest contingency on the system be maintained as primary reserve. PJM can make temporary adjustments to the primary reserve requirement when grid maintenance or outages change the largest contingency or in cases of hot weather alerts or cold weather alerts.

Until July 12, 2017, PJM's primary reserve requirement was 2,175 MW for the RTO Zone. From January 1 through May 9, 2017, the primary reserve requirement was 1,700 MW for the MAD Subzone. On May 10, 2017, the primary reserve requirement for the MAD subzone was raised to 2,175 MW. This means that the full 2,175 MW of primary reserve must at all times be deliverable everywhere across the RTO. On July 12, 2017, PJM adopted a dynamic reserve requirement set equal to 150 percent of the largest contingency, determined hourly, based on the forecasted dispatch.

On January 10, 2017, the default primary reserve requirement in the RTO Reserve Zone was temporarily raised from 2,175 MW to 3,300 MW for 32 hours. On May 10, 2017, the default primary reserve requirement for the RTO Reserve Zone was temporarily raised from 2,175 MW to 2,550 MW for two hours. The hourly average RTO primary reserve requirement from January 1, 2017 through July 11, 2017 was 2,183.3 MW. From July 12, 2017 through

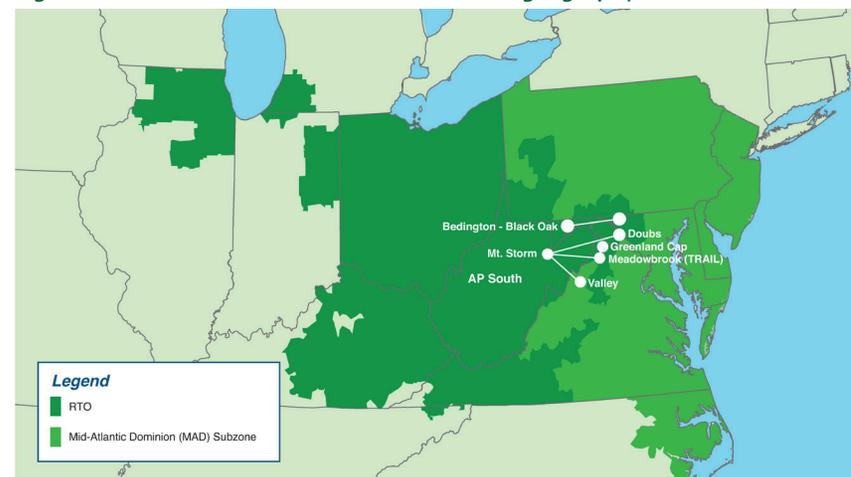
¹³ See PJM, "Manual 10: Pre-Scheduling Operations," Rev. 35 (January 1, 2017) at 2425.

September 30, 2017, the average primary reserve requirement in the RTO Zone was 2,199.2 MW.

No temporary changes were applied to the primary reserve requirement in the MAD Subzone between January 1 and July 11, 2017. From July 12, 2017 through September 30, 2017, the average primary reserve requirement was 2,184.9 MW.

Transmission constraints limit the deliverability of reserves within the RTO, requiring the definition of the Mid-Atlantic Dominion (MAD) Subzone (Figure 10-1).¹⁴

Figure 10-1 PJM RTO Zone and MAD Subzone geography: 2017



The MAD Subzone is generally defined dynamically by the most limiting constraint separating MAD from the PJM RTO Reserve Zone. However, PJM can override the dynamic determination. Between January 1, 2017, and September 30, 2017, Bedington - Black Oak was the most limiting interface in 70.1 percent of hourly market solutions and AP South was the most limiting interface in the other 29.9 percent of hours.

¹⁴ Additional subzones may be defined by PJM to meet system reliability needs. PJM will notify stakeholders in such an event. See PJM Manual 11: Energy & Ancillary Services Market Operations, Rev. 90 (July 27, 2017) at 87.

PJM requires that synchronized reserves equal at least 100 percent of the largest contingency. Prior to PJM's introduction of the dynamic, real time determination of the largest contingency in every spinning market solution on July 12, 2017, the primary reserve requirement was 1,450 MW in every hour for both RTO Reserve Zone and the Mid Atlantic Dominion Reserve Subzone. From July 12, through September 30, 2017, the synchronized reserve requirement averaged 1,514.8 MW per hour in the MAD Subzone and 1,522.8 MW per hour in the RTO Zone.

Supply

The demand for primary reserve is satisfied by tier 1 synchronized reserves, tier 2 synchronized reserves and nonsynchronized reserves, subject to the requirement that synchronized reserves equal 100 percent of the largest contingency. After the hourly synchronized reserve requirement is satisfied, the remainder of primary reserves can come from the least expensive combination of synchronized and nonsynchronized reserves.

Estimated tier 1 is credited against PJM's primary reserve requirement as well as PJM's synchronized reserve requirement. In the MAD Subzone an average of 1,077.6 MW of tier 1 was identified by the ASO market solution as available hour ahead during the first nine months of 2017 (Table 10-6).¹⁵ Tier 1 synchronized reserve fully satisfied the MAD Subzone synchronized reserve requirement in 3.9 percent of hours in the first nine months of 2017. In the RTO Zone, an average of 1,156.8 MW of tier 1 was available (Table 10-6). Tier 1 synchronized reserve fully satisfied the RTO Zone synchronized reserve requirement in 33.1 percent of all hours. The tier 1 MW in this report includes the impact of tier 1 MW reductions caused by tier 1 biasing by PJM operators. Tier 1 biasing is discussed in detail in the Tier 1 Estimate Bias section.

Regardless of online/offline state, all nonemergency generation capacity resources must submit a daily offer for tier 2 synchronized reserve in Markets Gateway prior to the offer submission deadline (14:15 the day prior to the operating day). Resources listed as available for tier 2 synchronized reserve

without a synchronized reserve offer will have their offer price automatically set to \$0.00. Offer MW and other non-cost offer parameters can be changed during the operating day. Owners are permitted to make resources unavailable for tier 2 synchronized reserve daily or hourly, but only if they are physically unavailable. Certain unit types including nuclear, wind, solar, and energy storage resources, are expected to have zero MW tier 2 synchronized reserve offer quantities.¹⁶

After tier 1 is estimated, the remainder of the synchronized reserve requirement is met by tier 2. In the RTO Zone, there were 24,010.7 MW of tier 2 synchronized reserve offered daily. Of this, 6,513.7 MW were located in the MAD Subzone (Figure 10-11) and available to meet the average tier 2 hourly demand of 441.5 MW (Table 10-5).

In the MAD Subzone, there was an average of 2,037.9 MW of eligible nonsynchronized reserve supply available to meet the average hourly demand of 424.3 MW. (Table 10-6) In the RTO Zone, an hourly average of 2,388.2 MW supply was available to meet the average hourly demand of 439.0 MW (Table 10-5).

Table 10-5 provides the average monthly reserves, by type, uses to satisfy the primary reserve requirement in the MAD subzone from January 1, 2016, through September 30, 2017.

¹⁵ ASO, Ancillary Services Optimizer. This is the hour-ahead market software that optimizes ancillary services with energy. ASO schedules hourly the Tier 2 Synchronized Reserve, Regulation, and Nonsynchronized Reserves.

¹⁶ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 86.

Table 10-5 Average monthly reserves used to satisfy the primary reserve requirement, MAD Subzone: January 1, 2016 through September 30, 2017

Year	Month	Tier 1 Total MW	Tier 2 Synchronized Reserve MW	Nonsynchronized Reserve MW	Total Primary Reserve MW
2016	Jan	1,263.5	228.5	295.9	1,787.9
2016	Feb	1,230.1	241.5	302.2	1,773.8
2016	Mar	993.3	485.7	265.7	1,744.7
2016	Apr	912.4	565.0	289.2	1,766.5
2016	May	956.5	511.3	292.2	1,760.0
2016	Jun	1,116.9	348.4	368.7	1,834.0
2016	Jul	1,254.7	208.8	621.3	2,084.7
2016	Aug	1,228.4	239.7	669.1	2,137.2
2016	Sep	1,170.6	293.0	603.7	2,067.2
2016	Oct	1,086.1	481.3	508.7	2,076.2
2016	Nov	774.8	687.8	360.4	1,822.9
2016	Dec	995.0	479.6	520.7	1,995.3
2016		1,081.8	397.5	424.8	1,904.2
2017	Jan	981.6	508.5	361.1	1,851.2
2017	Feb	1,111.6	355.5	377.7	1,844.9
2017	Mar	767.4	693.3	399.3	1,860.0
2017	Apr	896.9	555.4	435.4	1,887.7
2017	May	1,164.6	492.3	440.8	2,097.8
2017	Jun	1,373.0	348.9	459.9	2,181.8
2017	Jul	1,391.9	354.1	448.2	2,194.2
2017	Aug	1,438.3	309.9	451.8	2,200.0
2017	Sep	1,419.2	346.8	442.1	2,208.1
2017		1,171.6	440.5	424.0	2,036.2

Table 10-6 provides the average monthly reserves, by type, uses to satisfy the primary reserve requirement in the RTO zone from January 1, 2016, through September 30, 2017.

Table 10-6 Average monthly reserves used to satisfy the primary reserve requirement, RTO Zone: January 1, 2016 through September 30, 2017

Year	Month	Tier 1 Total MW	Tier 2 Synchronized Reserve MW	Nonsynchronized Reserve MW	Total Primary Reserve MW
2016	Jan	1,659.4	374.5	319.1	2,353.0
2016	Feb	1,564.1	411.4	329.4	2,304.9
2016	Mar	1,089.1	818.1	300.0	2,207.2
2016	Apr	1,011.7	878.3	318.0	2,207.9
2016	May	1,160.9	722.6	349.5	2,233.0
2016	Jun	1,546.0	497.1	384.2	2,427.3
2016	Jul	1,663.8	360.1	634.0	2,657.9
2016	Aug	1,605.6	419.0	682.4	2,707.0
2016	Sep	1,290.4	578.6	617.5	2,486.5
2016	Oct	802.7	982.4	524.0	2,309.1
2016	Nov	810.8	1,014.1	375.4	2,200.4
2016	Dec	953.1	807.3	533.0	2,293.4
2016		1,263.1	655.3	447.2	2,365.6
2017	Jan	1,020.4	915.5	372.3	2,308.2
2017	Feb	1,172.0	686.0	395.1	2,253.2
2017	Mar	654.2	1,128.9	420.9	2,204.0
2017	Apr	805.1	959.2	452.2	2,216.5
2017	May	924.1	879.4	454.0	2,257.5
2017	Jun	1,413.5	644.7	474.9	2,533.0
2017	Jul	1,540.1	676.1	459.5	2,675.7
2017	Aug	1,512.8	610.2	466.9	2,589.9
2017	Sep	1,368.9	620.2	453.2	2,442.3
2017		1,156.8	791.1	438.8	2,386.7

Supply and Demand

The market solution software relevant to reserves consists of: the Ancillary Services Optimizer (ASO) solving hourly; the intermediate term security constrained economic dispatch market solution (IT-SCED); and the real-time (short term) security constrained economic dispatch market solution (RT-SCED).

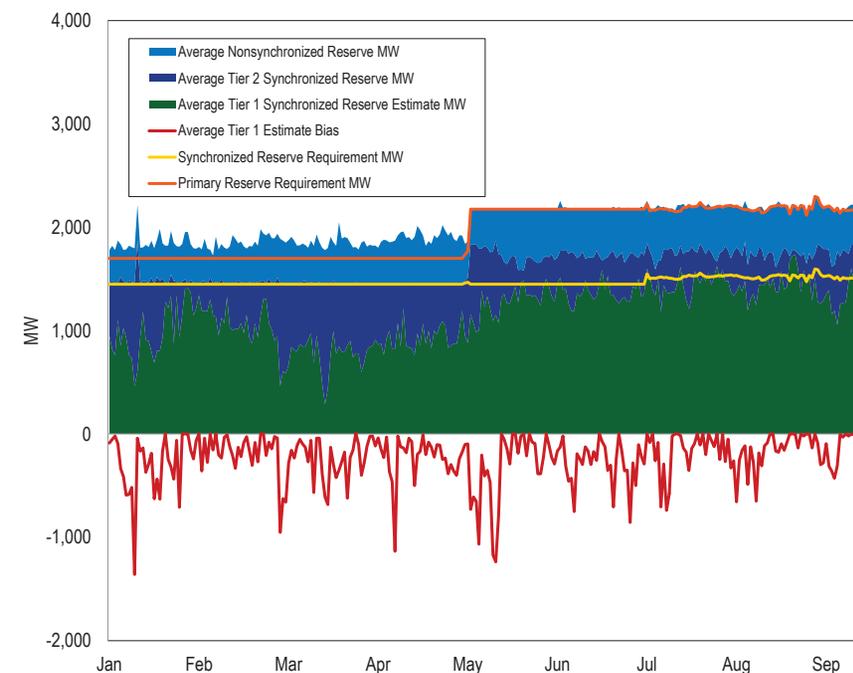
The ASO jointly optimizes energy, synchronized reserves, and nonsynchronized reserves based on forecast system conditions to determine the most economic set of reserve resources to commit for the upcoming operating hour. IT-SCED runs at 15 minute intervals and jointly optimizes energy and reserves given the ASO's inflexible unit commitments. IT-SCED estimates available tier 1 synchronized reserve and can commit additional reserves (flexibly or inflexibly) if needed. RT-SCED runs at five minute intervals and produces load forecasts up to 20 minutes ahead. The RT-SCED estimates the available tier 1, provides a real-time ancillary services solution and can commit additional tier 2 resources (flexibly or inflexibly) if needed.

Figure 10-2 illustrates how the ASO satisfies the primary reserve requirement (orange line) for the Mid-Atlantic Dominion Subzone. For the Mid-Atlantic Dominion Reserve Zone primary reserve solution the ASO must first satisfy the synchronized reserve requirement (yellow line) which is calculated hourly in the MAD Subzone. The ASO first estimates how much tier 1 synchronized reserve (green area) is available. If there is enough tier 1 MW available to satisfy the synchronized reserve requirement, then ASO jointly optimizes synchronized reserve and nonsynchronized reserve to assign the remaining primary reserve up to the primary reserve requirement. If there is not enough tier 1 synchronized reserve then the remaining synchronized reserve requirement up to the synchronized reserve is filled with tier 2 synchronized reserve (dark blue area). After synchronized reserve is assigned, the primary reserve requirement is filled by jointly optimizing synchronized reserve and nonsynchronized reserve (light blue area). Since nonsynchronized reserve is priced lower than or equal to synchronized reserve, almost all primary reserve above the synchronized reserve requirement is filled by nonsynchronized reserve.

There is a serious shortcoming with the ASO market solution based on the rule that tier 1 synchronized reserve will be paid the tier 2 synchronized reserve market clearing price whenever the nonsynchronized reserve market clearing price is above \$0. The ancillary services market solution treats the cost of estimated tier 1 synchronized reserve as \$0, even when the nonsynchronized

reserve market clearing price is above \$0. As a result, the optimization cannot minimize the total cost of primary reserves.

Figure 10-2 Mid-Atlantic Dominion Subzone primary reserve MW by source (Daily Averages): January through September, 2017



The solution method is the same for the RTO Reserve Zone.¹⁷ Figure 10-3 shows how the hour ahead ASO satisfies the primary reserve requirement for the RTO Zone.

¹⁷ Although tier 1 has a price of zero, changes made with shortage pricing on November 1, 2012, have given tier 1 a very high cost in some hours. This high cost raises questions about the economics of the solution method used by the ASO, IT-SCED, and RT-SCED market solutions which assume zero cost.

Figure 10-3 RTO Reserve Zone primary reserve MW by source (Daily Averages): January through September, 2017

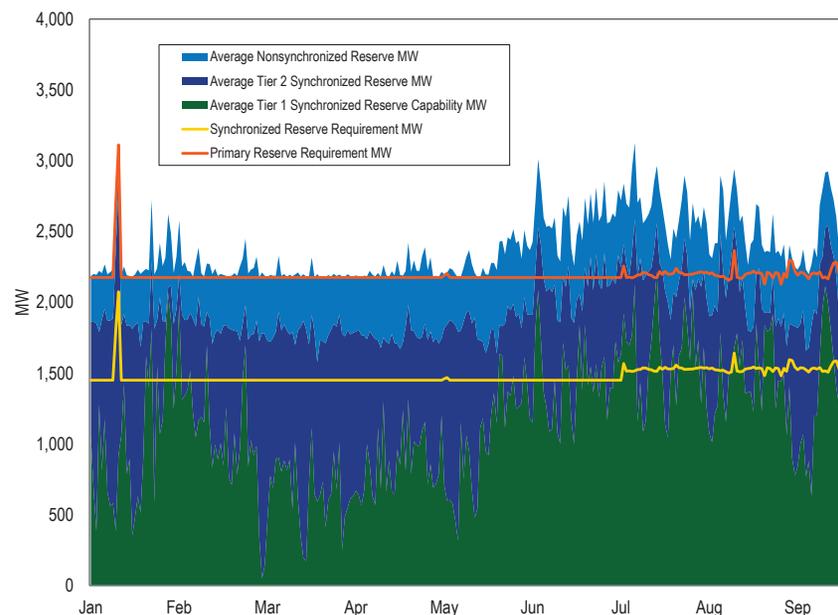
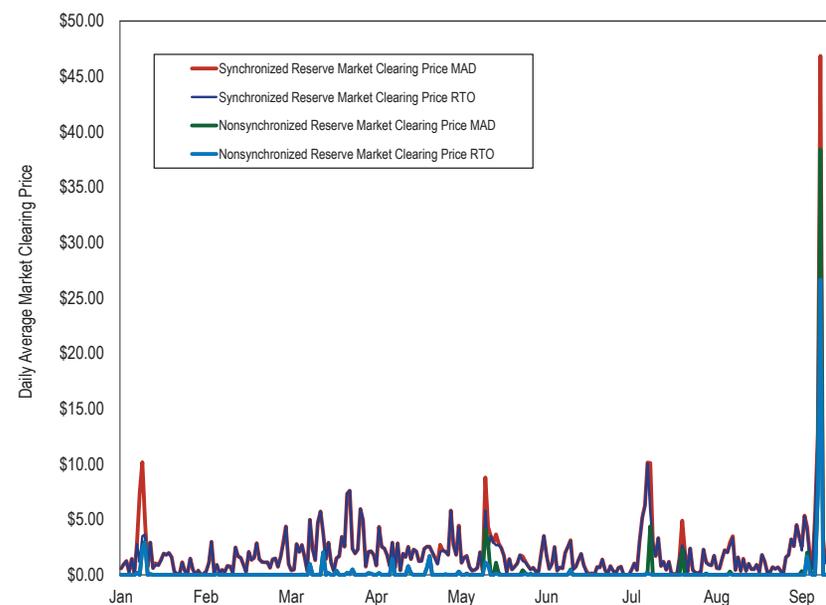


Figure 10-2 and Figure 10-3 show that tier 1 synchronized reserve remains the major contributor to satisfying the synchronized reserve requirements both in the RTO Zone and the Mid-Atlantic Dominion (MAD) Subzone.

Price and Cost

Figure 10-4 shows daily average synchronized and nonsynchronized market clearing prices in the first nine months of 2017.

Figure 10-4 Daily weighted average market clearing prices (\$/MW) for synchronized reserve and nonsynchronized reserve: January through September, 2017



PJM's primary reserves are made up of three components, tier 1 synchronized reserve, tier 2 synchronized reserve, and nonsynchronized reserve, each with its own price and cost determinants and interdependent scheduling algorithms. The overall price and cost for meeting the BAL-002-1 primary reserve requirement is calculated by combining the three components (Table 10-7). The "Cost per MW" column is the total credits divided by the total MW of reserves.

On a combined basis, the ratio of price to cost for all primary reserve during the first nine months of 2017 is low at 33.4 percent. This is partly a result of the unnecessary payment of the tier 2 price to tier 1 resources, and partly a result of the poor price to cost ratio of nonsynchronized reserves. While tier 1 has zero actual incremental cost, estimated tier 1 is paid the tier 2 clearing price in any hour where nonsynchronized reserves clears at a non-zero price. Table 10-7 shows that the cost of tier 1 reserves is \$18.97 per MW when the price of nonsynchronized reserve is greater than zero and more than twice the cost of tier 2 reserves which is \$8.32 per MW.

Table 10-7 MW credited, price, cost, and all-in price for primary reserve and its component products, RTO Reserve Zone: January through September, 2017

Product	MW Share of Primary Reserve Requirement	MW	Credits Paid	Price Per MW Reserve	Cost Per MW Reserve
Tier 1 Synchronized Reserve Response	NA	5,063	\$461,439	NA	\$91.13
Tier 1 Synchronized Reserve Estimated	1.0%	105,195	\$1,995,133	\$0.00	\$18.97
Tier 2 Synchronized Reserve Scheduled	35.0%	3,569,981	\$29,709,256	\$3.14	\$8.32
Nonsynchronized Reserve Scheduled	63.9%	6,507,984	\$4,758,140	\$0.17	\$0.73
Primary Reserve (total of above)	100.0%	10,188,223	\$36,923,968	\$1.21	\$3.62

Tier 1 Synchronized Reserve

Tier 1 synchronized reserve is a component of primary reserve comprised of all online resources following economic dispatch and able to ramp up from their current output in response to a synchronized reserve event. The tier 1 synchronized reserve for a unit is measured as the lower of the available 10 minute ramp and the difference between the economic dispatch point and the economic maximum output. Tier 1 resources are identified by the market solution. The sum of their 10 minute availability equals available tier 1 synchronized reserve. Tier 1 synchronized reserve is the first element of primary reserve identified by the market software and has an incremental cost of zero. Tier 1 reserves are paid to respond to a synchronized reserve event. Tier 1 reserves are paid a clearing price whenever the nonsynchronized reserve market clearing price is above \$0, regardless of their actual response.

While PJM relies on tier 1 resources to respond to a synchronized reserve event, tier 1 resources are not obligated to respond during an event. Tier 1 resources are credited if they do respond but are not penalized if they do not.

Market Structure

Supply

All generating resources operating on the PJM system with the exception of those assigned to tier 2 synchronized reserve are available for tier 1 synchronized reserve and any response to a spinning event will be credited at the Synchronized Energy Premium Price.

The process for estimating tier 1 synchronized reserve has been refined. Beginning January 2015, DGP (Degree of Generator Performance) was introduced as a metric to improve the accuracy of the tier 1 MW estimate used by the market solution. DGP is calculated for all online resources for each market solution. DGP measures how closely the unit has been following economic dispatch for the past 30 minutes.¹⁸

The available tier 1 MW estimated by the market solution for each resource is based upon its economic dispatch, and energy schedule ramp rate or submitted synchronized reserve ramp rate, adjusted by its DGP. PJM communicates to generation operators whose tier 1 MW is part of the market solution the latest estimate of units' tier 1 MW and units' current DGP.¹⁹

In the first nine months of 2017, PJM estimated tier 1 MW for an average of 146 units as part of the market solution each hour for which the average DGP was 88.8 percent.

The supply of tier 1 synchronized reserve available to the market solution is further adjusted by eliminating tier 1 MW from units that cannot reliably provide synchronized reserve. These units are nuclear, wind, solar, energy storage, and hydro units.²⁰ These units will be credited the synchronized energy premium price, like any other responding unit, if they respond to a

¹⁸ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 80 (July 27, 2017) at 85.

¹⁹ PJM. Ancillary Services, "Communication of Synchronized Reserve Quantities to Resource Owners," <<http://www.pjm.com/~media/markets-ops/ancillary/communication-of-synchronized-reserve-quantities-to-resource-owners.ashx>> (May 6, 2015).

²⁰ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 83.

spinning event. These units will not, however, be paid as tier 1 resources when the nonsynchronized reserve market clearing price goes above \$0.

In the first nine months of 2017, in the RTO Reserve Zone, the average hourly estimated tier 1 synchronized reserve was 1,156.6 MW (Table 10-8). In 48.7 percent of hours, the estimated tier 1 synchronized reserve was greater than the synchronized reserve requirement, meaning that the synchronized reserve requirement was met entirely by tier 1 synchronized reserve.

In the first nine months of 2017, in the MAD Reserve Subzone, the average hourly estimated tier 1 synchronized reserve was 491.5 MW in the MAD subzone and 665.1 MW were available from the RTO (Table 10-8). In 5.3 percent of hours, the estimated tier 1 synchronized reserve available in MAD was greater than the synchronized reserve requirement, meaning that the synchronized reserve requirement was met entirely by tier 1 synchronized reserve.

Table 10-8 Monthly average market solution tier 1 synchronized reserve (MW) identified hourly: January 1, 2016 through September 30, 2017

Year	Month	Average Hourly Tier		Average Hourly Tier	
		1 Local To MAD	Tier 1 Synchronized Reserve From RTO Zone	1 Used in MAD	1 Used in RTO Zone
2016	Jan	586.1	659.3	1,245.4	1,659.4
2016	Feb	609.3	635.9	1,245.2	1,564.1
2016	Mar	402.4	660.7	1,063.0	1,089.1
2016	Apr	341.7	620.2	961.9	1,011.7
2016	May	408.2	613.9	1,022.1	1,160.9
2016	Jun	638.4	504.0	1,142.5	1,546.0
2016	Jul	756.7	513.5	1,270.2	1,663.8
2016	Aug	750.5	495.2	1,245.7	1,605.6
2016	Sep	658.9	566.8	1,225.7	1,290.4
2016	Oct	393.6	723.9	1,117.5	802.7
2016	Nov	385.2	478.6	863.8	810.8
2016	Dec	660.4	419.8	1,080.2	953.1
2016		549.3	574.3	1,123.6	1,263.1
2017	Jan	530.0	450.9	980.9	1,019.5
2017	Feb	528.0	586.6	1,114.6	1,177.0
2017	Mar	292.4	475.0	767.4	654.3
2017	Apr	288.8	607.5	896.3	805.5
2017	May	384.5	777.2	1,161.7	920.1
2017	Jun	558.4	813.7	1,372.1	1,411.9
2017	Jul	695.2	695.9	1,391.1	1,541.4
2017	Aug	582.9	856.4	1,439.3	1,513.2
2017	Sep	564.5	854.7	1,419.2	1,368.7
2017		491.6	679.8	1,171.4	1,156.8

Demand

There is no required amount of tier 1 synchronized reserve.

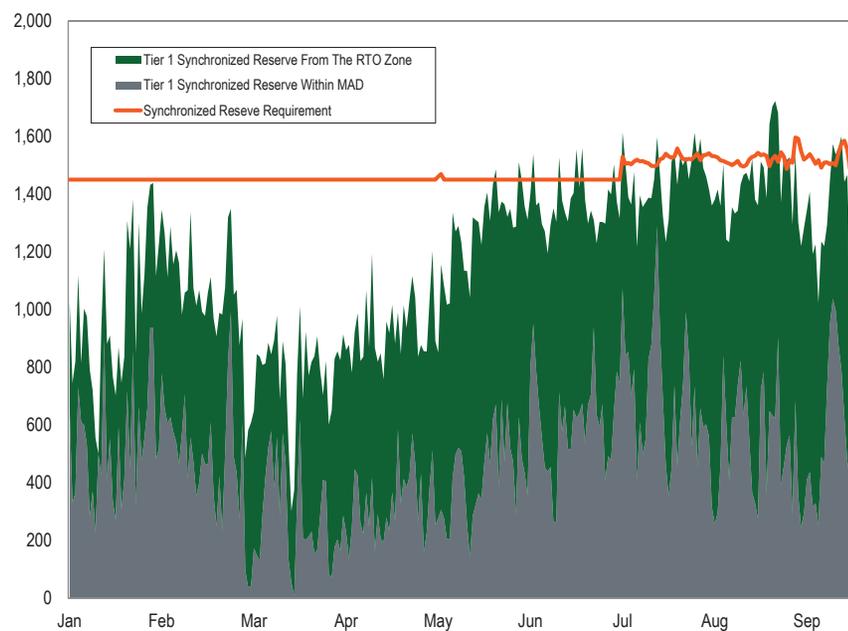
The ancillary services market solution treats the cost of estimated tier 1 synchronized reserve as \$0, even when the nonsynchronized reserve market clearing price is above \$0. As a result, the optimization cannot minimize the total cost of primary reserves.

Supply and Demand

When solving for the synchronized reserve requirement the market solution first subtracts the amount of self scheduled synchronized reserve from the requirement and then estimates the amount of tier 1.

In the MAD Subzone, the market solution takes all tier 1 MW estimated to be available within the MAD Subzone (gray area of Figure 10-5). It then adds the tier 1 MW estimated to be available within the MAD Subzone from the RTO Zone (green area of Figure 10-5) up to the synchronized reserve requirement. If the total tier 1 synchronized reserve is less than the synchronized reserve requirement, the remainder of the synchronized reserve requirement is filled with tier 2 synchronized reserve (white area below the synchronized reserve required line in Figure 10-5).

Figure 10-5 Daily average tier 1 synchronized reserve supply (MW) in the MAD Subzone: January through September, 2017



Average demand for synchronized reserve in the RTO Zone in the first nine months of 2017 was 1,471.8 MW. There was a temporary increase in the hourly synchronized reserve requirement to 2,200 MW on January 10 and 11, to 1,658 MW for two hours on May 8, and to 1,680 MW for three hours on May 9, 2017.

Tier 1 Synchronized Reserve Event Response

Tier 1 synchronized reserve is awarded credits when a synchronized reserve event occurs and it responds. These synchronized reserve event response credits for tier 1 response are independent of the tier 1 estimated, independent of the synchronized reserve market clearing price, and independent of the nonsynchronized reserve market clearing price. Credits are awarded to tier 1 synchronized reserve resources equal to the increase in MW output (or decrease in MW consumption for demand resources) for each five minute interval times the five minute LMP plus \$50 per MW. During a synchronized reserve event, tier 1 credits are awarded to all units that increase their output during the event regardless of their estimated tier 1 MW, or tier 1 deselection status at market clearing time, unless the units have cleared the tier 2 market.

In the first nine months of 2017, tier 1 synchronized reserve event response credits of \$461,439 were paid for 5,063.4 MWh of tier 1 response at an average cost per MWh of \$91.13, for 19 spinning event hours (Table 10-9).

Table 10-9 Tier 1 synchronized reserve event response costs: January 1, 2016 through September 30, 2017

Year	Month	Total Synchronized Reserve Event Response Hour Count	Total Credited Tier 1 Synchronized Reserve Event Response MWh	Total Tier 1 Synchronized Reserve Event Response Credits	Tier 1 Synchronized Reserve Event Response Cost Per MWh	Average Tier 1 MWh Response
2016	Jan	2	731.1	\$70,330	\$96.24	365.4
2016	Feb	2	675.0	\$40,622	\$60.18	337.5
2016	Mar	0	0.0	\$0	\$0.00	0.0
2016	Apr	1	339.0	\$66,199	\$195.27	339.0
2016	May	2	113.4	\$9,790	\$86.35	56.7
2016	Jun	1	206.9	\$11,129	\$53.78	206.9
2016	Jul	3	714.3	\$58,114	\$81.36	357.1
2016	Aug	1	334.5	\$13,026	\$38.95	334.5
2016	Sep	2	452.4	\$34,824	\$76.97	226.2
2016	Oct	2	281.1	\$24,130	\$85.85	140.5
2016	Nov	1	204.3	\$10,910	\$53.41	204.3
2016	Dec	1	256.8	\$14,766	\$57.50	256.8
2016		18	4,308.8	\$353,840	\$76.57	235.4
2017	Jan	6	1,250.2	\$60,447	\$48.35	208.4
2017	Feb	3	624.1	\$55,705	\$89.26	208.0
2017	Mar	2	757.9	\$55,300	\$72.96	379.0
2017	Apr	2	297.2	\$16,955	\$57.05	148.6
2017	May	1	405.6	\$21,848	\$53.87	405.6
2017	Jun	2	624.8	\$29,228	\$46.78	312.4
2017	Sep	3	1,103.7	\$221,957	\$201.10	367.9
2017		19	5,063.4	\$461,439	\$91.13	290.0

Paying Tier 1 the Tier 2 Price

Tier 1 synchronized reserve has zero marginal cost and the corresponding price for tier 1 synchronized reserves is also zero. However, the PJM rules artificially create a marginal cost of tier 1 when the price of nonsynchronized reserve is greater than zero and tier 1 is paid the tier 2 price. But the PJM market solutions do not include that marginal cost and therefore do not solve for the efficient level of tier 1, tier 2 and nonsynchronized reserve in those cases. When called to respond to a spinning event tier 1 is compensated at the Synchronized Energy Premium Price (Table 10-12). However, the shortage pricing tariff changes (October 1, 2012) modified the pricing of tier 1 so that tier 1 synchronized reserve is paid the tier 2 synchronized reserve market

clearing price whenever the nonsynchronized reserve market clearing price rises above zero. The rationale for this change was and is unclear, but it has had a significant impact on the cost of tier 1 synchronized reserves. The nonsynchronized reserve market clearing price was above \$0.00 in 151 hours in the first nine months of 2017. For those 151 hours, tier 1 synchronized reserve resources were paid a weighted average synchronized reserve market clearing price of \$16.90 per MW and earned \$1,995,133 in credits. In 2016, PJM paid \$4,948,084 in credits for tier 1 estimated during the 297 hours when the nonsynchronized reserve market clearing price was above \$0.

Table 10-10 Weighted price of tier 1 synchronized reserve attributable to a nonsynchronized reserve price above zero: January 1, 2016 through September 30, 2017

Year	Month	Total Hours When NSRMCP>\$0	Weighted Average SRMCP for Hours When NSRMCP>\$0	Total Tier 1 MW Credited for Hours When NSRMCP>\$0	Total Tier 1 Credits Paid When NSRMCP>\$0	Average Tier 1 MW Paid
2016	Jan	41	\$14.18	56,841	\$806,038	1,624.0
2016	Feb	16	\$9.42	24,752	\$233,208	1,768.0
2016	Mar	73	\$6.57	105,142	\$690,294	1,440.3
2016	Apr	40	\$28.83	38,662	\$1,114,670	1,137.1
2016	May	22	\$9.01	27,027	\$243,515	1,228.5
2016	Jun	9	\$15.24	11,630	\$177,275	1,453.8
2016	Jul	10	\$21.38	13,975	\$298,736	1,397.5
2016	Aug	14	\$32.45	19,649	\$637,554	1,403.6
2016	Sep	9	\$26.22	11,247	\$294,857	1,249.7
2016	Oct	50	\$12.12	33,761	\$409,208	675.2
2016	Nov	12	\$3.04	13,867	\$42,216	1,155.6
2016	Dec	1	\$0.58	888	\$515	888.2
2016		297	\$13.84	357,442	\$4,948,084	1,285.1
2017	Jan	26	\$11.38	19,441	\$221,157	747.7
2017	Feb	1	\$12.35	1,293	\$15,971	1,293.2
2017	Mar	14	\$14.27	13,389	\$191,084	956.4
2017	Apr	16	\$9.82	11,680	\$114,662	730.0
2017	May	30	\$10.61	20,242	\$214,816	674.7
2017	Jun	13	\$4.96	7,563	\$37,542	581.8
2017	Jul	10	\$29.58	6,631	\$196,128	663.1
2017	Aug	6	\$14.04	3,926	\$55,108	654.4
2017	Sep	35	\$45.11	21,030	\$948,664	600.9
2017		151	\$16.90	105,195	\$1,995,133	766.9

The additional payments to tier 1 synchronized reserves under the shortage pricing rule are a windfall. The additional payment does not create an incentive to provide more tier 1 synchronized reserves. The additional payment is not a payment for performance; all estimated tier 1 receives the higher payment regardless of whether they provide any response during any spinning event. Tier 1 resources are not obligated to respond to synchronized reserve events. In the first nine months of 2017, 60.1 percent of the DGP adjusted market solution's estimated tier 1 resources MW actually responded during synchronized reserve events of 10 minutes or longer. Thus, 39.9 percent of DGP adjusted tier 1 estimated MW did not respond during spinning events. However, all resources that were included in the Tier 1 estimates were paid the Tier 2 price for their full estimated MW when the nonsynchronized reserve (NSR) price was greater than zero. Unlike tier 1 resources, tier 2 synchronized reserve resources are paid the market clearing price for tier 2 because they stand ready to respond and incur costs to do so, have an obligation to perform and pay penalties for nonperformance.

When the next MW of nonsynchronized reserve required to satisfy the primary reserve requirement increases in price from \$0.00 per MW to \$0.01 per MW, the cost of all tier 1 MW increases significantly.

In the first nine months of 2017, tier 1 synchronized reserve was paid \$458,674 for responding to synchronized reserve events. During the same time period tier 1 synchronized reserve was paid a windfall of \$1,995,133 simply because the NSRMCP was greater than \$0.00 in 151 hours (Table 10-11).

Table 10-11 Excess payments for tier 1 synchronized reserve: January 1, 2016 through September 30, 2017

Year	Month	Synchronized Reserve Events			Hours When NSRMCP > \$0		
		Total MWh	Total Credits	Average MWh Per Event	Total MW	Total Credits	Average MW Per Hour
2016	Jan	754	\$70,330	366	56,841	\$806,038	1,624.0
2016	Feb	675	\$40,622	338	24,752	\$233,208	1,768.0
2016	Mar	0	\$0	0	105,142	\$690,294	1,440.3
2016	Apr	339	\$66,199	339	38,662	\$1,114,670	1,137.1
2016	May	113	\$9,790	57	27,028	\$243,515	1,228.5
2016	Jun	207	\$11,129	207	11,630	\$177,275	1,453.8
2016	Jul	714	\$58,114	238	13,975	\$298,736	1,397.5
2016	Aug	334	\$13,026	334	19,650	\$637,554	1,403.6
2016	Sep	452	\$34,824	226	11,247	\$294,857	1,249.7
2016	Oct	141	\$24,130	141	33,761	\$409,208	675.2
2016	Nov	204	\$10,910	204	13,867	\$42,216	1,155.6
2016	Dec	695	\$43,512	347	888	\$515	888.2
2016		4,629	\$382,585	233	357,442	\$4,948,084	1,285.1
2017	Jan	1,250	\$60,447	208	19,441	\$221,157	1,143.6
2017	Feb	624	\$55,705	208	1,293	\$15,971	1,293.2
2017	Mar	758	\$55,300	379	13,389	\$191,084	956.4
2017	Apr	297	\$16,955	149	11,680	\$114,662	730.0
2017	May	406	\$21,848	406	20,242	\$214,816	1,065.4
2017	Jun	625	\$29,228	312	7,563	\$37,542	945.4
2017	Jul	0	\$0	NA	6,631	\$196,128	663.1
2017	Aug	0	\$0	NA	3,926	\$55,108	654.4
2017	Sep	1,104	\$221,957	368	21,030	\$948,664	600.9
2017		5,064	\$461,439	290	105,195	\$1,995,133	894.7

The MMU recommends that the rule requiring the payment of tier 1 synchronized reserve resources when the nonsynchronized reserve price is above zero be eliminated immediately.²¹ Tier 1 should be compensated only for a response to synchronized reserve events, as it was before the shortage pricing changes. This compensation requires that when a synchronized reserve event is called, all tier 1 response is paid the average of five-minute LMPs during the event, rather than hourly integrated LMP, plus \$50/MW, termed the Synchronized Energy Premium Price.

²¹ This recommendation was presented as a proposal, "Tier 1 Compensation," to the Markets and Reliability Committee Meeting, October 22, 2015. The MMU proposal and a PJM counterproposal were both rejected.

PJM's current tier 1 compensation rules are presented in Table 10-12.

Table 10-12 Tier 1 compensation as currently implemented by PJM

Tier 1 Compensation by Type of Hour as Currently Implemented by PJM		
Hourly Parameters	No Synchronized Reserve Event	Synchronized Reserve Event
NSRMCP=\$0	T1 credits = \$0	T1 credits = Synchronized Energy Premium Price * actual response MWh
NSRMCP>\$0	T1 credits = T2 SRMCP * estimated tier 1 MW	T1 credits = T2 SRMCP * min(calculated tier 1 MW, actual response MWh)

The MMU's recommended compensation rules for tier 1 MW are in Table 10-13.

Table 10-13 Tier 1 compensation as recommended by MMU

Tier 1 Compensation by Type of Hour as Recommended by MMU		
Hourly Parameters	No Synchronized Reserve Event	Synchronized Reserve Event
NSRMCP=\$0	T1 credits = \$0	T1 credits = Synchronized Energy Premium Price * actual response MWh
NSRMCP>\$0	T1 credits = \$0	T1 credits = Synchronized Energy Premium Price * actual response MWh

Tier 1 Estimate Bias

PJM's market solution software allows the dispatcher to bias the tier 2 synchronized reserve solution by forcing the software to assume a different tier 1 MW value than it actually estimates. PJM no longer allows dispatchers to use tier 1 biasing in the intermediate and real-time SCED solutions, but tier 1 biasing is used in the hour ahead reserve market solution, ASO. Biasing means manually modifying (decreasing or increasing) the tier 1 synchronized reserve estimate of the market solution. This forces the market clearing engine to clear more or less tier 2 synchronized reserve and nonsynchronized reserve to satisfy the synchronized reserve and primary reserve requirements than would have cleared under the market solution. Negative biasing is the primary form of biasing actually used.

PJM uses tier 1 estimate biasing in the MAD Subzone and in the full RTO Zone of the ASO market solution (Table 10-14).

Table 10-14 RTO Zone ASO tier 1 estimate biasing: January 2016 through September 2017

Year	Month	Number of Hours Biased Negatively	Average Negative Bias (MW)	Number of Hours Biased Positively	Average Positive Bias (MW)
2016	Jan	21	(682.7)	64	1,104.7
2016	Feb	27	(484.3)	12	762.5
2016	Mar	1	(400.0)	28	732.1
2016	Apr	31	(303.2)	22	502.1
2016	May	19	(452.4)	21	335.7
2016	Jun	46	(502.1)	3	500.0
2016	Jul	53	(532.1)	1	250.0
2016	Aug	134	(687.1)	1	1,000.0
2016	Sep	105	(864.7)	0	NA
2016	Oct	77	(729.9)	0	NA
2016	Nov	139	(877.0)	1	100.0
2016	Dec	262	(1,420.4)	0	NA
2016		915	(661.3)	153	648.4
2017	Jan	332	(987.7)	4	362.5
2017	Feb	194	(719.7)	0	NA
2017	Mar	354	(760.5)	3	200.0
2017	Apr	227	(697.1)	0	NA
2017	May	301	(1,000.3)	13	207.7
2017	Jun	253	(873.5)	0	NA
2017	Jul	244	(938.1)	0	NA
2017	Aug	179	(805.3)	2	1,250.0
2017	Sep	144	(682.6)	0	NA
2017		2228	(829.4)	22	256.7

Tier 1 biasing is not mentioned in the PJM manuals and does not appear to be defined in any public document. PJM dispatchers use tier 1 biasing to compensate for uncertainty in short-term load forecasting and uncertainty about expected generator performance, which result in uncertainty about the accuracy of the market solution's tier 1 estimate. The purpose of Tier 1 estimate biasing is to modify the demand for tier 2 and therefore the market results both for tier 2 synchronized reserve and for nonsynchronized reserve. Biasing the tier 1 estimate forces the market solution to clear more or less tier 2 and thus affects the price for tier 2 reserves. The average SRMCP in the MAD Subzone for hours when tier 1 is biased negatively is \$2.43 and \$2.14 when tier 1 is biased positively. The average SRMCP when there is no tier 1 bias is \$1.80.

The MMU recommends that PJM be more explicit and transparent about why tier 1 biasing is used in defining demand in the Tier 2 Synchronized Reserve Market. The MMU recommends that PJM define rules for estimating tier 1 MW, define rules for the use and amount of tier 1 biasing and identify the rule based reasons for each instance of biasing.

Tier 2 Synchronized Reserve Market

Synchronized reserve is provided by generators or demand response resources synchronized to the grid and capable of increasing output or decreasing load within 10 minutes. Synchronized reserve consists of tier 1 and tier 2 synchronized reserves. When the synchronized reserve requirement cannot be met by tier 1 synchronized reserve, PJM clears a market to satisfy the requirement with tier 2 synchronized reserve. Tier 2 synchronized reserve is provided by online resources, either synchronized to the grid but not producing energy, or dispatched to provide synchronized reserve at an operating point below their economic dispatch point. Tier 2 synchronized reserve is also provided by demand resources that have offered to reduce load in the event of a synchronized reserve event. Tier 2 synchronized reserves are committed to be available in the event of a synchronized reserve event. Tier 2 resources have a must offer requirement. Tier 2 resources are scheduled by the ASO sixty minutes before the operating hour, are committed to provide synchronized reserve for the entire hour, and are paid the higher of the SRMCP or their offer price plus lost opportunity cost (LOC). Demand response resources are paid the clearing price (SRMCP).

Tier 2 synchronized reserve resources committed for a full hour by the hour ahead market solution are defined to be inflexible resources. Inflexible resources cannot be released for energy during the operating hour. Tier 2 synchronized reserve resources may also be inflexible because of asserted physical limitations. Such resources include synchronous condensers operating solely for the purpose of providing synchronized reserves and demand resources. Demand side resources are also considered to be inflexible.

During the operating hour, the IT-SCED and the RT-SCED market solutions software can dispatch additional resources flexibly. A flexible commitment is one in which the IT-SCED or RT-SCED redispatches tier 1 generating resources as tier 2 synchronized reserve to meet the synchronized and primary reserve requirements within the operational hour. Resources that are redispatched as tier 2 within the hour are required to maintain their available ramp and are paid the SRMCP plus any lost opportunity costs or energy use costs that exceed the SRMCP.

Market Structure

Supply

PJM has a must offer tier 2 synchronized reserve requirement. All nonemergency generating resources are required to submit tier 2 synchronized reserve offers. All online, nonemergency generating resources are deemed available to provide both tier 1 and tier 2 synchronized reserve although certain unit types are exempt. If PJM issues a primary reserve warning, voltage reduction warning, or manual load dump warning, all offline emergency generation capacity resources available to provide energy must submit an offer for tier 2 synchronized reserve.²²

In the first nine months of 2017, the Mid Atlantic Dominion (MAD) Reserve Subzone averaged 6,513.7 MW of tier 2 synchronized reserve offers, and the RTO Reserve Zone averaged 24,010.7 MW of tier 2 synchronized reserve offers (Figure 10-11).

The supply of tier 2 synchronized reserve in the first nine months of 2017 was sufficient to cover the ASO hourly requirement net of tier 1 in both the RTO Reserve Zone and the MAD Reserve Subzone. The supply of tier 2 synchronized reserve was short in two 5 minute intervals in the RTO Zone during a spinning event on September 21.

The largest portion of cleared tier 2 synchronized reserve in the first nine months of 2017 was from CTs, 65.5 percent (Figure 10-6). Although demand resources are limited to 33 percent of the total synchronized reserve

²² See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 84.

requirement, the amount of tier 2 synchronized reserve required in any hour is often much less than the full synchronized reserve requirement because so much of it is met with tier 1 synchronized reserve. This means that in many hours demand resources make up considerably more than 33 percent of the cleared Tier 2 MW. The DR MW share of the total cleared Tier 2 Synchronized Reserve Market was 8.8 percent in 2016.²³ The DR MW share of the total cleared Tier 2 Synchronized Reserve Market in the first nine months of 2017 was 23.2 percent.

Figure 10-6 Cleared tier 2 synchronized reserve average hourly MW per hour by unit type, RTO Zone: January 1, 2016 through September 30, 2017

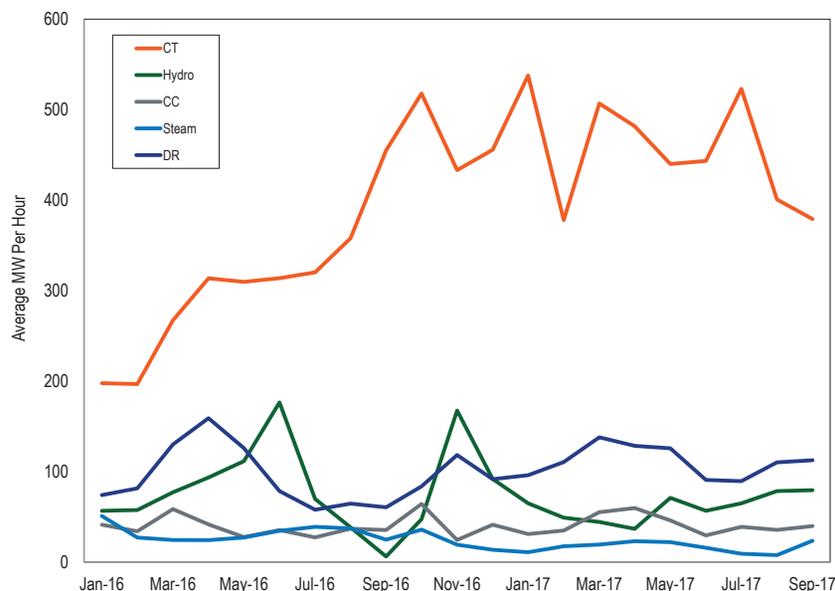
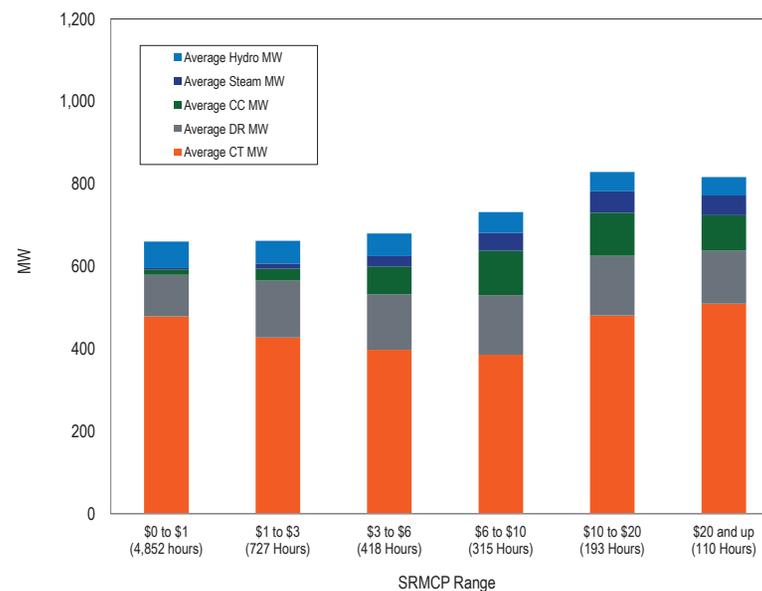


Figure 10-7 provides the average hourly cleared tier 2 MW by unit type by tier 2 clearing price range (SRMCP).

Figure 10-7 Average hourly tier 2 MW by unit type by SRMCP range: January through September, 2017



Demand

Until July 12, 2017 the default synchronized reserve requirement was set to 1,450 MW in both the Mid-Atlantic Dominion Subzone and the RTO Zone (Table 10-15). On July 12, 2017, PJM adopted a dynamic reserve requirement set equal to 150 percent of the largest contingency, determined hourly, based on the forecasted dispatch. There are two circumstances in which PJM may alter the synchronized reserve requirement from its 150 percent of the largest contingency value. When PJM operators anticipate periods of heavy load, they may bring on additional units to account for increased operational uncertainty in meeting load. When a Hot Weather Alert, Cold Weather Alert or an escalating emergency procedure (as defined in Manual 11 § 4.2.2 Synchronized Reserve Requirement Determination) has been issued for the operating day, operators may increase the synchronized reserve requirement

²³ The cap on demand response participation is defined in MW terms. There is no cap on the proportion of cleared demand response consistent with the MW cap.

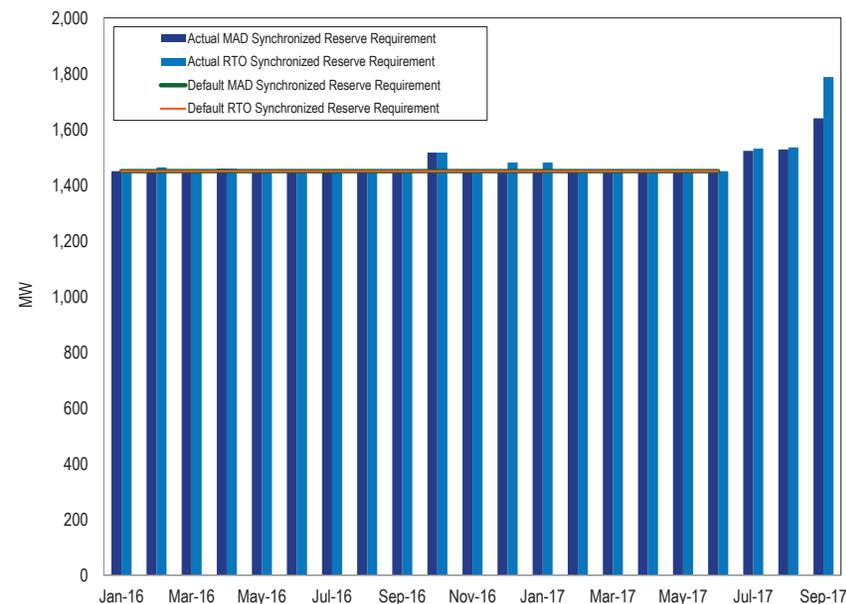
up to the full amount of the additional MW brought on line.²⁴ The synchronized reserve requirement was temporarily increased for the RTO Zone on January 10 and January 11, 2017, for a 31 hour period to 2,200 MW. The synchronized reserve requirement was increased for a two hour period on May 10, 2017 to 1,680 MW. The synchronized reserve requirement was increased slightly from September 11, 2017 through September 22, 2017, for a temporary switching condition.

Table 10-15 Default Tier 2 Synchronized Reserve Markets required MW, RTO Zone and Mid-Atlantic Dominion Subzone

Mid-Atlantic Dominion Subzone			RTO Synchronized Reserve Zone		
From Date	To Date	Required MW	From Date	To Date	Required MW
May 10, 2008	May 8, 2010	1,150	May 10, 2008	Jan 1, 2009	1,305
May 8, 2010	Jul 13, 2010	1,200	Jan 1, 2009	Mar 15, 2010	1,320
July 13, 2010	Jan 1, 2015	1,300	Mar 15, 2010	Nov 12, 2012	1,350
Jan 1, 2015	Jan 8, 2015	1,342	Nov 12, 2012	Jan 8, 2015	1,375
Jan 8, 2015	Jul 11, 2017	1,450	Jan 8, 2015	Jul 11, 2017	1,450
Jul 12, 2017		Calculated Hourly	Jul 12, 2017		Calculated Hourly

PJM may also change the synchronized reserve requirement from its default value when grid maintenance or outages change the largest contingency. Figure 10-8 shows monthly average actual synchronized reserve requirements and the default synchronized reserve requirements.

Figure 10-8 Monthly average actual vs default synchronized reserve requirements, RTO Zone and MAD Subzone: January 2016 through September 2017



The RTO Reserve Zone purchased an hourly average of 1,147.6 MW of tier 2 synchronized reserves the first nine months of 2017. Of this, an average of 455.1 MW cleared within the MAD Subzone.

Figure 10-9 and Figure 10-10 show the average monthly synchronized reserve required and the average monthly tier 2 synchronized reserve MW scheduled (PJM scheduled plus self scheduled) from January 2016 through September 2017, for the RTO Reserve Zone and MAD Reserve Subzone. The shortage pricing on September 21, 2017, was the result of a nine-hour period of ACE control problems. PJM called a “low ACE” spinning event during hour 14. There were 11 intervals of step 1 primary reserve shortage (NSRMCP=\$300), and two intervals of step 2 synchronized reserve shortage (SRMCP=\$300). In

²⁴ PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 88.

three subsequent intervals the SRMCP reached \$768.59. The hourly SRMCP for September 21, hour 14 was \$465.30.²⁵

Figure 10-9 MAD monthly average tier 2 synchronized reserve scheduled MW: January 1, 2016 through September 30, 2017

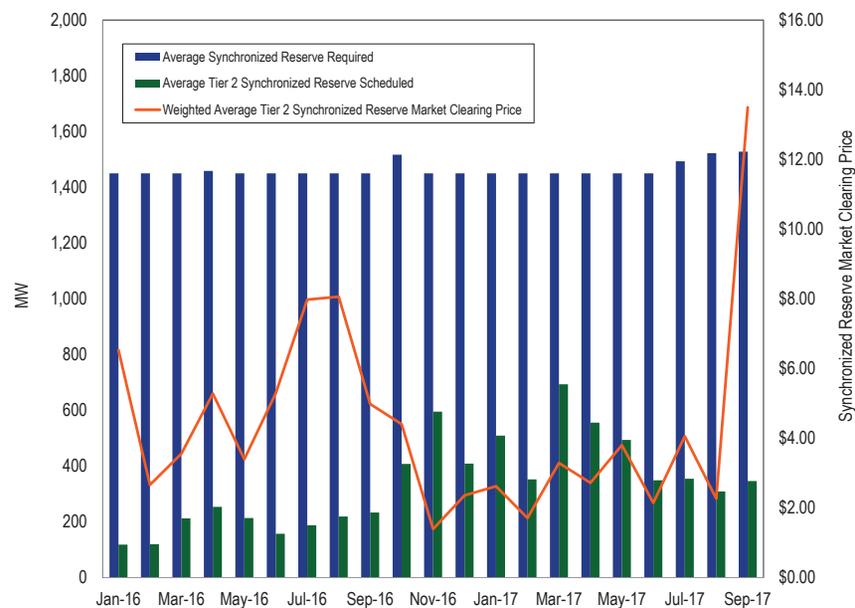
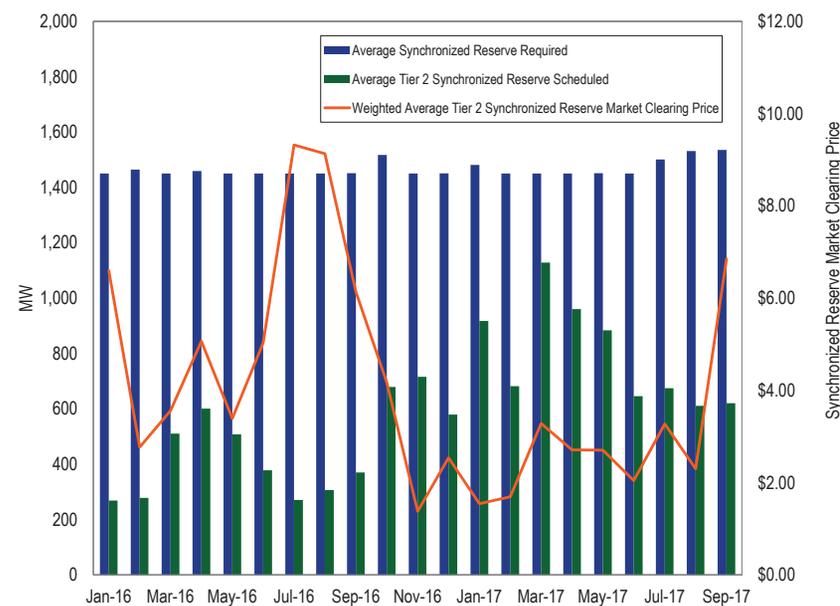


Figure 10-10 RTO monthly average tier 2 synchronized reserve scheduled MW: January 1, 2016 through September 30, 2017



Market Concentration

The HHI for tier 2 synchronized reserve for cleared hours in the Mid-Atlantic Dominion Subzone Tier 2 Synchronized Reserve Market in the first nine months of 2017 was 5895, which is defined as highly concentrated. The largest hourly market share was 100 percent and 99.7 percent of all cleared hours had a maximum market share greater than or equal to 40 percent.

The HHI for tier 2 synchronized reserve for cleared hours of the RTO Zone Tier 2 Synchronized Reserve Market in the first nine months of 2017 was 6653, which is defined as highly concentrated. The largest hourly market share was 100 percent and 94.0 percent of cleared hours had a maximum market share greater than or equal to 40 percent.

²⁵ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 86.

In the MAD Subzone, flexible synchronized reserve was 7.1 percent of all tier 2 synchronized reserve in the first nine months of 2017. In the RTO Zone, flexible synchronized reserve assigned was 10.5 percent of all tier 2 synchronized reserve during the same period.

The MMU calculates that 64.4 percent of hours would have failed the three pivotal supplier test in the MAD Subzone in the first nine months of 2017 for the inflexible Synchronized Reserve Market (excluding self scheduled synchronized reserve) in the hour ahead market (Table 10-16) and 63.9 percent of hours would have failed a three pivotal supplier test in the RTO Zone during the same time period.

Table 10-16 Three pivotal supplier test results for the RTO Zone and MAD Subzone: January 1, 2016 through September 30, 2017

Year	Month	Mid Atlantic Dominion Reserve Subzone	
		Pivotal Supplier Hours	RTO Reserve Zone Pivotal Supplier Hours
2016	Jan	82.7%	43.1%
2016	Feb	72.0%	39.6%
2016	Mar	93.4%	59.1%
2016	Apr	97.9%	55.6%
2016	May	94.2%	31.3%
2016	Jun	90.4%	27.4%
2016	Jul	79.4%	14.2%
2016	Aug	75.9%	14.4%
2016	Sep	84.3%	41.9%
2016	Oct	87.9%	80.9%
2016	Nov	96.0%	65.9%
2016	Dec	92.3%	69.8%
2016		87.2%	45.3%
<hr/>			
2017	Jan	79.3%	67.0%
2017	Feb	73.8%	57.6%
2017	Mar	72.6%	38.3%
2017	Apr	75.0%	51.0%
2017	May	70.9%	69.8%
2017	Jun	62.6%	84.9%
2017	Jul	57.3%	69.5%
2017	Aug	34.8%	71.0%
2017	Sep	53.7%	66.4%
2017		64.4%	63.9%

The market structure results indicate that the RTO Zone and Mid-Atlantic Dominion Subzone Tier 2 Synchronized Reserve Markets are not structurally competitive.

Market Behavior

Offers

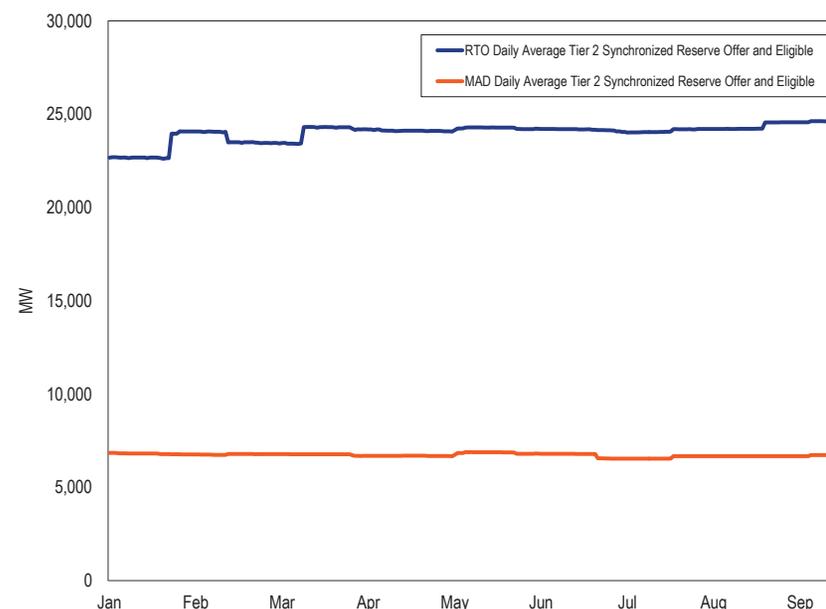
Daily cost-based offers are submitted for each unit by the unit owner. For generators the offer must include tier 1 synchronized reserve ramp rate, a tier 1 synchronized reserve maximum, self scheduled status, synchronized reserve availability, synchronized reserve offer quantity (MW), tier 2 synchronized reserve offer price, energy use for tier 2 condensing resources (MW), condense to gen cost, shutdown costs, condense startup cost, condense hourly cost, condense notification time, spin as a condenser status, and condense available status. The synchronized reserve offer price made by the unit owner is subject to an offer cap of marginal cost plus \$7.50 per MW. All suppliers are paid the higher of the market clearing price or their offer plus their unit specific opportunity cost. The offer quantity is limited to the economic maximum. PJM monitors this offer by checking to ensure that all offers are greater than or equal to 90 percent of the resource's ramp rate times 10 minutes. A resource that is unable to participate in the synchronized reserve market during a given hour may set its hourly offer to 0.00 MW. Certain defined resource types are not required to offer tier 2 because they cannot reliably provide synchronized reserve. These include: nuclear, wind, solar, landfill gas and energy storage resources.²⁶

Figure 10-11 shows the daily average of hourly offered tier 2 synchronized reserve MW for both the RTO Synchronized Reserve Zone and the Mid-Atlantic Dominion Synchronized Reserve Subzone. In the first nine months of 2017, the ratio of online and eligible tier 2 synchronized reserve to synchronized reserve required in the Mid-Atlantic Dominion Subzone was 4.96 averaged over all hours. For the RTO Synchronized Reserve Zone the ratio was 5.74.

²⁶ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 86.

PJM has a tier 2 synchronized reserve must offer requirement for all generation that is online, nonemergency, and physically able to operate with an output less than dictated by economic dispatch. Tier 2 synchronized reserve offers are made on a daily basis with hourly updates permitted. Daily offers can be changed as a result of maintenance status or physical limitations only and are required regardless of online/offline state.²⁷ The Tier 2 Synchronized Reserve Market is not actually cleared based on daily offers but based on hourly updates to the daily offers. As a result of hourly updates the actual amount of eligible tier 2 MW can change significantly every hour (Figure 10-11). Changes to the hourly offer status are only permitted when resources are physically unable to provide tier 2. Changes to hourly eligibility levels are the result of online status, minimum/maximum runtimes, minimum notification times, maintenance status and grid conditions including constraints. However, resource operators can make their units unavailable for an hour or block of hours without having to provide a reason.

Figure 10-11 Tier 2 synchronized reserve hourly offer and eligible volume (MW), averaged daily: January through September, 2017



Of all nonemergency resources capable of reliably producing synchronized reserve and therefore obligated to offer, an average of 2.6 percent of units capable of providing tier 2 synchronized reserve did not enter a daily tier 2 synchronized reserve offer for the first nine months of 2017.

The MMU recommends that the tier 2 synchronized reserve must offer requirement be enforced. The MMU recommends that PJM define a set of acceptable reasons why a unit can be made unavailable daily or hourly and require unit owners to select a reason in Markets Gateway whenever making a unit unavailable either daily or hourly or setting the offer MW to 0 MW.²⁸

²⁷ See *id.* ("Regardless of online/offline state, all non-emergency generation capacity resources must submit a daily offer for Tier 2 Synchronized Reserve in eMKT...").

²⁸ PJM has adopted a new business rule in the third quarter of 2017 to enforce compliance with the tier 2 must-offer requirement. PJM enters a zero dollar offer price for all units with a must offer obligation for tier 2 synchronized reserves.

Figure 10-12 shows average offer MW volume by market and unit type for the MAD Subzone and Figure 10-13 shows average offer MW volume by market and unit type for the RTO Zone.

Figure 10-12 MAD average daily tier 2 synchronized reserve offer by unit type (MW): January through September, 2014 through 2017

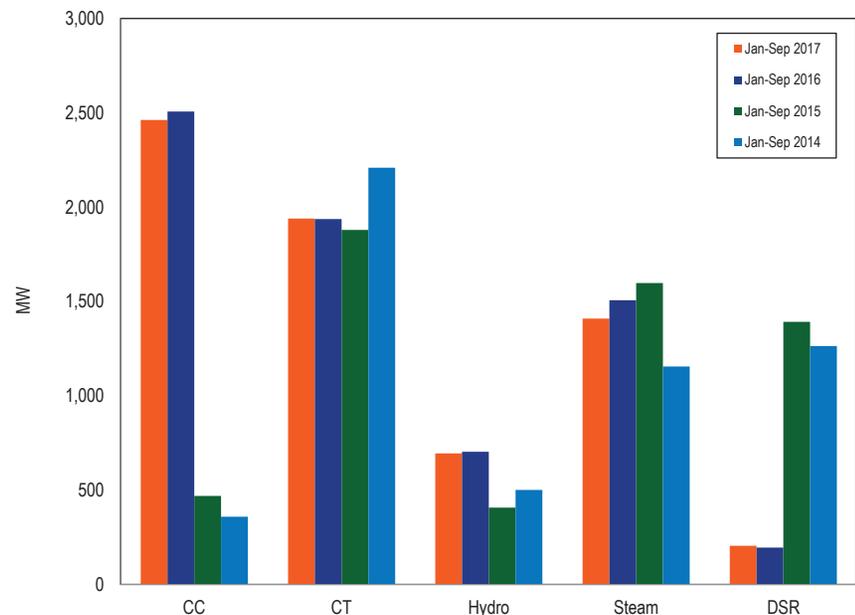
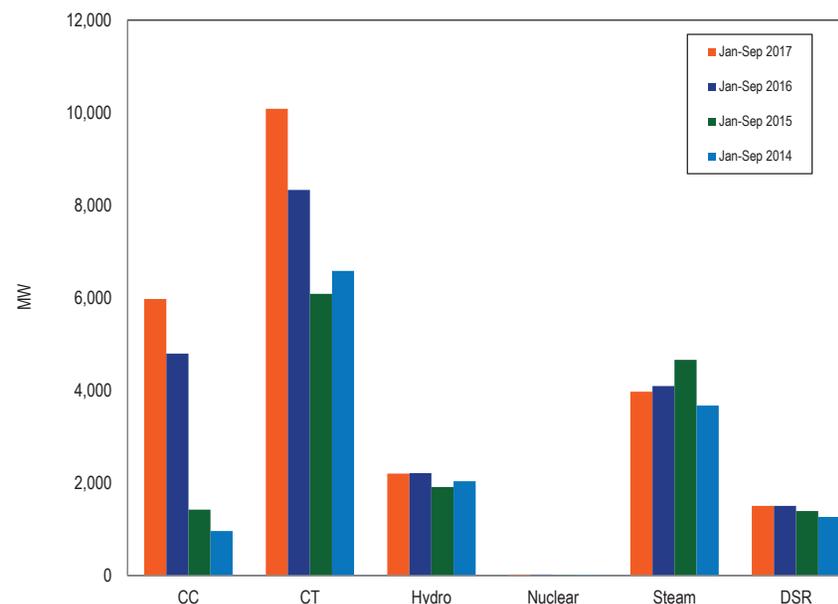


Figure 10-13 RTO Zone average daily tier 2 synchronized reserve offer by unit type (MW): January through September, 2014 through 2017



Market Performance

Price

The price of tier 2 synchronized reserve is calculated in real time every five minutes and averaged each hour for the RTO Reserve Zone and the MAD Subzone. In hours where total tier 1 MW synchronized reserve MW is less than the synchronized reserve requirement, PJM must clear a Tier 2 Synchronized Reserve Market for synchronized reserves.

In the first nine months of 2017, a Tier 2 Synchronized Reserve Market was cleared for the MAD Subzone in 98.1 percent of all hours. In 1.9 percent of hours there was enough tier 1 synchronized reserve to cover the full requirement. The MAD tier 2 market cleared an average of 343.3 MW at a

weighted average clearing price of \$3.34 compared to \$4.39 in the first nine months of 2016.

In the first nine months of 2017, the Tier 2 Synchronized Reserve Market for the RTO Zone cleared an average of 524.3 MW at a weighted average price of \$3.44 compared to \$5.35 in the first nine months of 2016.

In 98.2 percent of cleared hours, the synchronized reserve market clearing price was the same for both the MAD Subzone and the RTO Zone. In the 1.8 percent of hours when the price diverged, the average clearing price was \$19.74 in the MAD Subzone, and \$23.13 in the RTO Zone.

Although influenced by tier 1 bias, supply, performance, and demand are reflected in the price of synchronized reserve. (Figure 10-9 and Figure 10-10).

Table 10-17 Mid-Atlantic Dominion subzone, weighted average SRMCP and average scheduled, tier 1 estimated and demand response MW: January 1, 2016 through September 30, 2017

Year	Month	Weighted Average Synchronized Reserve Market Clearing Price	Average Tier 2 Generation Synchronized Reserve Purchased (MW)	Average Hourly Tier 1 Synchronized Reserve Estimated Hour Ahead (MW)	Average Hourly Demand Response Cleared (MW)
2016	Jan	\$4.70	206.1	1,263.5	62.2
2016	Feb	\$1.99	205.3	1,230.1	63.1
2016	Mar	\$3.07	386.8	993.3	97.8
2016	Apr	\$4.62	500.9	912.4	125.7
2016	May	\$2.88	432.0	956.5	96.6
2016	Jun	\$4.34	311.7	1,116.9	67.1
2016	Jul	\$7.98	188.0	1,254.7	46.8
2016	Aug	\$8.06	219.2	1,228.4	50.5
2016	Sep	\$4.66	230.6	1,170.6	43.6
2016	Oct	\$4.00	407.9	1,086.1	58.8
2016	Nov	\$1.28	595.1	774.8	92.8
2016	Dec	\$2.21	408.7	995.0	69.5
2016		\$4.15	341.0	1,089.7	72.9
2017	Jan	\$2.18	400.8	981.6	75.3
2017	Feb	\$1.60	288.8	1,111.6	84.8
2017	Mar	\$2.88	549.5	767.4	108.4
2017	Apr	\$2.69	419.0	896.9	100.7
2017	May	\$3.13	409.8	1,164.6	98.4
2017	Jun	\$2.03	287.4	1,373.0	51.2
2017	Jul	\$3.11	305.5	1,391.9	45.8
2017	Aug	\$2.02	270.3	1,438.3	58.9
2017	Sep	\$10.42	304.8	1,419.2	65.2
2017		\$3.34	359.6	1,171.6	76.5

Table 10–18 RTO zone weighted average SRMCP and average scheduled, tier 1 estimated and demand response MW: January 1, 2016 through September 30, 2017

Year	Month	Weighted Average Synchronized Reserve Market Clearing Price	Average Tier 2 Generation Synchronized Reserve Purchased (MW)	Average Hourly Tier 1 Synchronized Reserve Estimated Hour Ahead (MW)	Average Hourly Demand Response Cleared (MW)
2016	Jan	\$6.64	269.5	1,659.4	74.3
2016	Feb	\$2.76	277.9	1,564.1	81.5
2016	Mar	\$3.56	510.2	1,089.1	130.0
2016	Apr	\$5.06	602.2	1,011.7	159.3
2016	May	\$3.39	508.3	1,160.9	125.8
2016	Jun	\$5.03	378.3	1,546.0	78.4
2016	Jul	\$9.32	270.5	1,663.8	59.6
2016	Aug	\$9.13	306.0	1,605.6	64.5
2016	Sep	\$5.62	364.6	1,290.4	60.7
2016	Oct	\$4.17	678.9	802.7	83.5
2016	Nov	\$1.37	715.6	810.8	117.7
2016	Dec	\$2.54	578.6	953.1	92.5
2016		\$4.88	455.1	1,399.0	94.0
2017	Jan	\$2.00	639.4	1,020.4	100.9
2017	Feb	\$1.70	483.5	1,172.0	110.6
2017	Mar	\$3.28	728.4	654.2	140.7
2017	Apr	\$2.71	629.6	805.1	129.6
2017	May	\$3.15	571.9	924.1	129.3
2017	Jun	\$2.09	407.8	1,413.5	92.2
2017	Jul	\$3.60	435.0	1,540.1	90.0
2017	Aug	\$2.29	392.8	1,512.8	111.8
2017	Sep	\$10.17	430.0	1,368.9	116.8
2017		\$3.44	524.3	1,156.8	113.5

Cost

As a result of changing grid conditions, load forecasts, and unexpected generator performance, prices do not always cover the full cost including the final LOC for each resource. Because price formation occurs within the hour (on a five minute basis integrated over the hour) but the synchronized reserve commitment occurs prior to the hour, the realized within hour price can be zero even when some tier 2 synchronized reserve is cleared. All resources cleared in the market are guaranteed to be made whole and are paid if the SRMCP does not compensate them for their offer plus LOC.

The full cost of tier 2 synchronized reserve including payments for the clearing price and out of market costs is calculated and compared to the price. The closer the price to cost ratio is to one hundred percent, the more the market price reflects the full cost of tier 2 synchronized reserve. A price to cost ratio close to one hundred percent is an indicator of an efficient synchronized reserve market design.

In the first nine months of 2017, the price to cost (including self scheduled) ratio of the RTO Zone Tier 2 Synchronized Reserve Market averaged 32.6 percent (Table 10-19); the price to cost ratio of the MAD Subzone averaged 34.5 percent.

Table 10–19 RTO Zone, Mid-Atlantic Subzone tier 2 synchronized reserve MW, credits, weighted price, and cost (including self scheduled): January 1 through September 30, 2017

Zone	Year	Month	Tier 2 Credited MW	Tier 2 Credits	Weighted Average Synchronized Reserve Market Clearing Price	Tier 2 Synchronized Reserve Cost	Price/Cost Ratio
MAD Subzone	2017	Jan	212,748	\$1,833,559	\$2.64	\$8.62	30.6%
MAD Subzone	2017	Feb	139,977	\$1,353,401	\$1.71	\$9.67	17.7%
MAD Subzone	2017	Mar	230,808	\$2,367,585	\$3.21	\$10.26	31.3%
MAD Subzone	2017	Apr	189,960	\$1,657,748	\$2.72	\$8.73	31.2%
MAD Subzone	2017	May	183,897	\$1,903,448	\$3.80	\$10.35	36.7%
MAD Subzone	2017	Jun	130,934	\$1,508,315	\$2.14	\$11.52	18.6%
MAD Subzone	2017	July	143,248	\$2,271,979	\$3.88	\$15.86	24.4%
MAD Subzone	2017	Aug	131,617	\$1,244,528	\$2.27	\$9.46	24.0%
MAD Subzone	2017	Sep	143,624	\$3,668,027	\$13.50	\$25.54	52.9%
MAD Subzone	2017		1,506,814	\$17,808,590	\$3.98	\$12.22	32.6%
RTO Zone	2017	Jan	492,122	\$3,222,096	\$1.58	\$6.55	24.1%
RTO Zone	2017	Feb	338,732	\$2,106,454	\$1.70	\$6.22	27.3%
RTO Zone	2017	Mar	554,786	\$4,376,913	\$3.20	\$7.89	40.6%
RTO Zone	2017	Apr	472,760	\$3,622,022	\$2.71	\$7.66	35.4%
RTO Zone	2017	May	443,223	\$3,289,276	\$2.83	\$7.42	38.1%
RTO Zone	2017	Jun	305,739	\$2,287,713	\$2.04	\$7.48	27.3%
RTO Zone	2017	July	336,342	\$3,526,998	\$3.20	\$10.49	30.5%
RTO Zone	2017	Aug	304,851	\$2,046,481	\$2.25	\$6.71	33.5%
RTO Zone	2017	Sep	321,426	\$5,231,304	\$8.73	\$16.28	53.6%
RTO Zone	2017		3,569,981	\$29,709,256	\$3.14	\$8.32	34.5%

Compliance

The MMU has identified and quantified the actual performance of scheduled tier 2 synchronized reserve resources when called on to deliver during synchronized reserve events since 2011.²⁹ When synchronized reserve resources self schedule or clear the Tier 2 Synchronized Reserve Market they are obligated to provide their full scheduled tier 2 MW during a synchronized reserve event. Actual synchronized reserve event response is determined by final output minus initial output where final output is the largest output between 9 and 11 minutes after start of the event, and initial output is the lowest output between one minute before the event and one minute after the event.³⁰ Tier 2 resources are obligated to sustain their final output for the shorter of the length of the event or 30 minutes. Penalties can be assessed for failure of a scheduled tier 2 resource to perform during any synchronized reserve event lasting 10 minutes or longer.

The MMU has reported the wide range of synchronized reserve event response levels and recommended that PJM take action to increase compliance rates. In 2015, there were 21 spinning events of which seven were 10 minutes or longer. In 2016, there were 16 spinning events of which six were 10 minutes or longer. In the first nine months of 2017, there have been 16 spinning events, six of which were 10 minutes or longer.

Tier 1 resource owners are paid for the actual amount of synchronized reserve they provide in response to a synchronized reserve event.³¹ Tier 2 resource owners are paid for being available and responding but are not paid based on the actual response to a synchronized reserve event. Tier 1 resource owners do not have an obligation to respond and are not penalized for a failure to respond. Tier 2 resource owners are penalized for a failure to respond.

A tier 2 resource is penalized for the amount of MW it falls short of its offer for the entire hour, not just for the portion of the hour covered by

²⁹ See 2011 State of the Market Report for PJM, Vol. 2, Section 9, "Ancillary Services," at 250.

³⁰ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) § 4.2.11 Verification at 97.

³¹ See *id.* at 98.

the synchronized reserve event.³² The penalty period extends for the average number of days between spinning events. For the first nine months of 2017, PJM used the average number of days between spinning events from November 2015 through October 2016 which is 13 days.³³ Resource owners are permitted to aggregate the response of multiple units to offset an under response from one unit with an overresponse from a different unit to reduce an under response penalty.

There were six synchronized reserve events of 10 minutes or longer in the first nine months of 2017. For those six events, 12.4 percent of all scheduled tier 2 synchronized reserve MW were not delivered and were penalized (Table 10–20).

Table 10–20 Synchronized reserve events 10 minutes or longer, tier 2 response compliance, RTO Reserve Zone: January 1 through September 30, 2017

Spin Event (Day, Time)	Duration (Minutes)	Tier 1						
		Estimate (MW Adj by DGP)	Tier 1 Response (MW)	Tier 2 Scheduled (MW)	Tier 2 Response (MW)	Tier 2 Penalty (MW)	Tier 1 Response Percent	Tier 2 Response Percent
Mar 23, 2017 06:48	24	926.8	549.6	742.8	559.1	183.7	59.3%	75.3%
Apr 8, 2017 11:53	10	1,222.6	827.2	879.3	828.7	50.6	67.7%	94.2%
May 8, 2017 04:18	10	1,325.6	976.3	335.1	298.5	36.6	73.6%	89.1%
Jun 8, 2017 03:39	10	974.4	726.7	575.7	522.4	53.3	74.6%	90.7%
Sep 4, 2017 20:03	15	476.3	68.1	601.0	563.8	37.2	14.3%	93.8%
Sep 21, 2017 14:15	16	305.8	217.4	1,253.9	1,037.3	216.6	71.1%	82.7%
2017 Average	14.2	871.9	560.9	731.3	635.0	96.3	60.1%	87.6%

History of Synchronized Reserve Events

Synchronized reserve is designed to provide relief for disturbances.³⁴ ³⁵ A disturbance is defined as loss of 1,000 MW of generation and/or transmission resources within 60 seconds. In the absence of a disturbance, PJM dispatchers have used synchronized reserve as a source of energy to provide relief from low ACE. There were 5 low ACE events in the first nine months of 2017, on

³² See PJM. "Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) p. 47. See also PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) § 4.2.12 Non-Performance, p. 99.

³³ "2016 Third Quarter Synchronized Reserve Performance & 2017 Synchronized Reserve Penalty Days," presentation to the Operating Committee, December 13, 2016. <<http://www.pjm.com/~media/committees-groups/committees/oc/20161213/20161213-item-16-2016-third-quarter-synchronized-reserve-performance-with-2017-penalty-days.ashx>>.

³⁴ 2013 State of the Market Report for PJM, Appendix F – PJM's DCS Performance, at 451–452.

³⁵ See PJM. "Manual 12: Balancing Operations," Rev. 36 (February 1, 2017) § 4.1.2 Loading Reserves at 40.

January 12, 2017 for 8 minutes, February 13, 2017 for 7 minutes, March 23, 2017 for 24 minutes, June 20, 2017 for 9 minutes, and September 21, 2017 for 16 minutes.

Table 10-21 Synchronized reserve events: January 1, 2010 through September 30, 2017

Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)
FEB-18-2010 13:27	Mid-Atlantic	19	JAN-11-2011 15:10	Mid-Atlantic	6	JAN-03-2012 16:51	RFC	9	JAN-22-2013 08:34	RTO	8
MAR-18-2010 11:02	RFC	27	FEB-02-2011 01:21	RFC	5	JAN-06-2012 23:25	RFC	8	JAN-25-2013 15:01	RTO	19
MAR-23-2010 20:14	RFC	13	FEB-08-2011 22:41	Mid-Atlantic	11	JAN-23-2012 15:02	Mid-Atlantic	8	FEB-09-2013 22:55	RTO	10
APR-11-2010 13:12	RFC	9	FEB-09-2011 11:40	Mid-Atlantic	16	MAR-02-2012 19:54	RFC	9	FEB-17-2013 23:10	RTO	13
APR-28-2010 15:09	Mid-Atlantic	8	FEB-13-2011 15:35	Mid-Atlantic	14	MAR-08-2012 17:04	RFC	6	APR-17-2013 01:11	RTO	11
MAY-11-2010 19:57	Mid-Atlantic	9	FEB-24-2011 11:35	Mid-Atlantic	14	MAR-19-2012 10:14	RFC	10	APR-17-2013 20:01	RTO	9
MAY-15-2010 03:03	RFC	6	FEB-25-2011 14:12	RFC	10	APR-16-2012 00:20	Mid-Atlantic	9	MAY-07-2013 17:33	RTO	8
MAY-28-2010 04:06	Mid-Atlantic	5	MAR-30-2011 19:13	RFC	12	APR-16-2012 11:18	RFC	8	JUN-05-2013 18:54	RTO	20
JUN-15-2010 00:46	RFC	34	APR-02-2011 13:13	Mid-Atlantic	11	APR-19-2012 11:54	RFC	16	JUN-08-2013 15:19	RTO	9
JUN-19-2010 23:49	Mid-Atlantic	9	APR-11-2011 00:28	RFC	6	APR-20-2012 11:08	Mid-Atlantic	7	JUN-12-2013 17:35	RTO	10
JUN-24-2010 00:56	RFC	15	APR-16-2011 22:51	RFC	9	JUN-20-2012 13:35	RFC	7	JUN-30-2013 01:22	RTO	10
JUN-27-2010 19:33	Mid-Atlantic	15	APR-21-2011 20:02	Mid-Atlantic	6	JUN-26-2012 17:51	RFC	7	JUL-03-2013 20:40	RTO	13
JUL-07-2010 15:20	RFC	8	APR-27-2011 01:22	RFC	8	JUL-23-2012 21:45	RFC	18	JUL-15-2013 18:43	RTO	29
JUL-16-2010 20:45	Mid-Atlantic	19	MAY-02-2011 00:05	Mid-Atlantic	21	AUG-03-2012 12:44	RFC	10	JUL-28-2013 14:20	RTO	10
AUG-11-2010 19:09	RFC	17	MAY-12-2011 19:39	RFC	9	SEP-08-2012 04:34	RFC	12	SEP-10-2013 19:48	RTO	68
AUG-13-2010 23:19	RFC	6	MAY-26-2011 17:17	Mid-Atlantic	20	SEP-27-2012 17:19	Mid-Atlantic	7	OCT-28-2013 10:44	RTO	33
AUG-16-2010 07:08	RFC	17	MAY-27-2011 12:51	RFC	6	OCT-17-2012 10:48	RTO	10	DEC-01-2013 11:17	RTO	9
AUG-16-2010 19:39	Mid-Atlantic	11	MAY-29-2011 09:04	RFC	7	OCT-23-2012 22:29	RTO	19	DEC-07-2013 19:44	RTO	7
SEP-15-2010 11:20	RFC	13	MAY-31-2011 16:36	RFC	27	OCT-30-2012 05:12	RTO	14			
SEP-22-2010 15:28	Mid-Atlantic	24	JUN-03-2011 14:23	RFC	7	NOV-25-2012 16:32	RTO	12			
OCT-05-2010 17:20	RFC	10	JUN-06-2011 22:02	Mid-Atlantic	9	DEC-16-2012 07:01	RTO	9			
OCT-16-2010 03:22	Mid-Atlantic	10	JUN-23-2011 23:26	RFC	8	DEC-21-2012 05:51	RTO	7			
OCT-16-2010 03:25	RFCNonMA	7	JUN-26-2011 22:03	Mid-Atlantic	10	DEC-21-2012 10:29	RTO	5			
OCT-27-2010 10:35	RFC	7	JUL-10-2011 11:20	RFC	10						
OCT-27-2010 12:50	Mid-Atlantic	10	JUL-28-2011 18:49	RFC	12						
NOV-26-2010 14:24	RFC	13	AUG-02-2011 01:08	RFC	6						
NOV-27-2010 11:34	RFC	8	AUG-18-2011 06:45	Mid-Atlantic	6						
DEC-08-2010 01:19	RFC	11	AUG-19-2011 14:49	RFC	5						
DEC-09-2010 20:07	RFC	5	AUG-23-2011 17:52	RFC	7						
DEC-14-2010 12:02	Mid-Atlantic	24	SEP-24-2011 15:48	RFC	8						
DEC-16-2010 18:40	Mid-Atlantic	20	SEP-27-2011 14:20	RFC	7						
DEC-17-2010 22:09	Mid-Atlantic	6	SEP-27-2011 16:47	RFC	9						
DEC-29-2010 19:01	Mid-Atlantic	15	OCT-30-2011 22:39	Mid-Atlantic	10						
			DEC-15-2011 14:35	Mid-Atlantic	8						
			DEC-21-2011 14:26	RFC	18						

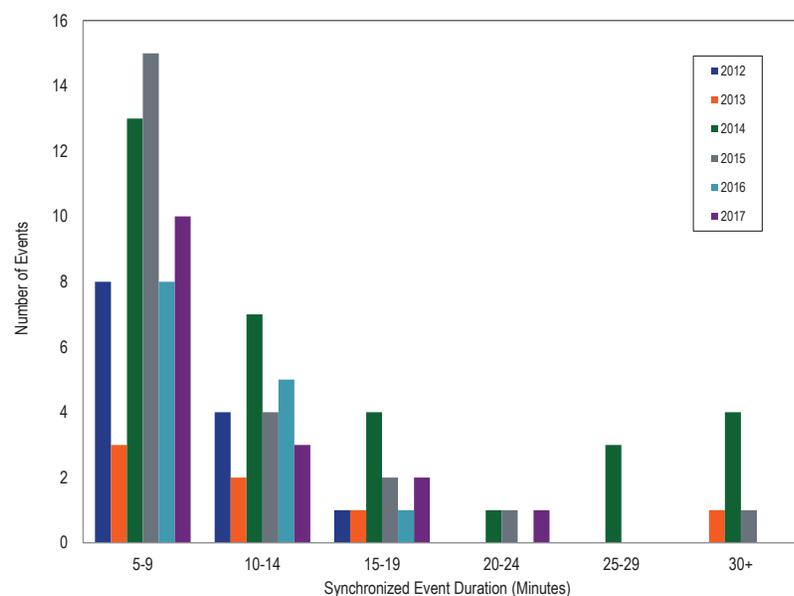
Table 10–21 Synchronized reserve events: January 1, 2010 through September 30, 2017 (continued)

Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)	Effective Time	Region	Duration (Minutes)
JAN-06-2014 22:01	RTO	68	JAN-07-2015 22:36	RTO	8	JAN-18-2016 17:58	RTO	12	JAN-08-2017 03:21	RTO	7
JAN-07-2014 02:20	RTO	25	FEB-24-2015 02:51	RTO	5	FEB-08-2016 15:05	RTO	10	JAN-09-2017 19:24	RTO	9
JAN-07-2014 04:18	RTO	34	FEB-26-2015 15:20	RTO	6	FEB-28-2016 18:29	RTO	8	JAN-10-2017 13:05	MAD	9
JAN-07-2014 11:27	RTO	11	MAR-03-2015 17:02	RTO	11	APR-14-2016 20:09	RTO	10	JAN-15-2017 20:13	RTO	8
JAN-07-2014 13:20	RTO	41	MAR-16-2015 10:25	RTO	24	MAY-11-2016 15:55	RTO	6	JAN-23-2017 09:08	RTO	7
JAN-10-2014 16:46	RTO	12	MAR-17-2015 23:34	RTO	17	JUN-01-2016 09:01	RTO	5	FEB-13-2017 18:30	RTO	7
JAN-21-2014 18:52	RTO	6	MAR-23-2015 23:44	RTO	15	JUL-06-2016 00:40	RTO	5	FEB-14-2017 00:11	RTO	6
JAN-22-2014 02:26	RTO	7	APR-06-2015 14:23	RTO	8	JUL-28-2016 13:28	RTO	15	FEB-15-2017 06:37	RTO	6
JAN-22-2014 22:54	RTO	8	APR-07-2015 17:11	RTO	31	AUG-31-2016 19:29	RTO	8	MAR-23-2017 06:48	RTO	24
JAN-25-2014 05:22	RTO	10	APR-15-2015 08:14	RTO	8	SEP-09-2016 19:11	RTO	6	APR-08-2017 11:53	RTO	10
JAN-26-2014 17:11	RTO	6	APR-25-2015 03:21	RTO	9	SEP-11-2016 19:30	RTO	9	MAY-08-2017 04:18	RTO	10
JAN-31-2014 15:05	RTO	13	JUL-30-2015 14:04	RTO	10	OCT-12-2016 08:21	RTO	5	JUN-08-2017 03:39	RTO	10
FEB-02-2014 14:03	Dominion	8	AUG-05-2015 19:47	RTO	7	OCT-12-2016 14:40	RTO	7	JUN-20-2017 05:38	RTO	9
FEB-08-2014 06:05	Dominion	18	AUG-19-2015 16:47	RTO	9	NOV-04-2016 17:13	RTO	11	SEP-04-2017 20:18	MAD	15
FEB-22-2014 23:05	RTO	7	SEP-05-2015 01:16	RTO	7	DEC-03-2016 00:11	RTO	7	SEP-07-2017 09:16	RTO	9
MAR-01-2014 05:18	RTO	26	SEP-10-2015 10:12	RTO	8	DEC-31-2016 05:10	RTO	12	SEP-21-2017 14:15	RTO	16
MAR-05-2014 21:25	RTO	8	SEP-29-2015 00:58	Mid-Atlantic	11						
MAR-13-2014 20:39	RTO	8	NOV-12-2015 16:42	RTO	8						
MAR-27-2014 10:37	RTO	56	NOV-21-2015 17:17	RTO	8						
APR-14-2014 01:16	RTO	10	DEC-04-2015 22:41	RTO	7						
APR-25-2014 17:33	RTO	6	DEC-24-2015 17:42	RTO	8						
MAY-01-2014 14:18	RTO	13									
MAY-03-2014 17:11	RTO	13									
MAY-14-2014 01:36	RTO	5									
JUL-08-2014 03:07	RTO	9									
JUL-25-2014 19:19	RTO	7									
SEP-06-2014 13:32	RTO	18									
SEP-20-2014 23:42	RTO	14									
SEP-29-2014 10:08	RTO	15									
OCT-20-2014 06:35	RTO	15									
OCT-23-2014 11:03	RTO	27									
NOV-01-2014 06:50	RTO	9									
NOV-08-2014 02:08	RTO	8									
NOV-22-2014 05:27	RTO	21									
NOV-22-2014 08:19	RTO	10									
DEC-10-2014 18:58	RTO	8									
DEC-31-2014 21:42	RTO	12									

The risk of using synchronized reserves for energy or any other non-disturbance reason is that it reduces the amount of synchronized reserve available for a disturbance. Disturbances are unpredictable. Synchronized reserve has a requirement to sustain its output for only up to thirty minutes. When the need is for reserve extending past thirty minutes secondary reserve is the appropriate source of the response. The use of synchronized reserve is an expensive solution during an hour when the hour ahead market solution and reserve dispatch indicated no shortage of primary reserve. PJM's primary reserve levels have been sufficient to recover from disturbances and should remain available in the absence of disturbance.

From January 1, 2010 through September 30, 2017, PJM experienced 207 synchronized reserve events (Table 10-21), approximately 2.2 events per month. During this period, synchronized reserve events had an average duration of 12.2 minutes.

Figure 10-14 Synchronized reserve events duration distribution curve: January, 2012 through September, 2017



Nonsynchronized Reserve Market

Nonsynchronized reserve consists of MW available within 10 minutes but not synchronized to the grid. Startup time for nonsynchronized reserve resources is not subject to testing and is based on parameters in offers submitted by resource owners. There is no defined requirement for nonsynchronized reserves. It is available to meet the primary reserve requirement. Generation resources that have designated their entire output as emergency are not eligible to provide nonsynchronized reserves. Generation resources that are not available to provide energy are not eligible to provide nonsynchronized reserves.

The market mechanism for nonsynchronized reserve does not include any direct participation by market participants. PJM defines the demand curve for nonsynchronized reserve and PJM defines the supply curve based on nonemergency generation resources that are available to provide energy and can start in 10 minutes or less and on the associated resource opportunity costs calculated by PJM. Generation owners do not submit supply offers. Since nonsynchronized reserve is a lower quality product, its clearing price is always less than or equal to the synchronized reserve market clearing price. In most hours, the nonsynchronized reserve clearing price is zero.

Market Structure

Demand

Prior to July 12, 2017, PJM specified that 2,175 MW of primary reserve must be available in the Mid-Atlantic Dominion Reserve Subzone, of which 1,450 MW must be synchronized reserve (Figure 10-2), and that 2,175 MW of primary reserve must be available in the RTO Reserve Zone of which 1,450 MW must be synchronized reserve (Figure 10-3). As of July 12, 2017, the largest contingency is calculated dynamically in every synchronized and nonsynchronized reserve market solution and the primary requirement is set equal to 150 percent of the largest expected contingency within the upcoming hour. The balance of primary reserve can be made up by the most economic combination of synchronized and nonsynchronized reserve. PJM market

operations increased the required amount of primary reserve from 2,175 MW to 3,300 MW on January 10 and January 11, 2017, for a 32 hour period. On May 10, 2017 the default primary reserve requirement for the RTO Reserve Zone was raised from 2,175 MW to 2,550 MW for three hours.

The RTO Zone demand for nonsynchronized reserve increased significantly on May 10, 2017, as a result of the PJM rule change that increased the primary reserve requirement in the MAD Subzone from 1,700 MW to 2,175 MW. In addition, this increase changed the mix of scheduled MW from mostly hydro to mostly CT resources.

Supply

Figure 10-2 shows that most of the primary reserve requirement (orange line) in excess of the synchronized reserve requirement (yellow line) is satisfied by nonsynchronized reserve (light blue area).

There are no offers for nonsynchronized reserve. The hour ahead market solution considers the MW supply of nonsynchronized reserve to be all generation resources currently not synchronized to the grid but available and capable of providing energy within 10 minutes. Generators that have set themselves as unavailable or have set their output to be emergency only will not be considered. The market solution considers the offered MW to be the lesser of the economic maximum or the ramp rate times 10 minutes minus the startup and notification time. The offer price of nonsynchronized is the unit's opportunity cost of providing reserves.

The market solution optimizes synchronized reserve, nonsynchronized reserve, and energy to satisfy the primary reserve requirement at the lowest cost. Nonsynchronized reserve resources are scheduled economically based on LOC until the Primary Reserve requirement is filled. The nonsynchronized reserve market clearing price is determined at the end of the hour based on the LOC of the marginal unit. When a unit clears the nonsynchronized reserve market and is scheduled, it is committed to remain offline for the hour and available to provide 10 minute reserves.

Resources that generally qualify as nonsynchronized reserve include run of river hydro, pumped hydro, combustion turbines, combined cycles and diesels.³⁶ In the first nine months of 2017, an average of 863.0 MW of nonsynchronized reserve was scheduled hourly out of 2,035.0 eligible MW as part of the primary reserve requirement in the Mid-Atlantic Dominion Subzone. In the first nine months of 2017, an average of 1,226.0 MW of nonsynchronized reserve was scheduled hourly out of 2,382.6 MW eligible MW in the RTO Zone.

In the first nine months of 2017, CTs provided 54.2 percent of scheduled nonsynchronized reserve and hydro provided 44.7 percent. The remaining 1.1 percent of cleared nonsynchronized reserve was provided by diesel resources.

Market Concentration

The supply of nonsynchronized reserves in the Mid-Atlantic Dominion Subzone and the RTO Zone was highly concentrated in the first nine months of 2017.

Table 10-22 Nonsynchronized reserve market HHIs: January 1 through September 30, 2017

Year	Month	MAD HHI	RTO HHI
2017	Jan	3995	3986
2017	Feb	3968	3966
2017	Mar	4359	4343
2017	Apr	3808	3799
2017	May	3446	3444
2017	Jun	3257	3257
2017	Jul	3451	3451
2017	Aug	3457	3457
2017	Sep	3211	3207
2017	Average	3661	3657

³⁶ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 101.

Table 10-23 Nonsynchronized reserve market pivotal supply test: January 1 through September 30, 2017

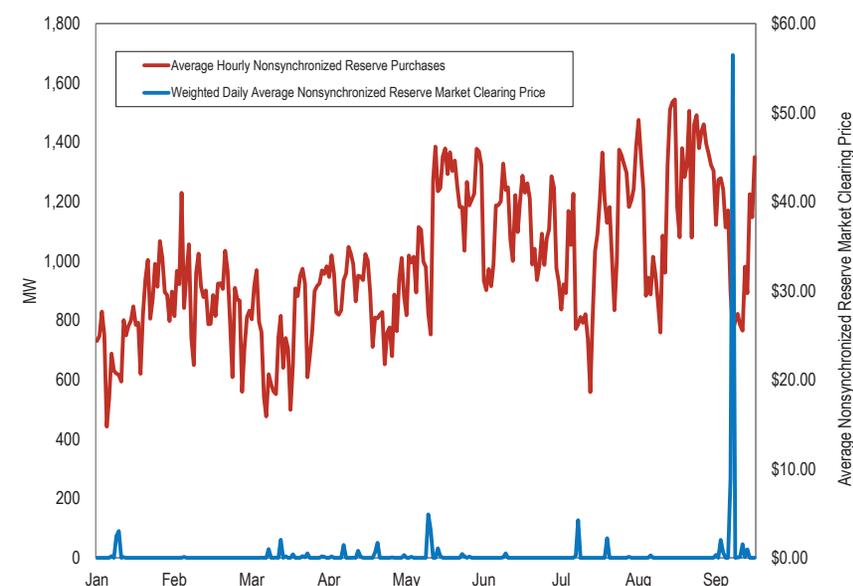
Year	Month	MAD Three Pivotal Supplier Hours	RTO Three Pivotal Supplier Hours
2017	Jan	32.2%	0.0%
2017	Feb	31.1%	0.0%
2017	Mar	38.1%	0.0%
2017	Apr	38.1%	0.0%
2017	May	52.3%	0.0%
2017	Jun	60.4%	0.0%
2017	Jul	55.9%	0.0%
2017	Aug	57.1%	0.0%
2017	Sep	70.8%	0.0%
2017	Average	48.4%	0.0%

Price

The price of nonsynchronized reserve is calculated in real time every five minutes and averaged hourly for the RTO Reserve Zone and the Mid-Atlantic Dominion Reserve Subzone.

Figure 10- 15 shows the daily average nonsynchronized reserve market clearing price and average scheduled MW for the RTO Zone. In the MAD Subzone and the RTO Zone in the first nine months of 2017, the average nonsynchronized market clearing price was \$0.17 per MW. The hourly average nonsynchronized reserve assigned was 863.0 MW in the MAD Subzone and 1,226.0 in the RTO Zone. The market cleared at a price greater than \$0 in 136 hours. The maximum hourly clearing price was \$388.72 per MW on September 21, 2017 during the course of a low ACE spinning event.

Figure 10-15 Daily average RTO Zone nonsynchronized reserve market clearing price and MW purchased: January 1 through September 30, 2017



Price and Cost

As a result of changing grid conditions, load forecasts, and unexpected generator performance, prices sometimes do not cover the full LOC of each resource. All resources cleared in the market are guaranteed to be made whole and are paid uplift credits if the NSRMCP does not fully compensate them. When real-time LMP rises above the generator’s cost at economic minimum, then an LOC is paid.³⁷

The full cost of nonsynchronized reserve including payments for the clearing price and uplift costs is calculated and compared to the price (Table 10-24). The closer the price to cost ratio comes to one, the more the market price reflects the full cost of nonsynchronized reserve.

³⁷ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 103.

In the first nine months of 2017, the price to cost ratio in both the RTO Zone Nonsynchronized Reserve Market averaged 22.4 percent; and the price to cost ratio of the MAD Subzone averaged 22.6 percent.

Resources that are not synchronized to the grid are generally off because it is not economic for them to produce energy. A resource scheduled for nonsynchronized reserve is obligated to remain unsynchronized even if its LMP changes and it becomes economic to start. In that case, the unit has a positive LOC.

Both nonsynchronized reserve markets cleared at a price above \$0 in only 2.1 percent of hours. The nonsynchronized reserve market clearing price was the same in the RTO zone and MAD subzone in all but 33 hours.

The costs of nonsynchronized reserves could be minimized if PJM could flexibly substitute lower LOC units for higher LOC units in real time as system conditions changed. Under current rules, PJM is required to keep committed a unit for which the LOC increases within the hour even if lower LOC units are available as substitutes.

Table 10-24 RTO zone, MAD subzone nonsynchronized reserve MW, charges, price, and cost: January 1 through September 30, 2017

Market	Year	Month	Total	Total	Weighted	Nonsynchronized Reserve Cost	Price/Cost Ratio
			Nonsynchronized Reserve MW	Nonsynchronized Reserve Charges	Nonsynchronized Reserve Market Price		
RTO Zone	2017	Jan	585,298	\$384,707	\$0.15	\$0.66	23.0%
RTO Zone	2017	Feb	599,304	\$171,893	\$0.00	\$0.29	1.2%
RTO Zone	2017	Mar	548,004	\$382,728	\$0.14	\$0.70	20.2%
RTO Zone	2017	Apr	653,872	\$360,626	\$0.13	\$0.55	24.1%
RTO Zone	2017	May	794,278	\$518,916	\$0.17	\$0.65	25.5%
RTO Zone	2017	Jun	842,213	\$356,180	\$0.03	\$0.42	7.3%
RTO Zone	2017	Jul	746,265	\$890,665	\$0.13	\$1.19	11.0%
RTO Zone	2017	Aug	874,607	\$548,271	\$0.01	\$0.63	1.4%
RTO Zone	2017	Sep	867,108	\$1,229,492	\$0.73	\$1.42	51.6%
RTO Zone	2017	Total	6,510,949	\$4,843,478	\$0.17	\$0.74	22.4%
MAD	2017	Jan	584,637	\$363,906	\$0.15	\$0.62	23.8%
MAD	2017	Feb	599,245	\$171,392	\$0.00	\$0.29	1.2%
MAD	2017	Mar	546,848	\$370,275	\$0.14	\$0.68	20.8%
MAD	2017	Apr	653,266	\$354,709	\$0.13	\$0.54	24.5%
MAD	2017	May	794,037	\$516,541	\$0.17	\$0.65	25.6%
MAD	2017	Jun	842,192	\$356,062	\$0.03	\$0.42	7.3%
MAD	2017	Jul	746,246	\$890,397	\$0.13	\$1.19	11.0%
MAD	2017	Aug	874,590	\$546,787	\$0.01	\$0.63	1.5%
MAD	2017	Sep	866,922	\$1,188,069	\$0.73	\$1.37	52.9%
MAD	2017	Total	6,507,984	\$4,758,140	\$0.17	\$0.73	22.6%

Secondary Reserve

There is no NERC standard for secondary reserve. PJM defines secondary reserve as reserves (online or offline available for dispatch) that can be converted to energy in 30 minutes. PJM defines a secondary reserve requirement but does not have a goal to maintain this reserve requirement in real time.

PJM maintains a day-ahead, offer based market for 30-minute day-ahead secondary reserve. The Day-Ahead Scheduling Reserve Market (DASR) has no performance obligations except that a unit which clears the DASR market is required to be available for dispatch in real time.³⁸

³⁸ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 170.511.2.3.

Market Structure

Supply

DASR is offered by both generation and demand resources. DASR offers consist of price only. DASR MW are calculated by the market clearing engine. DASR MW are the lesser of the energy ramp rate per minute for online units times thirty minutes, or the economic maximum MW minus the day-ahead dispatch point. For offline resources capable of being online in thirty minutes, the DASR quantity is the economic maximum. In the first nine months of 2017, the average available hourly DASR was 36,567.3 MW, a 1.8 percent increase from the first nine months of 2016. The DASR hourly MW purchased averaged 5,756.4 MW, a decrease from 6,345.0 MW the first nine months of 2016.

PJM excludes resources that cannot reliably provide reserves in real time from participating in the DASR Market. Such resources include nuclear, run-of-river hydro, self scheduled pumped hydro, wind, solar, and energy storage resources.³⁹ The intent of this proposal is to limit cleared DASR resources to those resources actually capable of providing reserves in the real-time market. Owners of excluded resources may request an exemption from their default non-eligibility.

On December 14, 2015, PJM announced a plan to recover DASR credits awarded to owners for units that clear the day-ahead scheduled reserve market but become unavailable through forced outages in real time.⁴⁰ The recovery was for hours cleared from April 2015 through March 2016. This recovery is completed for a total of \$404,000.

Of the 5,756.4 MW average hourly DASR cleared in the first nine months of 2017, 65.2 percent was from CTs, 6.5 percent was from steam, 18.5 percent was from hydro, and 6.5 percent was CCs. Load response resources which are registered in PJM's Economic Load Response and are dispatchable by PJM

³⁹ See PJM "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 169 §11.2.2 Day-Ahead Scheduling Reserve Market Eligibility.

⁴⁰ See PJM Market Settlements Subcommittee Meeting, December 14, 2015, "Item 01 – CT LOC Reconciliation," <<http://www.pjm.com/~media/committees-groups/subcommittees/mss/20151214/20151214-item-01-ct-loc-reconciliation.ashx>>

are eligible to provide DASR. In the first nine months of 2017, seven demand resources offered into the DASR Market.

Demand

Secondary reserve (30-minute reserve) requirements are determined by PJM for each reliability region. In the Reliability *First* (RFC) region, secondary reserve requirements are calculated based on historical under-forecasted load rates and generator forced outage rates.⁴¹ The RFC and Dominion secondary reserve requirements are added together to form a single RTO DASR requirement defined as the sum of a percent of the load forecast error and forced outage rate times the daily peak load forecast. For 2017, the DASR requirement is set to 5.52 percent of daily peak load forecast. This is down from 5.70 for 2016. The DASR requirement is applicable for all hours of the operating day.

Effective March 1, 2015, the DASR requirement can be increased by PJM dispatch under conditions of "hot weather or cold weather alert or max emergency generation alert or other escalating emergency."⁴² The amount of additional DASR MW that may be required is the Adjusted Fixed Demand (AFD) determined by a Seasonal Conditional Demand (SCD) factor.⁴³ The SCD factor is calculated separately for the winter (November through March) and summer (April through October) seasons. The SCD factor is calculated every year based on the top 10 peak load days from the prior year. For November 2015 through October 2016, the SCD values are 3.45 percent for winter and 2.88 percent for summer. PJM Dispatch may also schedule additional Day-Ahead Scheduling Reserves as deemed necessary for conservative operations.⁴⁴ PJM has defined the reasons for conservative operations to include, potential fuel delivery issues, forest/brush fires, extreme weather events, environmental alerts, solar disturbances, unknown grid operating state, physical or cyber attacks.⁴⁵ The result is substantial discretion for PJM to increase the demand for DASR under a variety of circumstances. PJM invoked adjusted fixed demand on 14 days

⁴¹ See PJM. "Manual 13: Emergency Operations," Rev. 64 (June 1, 2017) at 12.

⁴² PJM. "Energy and Reserve Pricing & Interchange Volatility Final Proposal Report," <<http://www.pjm.com/~media/committees-groups/committees/mrc/20141030/20141030-item-04-erpiv-final-proposal-report.ashx>>.

⁴³ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 166 at 11.2.1 Day-Ahead Scheduling Reserve Market Requirement.

⁴⁴ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 167 at 11.2.1 Day-Ahead Scheduling Reserve Market Requirement.

⁴⁵ See PJM. "Manual 13: Emergency Operations," Rev. 64, (June 1, 2017) at 58 at 3.2 Conservative Operations.

during the first nine months of 2017. All days were between May 17 and September 25. The top 60 hours with highest DASR market clearing price were all during days when adjusted fixed demand was invoked.

The MMU recommends that PJM modify the DASR Market to ensure that all resources cleared incur a real-time performance obligation.

Market Concentration

DASR market three pivotal test results are provided in Table 10-25.

Table 10-25 DASR market three pivotal supplier test results and number of hours with DASRMCP above \$0: January 1, 2016 through September 30, 2017

Year	Month	Number of Hours When	
		DASRMCP > \$0	Percent of Hours Pivotal
2016	Jan	326	0.3%
2016	Feb	235	0.4%
2016	Mar	369	1.9%
2016	Apr	392	0.0%
2016	May	259	4.2%
2016	Jun	193	6.2%
2016	Jul	474	38.0%
2016	Aug	402	42.8%
2016	Sep	383	45.7%
2016	Oct	373	35.1%
2016	Nov	351	20.8%
2016	Dec	209	23.9%
2016	Average	331	18.3%
<hr/>			
2017	Jan	93	16.1%
2017	Feb	49	2.0%
2017	Mar	359	2.5%
2017	Apr	402	9.5%
2017	May	250	44.0%
2017	Jun	242	37.8%
2017	Jul	341	36.8%
2017	Aug	165	8.3%
2017	Sep	179	12.8%
2017	Average	231	18.9%

Market Conduct

PJM rules allow any unit with reserve capability that can be converted into energy within 30 minutes to offer into the DASR Market.⁴⁶ Units that do not offer have their offers set to \$0.00 per MW during the day-ahead market clearing process.

Economic withholding remains an issue in the DASR Market. The marginal cost of providing DASR is zero. All offers greater than zero constitute economic withholding. In the first nine months of 2017, 41.0 percent of generation units offered DASR at a daily price above \$0.00. This compares to 36.2 percent in 2016. In the first nine months of 2017, 11.7 percent of daily offers were above \$5.00 per MW.

Market Performance

In the first nine months of 2017, the DASR Market cleared at a price above \$0 in 2,080 hours. In the first nine months of 2017, the weighted average DASR price for all 2,080 hours when the DASRMCP was above \$0.00 was \$3.10. In 2016, the weighted average DASR price for all hours when the DASRMCP was above \$0.00 was \$3.24. In 2016, the average cleared MW in all hours was 4,538.1 MW. The average cleared MW in all hours when the DASRMCP was above \$0.00 was 5,315.7 MW. The highest DASR price was \$174.45 on September 25, 2017.

The introduction of Adjusted Fixed Demand (AFD) on March 1, 2015, created a bifurcated market (Table 10-27). In 2015, PJM added AFD to the normal 5.93 percent of forecast load in 367 hours. In 2016, PJM added AFD to the normal 5.7 percent of forecast load in 522 hours. In the first nine months of 2017, PJM added AFD to the normal 5.52 percent of forecast load in 336 hours. The difference in market clearing price, MW cleared, obligation incurred, and charges to PJM load are substantial (Table 10-26).

⁴⁶ See PJM, "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) p. 168.

Table 10-26 Impact of Adjusted Fixed Demand on DASR prices and demand: January 1, 2017 through September 30, 2017

Metric	Year	Number Hours	Weighted Day-Ahead Scheduling Reserve Market Clearing Price (DASRMCP)	Average Additional DASR MW	Average Hourly Total DASR MW
All Hours	2017	6,553	\$1.42	272.1	4,422.4
All Hours when DASRMCP > \$0	2017	2,080	\$3.10	640.6	5,317.9
All Hours when AFD is used	2017	322	\$9.72	4,606.9	10,310.6

While the new rules allow PJM dispatch substantial discretion to add to DASR demand for a variety of reasons, the rationale for each specific increase is not always clear. The MMU recommends that PJM Market Operations attach a reason code to every hour in which PJM dispatch adds additional DASR MW above the default DASR hourly requirement. The addition of such a code would make the reason explicit, increase transparency and facilitate analysis of the use of PJM’s ability to add DASR MW.

Table 10-27 DASR Market, regular hours vs. adjusted fixed demand hours: January 1, 2016 through September 30, 2017.

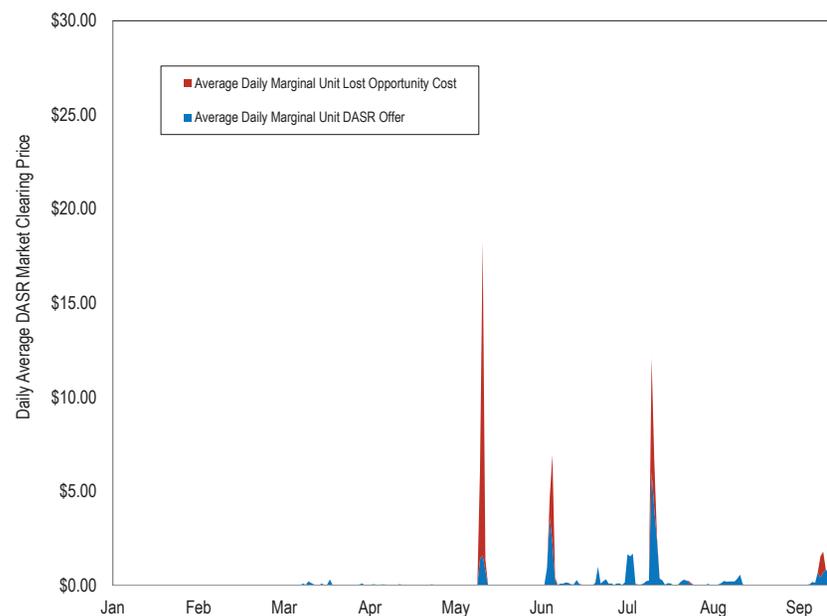
Year	Month	Number of Hours DASRMCP>\$0		Weighted DASRMCP		Average PJM Load MW		Hourly Average Cleared DASR MW		Average Hourly DASR Credits	
		Normal Hour	AFD Hour	Normal Hour	AFD Hour	Normal Hour	AFD Hour	Normal Hour	AFD Hour	Normal Hour	AFD Hour
2016	Jan	326	0	\$0.15		103,263		4,723		\$720	
2016	Feb	212	24	\$0.05	\$3.10	102,040	107,852	4,640	6,830	\$249	\$21,167
2016	Mar	369	0	\$0.04		83,994		4,175		\$175	
2016	Apr	393	0	\$0.26		80,925		4,083		\$1,060	
2016	May	259	0	\$0.43		89,181		4,228		\$1,839	
2016	Jun	191	0	\$0.53		111,102		5,377		\$2,892	
2016	Jul	188	288	\$0.71	\$8.23	117,686	112,587	5,794	10,226	\$4,117	\$84,195
2016	Aug	247	143	\$0.76	\$10.82	122,187	113,823	6,076	11,150	\$4,639	\$120,663
2016	Sep	316	67	\$1.11	\$11.53	100,198	110,940	5,231	12,163	\$5,792	\$138,972
2016	Oct	373	0	\$0.58		82,824		4,265		\$2,494	
2016	Nov	350	0	\$0.10		84,561		4,095		\$420	
2016	Dec	210	0	\$0.04		102,293		4,444		\$169	
2016		3,434	522	\$0.40	\$8.42	98,355	111,301	4,761	10,092	\$2,047	\$91,249
2017	Jan	93	0	\$0.02		106,095		4,386		\$91	
2017	Feb	49	0	\$0.02		96,628		4,444		\$92	
2017	Mar	359	0	\$0.08		91,182		4,092		\$329	
2017	Apr	402	0	\$0.04		80,834		3,828		\$159	
2017	May	250	48	\$0.07	\$18.13	85,581	98,184	4,004	10,727	\$280	\$194,491
2017	Jun	242	73	\$0.18	\$6.63	108,482	116,172	5,099	11,713	\$907	\$77,542
2017	Jul	341	115	\$0.29	\$6.41	114,832	117,568	5,288	10,669	\$1,551	\$68,397
2017	Aug	165	12	\$0.42	\$1.23	114,916	125,601	5,507	10,585	\$2,311	\$12,980
2017	Sep	179	22	\$1.17	\$40.30	105,850	104,097	5,105	11,620	\$5,966	\$468,298
2017		2,080	270	\$3.10	\$12.25	100,489	112,324	4,639	11,317	\$1,298	\$164,341

The implementation of AFD in 522 hours of 2016 and 270 hours of 2017 significantly increased the cost of DASR as a result of increases in DASR MW cleared and corresponding increases in the DASR clearing prices (Table 10-28).

Table 10-28 DASR Market all hours of DASR market clearing price greater than \$0: January 1, 2016 through September 30, 2017

Year	Month	Number of Hours DASRMCP > \$0	Weighted DASR Market Clearing Price	Average Hourly RT Load MW	Total PJM Cleared DASR MW	Total PJM Cleared Additional DASR MW	Total Charges
2016	Jan	326	\$0.15	103,263	1,539,783	0	\$234,679
2016	Feb	212	\$0.49	102,631	1,147,608	72,197	\$560,692
2016	Mar	369	\$0.04	83,994	1,540,415	0	\$64,728
2016	Apr	393	\$0.26	80,925	1,604,693	0	\$416,418
2016	May	259	\$0.43	89,181	1,094,991	0	\$476,305
2016	Jun	191	\$0.54	111,102	1,027,053	0	\$552,455
2016	Jul	476	\$6.20	114,601	4,034,436	1,161,661	\$25,022,218
2016	Aug	390	\$5.94	119,563	3,095,240	742,332	\$18,400,638
2016	Sep	383	\$4.51	102,077	2,467,814	409,330	\$11,141,362
2016	Oct	373	\$0.58	82,824	1,591,016	0	\$930,355
2016	Nov	350	\$0.10	84,561	1,433,267	0	\$147,023
2016	Dec	210	\$0.04	102,292	933,225	0	\$33,582
2016	Average	328	\$1.61	98,085	1,792,462	198,793	\$4,831,704
2016	Total	3,932			21,509,542	2,385,520	\$57,980,453
2017	Jan	93	\$0.02	106,095	407,922	0	\$8,426
2017	Feb	49	\$0.02	96,628	217,737	0	\$4,487
2017	Mar	359	\$0.08	91,182	1,468,921	0	\$117,995
2017	Apr	402	\$0.04	80,834	1,539,010	0	\$63,852
2017	May	250	\$6.76	87,849	1,303,480	246,420	\$8,809,449
2017	Jun	242	\$3.20	110,611	1,677,956	383,822	\$5,365,628
2017	Jul	341	\$3.39	115,755	2,422,053	516,238	\$8,216,211
2017	Aug	165	\$0.53	115,693	969,557	49,896	\$509,320
2017	Sep	179	\$10.63	105,635	1,057,048	136,136	\$11,239,260
2017	Average	231	\$3.10	101,142	1,229,298	148,057	\$3,814,959
2017	Total	2,080			11,063,684	1,332,512	\$34,334,628

Figure 10-16 Daily average components of DASR clearing price (\$/MW), marginal unit offer and LOC: January through September, 2017



When the DASR requirement is increased by PJM dispatch, the reserve requirement frequently cannot be met without redispatching online resources which significantly affects the price by creating an LOC, (Figure 10-16). DASR prices increase at peak loads as a result of high LOCs. DASR prices were low to moderate in January through April, 2017. The weighted average DASRMCP on September 25, 2017, of \$10.63 per MW was a three year high. A hot weather alert declared for that day led to 142,119 MW additional DASR and three consecutive hourly DASR prices above \$100.

Regulation Market

Regulation matches generation with very short term changes in load by moving the output of selected resources up and down via an automatic control signal. Regulation is provided by generators with a short-term response capability (less than five minutes) or by demand response (DR). The PJM Regulation Market is operated as a single real-time market.

Market Design

PJM's Regulation Market design is a result of Order 755.⁴⁷ The objective of PJM's regulation market design is to minimize the cost to provide regulation using two resource types in a single market.

The regulation market includes resources following two signals: RegA and RegD. Resources responding to either signal help control ACE (area control error). RegA is PJM's slow-oscillation regulation signal and is designed for resources with the ability to sustain energy output for long periods of time, with slower ramp rates. RegD is PJM's fast-oscillation regulation signal and is designed for resources with limited ability to sustain energy output and with faster ramp rates. Resources must qualify to follow one or both of the RegA and RegD signals, but will be assigned by the market clearing engine to follow only one signal in a given market hour.

The PJM regulation market design includes three clearing price components: capability (\$/MW, based on the MW being offered); performance (\$/mile, based on the total MW movement requested by the control signal, known as mileage); and lost opportunity cost (\$/MW of lost revenue from the energy market as a result of providing regulation). The MBF and performance score translate a RegD resource's capability (actual) MW into marginal effective MW and offers into \$/effective MW.

The regulation market solution is intended to meet the regulation requirement with the least cost combination of RegA and RegD. When solving for the least cost combination of RegA and RegD MW to meet the regulation requirement, the Regulation Market will substitute RegD MW for RegA MW when RegD

is cheaper. Performance adjusted RegA MW are used as the common unit of measure, called effective MW, of regulation service. All resource MW (RegA and RegD) are converted into effective MW. RegA MW are converted into effective MW by multiplying the RegA MW offered by their performance score. RegD MW are converted into effective MW by multiplying the RegD offered by their performance score and by the marginal benefit function (MBF). The regulation requirement is defined as the total effective MW required to provide a defined amount of area control error (ACE) control.

The Regulation Market converts performance adjusted RegD MW into effective MW using the marginal benefit function (MBF) in the PJM design. The MBF is used to convert incremental additions of RegD MW into incremental effective MW. The total effective MW for a given amount of RegD MW equal the area under the MBF curve (the sum of the incremental effective MW contributions). RegA and RegD resources should be paid the same price per marginal effective MW.

The MBF function describing the engineering substitutability between RegA and RegD must be correctly defined and consistently applied throughout the market design, from optimization to settlement. The MBF should be equal to the marginal rate of technical substitution (MRTS) between RegA and RegD, holding the level of regulation service constant. The MRTS is the marginal measure of substitutability of RegD resources for RegA resources in satisfying a defined regulation requirement at feasible combinations of RegA and RegD MW. Consistently applying the MBF from optimization to settlement is the only way to ensure that the rate of substitution between RegA and RegD in providing a defined level of regulation is reflected in the relative value of RegA and RegD resources. While resources following RegA and RegD can both provide regulation service in PJM's Regulation Market, PJM's joint optimization is intended to determine and assign the optimal mix of RegA and RegD MW to meet the hourly regulation requirement. The optimal mix is a function of the relative effectiveness and cost of available RegA and RegD resources.

⁴⁷ Frequency Regulation Compensation in the Organized Wholesale Power Markets, Order No. 755, 137 FERC ¶ 61,064 at P 2 (2011).

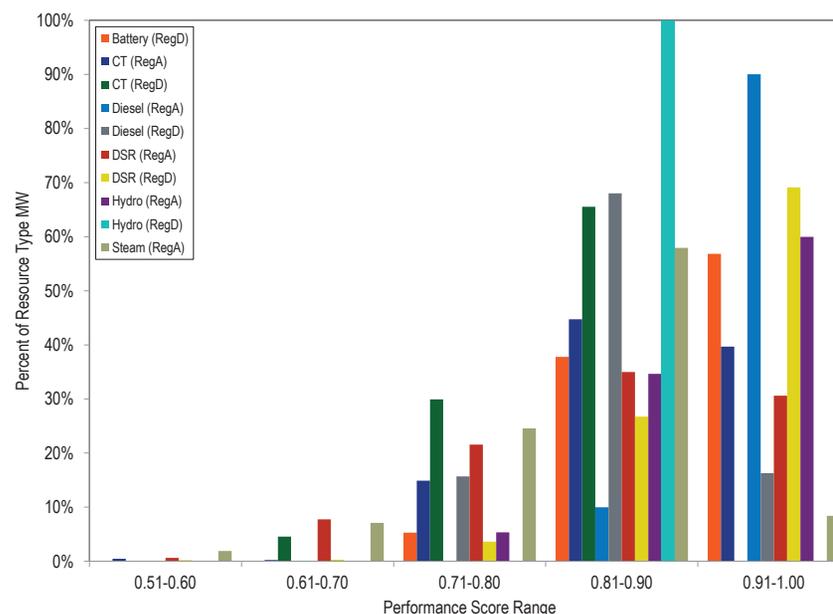
At any valid combination of RegA and RegD, regulation offers are converted to dollars per effective MW using the RegD offer and the MBF associated with that combination of RegA and RegD. The marginal contribution of a RegD MW to effective MW is equal to the MRTS associated with that RegA/RegD combination.

For example, a 1.0 MW RegD resource with a total offer price of \$2/MW with a MBF of 0.5 and a performance score of 100 percent would be calculated as offering 0.5 effective MW (0.5 MBF times 1.00 performance score times 1 MW). The total offer price would be \$4 per effective MW (\$2/MW offer divided by the 0.5 effective MW).

Regulation performance scores (0.0 to 1.0) measure the response of a regulating resource to its assigned regulation signal (RegA or RegD) every 10 seconds by measuring: delay, the time delay of the regulation response to a change in the regulation signal; correlation, the correlation between the regulating resource output and the regulation signal; and precision, the difference between the regulation response and the regulation requested.⁴⁸ Performance scores are reported on an hourly basis for each resource.

Figure 10-17 and Figure 10-18 show the average performance score by resource type and the signal followed for the first nine months of 2017. In these figures, the MW used are actual MW and the performance score is the hourly performance score of the regulation resource.⁴⁹ Each category (color bar) is based on the percentage of the full performance score distribution for each resource (or signal) type. As Figure 10-18 shows, 56.5 percent of RegD resources had average performance scores within the 0.91-1.00 range, and 23.1 percent of RegA resources had average performance scores within that range.

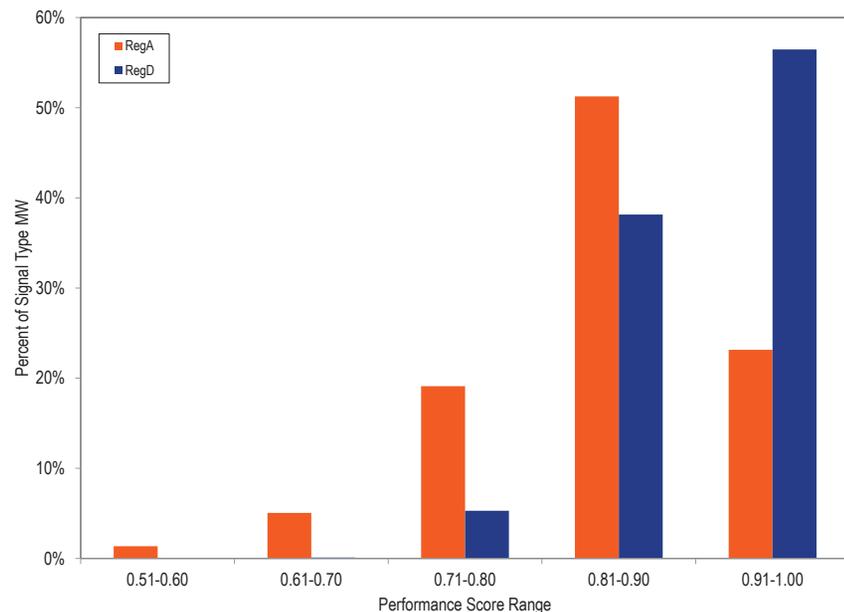
Figure 10-17 Hourly average performance score by unit type: January 1 through September 30, 2017



48 PJM. "Manual 12: Balancing Operations," Rev. 36 (February 1, 2017) at 4.5.6, p 54.

49 Except where explicitly referred to as effective MW or effective regulation MW, MW means actual MW unadjusted for either MBF or performance factor.

Figure 10-18 Hourly average performance score by regulation signal type: January 1 through September 30, 2017



Each cleared resource in a class (RegA or RegD) is allocated a portion of the class signal (RegA or RegD). This portion of the class signal is based on the cleared regulation MW of the resource relative to the cleared MW cleared for that class. This signal is called the Total Regulation Signal (TREG) for the resource. A resource with 10 MW of capability will be provided a TREG signal asking for a positive or negative regulation movement between negative and positive 10 MW around its regulation set point.

Resources are paid Regulation Market Clearing Price (RMCP) credits and lost opportunity cost credits. If a resource's lost opportunity costs for an hour are greater than its RMCP credits, that resource receives lost opportunity cost credits equal to the difference. PJM posts clearing prices for the Regulation Market (RMCCP, RMPCP and RMCP) in dollars per effective MW. The regulation market clearing price (RMCP in \$/effective MW) for the hour is the

simple average of the 12 five minute RMCPs within the hour. The RMCP is set in each five-minute interval based on the marginal offer in each interval. The performance clearing price (RMPCP in \$/effective MW) is based on the marginal performance offer (RMPCP) for the hour. The capability clearing price (RMCCP in \$/effective MW) is equal to the difference between the RMCP for the hour and the RMPCP for the hour. This is done so the total of RMPCP plus RMCCP equals the total clearing price (RMCP) but the RMPCP is maximized.

Market solution software relevant to regulation consists of the Ancillary Services Optimizer (ASO) solving hourly; the intermediate term security constrained economic dispatch market solution (IT-SCED) solving every 15 minutes; and the real-time security constrained economic dispatch market solution (RT-SCED) solving every five minutes. The market clearing price is determined by pricing software (LPC) that looks at the units cleared in the RT-SCED 15 minutes ahead of the pricing interval. The marginal price as identified by the LPC for each of these intervals is then averaged over the hour for an hourly regulation market clearing price.

Market Design Issues

PJM's current regulation market design is severely flawed and does not follow the appropriate basic design logic. The market results do not represent the least cost solution for the defined level of regulation service. PJM is working with the MMU and market participants to address these issues.

The MBF related issues with the Regulation Market have been raised in the PJM stakeholder process. In 2015, PJM stakeholders approved an interim, partial solution to the RegD over procurement problem which was implemented on December 14, 2015. The interim solution was designed to reduce the relative value of RegD MW in all hours and to cap purchases of RegD MW during critical performance hours. But the interim solution did not address the fundamental issues in the optimization or the lack of consistency in the application of the MBF.

Additional changes were implemented on January 9, 2017. These modifications included changing the definition of off peak and on peak hours, adjusting

the currently independent RegA and RegD signals to be interdependent, and changing the 15 minute neutrality requirement of the RegD signal to a 30 minute neutrality requirement.

The January design changes appear to have been intended to make RegD more valuable. That is not a reasonable design goal. The design goal should be to determine the least cost way to provide needed regulation. The RegA signal is now slower than it was previously, which may make RegA following resources less useful as ACE control. RegA is now explicitly used to support the conditional energy neutrality of RegD. The RegD signal is now the difference between ACE and RegA. RegA is required to offset RegD when RegD moves in the opposite direction of that required by ACE control in order to permit RegD to recharge. These changes in the signal design will allow PJM to accommodate more RegD in its market solutions. The new signal design is not making the most efficient use of RegA and RegD resources. The explicit reliance on RegA to offset issues with RegD is a significant conceptual change to the design that is inconsistent with the long term design goal for regulation. PJM increased the regulation requirement as part of these changes.

The January design changes replaced off peak and on peak hours with nonramp and ramp hours with definitions that vary by season. The regulation requirement for ramp hours was increased from 700 MW to 800 MW (Table 10-29). These market changes still do not address the fundamental issues in the optimization or the lack of consistency in the application of the MBF.

Table 10-29 Seasonal regulation requirement definitions⁵⁰

Season	Dates	Nonramp Hours	Ramp Hours
Winter	Dec 1 - Feb 28(29)	00:00 - 03:59	04:00 - 08:59
		09:00 - 15:59	16:00 - 23:59
Spring	Mar 1 - May 31	00:00 - 04:59	05:00 - 07:59
		08:00 - 16:59	17:00 - 23:59
Summer	Jun 1 - Aug 31	00:00 - 04:59	05:00 - 13:59
		14:00 - 17:59	18:00 - 23:59
Fall	Sep 1 - Nov 30	00:00 - 04:59	05:00 - 07:59
		08:00 - 16:59	17:00 - 23:59

⁵⁰ See PJM, "Regulation Requirement Definition," <<http://www.pjm.com/~media/markets-ops/ancillary/regulation-requirement-definition.ashx>>.

Performance Scores

Performance scores, by class and unit, are not an indicator of how well resources contribute to ACE control. Performance scores are an indicator only of how well the resources follow their TREG signal. High performance scores with poor signal design are not a meaningful measure of performance. For example, if ACE indicates the need for more regulation but RegD resources have provided all their available energy, the RegD regulation signal will be in the opposite direction of what is needed to control ACE. So, despite moving in the wrong direction for ACE control, RegD resources would get a good performance score for following the signal and will be paid for moving in the wrong direction.

The RegD signal prior to January 9, 2017, is an example of a signal that resulted in high performance scores, but due to 15 minute energy neutrality built into the signal, ran counter to ACE control at times. Energy neutrality means that energy produced equals energy used. With 15 minute energy neutrality, if a battery were following the regulation signal to provide MWh for 7.5 minutes, it would have to consume MWh for the next 7.5 minutes. When neutrality correction of the RegD signal is triggered, it overrides ACE control in favor of achieving zero net energy over the 15 minute period. When this occurs, the RegD signal runs counter to the control of ACE and hurts rather than helps ACE. In that situation, the control of ACE, which must also offset the negative impacts of RegD, depends entirely on RegA resources following the RegA signal. High performance scores under the signal design prior to January 9, 2017, was not an indication of good ACE control.

The January design changes did not address the fundamental issues with the definition of performance or the nature of payments for performance in the regulation market design. The regulation signal should not be designed to favor a particular technology. The signal should be designed to result in the lowest cost of regulation to the market. Only with a regulation signal based on full substitutability among resource types should payments be based on following the signal. The MRTS must be redesigned to reflect the actual capabilities of technologies to provide regulation. The PJM regulation market design remains fundamentally flawed.

In addition, the absence of a performance penalty, imposed as a reduction in performance score and/or as a forfeiture of revenues, for deselection initiated by the resource owner within the hour, creates a possible gaming opportunity for resources which may overstate their capability to follow the regulation signal. The MMU recommends that there be a penalty enforced as a reduction in performance score and/or a forfeiture of revenues when resource owners elect to deassign assigned regulation resources within the hour, to prevent gaming.

Regulation Signal

With any signal design for substitutable resources, the MBF function should be determined by the ability of RegA and RegD resources to follow the signal, including conditions under which neutrality cannot be maintained by RegD resources. The ability of energy limited RegD to provide ACE control depends on the availability of excess RegA capability to support RegD under the conditional neutrality design. When RegD resources are largely energy limited resources, a correctly calculated MBF would exhibit a rapid decrease in the MBF value for every MW of RegD added. This means that only a small amount of energy limited RegD is economic. The current and proposed signals and corresponding MBF functions do not reflect these principles or the actual substitutability of resource types.

MBF Issues

The MBF function, as implemented in the PJM Regulation Market, is not equal to the MRTS between RegA and RegD. The MBF is not consistently applied throughout the market design, from optimization to settlement, and market clearing does not confirm that the resulting combinations of RegA and RegD are realistic and can meet the defined regulation demand. The calculation of total regulation cleared using the MBF is incorrect.⁵¹

The result has been that the PJM Regulation Market has over procured RegD relative to RegA in most hours, has provided a consistently inefficient market signal to participants regarding the value of RegD in every hour, and has overpaid for RegD. In 2015, this over procurement began to degrade the

⁵¹ The MBF, as used in this report, refers to PJM's incorrectly calculated MBF and not the MBF equivalent to the MRTS.

ability of PJM to control ACE in some hours while at the same time increasing the cost of regulation. When the price paid for RegD is above the level defined by an accurate MBF function, there is an artificial incentive for inefficient entry of RegD resources.

Marginal Benefit Factor Not Correctly Defined

The MBF used in the PJM Regulation Market did not accurately reflect the MRTS between RegA and RegD resources under the old market design and it does not accurately reflect the MRTS between RegA and RegD resources under the modified design. The MBF function is incorrectly defined and improperly implemented in the current PJM Regulation Market.

The MBF should be the marginal rate of technical substitution between RegA and RegD MW at different, feasible combinations of RegA and RegD that can be used to provide a defined level of regulation service. The objective of the market design is to find, given the relative costs of RegA and RegD MW, the least cost feasible combination of RegA and RegD MW. If the MBF function is incorrectly defined, or improperly implemented in the market clearing and settlement, the resulting combinations of RegA and RegD will not represent the least cost solution and may not be a feasible way to reach the target level of regulation.

The MBF is not included in PJM's settlement process. This is a design flaw that results in incorrect payments for regulation. The issue results from two FERC orders. From October 1, 2012, through October 31, 2013, PJM implemented a FERC order that required the MBF to be fixed at 1.0 for settlement calculations only. On October 2, 2013, FERC directed PJM to eliminate the use of the MBF entirely from settlement calculations of the capability and performance credits and replace it with the RegD to RegA mileage ratio in the performance credit paid to RegD resources, effective retroactively to October 1, 2012.⁵² That rule continues in effect. The result of the current FERC order is that the MBF is used in market clearing to determine the relative value of an additional MW of RegD, but the MBF is not used in the settlement for RegD.

⁵² 145 FERC ¶ 61,011 (2013).

If the MBF were consistently applied, every resource would receive the same clearing price per marginal effective MW. But the MBF is not consistently applied and resources do not receive the same clearing price per marginal effective MW.

While prices are set on the basis of dollars per effective MW, only RegA resources receive payments based on this price per effective MW.⁵³ RegA resources are paid the RMCCP times MW times the performance factor times the MBF, plus the RMPCP times MW times the performance factor times the MBF. (The RegA MBF is 1.0.) RegD resources do not receive payments based on this price per effective MW. RegD resources are paid the RMCCP times MW times the performance factor, plus the RMPCP times MW times the performance factor times the mileage ratio.⁵⁴ As a result, the current market design does not send the correct price signal to the RegD resources.

Figure 10-19 compares the daily average MBF and the mileage ratio for excursion and nonexcursion hours. Excursion hours (hours ending 7:00, 8:00, 18:00-21:00) were hours in which PJM had decided that more RegA was needed and PJM would not clear any RegD with an MBF less than 1.0. Excursion hours were discontinued by PJM as of July 31, 2017. The shift in both the MBF values and the mileage ratio (Figure 10-19) resulted from the design changes implemented on January 9, 2017.

The change in design decreased RegA mileage (the change in MW output in response to regulation signal per MW of capability), increased the proportion of cleared RegD resources' capability that was called by the RegD signal (increased REG for a given MW) to better match offered capability, increased the mileage required of RegD resources and changed the energy neutrality component of the signal from a strict 15 minute neutrality to a conditional 30 minute neutrality. The changes in signal design increased the mileage ratio (the ratio of RegD mileage to RegA mileage). In addition, to adapt to the 30 minute neutrality requirement, RegD resources decreased their offered capability to maintain their performance. The reduction in offered capability

reduced the amount of RegD MW clearing and increased the amount of RegA MW clearing, meaning a higher MBF in every hour.

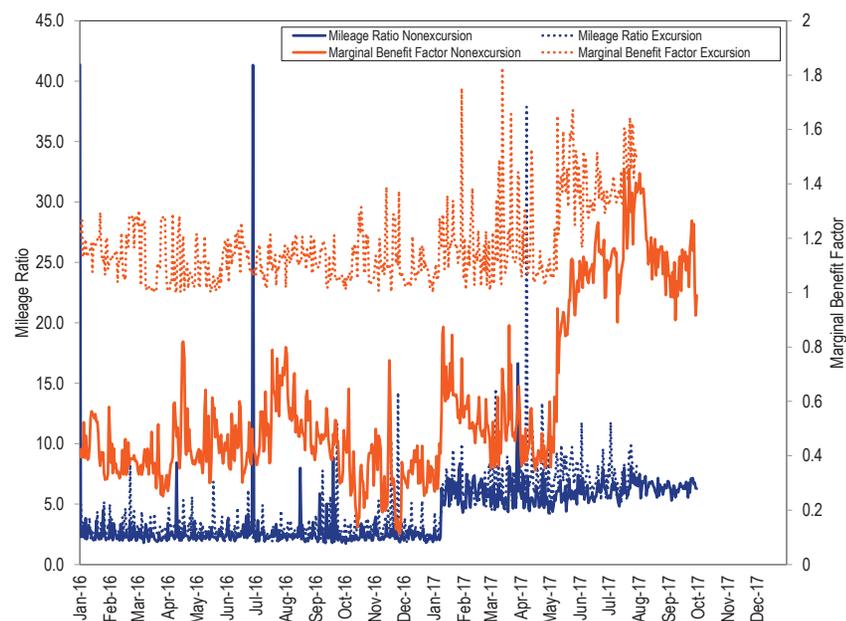
The weighted average mileage ratio during nonexcursion hours increased from 2.81 in the first nine months of 2016, to 5.97 in the first nine months of 2017 (an increase of 112.4 percent). The high mileage ratio values are the result of the mechanics of the mileage ratio calculation. The extreme mileage ratios result when the RegA signal is fixed at a single value ("pegged") to control ACE and the RegD signal is not. If RegA is held at a constant MW output, mileage is zero for RegA. The result of a fixed RegA signal is that RegA mileage is very small and therefore the mileage ratio is very large.

These results are an example of why it is not appropriate to use the mileage ratio, rather than the MBF, to measure the relative value of RegA and RegD resources. In these events, RegA resources are providing ACE control by providing a fixed level of MW output which means zero mileage, while RegD resources alternate between helping and hurting ACE control, both of which result in positive mileage.

⁵³ This is due to the fact that RegA resources performance adjusted MW are their effective MW as the MRTS of RegA resources is always equal to one, as effective MW are defined in terms of RegA performance adjusted MW.

⁵⁴ Performance adjusted RegD MW are converted to effective MW by multiplying the performance adjusted MW by the market clearing MRTS.

Figure 10-19 Daily average MBF and mileage ratio during excursion and nonexcursion hours: January 1, 2016 through September 30, 2017⁵⁵



The increase in the average mileage ratio caused by the signal design changes introduced on January 9, 2017 caused a large increase in payments to RegD resources on a performance adjusted MW basis. The average daily payment per performance adjusted RegD MW increased by 57.2 percent, from \$10.01 in the period from January 1, 2016, through January 8, 2017, to \$15.74 in the period between January 9, 2017, and September 30, 2017.

Table 10-30 shows RegD resource payments on a performance adjusted MW basis and RegA resource payments on a performance adjusted MW basis by month, from January 1, 2016, through September 30, 2017. In the first nine months of 2016, RegD resources earned 12.1 percent more per performance adjusted MW than RegA resources. In the first nine months of 2017, RegD

⁵⁵ Excursion hours were discontinued as of 00:00 on July 31, 2017.

resources earned 83.5 percent more per performance adjusted MW than RegA resources.

Table 10-30 Average monthly price paid per performance adjusted MW of RegD and RegA: January 1 through September 30, 2016 through 2017

Settlement Payments				
Year	Month	RegD (\$/Performance Adjusted RegD MW)	RegA (\$/Performance Adjusted MW)	Percent Performance Adjusted RegD/RegA Under/Over Payment
2016	Jan	\$17.20	\$15.60	10.3%
	Feb	\$19.55	\$17.56	11.3%
	Mar	\$15.00	\$13.21	13.5%
	Apr	\$21.10	\$18.87	11.8%
	May	\$18.31	\$15.42	18.8%
	Jun	\$14.93	\$13.81	8.1%
	Jul	\$19.34	\$17.48	10.6%
	Aug	\$18.57	\$17.15	8.3%
	Sep	\$19.38	\$17.47	10.9%
	Oct	\$17.58	\$15.44	13.9%
	Nov	\$15.39	\$13.01	18.3%
	Dec	\$12.38	\$11.15	11.0%
Yearly		\$17.39	\$15.51	12.1%
Jan-Sep		\$18.15	\$16.28	11.5%
2017	Jan	\$17.07	\$13.62	25.4%
	Feb	\$16.58	\$10.64	55.8%
	Mar	\$26.76	\$15.06	77.7%
	Apr	\$32.60	\$15.58	109.2%
	May	\$28.45	\$17.89	59.0%
	Jun	\$28.88	\$13.23	118.2%
	Jul	\$28.49	\$15.00	89.9%
	Aug	\$32.06	\$13.24	142.1%
	Sep	\$37.89	\$21.33	77.6%
Jan-Sep		\$27.64	\$15.07	83.5%

The current settlement process does not result in paying RegA and RegD resources the same price per effective MW. RegA resources are paid on the basis of dollars per effective MW of RegA. RegD resources are not paid in terms of dollars per effective MW of RegA because the MBF is not used in settlements. When the MBF is above one, RegD resources are underpaid on a per effective MW basis, although this could be offset by a high mileage ratio. When the MBF is less than one, RegD resources are overpaid on a per

effective MW basis. The average MBF was less than 1.0 in 2016 (0.60) and the first nine months of 2017 (0.95), resulting in an average overpayment of RegD resources.

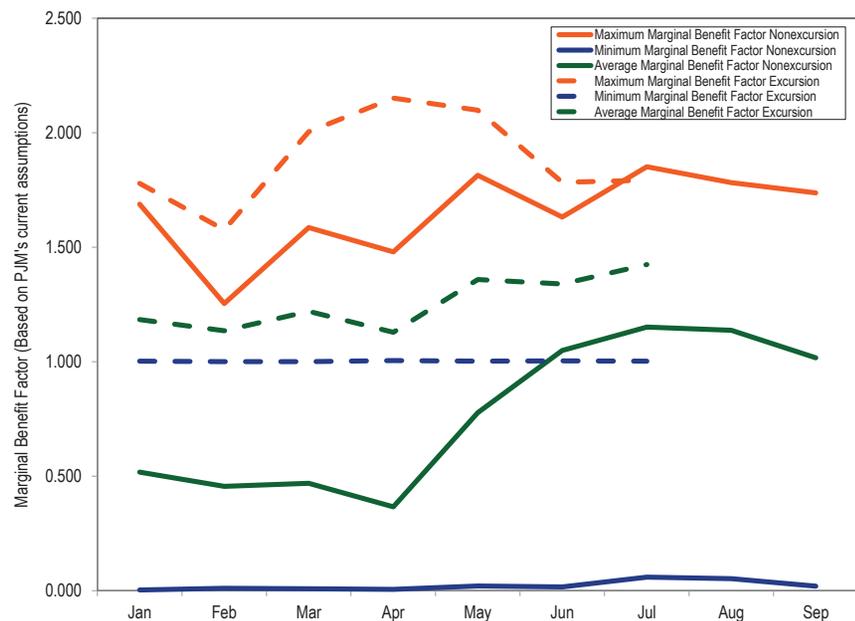
The effect of using the mileage ratio instead of the MBF to convert RegD MW into effective MW for purposes of settlement is illustrated in Table 10-31. Table 10-31 compares the monthly average payment to RegD per effective MW under the current settlement process to the monthly average payment RegD resources should have received using the MBF to convert RegD MW to effective MW. This also shows that using the MBF would result in RegA and RegD resources being paid exactly the same on a per effective MW basis. The MBF averaged less than one in each month of 2016, while the average daily mileage ratio was 2.79, resulting in RegD resources being paid \$11.2 million (1,855.6 percent) more than they should have been paid per effective MW in the first nine months of 2016. In the first nine months of 2017, the MBF also averaged less than one, while the average daily mileage ratio was 6.24, resulting in RegD resources being paid \$14.1 million (385.3 percent) more than they should have been.

Table 10-31 Average monthly price paid per effective MW of RegD and RegA under mileage and MBF based settlement: January 1 through September 30, 2016 through 2017

Year	Month	RegD Settlement Payments				Total RegD Under/Over Payment (\$)
		Mileage Based (\$/Effective RegD MW)	Marginal Rate of Technical Substitution Based (\$/Effective RegD MW)	RegA (\$/Effective MW)	Percent RegD Under/Over Payment	
2016	Jan	\$30.61	\$15.60	\$15.60	96.2%	\$1,319,364
	Feb	\$43.33	\$17.56	\$17.56	146.8%	\$1,591,651
	Mar	\$70.02	\$13.21	\$13.21	430.1%	\$1,375,711
	Apr	\$90.59	\$18.87	\$18.87	380.1%	\$1,335,655
	May	\$449.89	\$15.42	\$15.42	2,817.9%	\$1,452,512
	Jun	\$181.02	\$13.81	\$13.81	1,210.8%	\$996,391
	Jul	\$782.84	\$17.48	\$17.48	4,378.3%	\$884,677
	Aug	\$43.91	\$17.15	\$17.15	156.1%	\$985,398
	Sep	\$1,057.96	\$17.47	\$17.47	5,954.5%	\$1,259,051
	Oct	\$166.40	\$15.44	\$15.44	977.9%	\$1,251,166
	Nov	\$36.01	\$13.01	\$13.01	176.8%	\$1,109,221
	Dec	\$57.00	\$11.15	\$11.15	411.4%	\$1,041,258
Yearly		\$258.17	\$15.50	\$15.50	1,565.7%	\$14,602,055
Jan-Sep		\$318.19	\$16.27	\$16.27	1,855.6%	\$11,200,410
2017	Jan	\$80.44	\$13.62	\$13.62	490.7%	\$956,485
	Feb	\$293.97	\$10.64	\$10.64	2,662.3%	\$1,161,959
	Mar	\$80.90	\$15.06	\$15.06	437.2%	\$1,977,295
	Apr	\$79.84	\$15.58	\$15.58	412.4%	\$2,848,281
	May	\$34.79	\$17.89	\$17.89	94.4%	\$1,229,953
	Jun	\$24.18	\$13.23	\$13.23	82.7%	\$1,498,653
	Jul	\$22.16	\$15.00	\$15.00	47.7%	\$995,254
	Aug	\$26.53	\$13.24	\$13.24	100.4%	\$1,881,033
	Sep	\$35.67	\$21.33	\$21.33	67.2%	\$1,588,929
Jan-Sep		\$73.27	\$15.10	\$15.10	385.3%	\$14,137,842

Figure 10-20 shows, for the first nine months of 2017, the maximum, minimum and average MBF, by month, for excursion and nonexcursion hours. The average MBF during excursion hours from January 1, 2017, to July 30, 2017, was 1.26, and the average MBF during nonexcursion hours in the first nine months of 2017 was 0.80. The average MBF during excursion hours in the first nine months of 2016 was 1.12, and the average MBF during nonexcursion hours in the first nine months of 2016 was 0.44. The floor MBF for excursion hours was set to 1.0.

Figure 10-20 Maximum, minimum, and average PJM calculated MBF by month for excursion and nonexcursion hours: January 1 through September 30, 2017⁵⁶



The increase in the average MBF seen in Figure 10-20 during the second quarter of 2017 is a result of a decrease in the eligible and cleared RegD MW. Table 10-32 shows performance adjusted and effective MW that were eligible and cleared during the first nine months of 2016 and 2017.

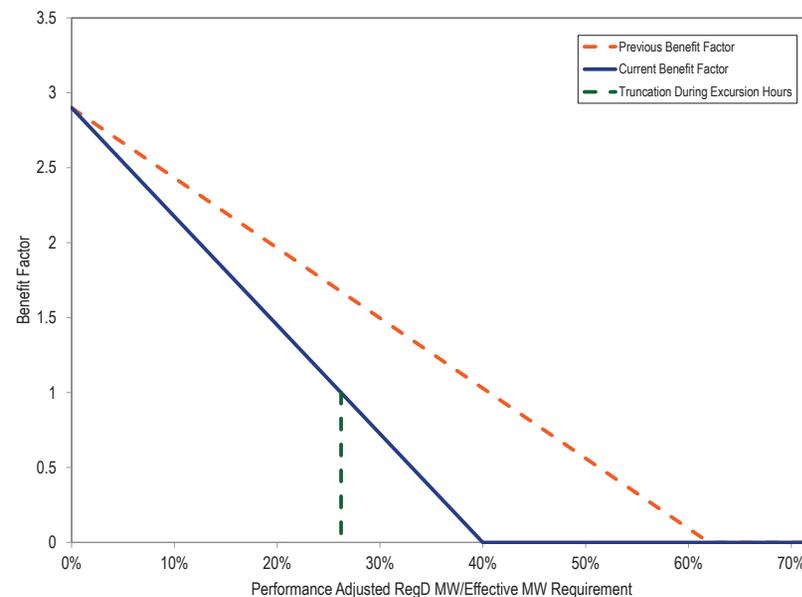
⁵⁶ Excursion hours were discontinued as of 00:00 on July 31, 2017.

Table 10-32 Performance adjusted and effective RegD MW eligible and cleared: January through September : 2016 and 2017

Performance Adjusted RegD MW (Jan-Sep)			
	2016	2017	Change
Actual Eligible	378.4	325.5	(14.0%)
Effective Eligible	340.9	319.5	(6.3%)
Actual Cleared	225.0	192.3	(14.5%)
Effective Cleared	339.3	314.2	(7.4%)

Figure 10-21 shows the MBF curve before and after the December 14, 2015, modification. Figure 10-21 shows the change in RegA for a change in RegD (MBF of RegD on the y-axis) for given ratio of RegD MW as a percentage of the effective MW requirement (Percentage RegD on the x-axis). The objective of the modification of the MBF was to reduce the operational issues caused by the over procurement of RegD. The modification to the MBF curve reduced the amount of RegD procured, but did not correct for identified issues with the definition of the MBF that are causing the over procurement to occur.

Figure 10-21 MBF curve before and after December 14, 2015, revisions by PJM



The MMU recommends that the Regulation Market be modified to incorporate a consistent and correct application of the MBF throughout the optimization, assignment and settlement process.⁵⁷

MBF Creates Results in Market Solutions that are not Feasible

An additional significant problem that results from using the incorrect MBF is that the market clearing is done without confirming that the resulting combinations of RegA and RegD are feasible and can meet the defined demand for regulation. This guarantees that an increasing proportion of RegD MW in the market incorrectly appears as a cheap feasible source of incremental effective regulation MW even when there are not enough RegA MW clearing the market to support this market solution.

The problem is illustrated in Table 10-33, for both the MBF curve used prior to December 14, 2015, and the current MBF curve. In Table 10-33, the contribution to the total regulation requirement of 800.0 MW for a ramp hour is given on both a performance adjusted RegD MW basis and effective RegD MW basis. For example, if the market cleared 320.0 MW of performance adjusted RegD (40 percent of the 800.0 performance adjusted MW needed) at a price of zero, the market would calculate that as 464.0 effective MW of RegD (area under curve) consistent with the MBF of 0.00, and determine it would need 336.0 MW of RegA to meet the 800.0 MW requirement using the current MBF curve. The resulting proportion of actual RegD MW to total regulation cleared would be 48.8 percent for the current MBF curve (320.0 actual RegD MW/(320.0 actual RegD MW + 336.0 actual RegA)), rather than the 40.0 percent defined by the MBF function. Although there is a smaller difference between the proportion of RegD cleared under the current MBF curve and the correct amount than under the prior MBF curve (48.8 percent versus 65.1 percent), the error is not **eliminated**. The result should be to maintain the desired proportions of RegA

⁵⁷ See "Regulation Market Review," Operating Committee meeting (May 5, 2015) <<http://www.pjm.com/~media/committees-groups/committees/oc/20150505/20150505-item-17-regulation-market-review.ashx>>.

and RegD regardless of the amount of RegD cleared. To do this, the MBF must be defined as the relationship between RegA MW and RegD MW, rather than the percent of RegD.

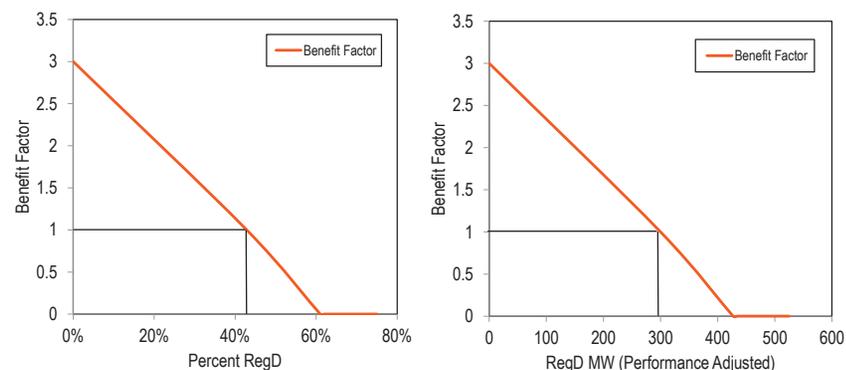
Table 10-33 MBF assumed RegD proportions versus market solution realized RegD proportions⁵⁸

RegD Percent of 800 MW	RegD MW (Performance Adjusted)	MBF (Previous)	MBF (Current)	Effective MW from RegD MW (Previous)	Effective MW from RegD MW (Current)	Residual A (800 MW Target, Previous)	Residual A (800 MW Target, Current)	RegD/(RegA+RegD, Previous)	RegD/(RegA+RegD, Current)
5.0%	40.0	2.67	2.54	111.3	108.8	688.7	691.3	5.5%	5.5%
10.0%	80.0	2.43	2.18	213.3	203.0	586.7	597.0	12.0%	11.8%
15.0%	120.0	2.20	1.81	305.9	282.8	494.1	517.3	19.5%	18.8%
20.0%	160.0	1.96	1.45	389.2	348.0	410.8	452.0	28.0%	26.1%
25.0%	200.0	1.73	1.09	463.1	398.8	336.9	401.3	37.2%	33.3%
30.0%	240.0	1.50	0.73	527.6	435.0	272.4	365.0	46.8%	39.7%
35.0%	280.0	1.26	0.36	582.8	456.8	217.2	343.3	56.3%	44.9%
40.0%	320.0	1.03	0.00	628.6	464.0	171.4	336.0	65.1%	48.8%
45.0%	360.0	0.80	-	665.1	-	134.9	-	72.7%	-
50.0%	400.0	0.56	-	692.3	-	107.7	-	78.8%	-
55.0%	440.0	0.33	-	710.0	-	90.0	-	83.0%	-
60.0%	480.0	0.09	-	718.5	-	81.5	-	85.5%	-

An example illustrates the issue. Figure 10-22 shows the same MBF curve, in terms of RegD percent (left diagram) and RegD MW (right diagram) in a scenario where 700 MW of effective MW are needed and the market clears 300 MW of RegD (actual MW), all priced at \$0.00, and 400 MW of RegA. Figure 10-22 shows that the 300 MW of cleared RegD are 42.9 percent of total cleared actual MW and that the MBF is 1.0.

⁵⁸ This example assumes that the calculation of effective MW from RegD was calculated correctly as the area under the MBF curve.

Figure 10-22 Example MBF functions with percent RegD and RegD MW



The Market Buys Too Much RegD

In 2015, the MMU determined that the PJM market design was buying too much RegD because the regulation market solution understates the amount of effective MW provided by RegD. PJM calculates the total effective MW of a unit as the simple product of the MW and the MBF, rather than the area under the MBF. The result is that 100 MW of RegD provided by a single resource (one 100 MW unit) will appear to provide fewer effective MW than 100 MW of RegD provided by two 50 MW units although they provide exactly the same total effective MW. This is the unit block issue.

The understatement of RegD was amplified by the treatment, in the market solution, of all RegD resources with the same price as a single resource for purposes of assigning a benefit factor and calculating total effective MW. All of the MW associated with multiple units with the same price were assigned the MBF of the last MW of the last unit of that block of resources. PJM calculates the total effective MW as the product of the MW and the marginal MBF, rather than the area under the MBF curve. This resulted in understating total effective MW from RegD resources cleared. This price block issue was solved by the modification of December 14, 2015.

The unit block issue was not addressed by the modification made on December 14, 2015. A complete correction of the effective MW calculation requires the use of the area under the curve.

Using PJM’s unit block method, all RegD resources are assigned the lowest MBF associated with the last RegD MW purchased. In this example (Figure 10-23), all 300 MW have an MBF of 1.0. PJM calculates total effective MW from RegD resources to be 300 (300 MW x 1.0 = 300 effective MW). In Figure 10-23, PJM’s price block/unit block calculation of total effective MW from RegD is represented by the area of the blue rectangle which is 300 effective MW.

The marginal benefit curve represents a marginal rate of substitution between RegD and RegA MW, and the area under the curve, at any RegD amount, represents the total effective MW supplied by RegD at that point. RegD is providing effective MW equal to the area of the green triangle plus the blue rectangle in Figure 10-23. This equals 600 effective MW from RegD resources, not 300 effective MW. The actual total effective MW cleared in the market is 300 more effective MW than needed to meet the regulation requirement.

Figure 10-23 Illustration of correct method for calculating effective MW

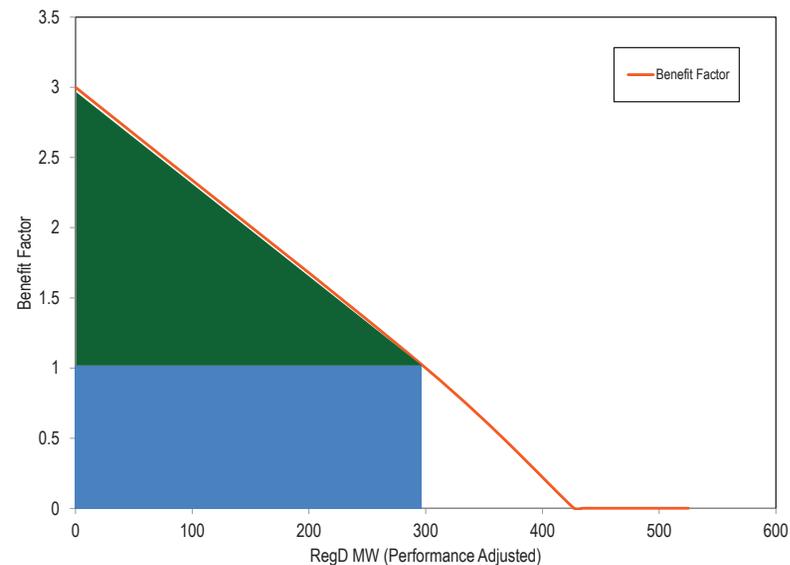
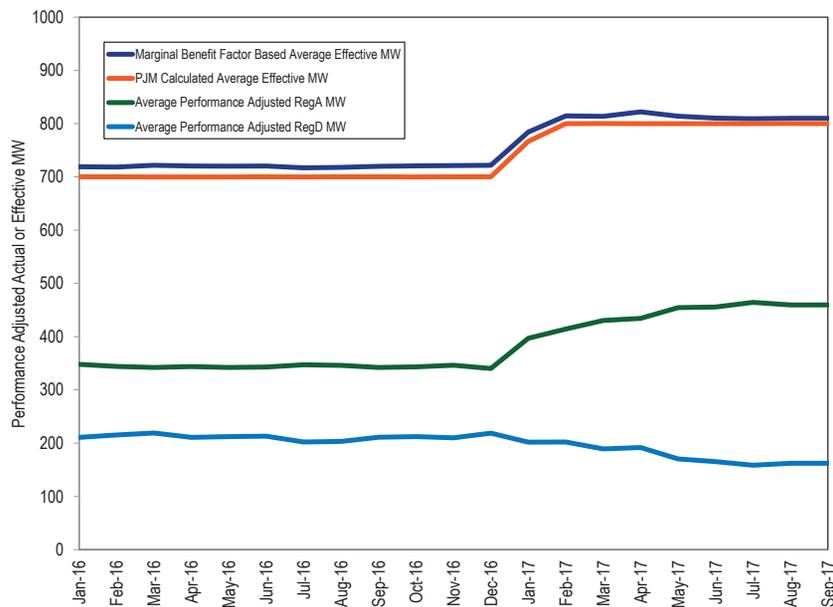


Figure 10-24 shows the average monthly peak and ramp total effective MW as calculated by PJM's MBF and as calculated by a correctly applied MBF for the January 1, 2016, through September 30, 2017, period. The figure also shows the monthly average performance adjusted RegA MW and RegD MW cleared in the Regulation Market for the period.

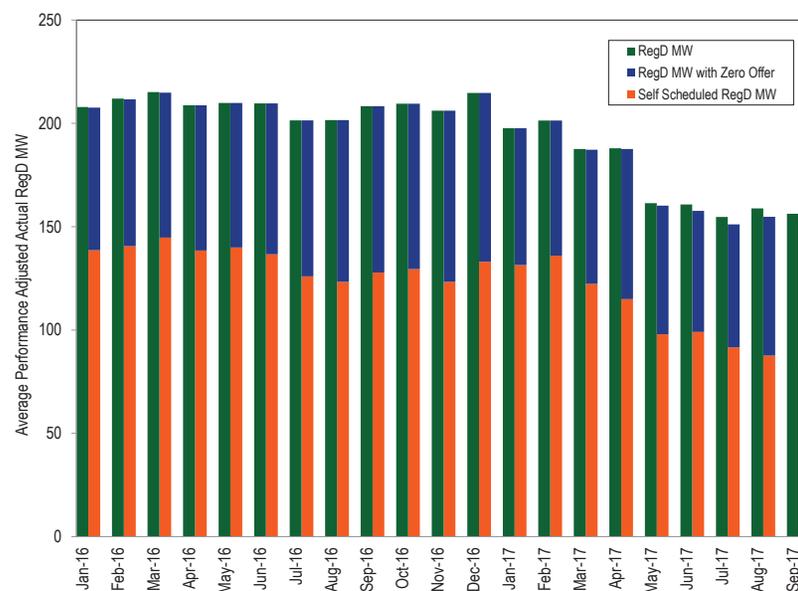
As a result of the changes made on January 9, 2017, the average cleared performance adjusted RegD MW during on peak hours decreased from 218.6 MW in December 2016, to 162.3 (a decrease of 25.7 percent) during ramp hours in September 2017. The average cleared performance adjusted RegA MW during on peak hours increased from 340.2 MW in December 2016, to 459.6 MW (an increase of 35.1 percent) during ramp hours in June 2017.

Figure 10-24 Average monthly total effective MW and RegA and RegD performance adjusted MW: PJM market calculated versus benefit factor based: January 1, 2016 through September 30, 2017



The excess procurement of RegD combined with the overpayment of RegD resulted in an increase in the level of \$0.00 offers from RegD resources. RegD MW providers are ensured that \$0.00 offers will be cleared and will be paid a price determined by the offers of RegA resources. Figure 10-25 shows, by month, the proportion of cleared RegD MW with an effective price of \$0.00 from January 1, 2016, through September 30, 2017. The figure shows that all RegD MW clearing the market in the period between January 1, 2016, and April 30, 2017, had an effective offer of \$0.00. From May 1, 2017 through September 30, 2017, an average of 98.2 percent of cleared RegD MW had an effective cost of \$0.00. The total level of RegD clearing the market leveled off beginning in January 2016 because the market cleared the maximum allowed RegD MW. Due to the changes implemented in January 2017, the total level of RegD cleared in the market decreased 16.4 percent in the first nine months of 2017 compared to the first nine months of 2016.

Figure 10-25 Average cleared RegD MW and average cleared RegD with an effective price of \$0.00 by month: January 1, 2016 through September 30, 2017

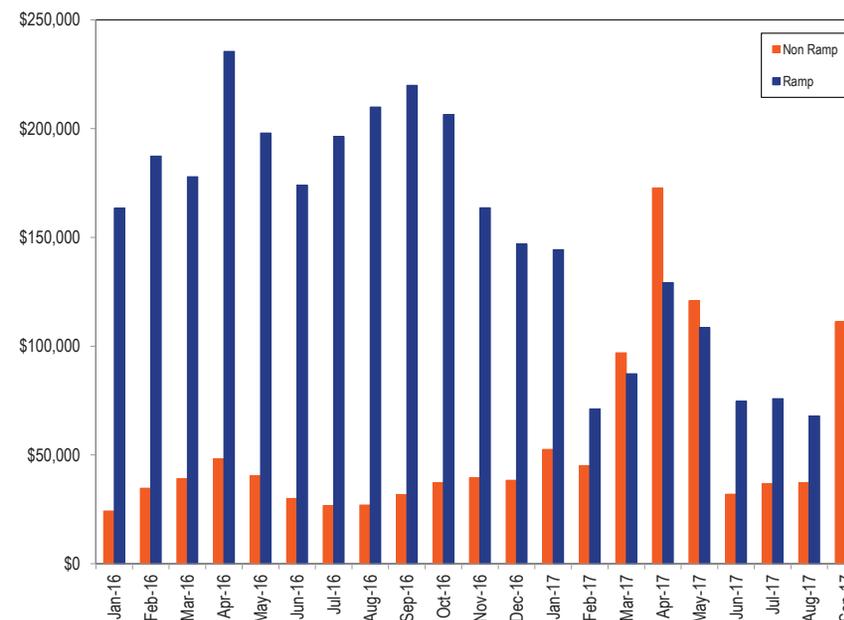


The Cost of Buying Too Much Regulation

Figure 10-26 shows the estimated cost of the excess effective MW cleared by month, peak and off peak, from January 1, 2017, through September 30, 2017, caused by PJM’s calculation of effective MW from RegD resources using mileage rather than MBF. To determine this excess cost, the total effective MW of RegD are calculated using the full area under the PJM MBF curve, and the difference between that value and the value used by PJM is multiplied by the price in each hour. The calculation of excess cost shown in Figure 10-26 that is caused by purchasing too much RegD is conservatively underestimated because it does not incorporate how the market clearing price and settlement would have been affected by replacing the current optimization and settlement process with a correct and consistent utilization of the MBF. Specifically, the calculation only reflects differences in RegA and RegD proportions due to incorrect versus correct application of the MBF, holding the actual market price and the mileage ratio based settlement constant and ignoring the actual MRTS.

In the first nine months of 2017, the estimated total cost of excess effective RegD MW during ramp and nonramp hours was \$0.83 million and \$0.71 million. In the first nine months of 2016, the estimated total cost of excess RegD MW during on peak and off peak hours was \$1.76 million and \$0.30 million. The implementation of the partial solution to the effective MW calculation and the changes in the MBF curve in December of 2015 reduced, but did not eliminate, the excess effective MW clearing in the regulation market.

Figure 10-26 Cost of excess effective MW cleared by month, peak and off peak: January 1, 2016 through September 30, 2017⁵⁹



Market Structure

Supply

Table 10-34 shows capability MW (performance adjusted), average daily offer MW (performance adjusted), average hourly eligible MW (performance adjusted and effective), and average hourly cleared MW (performance adjusted and effective) for all hours in the first nine months of 2017.⁶⁰ Total MW are adjusted by the historic 100-hour moving average performance score to get performance adjusted MW, and additionally by the resource specific benefit factor to get effective MW. A resource can choose to follow either signal. For that reason, the sum of each signal type’s capability can exceed the full

⁵⁹ Prior to January 9, 2017, on peak hours were defined between 05:00-23:59, off peak hours were defined as 00:00-04:59. After January 9, 2017, ramp and nonramp hours are defined seasonally. Please see Table 10-1 for a list of what hours are considered ramp and nonramp.
⁶⁰ Unless otherwise noted, analysis provided in this section uses PJM market data based on PJM’s internal calculations of effective MW values, based on PJM’s currently incorrect MBF curve. The MMU is working with PJM to correct the MBF curve.

regulation capability. Offered MW are calculated based on the daily offers from units that are offered as available for the day. Eligible MW are calculated from the hourly offers from units with daily offers and units that are offered as unavailable for the day, but still offer MW into some hours. Units with daily offers are permitted to offer above or below their daily offer from hour to hour. As a result of these hourly MW adjustments, the average hourly Eligible MW can be higher than the Offered MW.

In the first nine months of 2017, the average hourly eligible supply of regulation for nonramp hours was 1,135.6 performance adjusted MW (858.9 effective MW). This was a decrease of 79.4 performance adjusted MW (an increase of 9.4 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation was 1,215.0 performance adjusted MW (849.6 effective MW). In the first nine months of 2017, the average hourly eligible supply of regulation for ramp hours was 1,423.0 performance adjusted MW (1,173.7 effective MW). This was an increase of 231.6 performance adjusted MW (225.5 effective MW) from the first nine months of 2016, when the average hourly eligible supply of regulation was 1,191.4 performance adjusted MW (948.2 effective MW).

The ratio of the average hourly eligible supply of regulation to average hourly regulation demand (performance adjusted cleared MW) for ramp hours was 1.98 in the first nine months of 2017. This is an increase of 6.1 percent from the first nine months of 2016, when the ratio was 1.87. The ratio of the average hourly eligible supply of regulation to average hourly regulation demand (performance adjusted cleared MW) for nonramp hours was 2.31 in the first nine months of 2017. This is a decrease of 1.6 percent from the first nine months of 2016, when the ratio was 2.35.

Table 10-34 PJM regulation capability, daily offer and hourly eligible: January through September, 2017^{61 62}

		By Resource Type			By Signal Type	
		All Regulation	Generating Resources	Demand Resources	RegA Following Resources	RegD Following Resources
Capability MW	Daily	10,479.8	10,451.9	27.9	10,100.9	705.6
Offered MW	Daily	4,993.0	4,976.6	16.4	4,673.9	319.1
Actual Eligible MW	Ramp	1,423.0	1,408.6	14.4	1,093.9	329.1
	Nonramp	1,135.6	1,122.0	13.5	814.0	321.6
Effective Eligible MW	Ramp	1,173.7	1,155.2	18.5	811.7	362.0
	Nonramp	858.9	843.5	15.4	585.9	273.0
Actual Cleared MW	Ramp	718.2	709.9	8.3	522.3	195.8
	Nonramp	492.2	484.8	7.5	303.7	188.5
Effective Cleared MW	Ramp	795.6	778.7	16.9	441.2	354.3
	Nonramp	527.6	513.0	14.5	257.3	270.2

Table 10-35 provides the settled regulation MW by source unit type, the total settled regulation MW provided by all resources, and the percent of settled regulation provided by unit type. In Table 10-35 the MW have been adjusted by the performance score since this adjustment forms the basis of payment for units providing regulation. Total regulation performance adjusted capability MW increased 26.4 percent from 3,694,467.2 MW in the first nine months of 2016 to 4,670,170.9 MW in the first nine months of 2017. The average proportion of regulation provided by battery units had the largest increase, providing 41.1 percent of regulation in the first nine months of 2016 and 47.0 percent of regulation in the first nine months of 2017. Hydro units had the largest decrease in average proportion of regulation provided, decreasing from 18.7 percent in the first nine months of 2016, to 14.9 percent in the first nine months of 2017. The total regulation credits in the first nine months of 2017 were \$74,274,392, up 11.8 percent from \$66,444,595 in the first nine months of 2016.

⁶¹ Average Daily Offer MW excludes units that have offers but are unavailable for the day.

⁶² Total offer capability is defined as the sum of the maximum daily offer volume for each offering unit during the period, without regard to the actual availability of the resource or to the day on which the maximum was offered.

Table 10-35 PJM regulation by source: January through September, 2016 and 2017⁶³

Source	2016 (Jan-Sep)				2017 (Jan-Sep)			
	Number of Units	Performance Adjusted Settled Regulation (MW)	Percent of Settled Regulation	Total Regulation Credits	Number of Units	Performance Adjusted Settled Regulation (MW)	Percent of Settled Regulation	Total Regulation Credits
Battery	21	1,517,433.0	41.1%	\$24,507,644	21	2,196,108.6	47.0%	\$28,783,598
Coal	49	321,659.9	8.7%	\$7,464,327	44	294,539.0	6.3%	\$6,734,837
Hydro	39	691,254.3	18.7%	\$14,917,596	26	696,665.0	14.9%	\$13,451,226
Natural Gas	152	1,117,613.6	30.3%	\$18,794,966	148	1,386,066.5	29.7%	\$24,014,694
DR	35	46,506.5	1.3%	\$760,062	28	96,791.9	2.1%	\$1,290,038
Total	296	3,694,467.2	100.0%	\$66,444,595	267	4,670,170.9	100.0%	\$74,274,392

Significant flaws in the regulation market design have led to a significant over procurement of RegD MW primarily in the form of storage capacity. The incorrect market signals have led to more storage projects entering PJM's interconnection queue, despite clear evidence that the market design is flawed and despite operational evidence that the RegD market is saturated (Table 10-36).

Table 10-36 Active battery storage projects in the PJM queue system by submitted year: 2012 to 2017

Year	Number of Storage Projects	Total Capacity (MW)
2012	1	4.5
2013	0	0.0
2014	7	128.4
2015	34	236.1
2016	12	85.6
2017	3	0.5
Total	57	455.1

The supply of regulation can be affected by regulating units retiring from service. If all units that are requesting retirement through the end of 2017 retire, the supply of regulation in PJM will be reduced by less than one percent.

Although the MBF for RegA resources is 1.0, the effective MW of RegA resources were lower than the offered MW in the first nine months of 2017, because the average performance score was less than 1.00. For the first nine

months of 2017, the MW weighted average RegA performance score was 0.85 and there were 215 resources following the RegA signal.

For RegD resources, the total effective MW do not equal performance adjusted MW because the MBF for RegD resources can range from 0.0 to 2.9. In the first nine months of 2017, the MBF for cleared RegD resources ranged from 0.003 to 1.851 with an average over all nonexcursion hours of 0.796 and from 1.000 to 2.151 with an average over all excursion hours of 1.257. In the first nine months of 2017, the MW weighted average RegD resource performance score was 0.90 and there were 54 resources following the RegD signal.

Demand

The demand for regulation does not change with price. The regulation requirement is set by PJM to meet NERC control standards, based on reliability objectives, which means that a significant amount of judgment is exercised by PJM in determining the actual demand. Prior to October 1, 2012, the regulation requirement was 1.0 percent of the forecast peak load for on peak hours and 1.0 percent of the forecast valley load for off peak hours. Between October 1, 2012, and December 31, 2012, PJM changed the regulation requirement several times. It had been scheduled to be reduced from 1.0 percent of peak load forecast to 0.9 percent on October 1, 2012, but instead it was changed from 1.0 percent of peak load forecast to 0.78 percent of peak load forecast. It was further reduced to 0.74 percent of peak load forecast on November 22, 2012 and reduced again to 0.70 percent of peak load forecast on December 18, 2012. On December 14, 2013, it was reduced to 700 effective MW during peak hours and 525 effective MW during off peak hours. The regulation requirement remained 700 effective MW during peak hours and 525 effective MW during off peak hours until January 9, 2017. A change to the regulation requirement was approved by the RMISTF in 2016, with an implementation

⁶³ Biomass data have been added to the natural gas category for confidentiality purposes.

date of January 9, 2017. The regulation requirement was increased from 700 effective MW to 800 effective MW during ramp hours (See Table 10-37).

Table 10-37 shows the average hourly required regulation by month and the ratio of supply to demand for both actual and effective MW, for ramp and nonramp hours. The average hourly required regulation by month is an average of the ramp and nonramp hours in the month.

The nonramp regulation requirement of 525.0 effective MW was provided by a combination of RegA and RegD resources equal to 491.6 hourly average MW in the first nine months of 2017. This is a decrease of 26.6 MW from the first nine months of 2016, when the average hourly total regulation cleared MW for nonramp hours were 518.3 MW. The ramp regulation requirement of 700.0 effective MW prior to January 9, 2017, and 800.0 effective MW after January 9, 2017, was provided by a combination of RegA and RegD resources equal to 718.8 hourly average MW in the first nine months of 2017. This is an increase of 80.9 MW from the first nine months of 2016, where the average hourly regulation cleared MW for ramp hours were 637.9 MW.

Table 10-37 PJM Regulation Market required MW and ratio of eligible supply to requirement for ramp and nonramp hours: January through September, 2016 and 2017⁶⁴

Hours	Month	Average Required Regulation (MW)		Average Required Regulation (Effective MW)		Ratio of Supply MW to MW Requirement		Ratio of Supply Effective MW to Effective MW Requirement	
		2016	2017	2016	2017	2016	2017	2016	2017
Ramp	Jan	657.5	690.8	700.1	766.8	1.83	2.10	1.34	1.48
	Feb	663.6	705.8	700.1	800.1	1.84	2.11	1.38	1.52
	Mar	640.6	714.7	700.0	800.1	1.90	1.96	1.39	1.41
	Apr	633.8	730.6	699.9	800.0	1.78	1.86	1.32	1.41
	May	625.4	723.6	699.9	800.0	1.82	1.88	1.29	1.44
	Jun	632.2	719.9	700.1	800.0	1.98	1.98	1.38	1.49
	Jul	628.7	727.6	700.0	799.9	1.85	2.00	1.37	1.52
	Aug	630.6	727.8	700.1	800.3	1.88	1.97	1.35	1.50
	Sep	628.5	728.3	700.1	799.9	1.95	1.90	1.38	1.46
Nonramp	Jan	553.8	503.6	525.0	525.1	2.15	2.45	1.56	1.65
	Feb	550.0	508.3	525.6	525.0	2.17	2.47	1.56	1.75
	Mar	517.0	499.9	525.0	525.0	2.25	2.22	1.57	1.52
	Apr	513.1	519.0	525.0	525.0	2.23	2.20	1.54	1.60
	May	504.5	479.7	525.0	525.1	2.24	2.26	1.52	1.59
	Jun	509.0	471.9	525.2	525.1	2.62	2.31	1.78	1.63
	Jul	506.9	484.9	525.0	541.0	2.42	2.32	1.65	1.66
	Aug	502.0	481.8	525.0	535.2	2.58	2.41	1.74	1.71
	Sep	508.3	475.8	525.0	526.4	2.47	2.26	1.65	1.62

Market Concentration

In the first nine months of 2017, the effective MW weighted average HHI of RegA resources was 2730 which is highly concentrated and the weighted average HHI of RegD resources was 1595 which is also highly concentrated.⁶⁵ The weighted average HHI of all resources was 1144, which is moderately concentrated. The HHI of RegA resources and the HHI of RegD resources are higher than the HHI for all resources because different owners have large market shares in the RegA and RegD markets.

Table 10-38 includes a monthly summary of three pivotal supplier (TPS) results. In the first nine months of 2017, 89.9 percent of hours had three or

⁶⁴ The regulation requirement for January 2017 includes eight days of 700 effective MW and 23 days of 800 effective MW.

⁶⁵ HHI results are based on market shares of effective MW, defined as regulation capability MW adjusted by performance score and resource specific benefit factor, consistent with the way the regulation market is cleared.

fewer pivotal suppliers. The MMU concludes that the PJM Regulation Market in the first nine months of 2017 was characterized by structural market power. The TPS values are provided by PJM. The TPS results cannot be verified by the MMU or PJM because PJM does not save the necessary data. The MMU recommends that PJM save this data and make it available so that the TPS test calculations can be replicated by both PJM and the MMU. PJM has agreed that the lack of information is an issue but does not have a specific plan or timeline to resolve the issue.

Table 10-38 Regulation market monthly three pivotal supplier results: January 1, 2015 through September 30, 2017

Month	Percent of Hours Pivotal		
	2015	2016	2017
Jan	97.8%	93.9%	90.6%
Feb	96.3%	90.9%	93.1%
Mar	97.3%	87.8%	92.7%
Apr	98.1%	93.5%	92.9%
May	99.3%	94.0%	88.7%
Jun	98.6%	89.3%	89.2%
Jul	98.8%	92.2%	91.0%
Aug	97.7%	93.7%	88.0%
Sep	97.1%	94.0%	82.6%
Oct	96.1%	90.6%	
Nov	99.2%	96.2%	
Dec	97.2%	90.4%	
Average	97.8%	92.2%	89.9%

Market Conduct

Offers

Resources seeking to regulate must qualify to follow a regulation signal by passing a test for that signal with at least a 75 percent performance score. The regulating resource must be able to supply at least 0.1 MW of regulation and not allow the sum of its regulating ramp rate and energy ramp rate to exceed its overall ramp rate.⁶⁶ When offering into the regulation market, regulating resources must submit a cost offer and may submit a price offer (capped at \$100/MW) by 2:15 pm the day before the operating day.⁶⁷

⁶⁶ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 64.

⁶⁷ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 69.

Offers in the PJM Regulation Market consist of a capability component for the MW of regulation capability provided and a performance component for the miles (Δ MW of regulation movement) provided. The capability component for cost offers is not to exceed the increased fuel costs resulting from operating the regulating unit at a lower output level than its economically optimal output level, plus a \$12.00/MW adder. The performance component for cost offers is not to exceed the increased costs (increased VOM and increased fuel costs) resulting from moving the unit up and down to provide regulation. Batteries and flywheels have zero cost for lower efficiency from providing regulation instead of energy, as they are not net energy producers. There is an energy storage loss component for batteries and flywheels as a cost component of regulation performance offers to reflect the net energy consumed to provide regulation service.⁶⁸

Up until one hour before the operating hour, the regulating resource must provide: status (available, unavailable, or self scheduled); capability (movement up and down in MW); regulation maximum and regulation minimum (the highest and lowest levels of energy output while regulating in MW); and the regulation signal type (RegA or RegD). Resources may offer regulation for both the RegA and RegD signals, but will be assigned to follow only one signal for a given operating hour. Resources have the option to submit a minimum level of regulation they are willing to provide.⁶⁹

All LSEs are required to provide regulation in proportion to their load share. LSEs can purchase regulation in the regulation market, purchase regulation from other providers bilaterally, or self schedule regulation to satisfy their obligation (Table 10-40).⁷⁰ Figure 10-27 compares average hourly regulation and self scheduled regulation during ramp and nonramp hours on an effective MW basis. The average hourly regulation is the amount of regulation that actually cleared and is not the same as the regulation requirement because PJM clears the market within a two percent band around the requirement.⁷¹ Self scheduled regulation comprised an average of 40.0 percent during ramp

⁶⁸ See PJM. "Manual 15: Cost Development Guidelines," Rev. 29 (May 15, 2017) at 62.

⁶⁹ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 67.

⁷⁰ See PJM. "Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) at 4.1 at 22.

⁷¹ See PJM. "Manual 11: Energy & Ancillary Services Market Operations," Rev. 90 (July 27, 2017) at 3.2.9 at 78.

hours and 46.5 percent during nonramp hours in the first nine months of 2017.

Figure 10-27 Off peak, on peak, nonramp, and ramp regulation levels: January 1, 2016 through September 30, 2017⁷²

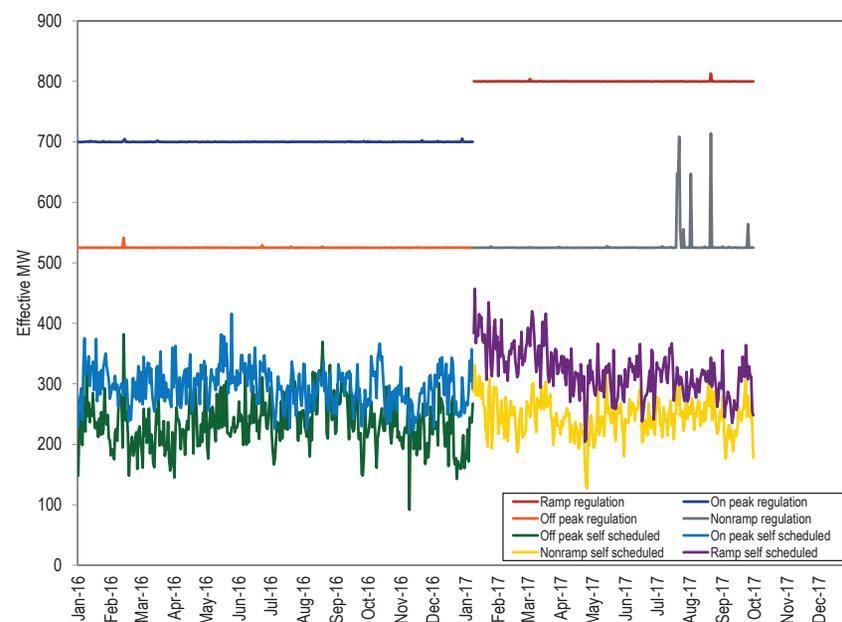


Table 10-39 shows the role of RegD resources in the regulation market. RegD resources are both a growing proportion of the market (10.9 percent of the total effective MW at the start of the performance based regulation market design in October 2012 and 46.5 percent of the total effective MW in September 2017) and a growing proportion of resources that self schedule (10.1 percent of all self scheduled MW in October 2012 and 24.5 percent of all self scheduled MW in September 2017). The increase in the share of RegD in 2016 was a result of the use of the unit block method of calculating the MBF over the previous price block method (See Figure 10-23). The decrease in the RegD share of total effective MW for the first nine months of 2017 was a result of a decrease in the amount of eligible MW of RegD (Table 10-32) in response to the changes to the regulation market on January 9, 2017.

⁷² The MW increase during the nonramp hours of Q3 was a result of PJM operations treating those hours as ramp hours.

Table 10-39 RegD self scheduled regulation by month: October 31, 2012 through September 30, 2017

Year	Month	RegD Self Scheduled Effective MW	RegD Effective MW	Total Self Scheduled Effective MW	Total Effective MW	Percent of Total Self Scheduled	RegD Percent of Total Self Scheduled	RegD Percent of Total Effective MW
2012	Oct	66.3	71.8	264.7	658.1	40.2%	10.1%	10.9%
2012	Nov	74.4	88.3	196.5	716.5	27.4%	10.4%	12.3%
2012	Dec	82.5	88.8	188.8	701.1	26.9%	11.8%	12.7%
2013	Jan	35.7	82.5	133.6	720.0	18.6%	5.0%	11.5%
2013	Feb	84.8	90.2	212.2	724.3	29.3%	11.7%	12.5%
2013	Mar	80.1	119.3	279.8	680.7	41.1%	11.8%	17.5%
2013	Apr	82.3	106.9	266.0	594.1	44.8%	13.8%	18.0%
2013	May	74.0	109.0	268.2	616.2	43.5%	12.0%	17.7%
2013	Jun	79.6	122.7	334.9	730.6	45.8%	10.9%	16.8%
2013	Jul	77.6	120.4	303.6	822.9	36.9%	9.4%	14.6%
2013	Aug	83.6	127.6	366.0	756.8	48.4%	11.0%	16.9%
2013	Sep	112.2	152.1	381.6	669.9	57.0%	16.7%	22.7%
2013	Oct	120.2	163.7	349.6	613.3	57.0%	19.6%	26.7%
2013	Nov	133.9	175.7	396.5	663.3	59.8%	20.2%	26.5%
2013	Dec	136.5	180.7	313.6	663.5	47.3%	20.6%	27.2%
2013	Average	91.7	129.2	300.5	688.0	44.1%	13.6%	19.0%
2014	Jan	132.9	193.5	261.1	663.6	39.3%	20.0%	29.2%
2014	Feb	134.3	193.4	289.0	663.6	43.5%	20.2%	29.1%
2014	Mar	131.8	193.8	287.2	663.8	43.3%	19.9%	29.2%
2014	Apr	126.8	212.4	270.8	663.7	40.8%	19.1%	32.0%
2014	May	121.7	248.5	265.6	663.6	40.0%	18.3%	37.4%
2014	Jun	123.3	231.0	365.5	663.9	55.0%	18.6%	34.8%
2014	Jul	126.4	235.5	352.7	663.5	53.2%	19.0%	35.5%
2014	Aug	117.6	229.8	368.2	663.6	55.5%	17.7%	34.6%
2014	Sep	121.0	242.6	393.8	663.6	59.3%	18.2%	36.6%
2014	Oct	116.1	255.4	352.7	663.6	53.2%	17.5%	38.5%
2014	Nov	113.5	235.1	347.5	664.2	52.3%	17.1%	35.4%
2014	Dec	116.7	254.3	353.0	663.6	53.2%	17.6%	38.3%
2014	Average	123.5	227.1	325.6	663.7	49.1%	18.6%	34.2%
2015	Jan	116.4	250.1	304.8	663.7	45.9%	17.5%	37.7%
2015	Feb	111.3	245.8	242.6	663.5	36.6%	16.8%	37.0%
2015	Mar	113.8	255.2	229.9	663.8	34.6%	17.1%	38.5%
2015	Apr	110.1	248.2	283.7	663.7	42.7%	16.6%	37.4%
2015	May	121.8	265.1	266.7	663.6	40.2%	18.4%	39.9%
2015	Jun	158.9	283.1	321.2	663.7	48.4%	23.9%	42.6%
2015	Jul	161.4	278.3	314.0	663.8	47.3%	24.3%	41.9%
2015	Aug	159.5	276.0	300.7	663.6	45.3%	24.0%	41.6%
2015	Sep	155.4	289.2	286.0	663.5	43.1%	23.4%	43.6%
2015	Oct	147.1	299.0	292.8	663.4	44.1%	22.2%	45.1%
2015	Nov	164.9	302.1	298.1	664.2	44.9%	24.8%	45.5%
2015	Dec	144.6	317.2	260.7	663.9	39.3%	21.8%	47.8%
2015	Average	138.8	275.8	283.4	663.7	42.7%	20.9%	41.6%

Year	Month	RegD Self Scheduled Effective MW	RegD Effective MW	Total Self Scheduled Effective MW	Total Effective MW	Percent of Total Self Scheduled	RegD Percent of Total Self Scheduled	RegD Percent of Total Effective MW
2016	Jan	187.7	335.9	295.3	663.8	44.5%	28.3%	50.6%
2016	Feb	179.9	339.0	274.6	663.6	41.4%	27.1%	51.1%
2016	Mar	182.6	340.8	280.1	663.7	42.2%	27.5%	51.3%
2016	Apr	182.2	339.5	287.0	663.5	43.3%	27.5%	51.2%
2016	May	183.9	341.1	301.5	663.5	45.4%	27.7%	51.4%
2016	Jun	178.8	340.5	302.4	663.6	45.6%	26.9%	51.3%
2016	Jul	165.2	337.5	273.3	663.5	41.2%	24.9%	50.9%
2016	Aug	165.8	338.5	283.2	663.5	42.7%	25.0%	51.0%
2016	Sep	160.9	341.4	279.9	663.6	42.2%	24.2%	51.4%
2016	Oct	168.6	340.0	283.0	663.5	42.6%	25.4%	51.2%
2016	Nov	156.2	338.0	259.8	664.3	39.1%	23.5%	50.9%
2016	Dec	162.2	342.7	274.7	663.6	41.4%	24.4%	51.6%
2016	Average	172.8	339.6	282.9	663.7	42.6%	26.0%	51.2%
2017	Jan	187.1	334.9	318.0	673.9	47.2%	27.8%	49.7%
2017	Feb	192.7	337.8	296.6	674.2	44.0%	28.6%	50.1%
2017	Mar	172.2	315.3	297.5	638.5	46.6%	27.0%	49.4%
2017	Apr	159.9	306.4	255.0	639.6	39.9%	25.0%	47.9%
2017	May	167.6	297.0	265.7	639.7	41.5%	26.2%	46.4%
2017	Jun	178.6	315.6	284.3	696.9	40.8%	25.6%	45.3%
2017	Jul	171.9	310.3	290.0	703.1	41.3%	24.5%	44.1%
2017	Aug	176.7	314.0	286.3	700.9	40.8%	25.2%	44.8%
2017	Sep	156.9	297.8	259.0	640.4	40.4%	24.5%	46.5%
2017	Jan-Sep Average	173.7	299.0	283.6	333.9	42.5%	8.7%	47.1%

Increased self scheduled regulation lowers the requirement for cleared regulation, resulting in fewer MW cleared in the market and lower clearing prices. Of the LSEs' obligation to provide regulation in the first nine months of 2017, 54.1 percent was purchased in the PJM market, 40.2 percent was self scheduled, and 5.8 percent was purchased bilaterally (Table 10-40). Table 10-41 shows the total regulation by source including spot market regulation, self scheduled regulation, and bilateral regulation for the first nine months of each year from 2012 to 2017. Table 10-40 and Table 10-41 are based on settled (purchased) MW.

Table 10-40 Regulation sources: spot market, self scheduled, bilateral purchases: January 1, 2016 through September 30, 2017

Year	Month	Spot Market Regulation (Unadjusted MW)	Spot Market Percent of Total	Self Scheduled Regulation (Unadjusted MW)	Self Scheduled Percent of Total	Bilateral Regulation (Unadjusted MW)	Bilateral Percent of Total	Total Regulation (Unadjusted MW)
2016	Jan	197,085.6	47.8%	193,843.1	47.0%	21,671.0	5.3%	412,599.7
2016	Feb	190,668.7	49.7%	173,704.0	45.2%	19,546.0	5.1%	383,918.8
2016	Mar	196,173.9	49.4%	178,691.7	45.0%	22,017.0	5.5%	396,882.6
2016	Apr	192,872.3	50.1%	173,923.2	45.2%	18,058.0	4.7%	384,853.5
2016	May	185,673.4	47.4%	185,434.2	47.4%	20,221.0	5.2%	391,328.7
2016	Jun	177,041.1	46.7%	180,936.5	47.7%	21,295.5	5.6%	379,273.1
2016	Jul	176,073.5	45.6%	168,116.9	43.5%	42,233.0	10.9%	386,423.4
2016	Aug	187,641.6	48.6%	172,116.0	44.6%	26,299.5	6.8%	386,057.1
2016	Sep	169,565.3	45.0%	171,466.0	45.5%	35,462.5	9.4%	376,493.8
2016	Oct	190,611.4	49.0%	174,555.6	44.8%	24,074.0	6.2%	389,241.0
2016	Nov	206,016.3	55.0%	155,359.8	41.5%	13,289.5	3.5%	374,665.6
2016	Dec	191,278.5	48.9%	176,628.1	45.1%	23,642.5	6.0%	391,549.0
	Total	2,260,701.6	48.6%	2,104,775.1	45.2%	287,809.5	6.2%	4,653,286.2
2017	Jan	181,386.7	45.8%	188,924.6	47.7%	25,490.5	6.4%	395,801.8
2017	Feb	179,488.3	50.4%	154,308.8	43.3%	22,371.0	6.3%	356,168.1
2017	Mar	174,026.3	46.3%	177,638.3	47.3%	23,963.0	6.4%	375,627.5
2017	Apr	206,895.4	55.7%	145,424.6	39.1%	19,207.5	5.2%	371,527.5
2017	May	212,510.8	57.8%	139,361.6	37.9%	15,967.5	4.3%	367,839.9
2017	Jun	221,942.4	57.5%	142,537.9	36.9%	21,535.0	5.6%	386,015.3
2017	Jul	227,034.0	55.8%	152,610.9	37.5%	27,183.5	6.7%	406,828.4
2017	Aug	238,636.3	59.2%	141,754.6	35.2%	22,844.5	5.7%	403,235.5
2017	Sep	206,302.9	58.1%	130,394.2	36.7%	18,197.0	5.1%	354,894.1
	Jan-Sep	1,848,223.0	54.1%	1,372,955.6	40.2%	196,759.5	5.8%	3,417,938.1

Table 10-41 Regulation sources: January through September, 2012 through 2017

Year (Jan-Sep)	Spot Market Regulation (Unadjusted MW)	Spot Market Percent of Total	Self Scheduled Regulation (Unadjusted MW)	Self Scheduled Percent of Total	Bilateral Regulation (Unadjusted MW)	Bilateral Percent of Total	Total Regulation (Unadjusted MW)
2012	5,110,747.9	79.7%	1,122,671.9	17.5%	180,121.0	2.8%	6,413,540.8
2013	2,528,830.3	60.8%	1,478,608.5	35.5%	152,328.5	3.7%	4,159,767.3
2014	1,836,480.7	51.8%	1,543,266.0	43.5%	166,857.0	4.7%	3,546,603.7
2015	1,897,225.7	54.7%	1,380,004.7	39.8%	193,529.1	5.6%	3,470,759.5
2016	1,672,795.5	47.8%	1,598,231.6	45.7%	226,803.5	6.5%	3,497,830.6
2017	1,848,223.0	54.1%	1,372,955.6	40.2%	196,759.5	5.8%	3,417,938.1

In the first nine months of 2017, DR provided an average of 8.3 MW of regulation per hour during ramp hours (7.1 MW of regulation per hour during ramp hours in the first nine months of 2016), and an average of 7.5 MW of regulation per hour during nonramp hours (5.3 MW of regulation per hour during off peak hours in the first nine months of 2016). Generating units supplied an average of 709.9 MW of regulation per hour during ramp hours (630.7 MW of regulation per hour during ramp hours in the first nine months of 2016), and an average of 484.8 MW per hour during nonramp hours (512.8 MW of regulation per hour during nonramp hours in the first nine months of 2016).

Market Performance

Price

After regulation performance was implemented on October 1, 2012, both regulation price and regulation cost per MW were higher than they were prior to October 1, 2012, for each year until 2016 (Table 10-45). The weighted average RMCP for the first nine months of 2017 was \$15.70 per effective MW. This is a decrease of \$0.82 per MW, or 4.9 percent, from the weighted average RMCP of \$16.52 per MW in the first nine months of 2016. The decrease in the regulation clearing price was the result of a reduction

in energy prices and the related reduction in the opportunity cost component of RMCP. The increase in self supply and \$0.00 offers from RegD resources since 2016 also contributed to lower prices.

In September 2016, an issue was identified concerning the real time clearing price for five minute intervals in the regulation market. Regulation units available to set price in a given five minute interval are based on the latest five minute RT-SCED 15 minute look ahead scheduling and assignment of regulation resources. This means that at the end of an hour, pricing in 5 minute intervals starting at 00:45, 00:50, and 00:55 is based on RT-SCED scheduling information (regulation assignments) from 01:00, 01:05, and 01:10 of the following hour. In cases where units provided regulation in an hour, but are not assigned to provide regulation in the following hour, these deassigned units appeared as unavailable for purposes of determining price in the last three, 5 minute intervals of their assigned regulation hour (00:45, 00:50, and 00:55). The pricing algorithm instead used the list of resources assigned to regulation for the next hour to set the price in intervals 00:45, 00:50, and 00:55 of the current hour. The result was that the prices did not accurately reflect the units actually running in intervals 00:45, 00:50, and 00:55. In November 2016, PJM corrected this problem by forcing the pricing algorithm to use the regulation availability status of the current hour to determine which units are eligible to set the regulation price for the current hour.

Figure 10-28 shows the daily weighted average regulation market clearing price and the opportunity cost component for the marginal units in the PJM Regulation Market on a performance adjusted MW basis. This data is based on actual five minute interval operational data. As

Figure 10-28 illustrates, the opportunity cost (blue line) is the largest component of the clearing price.

Figure 10-28 PJM regulation market daily weighted average market-clearing price, marginal unit opportunity cost and offer price (Dollars per MW): January 1 through September 30, 2017

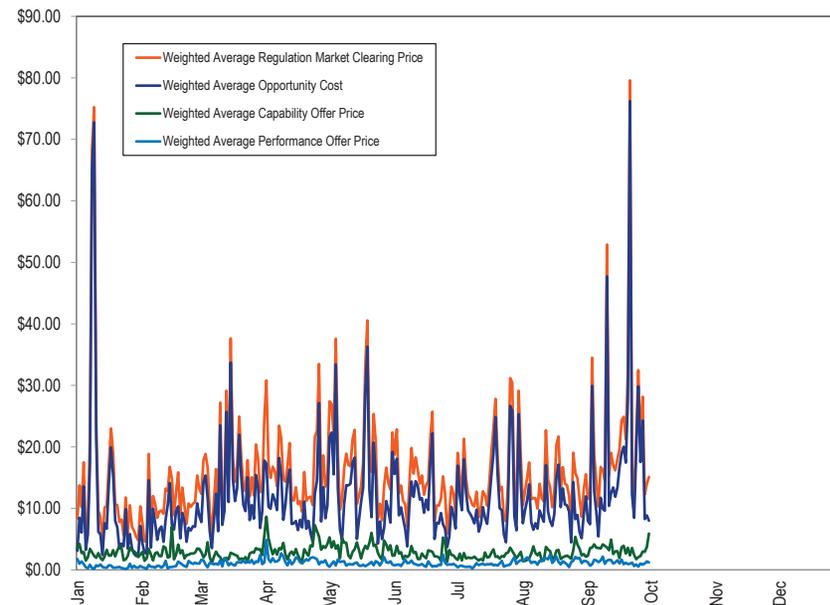


Table 10-42 shows the components of the monthly average regulation prices. NA is the unexplained portion of the total weighted average market price.

Table 10-42 PJM regulation market monthly component of price (Dollars per MW): January 1 through September 30, 2017

Month	Weighted Average Regulation Marginal Unit LOC (\$/Actual MW)	Weighted Average Regulation Marginal Unit Capability Offer (\$/Actual MW)	Weighted Average Regulation Marginal Unit Performance Offer (\$/Actual MW)	Weighted Average Regulation Market Clearing Price (\$/ Actual MW)	NA	Weighted Average Regulation Market Price from Settlements (\$/Actual MW)
Jan	\$11.77	\$2.68	\$0.59	\$15.04	\$0.95	\$14.08
Feb	\$7.49	\$2.84	\$0.75	\$11.08	(\$0.05)	\$11.12
Mar	\$12.81	\$2.50	\$1.21	\$16.52	\$0.20	\$16.32
Apr	\$10.96	\$3.65	\$1.65	\$16.26	\$0.04	\$16.21
May	\$14.22	\$3.60	\$1.08	\$18.90	\$0.05	\$18.85
Jun	\$10.31	\$2.63	\$0.98	\$13.92	\$0.08	\$13.85
Jul	\$12.52	\$2.29	\$0.89	\$15.71	\$0.05	\$15.66
Aug	\$9.79	\$2.57	\$1.49	\$13.85	\$0.15	\$13.70
Sep	\$17.63	\$3.30	\$1.21	\$22.13	\$0.15	\$21.98
Average	\$11.94	\$2.90	\$1.09	\$15.94	\$0.18	\$15.75

Monthly, total annual, and total year to date scheduled regulation MW and regulation charges, as well as monthly and monthly average regulation price and regulation cost are shown in Table 10-43. Total scheduled regulation is based on settled performance adjusted MW. The total of all regulation charges for the first nine months of 2017 was \$74.1 million, compared to \$66.4 million for the first nine months of 2016.

Table 10-43 Total regulation charges: January 1, 2016 through September 30, 2017⁷³

Year	Month	Scheduled Regulation (MW)	Total Regulation Charges (\$)	Weighted Average Regulation Market Price (\$/MW)	Cost of Regulation (\$/MW)	Price as Percent of Cost
2016	Jan	412,599.7	\$7,594,184	\$15.65	\$18.41	85.1%
2016	Feb	383,918.8	\$7,682,435	\$17.63	\$20.01	88.1%
2016	Mar	396,882.6	\$6,111,918	\$13.43	\$15.40	87.2%
2016	Apr	384,853.5	\$8,372,956	\$19.07	\$21.76	87.7%
2016	May	391,328.7	\$7,220,908	\$15.67	\$18.45	84.9%
2016	Jun	379,273.1	\$5,997,055	\$14.03	\$15.81	88.7%
2016	Jul	386,423.4	\$7,959,676	\$17.86	\$20.60	86.7%
2016	Aug	386,057.1	\$7,707,370	\$17.58	\$19.96	88.1%
2016	Sep	376,493.8	\$7,783,970	\$17.91	\$20.67	86.6%
2016	Oct	389,241.0	\$7,019,998	\$15.68	\$18.04	87.0%
2016	Nov	374,665.6	\$5,777,522	\$13.12	\$15.42	85.1%
2016	Dec	391,549.0	\$5,133,457	\$11.17	\$13.11	85.2%
2016 Annual		4,653,286.2	\$84,361,450	\$15.73	\$18.14	86.7%
2017	Jan	395,801.8	\$6,851,605	\$14.08	\$17.31	81.4%
2017	Feb	356,168.1	\$5,332,548	\$11.12	\$14.97	74.3%
2017	Mar	375,627.5	\$8,604,453	\$16.32	\$22.91	71.2%
2017	Apr	371,527.5	\$9,048,650	\$16.21	\$24.36	66.6%
2017	May	367,839.9	\$8,943,812	\$18.85	\$24.31	77.5%
2017	Jun	386,015.3	\$7,726,835	\$13.85	\$20.02	69.2%
2017	Jul	406,828.4	\$8,698,944	\$15.66	\$21.38	73.2%
2017	Aug	403,235.5	\$8,395,118	\$13.70	\$20.82	65.8%
2017	Sep	354,894.1	\$10,508,379	\$21.98	\$29.61	74.2%
Jan-Sep		3,417,938.1	\$74,110,345	\$15.75	\$21.74	72.6%

The capability, performance, and opportunity cost components of the cost of regulation are shown in Table 10-44. Total scheduled regulation is based on settled performance adjusted MW. In the first nine months of 2017, the monthly average total cost of regulation was \$21.74, 14.4 percent higher than \$19.01 in the first nine months of 2016. In the first nine months of 2017, the monthly average capability component cost of regulation was \$13.30, 12.5 percent lower than \$15.19 in the first nine months of 2016. In the first nine months of 2017, the monthly average performance component cost of regulation was \$6.79, 195.9 percent higher than \$2.30 in the first nine months of 2016

⁷³ Weighted average market clearing prices presented here are taken from PJM settlements data, and differ from the values reported in Table 10-42, which are from five minute interval operational data. The MMU is investigating the cause of the discrepancies with PJM.

Table 10-44 Components of regulation cost, January 1, 2016, through September 30, 2017

Year	Month	Scheduled Regulation (MW)	Cost of Regulation Capability (\$/MW)	Cost of Regulation Performance (\$/MW)	Opportunity Cost (\$/MW)	Total Cost (\$/MW)
2016	Jan	412,599.7	\$14.49	\$1.97	\$1.95	\$18.41
	Feb	383,918.8	\$16.00	\$2.61	\$1.40	\$20.01
	Mar	396,882.6	\$12.01	\$2.25	\$1.14	\$15.40
	Apr	384,853.5	\$17.38	\$2.70	\$1.67	\$21.76
	May	391,328.7	\$13.56	\$3.50	\$1.39	\$18.45
	Jun	379,273.1	\$13.33	\$1.38	\$1.10	\$15.81
	Jul	386,423.4	\$16.52	\$2.27	\$1.80	\$20.60
	Aug	386,057.1	\$16.74	\$1.66	\$1.56	\$19.96
	Sep	376,493.8	\$16.68	\$2.32	\$1.68	\$20.67
	Oct	389,241.0	\$14.11	\$2.73	\$1.19	\$18.04
	Nov	374,665.6	\$11.28	\$3.11	\$1.03	\$15.42
	Dec	391,549.0	\$10.14	\$1.73	\$1.25	\$13.11
Yearly		4,653,286.2	\$14.35	\$2.35	\$1.43	\$18.14
Jan-Sep		3,497,830.6	\$15.19	\$2.30	\$1.52	\$19.01
2017	Jan	395,801.8	\$13.19	\$2.43	\$1.69	\$17.31
	Feb	356,168.1	\$9.91	\$3.68	\$1.38	\$14.97
	Mar	375,627.5	\$13.93	\$6.99	\$1.98	\$22.91
	Apr	371,527.5	\$12.94	\$9.78	\$1.64	\$24.36
	May	367,839.9	\$16.77	\$5.78	\$1.77	\$24.31
	Jun	386,015.3	\$10.81	\$7.95	\$1.26	\$20.02
	Jul	406,828.4	\$13.19	\$6.37	\$1.82	\$21.38
	Aug	403,235.5	\$10.10	\$9.34	\$1.38	\$20.82
	Sep	354,894.1	\$18.83	\$8.81	\$1.96	\$29.61
Jan-Sep		3,417,938.1	\$13.30	\$6.79	\$1.65	\$21.74

Table 10-45 provides a comparison of the average price and cost for PJM regulation. The ratio of regulation market price to the actual cost of regulation in the first nine months of 2017 was 72.6 percent, a 14.4 percent decrease from 87.0 percent in the first nine months of 2016.

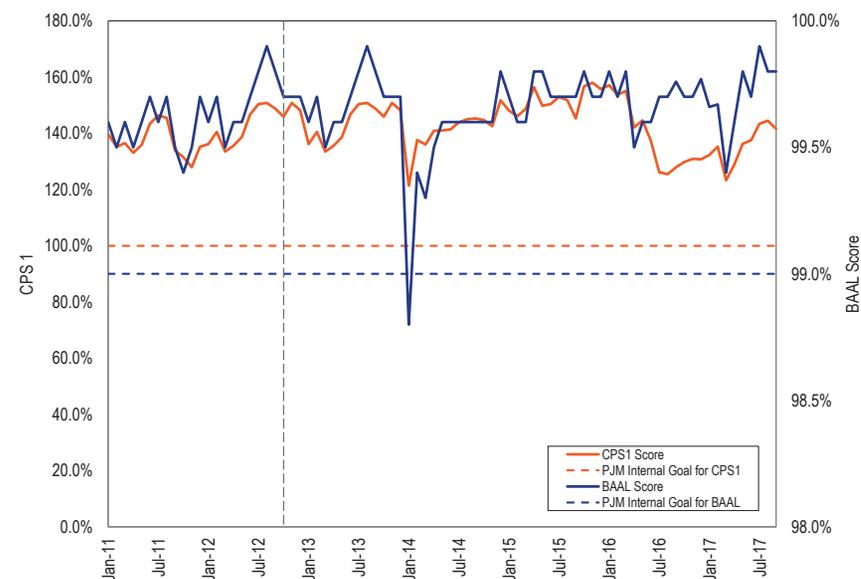
Table 10-45 Comparison of average price and cost for PJM regulation: January through September, 2009 through 2017

Year (Jan-Sep)	Weighted Regulation Market Price	Weighted Regulation Market Cost	Regulation Price as Percent Cost
2009	\$24.94	\$32.28	77.3%
2010	\$19.47	\$34.54	56.4%
2011	\$17.04	\$32.70	52.1%
2012	\$15.16	\$21.07	71.9%
2013	\$33.29	\$38.49	86.5%
2014	\$50.19	\$60.94	82.4%
2015	\$35.56	\$43.00	82.7%
2016	\$16.52	\$18.99	87.0%
2017	\$15.70	\$21.68	72.4%

Performance Standards

PJM's performance as measured by CPS1 and BAAL standards is shown in Figure 10-29 for every month from January 2011 through June 2017 with the dashed vertical line marking the date (October 1, 2012) of the implementation of the Performance Based Regulation Market design.⁷⁴ The horizontal dashed lines represent PJM internal goals for CPS1 and BAAL performance. While PJM did not meet its internal goal for BAAL performance in January 2014, PJM remained in compliance with the applicable NERC standards.

Figure 10-29 PJM monthly CPS1 and BAAL performance: January 1, 2011 through September 30, 2017



Black Start Service

Black start service is necessary to ensure the reliable restoration of the grid following a blackout. Black start service is the ability of a generating unit to start without an outside electrical supply, or the demonstrated ability of a generating unit to automatically remain operating when disconnected from the grid.

PJM does not have a market to provide black start service, but compensates black start resource owners on the basis of an incentive rate or for the costs associated with providing this service.

PJM defines required black start capability zonally, while recognizing that the most effective way to provide black start service may be across zones,

⁷⁴ See 2016 State of the Market Report for PJM, Appendix F: Ancillary Services.

and ensures the availability of black start service by charging transmission customers according to their zonal load ratio share and compensating black start unit owners. Substantial rule changes to the black start restoration and procurement strategy were implemented on February 28, 2013, following a stakeholder process in the System Restoration Strategy Task Force (SRSTF) and the Markets and Reliability Committee (MRC) that approved the PJM and MMU joint proposal for system restoration. These changes gave PJM substantial flexibility in procuring black start resources and made PJM responsible for black start resource selection.

On July 1, 2013, PJM initiated its first RTO-wide request for proposals (RFP) under the new rules.⁷⁵ ⁷⁶ PJM identified zones with black start shortages and began awarding contracts on January 14, 2014. PJM and the MMU coordinated closely during the selection process.

PJM issued two additional RFPs in 2014. On April 11, 2014, PJM sought additional black start in the AEP Zone and one proposal was selected. On November 24, 2014, PJM sought additional black start in northeastern Ohio and western Pennsylvania, but no proposals were selected because they did not meet the bid requirements. On July 28, 2015, PJM issued an Incremental Request for Proposals, for northeastern Ohio and western Pennsylvania together. On August 8, 2016, PJM made one award which will cover both areas.

Black start payments are nontransparent payments made to units by load to maintain adequate reliability to restart the system in case of a blackout. Current rules appear to prevent publishing detailed data regarding these black start resources, hindering transparency and competitive replacement RFPs. In 2014, zonal reporting of black start payments was implemented, partially fulfilling the recommendation.

Total black start charges are the sum of black start revenue requirement charges and black start operating reserve charges. Black start revenue requirements for black start units consist of fixed black start service costs, variable black start

service costs, training costs, fuel storage costs, and an incentive factor. Section 18 of Schedule 6A of the OATT specifies how to calculate each component of the revenue requirement formula. Black start resources can choose to recover fixed costs under a formula rate based on zonal Net CONE and unit ICAP rating, a cost recovery rate based on incremental black start NERC-CIP compliance capital costs, or a cost recovery rate based on incremental black start equipment capital costs. Black start operating reserve charges are paid to units scheduled in the Day-Ahead Energy Market or committed in real time to provide black start service under the automatic load rejection (ALR) option or for black start testing. Total black start charges are allocated monthly to PJM customers proportionally to their zone and nonzone peak transmission use and point to point transmission reservations.⁷⁷

In the first nine months of 2017, total black start charges were \$46.9 million, a decrease of \$4.78 million (-9.2 percent) from the same period of 2016. Operating reserve charges for black start service increased from \$0.180 million in 2016 to \$0.182 million in 2017. Table 10-46 shows total revenue requirement charges from 2010 through 2017. Prior to December 2012, PJM did not define a black start operating reserve category. As a result of the changes in the black start operating reserve category, 2013 was the first full year in which operating reserve charges were allocated to black start, resulting in the increase in operating reserve charges. Starting in 2014, the ALR black start units began to be replaced with new black start units, resulting in a decline in operating reserve charges. As of April 2015 all ALR units had been replaced and no longer provided black start service. Prior to December 2012, operating reserve charges resulting from units providing black start service were allocated as operating reserve charges for reliability in the western region.

⁷⁵ See PJM, "RTO-Wide Five-Year Selection Process Request for Proposal for Black Start Service," (July 1, 2013).

⁷⁶ RFPs issued can be found on the PJM website. See PJM. <<http://www.pjm.com/markets-and-operations/ancillary-services.aspx>>.

⁷⁷ OATT Schedule 6A (paras. 25, 26 and 27 outline how charges are to be applied).

Table 10-46 Black start revenue requirement charges: January 1 through September 30, 2010 through 2017

Year	Revenue Requirement Charges	Operating Reserves Charges	Total
2010	\$7,510,928	\$0	\$7,510,928
2011	\$8,654,215	\$0	\$8,654,215
2012	\$11,490,631	\$0	\$11,490,631
2013	\$13,989,520	\$61,518,802	\$75,508,322
2014	\$15,815,883	\$22,785,301	\$38,601,184
2015	\$34,142,507	\$5,069,722	\$39,212,229
2016	\$45,605,755	\$180,265	\$45,786,021
2017	\$46,767,195	\$181,926	\$46,949,121

Black start zonal charges in the first nine months of 2017 ranged from \$0.05 per MW-day in the DLCO Zone (total charges were \$33,750) to \$4.27 per MW-day in the PENELEC Zone (total charges were \$3,016,578). For each zone, Table 10-47 shows black start charges, the sum of monthly zonal peak loads multiplied by the number of days of the month in which the peak load occurred, and black start rates (calculated as charges per MW-day). For black start service, point-to-point transmission customers paid on average \$1.18 per MW of reserve capacity during the first nine months of 2017.

Table 10-47 Black start zonal charges for network transmission use: January 1 through September 30, 2016 and 2017

Zone	Jan-Sep 2016						Jan-Sep 2017					
	Revenue Requirement Charges	Operating Reserve Charges	Total Charges	Peak Load (MW)	Days	Black Start Rate (\$/MW-day)	Revenue Requirement Charges	Operating Reserve Charges	Total Charges	Peak Load (MW)	Days	Black Start Rate (\$/MW-day)
AECO	\$1,745,007	\$9,224	\$1,754,230	2,553	274	\$2.51	\$1,769,087	\$5,349	\$1,774,436	2,380	273	\$2.73
AEP	\$11,938,798	\$22,540	\$11,961,338	24,725	274	\$1.77	\$11,605,846	\$36,723	\$11,642,569	20,005	273	\$2.13
AP	\$3,024,958	\$2,304	\$3,027,262	9,594	274	\$1.15	\$2,571,139	\$1,394	\$2,572,532	7,759	273	\$1.21
ATSI	\$2,258,046	\$1,974	\$2,260,021	12,356	274	\$0.67	\$2,013,123	\$0	\$2,013,123	11,351	273	\$0.65
BGE	\$5,512,091	\$3,069	\$5,515,161	6,712	274	\$3.00	\$3,540,226	\$3,310	\$3,543,536	5,876	273	\$2.21
ComEd	\$3,633,698	\$24,735	\$3,658,432	20,162	274	\$0.66	\$3,243,260	\$15,010	\$3,258,270	18,848	273	\$0.63
DAY	\$177,715	\$8,784	\$186,499	3,281	274	\$0.21	\$166,287	\$9,966	\$176,253	2,974	273	\$0.22
DEOK	\$865,047	\$586	\$865,633	5,123	274	\$0.62	\$693,849	\$2,057	\$695,906	4,725	273	\$0.54
Dominion	\$2,658,236	\$20,361	\$2,678,597	21,651	274	\$0.45	\$2,862,391	\$28,576	\$2,890,967	17,391	273	\$0.61
DPL	\$1,217,655	\$7,978	\$1,225,632	4,114	274	\$1.09	\$1,515,092	\$5,393	\$1,520,485	3,673	273	\$1.52
DLCO	\$38,048	\$0	\$38,048	2,804	274	\$0.05	\$33,750	\$0	\$33,750	2,489	273	\$0.05
EKPC	\$281,004	\$0	\$281,004	3,490	274	\$0.29	\$274,344	\$0	\$274,344	2,562	273	\$0.39
JCPL	\$5,131,573	\$0	\$5,131,573	5,818	274	\$3.22	\$4,536,914	\$9,358	\$4,546,272	5,300	273	\$3.14
Met-Ed	\$446,028	\$44,848	\$490,876	2,798	274	\$0.64	\$387,055	\$37,512	\$424,566	2,624	273	\$0.59
PECO	\$1,193,965	\$1,253	\$1,195,218	8,094	274	\$0.54	\$1,071,896	\$1,777	\$1,073,673	7,445	273	\$0.53
PENELEC	\$3,402,344	\$3,372	\$3,405,716	3,024	274	\$4.11	\$3,014,955	\$1,623	\$3,016,578	2,590	273	\$4.27
Pepco	\$1,899,415	\$19,951	\$1,919,366	6,268	274	\$1.12	\$1,677,856	\$12,426	\$1,690,281	5,860	273	\$1.06
PPL	\$845,429	\$0	\$845,429	8,055	274	\$0.38	\$802,979	\$0	\$802,979	6,253	273	\$0.47
PSEG	\$3,160,022	\$2,303	\$3,162,325	9,595	274	\$1.20	\$2,781,080	\$2,805	\$2,783,885	8,723	273	\$1.17
RECO	\$0	\$0	\$0	NA/	274	NA	\$0	\$0	\$0	NA	273	NA
(Imp/Exp/Wheels)	\$2,115,484	\$6,984	\$2,122,468	6,829	274	\$1.13	\$2,206,067	\$8,649	\$2,214,716	6,884	273	\$1.18
Total	\$51,544,562	\$180,265	\$51,724,827	167,047		\$1.13	\$46,767,195	\$181,926	\$46,949,121	145,710		\$1.18

Figure 10-30 Oil tank MTSL not changed from addition of black start generator

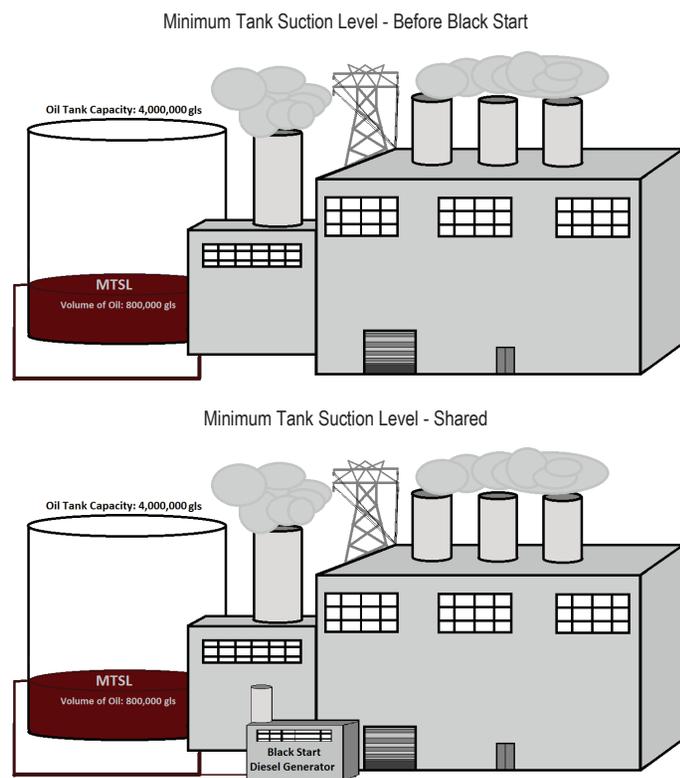


Figure 10-31 Oil tank black start MTSL portion

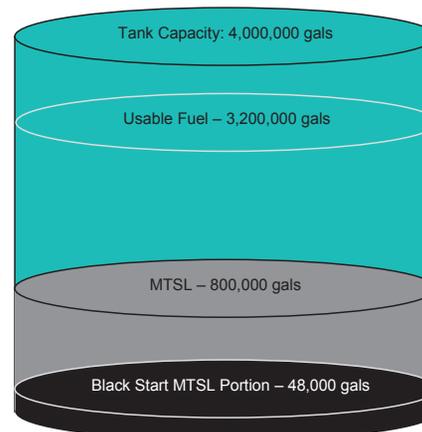


Table 10-48 provides a revenue requirement estimate by zone for the 2016/2017, 2017/2018 and 2018/2019 delivery years.⁷⁸ Revenue requirement values are rounded up to the nearest \$50,000 to reflect uncertainty about future black start revenue requirement costs. These values are illustrative only. The estimates are based on the best available data including current black start unit revenue requirements, expected black start unit termination and in-service dates, and owner provided cost estimates of incoming black start units, at the time of publication and may change significantly.

NERC – CIP

Currently, no black start units have requested new or additional black start NERC – CIP Capital Costs.⁷⁹

⁷⁸ The System Restoration Strategy Task Force requested that the MMU provide estimated black start revenue requirements.

⁷⁹ OATT Schedule 6A para. 21. "The Market Monitoring Unit shall include a Black Start Service summary in its annual State of the Market report which will set forth a descriptive summary of the new or additional Black Start NERC-CIP Capital costs requested by Black Start Units, and include a list of the types of capital costs requested and the overall cost of such capital improvements on an aggregate basis such that no data is attributable to an individual Black Start Unit."

Minimum Tank Suction Level (MTSL)

Some units that participate in the PJM Energy Market have oil tanks. All oil tanks at PJM units have a MTSL regardless of whether the units provide black start service (unless they use direct current pumps). The MTSL is the amount of fuel at the bottom of a tank which cannot be recovered for use.

PJM has required that customers pay black start unit owners carrying cost recovery for one hundred percent of the MTSL for tanks which are shared with units in the energy market. These tanks were sized to meet the needs of the generating units, which use significantly more fuel than the black start units. In some instances the MTSL is greater than the total amount of fuel that the black start unit needs to operate to meet its black start obligations. When a black start diesel is added at the site of an oil-fired generating unit, the additional MTSL is zero.

Figure 10-30 illustrates how the size of the oil tank does not change with the addition of the black start unit. Figure 10-31 shows how the MTSL could be proportionally divided between the generator and the black start unit. The tank is 4,000,000 gallons with an MTSL of 800,000 gallons leaving 3,200,000 gallons of usable fuel. The black start unit running 16 hours using 12,000 gallons per hour would need a total of 192,000 gallons, or six percent of the total usable fuel. Assigning six percent of the MTSL (800,000 gallons) would yield 48,000 gallons which could be assigned to the black start proportion for the MTSL.

The MMU recommends that for oil tanks which are shared with other resources that only a proportionate share of the MTSL be allocated for black start units. The MMU further recommends that the PJM tariff be updated to clearly state how the MTSL will be calculated for black start units sharing oil tanks.

Table 10-48 Black start zonal revenue requirement estimate: 2017/2018 through 2019/2020 delivery years

Zone	2017 / 2018 Revenue Requirement	2018 / 2019 Revenue Requirement	2019 / 2020 Revenue Requirement
AECO	\$2,900,000	\$2,850,000	\$2,850,000
AEP	\$19,000,000	\$18,750,000	\$18,800,000
AP	\$4,100,000	\$4,100,000	\$4,100,000
ATSI	\$3,150,000	\$3,150,000	\$3,150,000
BGE	\$2,050,000	\$500,000	\$450,000
ComEd	\$5,200,000	\$4,400,000	\$4,550,000
DAY	\$300,000	\$200,000	\$250,000
DEOK	\$1,100,000	\$400,000	\$400,000
DLCO	\$100,000	\$1,150,000	\$2,250,000
Dominion	\$4,450,000	\$3,650,000	\$3,650,000
DPL	\$2,400,000	\$2,300,000	\$2,300,000
EKPC	\$450,000	\$350,000	\$350,000
JCPL	\$7,200,000	\$7,100,000	\$7,100,000
Met-Ed	\$700,000	\$550,000	\$550,000
PECO	\$1,800,000	\$1,450,000	\$1,450,000
PENELEC	\$4,800,000	\$4,650,000	\$4,650,000
Pepco	\$2,650,000	\$2,600,000	\$2,600,000
PPL	\$1,300,000	\$1,200,000	\$1,200,000
PSEG	\$4,350,000	\$4,300,000	\$4,300,000
RECO	\$0	\$0	\$0
Total	\$68,000,000	\$63,650,000	\$64,950,000

Reactive Service

Suppliers of reactive power are compensated separately for reactive capability, day-ahead operating reserves, and for real-time lost opportunity costs. Compensation for reactive capability must be approved by FERC per Schedule 2 of the OATT. Generators may obtain FERC approval to recover a share of units' fixed costs by calculating a reactive revenue requirement, the reactive capability rate, and to collect such rates from PJM transmission customers.⁸⁰

Any reactive service provided operationally that involves a MW reduction outside of its normal operating range or a startup for reactive power will be logged by PJM operators and awarded uplift or LOC credits.

⁸⁰ See PJM, "Manual 27: Open Access Transmission Tariff Accounting," Rev. 87, (February 1, 2017) at 3.

Reactive Service, Reactive Supply and Voltage Control are provided by generation and other sources of reactive power (such as static VAR compensators and capacitor banks).⁸¹ While a fixed requirement for reactive power is not established, reactive power helps maintain appropriate voltages on the transmission system.

Total reactive capability charges are the sum of FERC approved reactive supply revenue requirements which are posted monthly on the PJM website.⁸² Zonal reactive supply revenue requirement charges are allocated monthly to PJM customers proportionally to their zone and to any nonzone (i.e. outside of the PJM Region) peak transmission use and point to point transmission reservations.⁸³

In 2016, the FERC began to reexamine its policies on reactive compensation.⁸⁴ Changes in the default capabilities of generators, disparities between nameplate values and tested values and questions about the way the allocation factors have been calculated have called continued reliance on the *AEP* method into question.⁸⁵ The continued use of fleet rates rather than unit specific rates is also an issue.

Recommended Market Approach to Reactive Costs

The best approach for recovering reactive capability costs is through markets where markets are available as they are in PJM and some other RTOs/ISOs. The best approach for recovering reactive capability costs in PJM is through the capacity market. The capacity market already incorporates reactive costs and reactive revenues. The treatment of reactive costs in the PJM market needs to be modified so that the capacity market incorporates reactive costs and revenues in a more efficient manner.

81 OATT Schedule 2.

82 See PJM. Markets & Operations: Billing, Settlements & Credit, "Reactive Revenue Requirements," <<http://www.pjm.com/~media/markets-ops/settlements/reactive-revenue-requirements-table-may-2016.ashx>> (June 8, 2016).

83 OATT Schedule 2.

84 See *Reactive Supply Compensation in Markets Operated by Regional Transmission Organizations and Independent System Operators*, Docket No. AD16-17-000 (March 17, 2016) (Notice of Workshop).

85 See 88 FERC ¶ 61,141 (1999).

Reactive capability is an integral part of all generating units; no generating unit is built without reactive capability.⁸⁶ There is no reason that the fixed costs of reactive capability either can be or should be separated from the total fixed costs of a generating unit. There is no reason that reactive capability should be compensated outside the markets when the units participate in organized markets. Reactive capability is a precondition for participating in organized markets. Resources must invest in the equipment needed to have minimum reactive capability as a condition of receiving interconnection service from PJM and other markets.⁸⁷ The Commission has recently extended the interconnection service requirement to have reactive capability to wind and solar units, which previously had been exempt.⁸⁸ Reactive capability is a requirement for participating in organized markets and is therefore appropriately treated as part of the gross Cost of New Entry in organized markets.

PJM requires a power factor of at least 0.95 leading to 0.90 lagging for synchronous units and at least 0.95 leading to 0.95 lagging for nonsynchronous units.⁸⁹ The regulations specify a minimum power factor range of 0.95 leading and 0.95 lagging power factor unless the market operators' rules specify otherwise.⁹⁰

There are two ways to address the cost of reactive in the PJM market design.

Under the current capacity market rules, the gross costs of the entire plant, including any reactive costs, are included in the gross Cost of New Entry (CONE) and the revenues from reactive service capability rates are an offset

86 See *Reactive Power Requirements for Non-Synchronous Generation*, Order No. 827, 155 FERC ¶ 61,277 at P 9 (2016) ("[T]he equipment needed for a wind generator to provide reactive power has become more commercially available and less costly, such that the cost of installing equipment that is capable of providing reactive power is comparable to the costs of a traditional generator.")

87 See 18 CFR § 35.28(f)(1); *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, FERC Stats. & Regs. ¶ 31,146, Appendix G (Large Generator Interconnection Agreement (LGIA)), *order on reh'g*, Order No. 2003-A, FERC Stats. & Regs. ¶ 31,160, *order on reh'g*, Order No. 2003-B, FERC Stats. & Regs. ¶ 31,171 (2004), *order on reh'g*, Order No. 2003-C, FERC Stats. & Regs. ¶ 31,190 (2005), *aff'd sub nom. Nat'l Ass'n of Regulatory Util. Comm'rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007), *cert. denied*, 552 U.S. 1230 (2008); *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180, Attachment F (Small Generator Interconnection Agreement), *order on reh'g*, Order No. 2006-A, FERC Stats. & Regs. ¶ 31,196 (2005), *order granting clarification*, Order No. 2006-B, FERC Stats. & Regs. ¶ 31,221 (2006).

88 *Reactive Power Requirements for Non-Synchronous Generation*, Order No. 827, 155 FERC ¶ 61,277 (2016); see also 151 FERC ¶ 61,097 at P 28 (2015).

89 See OATT Attachment O Appendix 2 § 4.7.

90 See LGIA Article 9.6.1 ("Interconnection Customer shall design the Large Generating Facility to maintain a composite power delivery at continuous rated power output at the Point of Interconnection at a power factor within the range of 0.95 leading to 0.95 lagging, unless Transmission Provider has established different requirements that apply to all generators in the Control Area on a comparable basis.")

to the gross CONE. The result is that, conceptually, the cost of reactive is not part of net CONE.⁹¹ This is logically consistent with the separate collection of reactive costs through a cost of service rate in that there is no double counting if the revenue offset is done accurately. Under this approach there is a separate collection of reactive capability costs. This approach also requires that any capacity resource calculating unit specific net revenues must include the cost of service reactive revenues in the calculation.

An alternative approach to the current treatment of reactive costs in the capacity market would be to include the gross costs of the entire plant including any reactive costs in the gross Cost of New Entry (CONE) but to calculate net CONE without a reactive revenue offset for reactive service capability rates. The result of this approach would be that the cost of reactive is part of net CONE. This is logically consistent with the elimination of the separate collection of reactive costs through a cost of service rate in that there is no double counting if done accurately. Under this approach there would be no separate collection of reactive capability costs.

PJM currently uses the first approach. There is no reason that PJM could not easily implement the second approach.

The second approach is preferable. The second approach relies on competitive markets to provide incentives to provide energy, both real and reactive, at the lowest possible cost. The second approach provides a consistent and nondiscriminatory approach to compensation, avoiding reliance on a large number of costly and sporadic ratemaking proceedings. The second approach does not require the use of arbitrary, approximate and generally inaccurate allocators to determine the cost of providing reactive. The second approach does not require the use of estimated, average and inaccurate net reactive revenue offsets to calculate Net CONE. It is critical in the PJM Capacity Market that Net CONE be as accurate as possible. Only the second approach assures this.

Units are compensated for reactive capability costs under the second approach. **But the compensation is based on the outcome of a competitive capacity**

⁹¹ See OATT Attachment DD § 5.10(a)(iv).

market rather than based on current or historical cost of service filings for units or fleets of units.

The first approach, although internally logically consistent, relies on unnecessary and inaccurate approximations. The reactive allocator is such an approximation. The reactive revenue offset is an inaccurate estimate based on historical data from reactive revenue requirement filings. The reactive revenues used in the net CONE calculation are based on an average of reactive filings over the three years from 2005 through 2007 and therefore do not reflect even the allocated reactive costs and revenues for a new unit, as would be required to be consistent with the CONE logic.⁹² To the extent that the reactive portion of the Net Energy and Ancillary Services Offset is inaccurate, the net CONE is inaccurate.

The reactive revenue offset is set equal to \$ 2,199/MW-year in the OATT.⁹³ This figure is the average annual reactive revenue for combustion turbines from 2005 through 2007, based on the actual costs reported to the Commission in reactive service filings of CTs, as developed by the MMU.

The Net Cost of New Entry is a key parameter in the PJM Capacity Market as it affects the location of the VRR or demand curve and thus has a direct impact on capacity market prices.⁹⁴

If revenues for reactive capacity were removed from the Net Energy and Ancillary Services Revenue Offset, then the fixed costs for investment in reactive capability would be recoverable through the capacity market. By employing a simple and direct approach using CONE with no offset, the rules for cost of service compensation included in Schedule 2 could be eliminated and the requirement for cost of service filings would be eliminated.

⁹² OATT Attachment DD § 5.10(a)(v)(A) ("The Office of the Interconnection shall determine the Net Energy and Ancillary Services Revenue Offset each year for the PJM Region as (A) the annual average of the revenues that would have been received by the Reference Resource from the PJM energy markets during a period of three consecutive calendar years preceding the time of the determination, based on (1) the heat rate and other characteristics of such Reference Resource; (2) fuel prices reported during such period at an appropriate pricing point for the PJM Region with a fuel transmission adder appropriate for such region, as set forth in the PJM Manuals, assumed variable operation and maintenance expenses for such resource of \$6.47 per MWh, and actual PJM hourly average Locational Marginal Prices recorded in the PJM Region during such period; and (3) an assumption that the Reference Resource would be dispatched for both the Day-Ahead and Real-Time Energy Markets on a Peak-Hour Dispatch basis; plus (B) ancillary service revenues of \$2,199 per MW-year.")

⁹³ *Id.*

⁹⁴ *Id.*

As a result of the nature of reactive filings, it is not possible to identify the reactive capability revenues for all individual units that receive reactive capability revenues. As a result, the offer caps in the capacity market are not as accurate as they should be.

Relying on capacity markets instead of cost of service allocations would enhance competition and efficient pricing.

Actual experience with the cost of service approach suggests that customers would be better off under a competition based approach. The Commission's recent investigations into particular rates raises questions about the accuracy and basis of rates currently charged for reactive capability.

Cost of service ratemaking creates unnecessary monitoring difficulties. Because service providers do not have to file rates periodically, suppliers have no incentive to adjust reactive capability rates except when they increase. Suppliers have direct access to information about the costs for their own units. The Commission and other parties do not have such access. When rates are established on a fleet basis or result from a black box settlement, the ability of parties to review and challenge rates is further reduced.

The current FERC review provides an excellent opportunity to discard an anachronistic cost of service approach that has not been working well and that is inconsistent with markets and is unnecessary in organized markets.⁹⁵ Increased reliance on markets for the recovery of reactive capability costs would promote efficiency and consistency. Customers, market administrators and regulators will be better served by a simpler and more effective competition based approach.

The MMU recommends that separate payments for reactive capability be eliminated and the cost of reactive capability be recovered in the capacity market.

⁹⁵ See FERC Docket No. AD16-17-000.

Improvements to Current Approach

If OATT Schedule 2 reactive capability payments are not eliminated, then the MMU recommends, at a minimum, that steps be taken to ensure that payments are based on capability that is measured in tests performed by PJM or demonstrated in market data showing actual reactive output and based on capability levels that are useful to PJM system operators to maintain system stability. FERC has initiated a number of investigations into the basis for reactive rates, and the MMU has intervened in and is participating in those proceedings.⁹⁶

Under the *AEP* method, units must establish their MVAR rating based on “the capability of the generators to produce VAr.”⁹⁷ Typically this has meant reliance on manufacturers' specified nameplate power factor.⁹⁸ More recently, the Commission has, in the *Wabash* Orders, required that “reactive power revenue requirement filings must include reactive power test reports.”⁹⁹ Noting a difference between tested reactive MVAR ratings and nameplate MVAR ratings, the Commission has, in a number of cases, set the issue of MVAR rating degradation for hearing.¹⁰⁰

The Commission has identified a significant issue. Tests are essential to “evaluate and analyze” proposed reactive revenue requirements.¹⁰¹ The MVAR rating has a significant influence on the level of the requirements and should accurately reflect the MVAR capability actually available to maintain reliability.

There is no reason to use the nameplate MVAR rating to develop a reactive allocation and there is no basis in the *AEP* method for reliance on the nameplate MVAR rating. Nameplate reactive power ratings are generally higher than the actual ratings as defined by the PJM mandated tests of capability because

⁹⁶ See e.g., FERC Dockets Nos. EL16-32, EL16-44, EL16-51, EL16-54, EL16-65, EL16-66, EL16-79, EL16-89, EL16-90, EL16-98, EL16-72, EL16-100, EL16-103, EL16-118, EL16-1004, ER16-1456, ER16-2217, EL17-19, EL17-38, EL17-39, EL17-49, ER17-259 and ER17-801.

⁹⁷ *AEP* *mimeo* at 31.

⁹⁸ See, e.g., *id.*

⁹⁹ 154 FERC ¶ 61,246 at P 28 (2016); see also 154 FERC ¶ 61,246 at P 29 (*Wabash* Orders).

¹⁰⁰ See, e.g., *Talen Energy Marketing, LLC*, 154 FERC ¶ 61,087 at P 10 (2016) (“The Informational Filing contains information that raises concerns about the justness and reasonableness of Ironwood's reactive power rate, including, but not limited to, the degradation of the Facility's current MVAR capability as compared with the MVAR capability that was originally used to calculate the revenue requirement for Reactive Service included in Ironwood's reactive power rate.”).

¹⁰¹ 154 FERC ¶ 61,246 at P 28 (2016); see also 154 FERC ¶ 61,246 at P 29.

nameplate power ratings are generally calculated using leading and lagging power factors that are lower than are achievable when installed in a specific plant interconnected to a specific transmission network. Although this issue is characterized as degradation, the difference between pre installation nameplate ratings and post installation tested capability exists even when units are new. Testing reveals whether the tested capability changes. Reliance on tested results would address both the issue of degradation and the issue of theoretical versus actual MVAR ratings.

The logic of the *Wabash* orders should be extended to exclude manufacturers' nameplate MVAR ratings and the corresponding theoretical power factors. Nameplate MVAR ratings should not be relied upon to define the allocator used to calculate the costs of reactive capability. Current performance and testing show significant disparities between nameplate MVAR output and actual output. This is significant regardless of whether the cause is degradation of power factors or simply the difference between theoretical and tested power factors.¹⁰² PJM determined in 1999 that nameplate MVAR and power factor ratings do not reflect the value to the system operator of a unit's reactive output after it is interconnected at a specific location.¹⁰³ Only operator evaluation of reactive capability can provide a meaningful measure of reactive capability.

The information for MVAR ratings should come from data on the MVAR output provided. System operators can evaluate the usefulness and value of reactive capacity based on the actual availability and use of such capability.

Data from periodic testing for reactive capability is another approach to measuring MVAR output. Testing at relatively long intervals is not likely to be as accurate as actual market operations data, but it is more reliable than an untested and dated manufacturers' nameplate rating.

¹⁰² In response to a 1999 low voltage event, PJM performed a root cause analysis. The analysis concluded that "PJM narrowly avoided a voltage collapse" and that "if PJM had realized that the MVAR reserves that the EMS indicated were available were not realistic, other action could have been take [sic] to stabilize the system." PJM State & Member Training Dept., Slides, Reactive Reserves and Generator D-Curves at 13 (included as an Attachment) <<http://www.pjm.com/~media/training/nerc-certifications/gen-exam-materials/gof/20160104-reactive-reserves-and-d-curve.ashx>>.

¹⁰³ *Id.*, including Attachment.

The estimated capability costs also include estimated heating losses relative to MVAR output.¹⁰⁴ Heating losses are variable costs and not fixed costs and should not be included in the definition of reactive capability costs.¹⁰⁵ Heating losses can be accurately calculated for each hour of operation if each unit had an accurate, recent D-curve test. Heating losses are variable costs and should not be included in the cost of reactive capability. The production of reactive power slightly reduces the MWh output of the generator as the generator follows its D-curve. The value of this heating loss component is generally estimated based on estimated operation and associated estimated losses and estimated market prices, treated as a fixed cost, and included in the cost of reactive capability. Losses are minimal and occur during normal operations and should not be treated as a fixed cost. Losses can be better and more accurately accounted for as a variable cost based on actual unit operations and market conditions.

Reactive service is supplied during normal operation as needed and directed by PJM dispatchers. Most reactive service is provided with no impact to operational dispatch. When a need for reactive service requires that a unit's MW output be reduced outside of its normal operational range, or when a unit is started to provide reactive power, it is logged by PJM dispatchers and will be paid reactive service credits in the zone or zones where the reactive service was provided proportionally to their zone and nonzone peak transmission use and point to point transmission reservations.

Cost of service rates are established under Schedule 2 of the OATT and may cover rates for single units or a fleet of units.¹⁰⁶ Until the Commission took corrective action, fleet rates remained in place in PJM even when the actual units in the fleet changed as a result of unit retirements or sales of units.¹⁰⁷ New rules require unit owners to give notice of fleet changes in an informational filing or to file a new rate based on the remaining units, but do not yet require unit specific reactive rates.¹⁰⁸ Fleet rates should be eliminated. Compensation

¹⁰⁴ See, e.g., *id.* at P 10 n12, citing *PPL Energy Plus, LLC*, Letter Order, Docket No. ER08-1462-000 (Sept. 24, 2008); *Dynegy Midwest Generation, Inc.*, 125 FERC ¶ 61,280 at P 35 (2008).

¹⁰⁵ See Transcript, *Reactive Supply Compensation in Markets Operated by Regional Transmission System Operators Workshop*, AD16-17-000 (June 30, 2016) at 26:21–27:23.

¹⁰⁶ See, e.g., OATT Schedule 2; 114 FERC ¶ 61,318 (2006).

¹⁰⁷ See 149 FERC ¶ 61,132 (2014); 151 FERC ¶ 61,224 (2015); OATT Schedule 2.

¹⁰⁸ *Id.*

should be based on unit specific costs. Fleet rates make it almost impossible to monitor whether compensation for reactive capability is based on actual unit specific performance and costs.

To the extent that the Commission decides that PJM and other markets should continue to rely on a cost of service method to compensate reactive capability, the rules should be modified to improve the accuracy of the calculations of reactive capability cost. Rates that do not accurately reflect the cost of the service provided are not just and reasonable.

Reactive capability rate schedules must be accurate, and they must also coordinate properly with the PJM market rules. Revenues received for reactive capability are revenues for ancillary services that should be netted against avoidable costs whenever avoidable cost rate offers are submitted in RPM capacity market auctions.¹⁰⁹ Participants have not been properly including reactive revenues in capacity market offers, and the MMU has notified participants of its compliance concerns. The identification of revenues for reactive capability on a unit specific basis is necessary for the calculation of accurate avoidable cost rate offers and is needed to avoid disputes that could interfere with the orderly administration of RPM auctions. The MMU has sought to address this issue through participation in proceedings at FERC concerning reactive capability rates for PJM units.¹¹⁰

Reactive Costs

In the first nine months of 2017, total reactive charges were \$249.5 million, a 12.6 percent increase from the 2016 level of \$221.6 million.¹¹¹ Reactive service charges increased in the first nine months of 2017 to \$14.0 million from \$828.1 thousand in 2016. All \$14.0 million in 2017 were paid for reactive service provided by 31 units in 543 hours. The reason for the increase in reactive service charges from the first nine months in 2016 to 2017 is primarily due to the need to control regional voltages resulting from outages and locational loads.

¹⁰⁹ See OATT Attachment DD §§ 6.4, 6.8(d).

¹¹⁰ See, e.g., FERC Dockets Nos. EL16-44 et al.; EL16-1456; EL16-57 et al.; EL16-51 et al.; EL16-1004; EL16-32; EL16-72; EL16-66; EL16-65; EL16-54; EL16-90 et al.; EL16-103 et al.; EL16-89 et al.; EL16-98 et al.; EL16-79 et al.; EL16-80 et al.; EL16-81 et al.; EL16-82 et al.; EL16-83 et al.; EL16-2217 et al.; EL17-19; EL16-118.

¹¹¹ See 2015 State of the Market Report for PJM, Vol. 2, Section 4, "Energy Uplift."

Table 10-49 shows reactive service charges in 2016 and 2017, reactive capability revenue requirement charges and total charges.

Table 10-49 Reactive zonal charges for network transmission use: January 1 through September 30, 2016 and 2017

Zone	Jan-Sep 2016			Jan-Sep 2017		
	Reactive Service Charges	Reactive Capability Revenue Requirement Charges	Total Charges	Reactive Service Charges	Reactive Capability Revenue Requirement Charges	Total Charges
AECO	\$0	\$4,100,181	\$4,100,181	\$8,686	\$4,077,510	\$4,086,195
AEP	\$35,493	\$27,985,307	\$28,020,799	\$172,736	\$28,657,140	\$28,829,876
APS	\$0	\$12,490,982	\$12,490,982	\$135,676	\$12,384,032	\$12,519,709
ATSI	\$0	\$16,443,788	\$16,443,788	\$60,696	\$16,275,947	\$16,336,643
BGE	\$0	\$5,696,008	\$5,696,008	\$1,694,486	\$6,008,533	\$7,703,020
ComEd	\$1,091	\$19,941,655	\$19,942,745	\$7,535,612	\$24,379,843	\$31,915,455
DAY	\$0	\$6,382,228	\$6,382,228	\$15,845	\$5,509,864	\$5,525,709
DEOK	\$0	\$4,264,787	\$4,264,787	\$25,386	\$4,872,968	\$4,898,353
Dominion	\$16,427	\$22,436,415	\$22,452,842	\$120,722	\$24,878,192	\$24,998,913
DPL	\$712,627	\$9,128,961	\$9,841,587	\$748,342	\$8,623,103	\$9,371,444
DLCO	\$0	\$0	\$0	\$12,737	\$0	\$12,737
EKPC	\$0	\$1,620,466	\$1,620,466	\$12,013	\$1,608,259	\$1,620,272
JCPL	\$0	\$6,633,887	\$6,633,887	\$19,441	\$6,374,817	\$6,394,258
Met-Ed	\$15,071	\$4,631,539	\$4,646,610	\$68,170	\$4,182,570	\$4,250,740
PECO	\$0	\$13,343,032	\$13,343,032	\$103,510	\$12,829,527	\$12,933,036
PENELEC	\$32,108	\$6,070,926	\$6,103,034	\$1,641,212	\$8,028,226	\$9,669,437
Pepco	\$0	\$4,483,212	\$4,483,212	\$1,595,597	\$6,610,294	\$8,205,891
PPL	\$15,263	\$14,686,578	\$14,701,841	\$37,886	\$17,999,568	\$18,037,454
PSEG	\$0	\$27,212,928	\$27,212,928	\$37,255	\$26,374,116	\$26,411,371
RECO	\$0	\$0	\$0	\$1,239	\$0	\$1,239
(Imp/Exp/Wheels)	\$0	\$13,230,717	\$13,230,717	\$0	\$15,766,244	\$15,766,244
Total	\$828,078	\$220,783,599	\$221,611,677	\$14,047,245	\$235,440,752	\$249,487,997

Congestion and Marginal Losses

The locational marginal price (LMP) is the incremental price of energy at a bus. The LMP at a bus is the sum of three components: the system marginal price (SMP) or energy component, the congestion component of LMP (CLMP), and the marginal loss component of LMP (MLMP).¹ SMP, MLMP and CLMP are products of the least cost, security constrained dispatch of system resources to meet system load.

SMP is the incremental price of energy for the system, given the current dispatch, at the load weighted reference bus, or LMP net of losses and congestion. SMP is the LMP at the load weighted reference bus. The load weighted reference bus is not a fixed location but varies with the distribution of load at system load buses.

CLMP is the incremental price of congestion at each bus, based on the shadow prices associated with the relief of binding constraints in the security constrained optimization. CLMPs are positive or negative depending on location relative to binding constraints and relative to the load weighted reference bus. In an unconstrained system CLMPs will be zero.

MLMP is the incremental price of losses at a bus, based on marginal loss factors in the security constrained optimization. Losses refer to energy lost to physical resistance in the transmission network as power is moved from generation to load.

Total losses refer to the total system-wide transmission losses as a result of moving power from injections to withdrawals on the system. Marginal losses are the incremental change in system losses caused by changes in load and generation.²

Congestion is neither good nor bad, but is a direct measure of the extent to which there are multiple marginal generating units dispatched to serve load as a result of transmission constraints. Congestion occurs when available, least-

cost energy cannot be delivered to all load because transmission facilities are not adequate to deliver that energy to one or more areas, and higher cost units in the constrained area(s) must be dispatched to meet the load.³ The result is that the price of energy in the constrained area(s) is higher than in the unconstrained area.

The energy, marginal losses and congestion metrics must be interpreted carefully. The term total congestion refers to what is actually net congestion, which is calculated as net implicit congestion costs plus net explicit congestion costs plus net inadvertent congestion charges. The net implicit congestion costs are the load congestion payments less generation congestion credits. This section refers to total energy costs and total marginal loss costs in the same way. As with congestion, total energy costs are more precisely termed net energy costs and total marginal loss costs are more precisely termed net marginal loss costs. Ignoring interchange, total generation MWh must be greater than total load MWh in any hour in order to provide for losses. Since the hourly integrated energy component of LMP is the same for every bus within every hour, the net energy bill is negative (ignoring net interchange), with more generation credits than load payments in every hour.⁴

Overview

Congestion Cost

- **Total Congestion.** Total congestion costs decreased by \$366.8 million or 44.6 percent, from \$822.2 million in the first nine months of 2016 to \$455.4 million in the first nine months of 2017.
- **Day-Ahead Congestion.** Day-ahead congestion costs decreased by \$395.2 million or 45.0 percent, from \$877.8 million in the first nine months of 2016 to \$482.5 million in the first nine months of 2017.

¹ On June 1, 2013, PJM integrated the East Kentucky Power Cooperative (EKPC) Control Zone. The metrics reported in this section treat EKPC as part of MISO for the first hour of June 2013 and as part of PJM for the second hour of June 2013 through 2014.

² See the 2014 SOM Technical Appendices for a full discussion of the relationship between marginal, average and total losses.

³ This is referred to as dispatching units out of economic merit order. Economic merit order is the order of all generator offers from lowest to highest cost. Congestion occurs when loadings on transmission facilities mean the next unit in merit order cannot be used and a higher cost unit must be used in its place. Dispatch within the constrained area follows merit order for the units available to relieve the constraint.

⁴ The total congestion and marginal losses were calculated as of July 18, 2017, and are subject to change, based on continued PJM billing updates.

- **Balancing Congestion.** Balancing congestion costs increased by \$28.4 million or 51.2 percent, from -\$55.5 million in the first nine months of 2016 to -\$27.1 million in the first nine months of 2017.
- **Real-Time Congestion.** Real-time congestion costs decreased by \$344.7 million or 39.2 percent, from \$878.5 million in the first nine months of 2016 to \$533.8 million in the first nine months of 2017.
- **Monthly Congestion.** Monthly total congestion costs in the first nine months of 2017 ranged from \$30.1 million in August to \$98.5 million in September.
- **Geographic Differences in CLMP.** Differences in CLMP among eastern, southern and western control zones in PJM were primarily a result of congestion on the Conastone - Peach Bottom Line, the Braidwood - East Frankfort Line, the Emilie - Falls Line, the Graceton - Safe Harbor Line and the Westwood Flowgate.
- **Congestion Frequency.** Congestion frequency continued to be significantly higher in the Day-Ahead Energy Market than in the Real-Time Energy Market in the first nine months of 2017. The number of congestion event hours in the Day-Ahead Energy Market was about 13 times the number of congestion event hours in the Real-Time Energy Market.

Day-ahead congestion frequency increased by 7.1 percent from 209,600 congestion event hours in the first nine months of 2016 to 224,543 congestion event hours in the first nine months of 2017.

Real-time congestion frequency decreased by 19.2 percent from 20,396 congestion event hours in the first nine months of 2016 to 16,474 congestion event hours in the first nine months of 2017.

- **Congested Facilities.** Day-ahead, congestion-event hours increased on flowgates and transformers and decreased on interfaces and lines. Real-time, congestion-event hours increased on flowgates and interfaces and decreased on lines and transformers.

The Conastone - Peach Bottom Line was the largest contributor to congestion costs in the first nine months of 2017. With \$33.6 million

in total congestion costs, it accounted for 7.4 percent of the total PJM congestion costs in the first nine months of 2017.

- **Zonal Congestion.** ComEd had the largest total congestion costs among all control zones in the first nine months of 2017. ComEd had \$140.0 million in total congestion costs, comprised of -\$119.0 million in total load congestion payments, -\$263.0 million in total generation congestion credits and -\$4.0 million in explicit congestion costs. The Alpine - Belvidere Flowgate, the Cherry Valley Transformer, the Braidwood - East Frankfort Line, the Westwood Flowgate and the Havana E - Havana S Flowgate contributed \$66.6 million, or 47.6 percent of the total ComEd control zone congestion costs.
- **Ownership.** In the first nine months of 2017, financial entities were net receivers and physical entities were net payers of congestion charges. In the first nine months of 2017, financial entities were paid \$16.1 million in congestion credits compared to \$16.9 million received in congestion credits in the first nine months of 2016. In the first nine months of 2017, physical entities paid \$471.5 million in congestion charges, a decrease of \$367.6 million or 43.8 percent compared to the first nine months of 2016.

Marginal Loss Cost

- **Total Marginal Loss Costs.** Total marginal loss costs decreased by \$40.9 million or 7.5 percent, from \$541.9 million in the first nine months of 2016 to \$501.0 million in the first nine months of 2017. The loss MWh in PJM decreased by 571.1 GWh or 4.9 percent, from 11,607.8 GWh in the first nine months of 2016 to 11,036.7 GWh in the first nine months of 2017. The loss component of real-time LMP in the first nine months of 2017 was \$0.015, compared to \$0.014 in the first nine months of 2016.
- **Monthly Total Marginal Loss Costs.** Monthly total marginal loss costs in the first nine months of 2017 ranged from \$44.2 million in April to \$71.6 million in July.
- **Day-Ahead Marginal Loss Costs.** Day-ahead marginal loss costs decreased by \$29.3 million or 4.9 percent, from \$595.4 million in the first nine months of 2016 to \$566.0 million in the first nine months of 2017.

- **Balancing Marginal Loss Costs.** Balancing marginal loss costs decreased by \$11.6 million or 21.7 percent, from -\$53.4 million in the first nine months of 2016 to -\$65.0 million in the first nine months of 2017.
- **Total Marginal Loss Surplus.** The total marginal loss surplus decreased in the first nine months of 2017 by \$24.5 million or 13.5 percent, from \$181.0 million in the first nine months of 2016, to \$156.5 million in the first nine months of 2017.

Energy Cost

- **Total Energy Costs.** Total energy costs increased by \$14.3 million or 4.2 percent, from -\$358.3 million in the first nine months of 2016 to -\$344.0 million in the first nine months of 2017.
- **Day-Ahead Energy Costs.** Day-ahead energy costs decreased by \$0.9 million or 0.2 percent, from -\$483.5 million in the first nine months of 2016 to -\$484.4 million in the first nine months of 2017.
- **Balancing Energy Costs.** Balancing energy costs increased by \$7.8 million or 6.1 percent, from \$128.1 million in the first nine months of 2016 to \$135.9 million in the first nine months of 2017.
- **Monthly Total Energy Costs.** Monthly total energy costs in the first nine months of 2017 ranged from -\$48.2 million in January to -\$31.0 million in April.

Conclusion

Congestion is defined to be the total congestion payments by load in excess of the total congestion credits received by generation. The level and distribution of congestion reflects the underlying characteristics of the power system, including the nature and capability of transmission facilities, the offers and geographic distribution of generation facilities, the level and geographic distribution of incremental bids and offers and the geographic and temporal distribution of load.

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, 86.5 and 98.1 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014/2015, 2015/2016 and 2016/2017 planning periods. For the first four months of the 2017/2018 planning period ARRs and self scheduled FTRs offset 79.7 percent of total congestion costs.

Locational Marginal Price (LMP) Components

On June 1, 2007, PJM changed from a single node reference bus to a distributed load reference bus. While the use of a single node reference bus or a distributed load reference bus has no effect on the total LMP, the use of a single node reference bus or a distributed load reference bus will affect the components of LMP. With a distributed load reference bus, the energy component is a load-weighted system price. There is no congestion or losses included in the load weighted reference bus price, unlike the case with a single node reference bus.

LMP at a bus reflects the incremental price of energy at that bus. LMP at any bus is the sum of three components: the system marginal price (SMP), marginal loss component of LMP (MLMP), and congestion component of LMP (CLMP).

SMP, MLMP and CLMP are a product of the least cost, security constrained dispatch of system resources to meet system load. SMP is the incremental cost of energy, given the current dispatch and given the choice of reference bus. SMP is LMP net of losses and congestion. Losses refer to energy lost to physical resistance in the transmission and distribution network as power is moved from generation to load. The greater the resistance of the system to flows of energy from generation to loads, the greater the losses of the system and the greater the proportion of energy needed to meet a given level of load. Marginal losses are the incremental change in system power losses caused by changes in the system load and generation patterns.⁵ The first derivative of

⁵ For additional information, see the *MMU Technical Reference for PJM Markets*, at "Marginal Losses," <http://www.monitoringanalytics.com/reports/Technical_References/docs/2010-som-pjm-technical-reference.pdf>.

total losses with respect to the power flow equals marginal losses. Congestion cost reflects the incremental cost of relieving transmission constraints while maintaining system power balance. Congestion occurs when available, least-cost energy cannot be delivered to all loads because transmission facilities are not adequate to deliver that energy. When the least-cost available energy cannot be delivered to load in a transmission constrained area, higher cost units in the constrained area must be dispatched to meet that load.⁶ The result is that the price of energy in the constrained area is higher than in the unconstrained area because of the combination of transmission limitations and the cost of local generation. Congestion is the difference between the total cost of energy paid by load in the transmission constrained area and the total revenue received by generation in the transmission constrained area.

Table 11-1 shows the PJM real-time, load-weighted average LMP components for January 1 through September 30, 2008 through 2017.⁷

The load-weighted average real-time LMP increased \$1.04 or 3.5 percent from \$29.32 in the first nine months of 2016 to \$30.36 in the first nine months of 2017. The load-weighted average congestion component decreased by \$0.02 from \$0.04 in the first nine months of 2016 to \$0.02 in the first nine months of 2017. The load-weighted average loss component in the first nine months of 2017 was \$0.014 compared to \$0.015 in the first nine months of 2016. The load-weighted average energy component increased by \$1.05 or 3.6 percent from \$29.27 in the first nine months of 2016 to \$30.32 in the first nine months of 2017.

⁶ This is referred to as dispatching units out of economic merit order. Economic merit order is the order of all generator offers from lowest to highest cost. Congestion occurs when loadings on transmission facilities mean the next unit in merit order cannot be used and a higher cost unit must be used in its place.

⁷ The PJM real-time, load-weighted price is weighted by accounting load, which differs from the state-estimated load used in determination of the energy component (SMP). In the Real-Time Energy Market, the distributed load reference bus is weighted by state-estimated load in real time. When the LMP is calculated in real time, the energy component equals the system load-weighted price. But real-time bus-specific loads are adjusted, after the fact, based on updated load information from meters. This meter adjusted load is accounting load that is used in settlements and is used to calculate reported PJM load-weighted prices. This after the fact adjustment means that the Real-Time Energy Market energy component of LMP (SMP) and the PJM real-time, load-weighted LMP are not equal. The difference between the real-time energy component of LMP and the PJM-wide real-time load-weighted LMP is a result of the difference between state-estimated and metered loads used to weight the load-weighted reference bus and the load-weighted LMP.

Table 11-1 PJM real-time, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2008 through 2017⁸

(Jan - Sep)	Real-Time LMP	Energy Component	Congestion Component	Loss Component
2008	\$77.27	\$77.15	\$0.07	\$0.05
2009	\$39.57	\$39.49	\$0.04	\$0.03
2010	\$49.91	\$49.81	\$0.06	\$0.04
2011	\$49.48	\$49.40	\$0.05	\$0.03
2012	\$35.02	\$34.97	\$0.04	\$0.01
2013	\$39.75	\$39.72	\$0.01	\$0.02
2014	\$58.60	\$58.61	(\$0.03)	\$0.02
2015	\$38.94	\$38.89	\$0.03	\$0.02
2016	\$29.32	\$29.27	\$0.04	\$0.02
2017	\$30.36	\$30.32	\$0.02	\$0.01

Table 11-2 shows the PJM day-ahead, load-weighted average LMP components for January 1 through September 30, 2008 through 2017.⁹ The load-weighted average day-ahead LMP increased \$0.56, or 1.9 percent, from \$29.69 in the first nine months of 2016 to \$30.26 in the first nine months of 2017. The load-weighted average congestion component decreased \$0.13, or 77.3 percent, from \$0.17 in the first nine months of 2016 to \$0.04 in the first nine months of 2017. The load-weighted average loss component decreased from -\$0.0115 in the first nine months of 2016 to -\$0.0191 in the first nine months of 2017. The load-weighted average energy component increased \$0.7, or 2.4 percent, from \$29.54 in the first nine months of 2016 to \$30.24 in the first nine months of 2017.

⁸ Calculated values shown in Section 11, "Congestion and Marginal Losses," are based on unrounded, underlying data and may differ from calculations based on the rounded values in the tables.

⁹ In the Real-Time Energy Market, the energy component (SMP) equals the system load-weighted price, with the caveat about state-estimated versus metered load. However, in the Day-Ahead Energy Market the day-ahead energy component of LMP (SMP) and the PJM day-ahead, load-weighted LMP are not equal. The difference between the day-ahead energy component of LMP and the PJM day-ahead, load-weighted LMP is a result of the difference in the types of load used to weight the load-weighted reference bus and the load-weighted LMP. In the Day-Ahead Energy Market, the distributed load reference bus is weighted by fixed-demand bids only and the day-ahead SMP is, therefore, a system fixed demand weighted price. The day-ahead, load-weighted LMP calculation uses all types of demand, including fixed, price-sensitive and decrement bids.

Table 11-2 PJM day-ahead, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Day-Ahead LMP	Energy Component	Congestion Component	Loss Component
2008	\$75.96	\$76.30	(\$0.09)	(\$0.24)
2009	\$39.35	\$39.50	(\$0.05)	(\$0.10)
2010	\$49.12	\$49.05	\$0.11	(\$0.03)
2011	\$48.34	\$48.55	(\$0.05)	(\$0.16)
2012	\$34.29	\$34.19	\$0.12	(\$0.02)
2013	\$39.49	\$39.35	\$0.14	(\$0.00)
2014	\$59.08	\$58.84	\$0.26	(\$0.01)
2015	\$39.51	\$39.25	\$0.28	(\$0.02)
2016	\$29.69	\$29.54	\$0.17	(\$0.01)
2017	\$30.26	\$30.24	\$0.04	(\$0.02)

Table 11-3 shows the PJM real-time, load-weighted average LMP by constrained and unconstrained hours. In the first nine months of 2017, July had the highest real-time, load-weighted average LMP in the constrained hours which was \$34.22.

Table 11-3 PJM real-time, load-weighted average LMP by constrained and unconstrained hours (Dollars per MWh): January 1, 2016 through September 30, 2017

	2016		2017	
	Constrained Hours	Unconstrained Hours	Constrained Hours	Unconstrained Hours
Jan	\$31.18	\$20.73	\$32.96	\$26.37
Feb	\$26.99	\$17.67	\$25.82	\$24.26
Mar	\$23.02	\$10.71	\$32.56	\$26.54
Apr	\$29.40	\$21.24	\$29.26	\$23.90
May	\$25.13	\$19.98	\$32.27	\$23.90
Jun	\$30.03	\$16.32	\$29.23	\$18.80
Jul	\$32.82	\$23.20	\$34.22	\$26.33
Aug	\$36.25	\$22.88	\$28.39	\$24.66
Sep	\$31.37	\$15.98	\$33.79	\$21.28
Oct	\$28.15	\$20.48		
Nov	\$25.73	\$25.23		
Dec	\$32.81	\$28.17		
Avg	\$29.75	\$21.55	\$31.06	\$24.46

Zonal Components

The real-time components of LMP for each control zone are presented in Table 11-4 for the first nine months of 2016 and the first nine months of 2017. In the first nine months of 2017, BGE had the highest real-time congestion component of all control zones and AECO had the lowest real-time congestion component.

Table 11-4 Zonal and PJM real-time, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)				2017 (Jan - Sep)			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
AECO	\$27.41	\$29.74	(\$2.91)	\$0.58	\$28.38	\$30.48	(\$2.49)	\$0.39
AEP	\$29.06	\$29.03	\$0.28	(\$0.25)	\$30.15	\$30.14	\$0.27	(\$0.26)
APS	\$29.79	\$29.11	\$0.69	(\$0.00)	\$30.56	\$30.22	\$0.33	\$0.01
ATSI	\$29.91	\$29.08	\$0.15	\$0.67	\$31.19	\$30.16	\$0.46	\$0.58
BGE	\$39.31	\$29.52	\$8.72	\$1.06	\$33.73	\$30.56	\$2.18	\$0.99
ComEd	\$27.61	\$29.22	(\$0.66)	(\$0.95)	\$28.64	\$30.30	(\$0.67)	(\$1.00)
DAY	\$29.31	\$29.23	(\$0.41)	\$0.49	\$31.14	\$30.30	\$0.32	\$0.52
DEOK	\$28.67	\$29.26	\$0.09	(\$0.68)	\$30.68	\$30.29	\$1.07	(\$0.68)
DLCO	\$29.39	\$29.26	\$0.35	(\$0.23)	\$30.58	\$30.27	\$0.43	(\$0.11)
Dominion	\$32.22	\$29.50	\$2.67	\$0.06	\$32.19	\$30.49	\$1.39	\$0.32
DPL	\$30.57	\$29.63	\$0.06	\$0.87	\$30.36	\$30.59	(\$0.93)	\$0.70
EKPC	\$27.98	\$29.35	(\$0.57)	(\$0.80)	\$29.25	\$30.49	(\$0.50)	(\$0.74)
JCPL	\$26.63	\$29.87	(\$3.57)	\$0.33	\$29.72	\$30.78	(\$1.33)	\$0.26
Met-Ed	\$26.08	\$29.22	(\$3.31)	\$0.18	\$30.32	\$30.32	(\$0.17)	\$0.17
PECO	\$25.76	\$29.34	(\$3.74)	\$0.15	\$28.42	\$30.40	(\$2.01)	\$0.04
PENELEC	\$27.62	\$28.79	(\$1.55)	\$0.39	\$29.28	\$29.95	(\$0.87)	\$0.19
Pepco	\$34.30	\$29.53	\$4.20	\$0.56	\$32.63	\$30.51	\$1.50	\$0.63
PPL	\$25.37	\$29.06	(\$3.70)	\$0.01	\$28.85	\$30.23	(\$1.35)	(\$0.04)
PSEG	\$26.28	\$29.37	(\$3.36)	\$0.27	\$29.38	\$30.36	(\$1.23)	\$0.25
RECO	\$27.07	\$30.00	(\$3.24)	\$0.32	\$30.02	\$30.88	(\$1.19)	\$0.32
PJM	\$29.32	\$29.27	\$0.04	\$0.02	\$30.36	\$30.32	\$0.02	\$0.01

The day-ahead components of LMP for each control zone are presented in Table 11-5 for the first nine months of 2016 and the first nine months of 2017. In the first nine months of 2017, BGE had the highest day-ahead congestion component of all control zones and AECO had the lowest day-ahead congestion component.

Table 11-5 Zonal and PJM day-ahead, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)				2017 (Jan - Sep)			
	Day-Ahead LMP	Energy Component	Congestion Component	Loss Component	Day-Ahead LMP	Energy Component	Congestion Component	Loss Component
AECO	\$28.16	\$30.13	(\$2.56)	\$0.59	\$28.37	\$30.42	(\$2.25)	\$0.19
AEP	\$29.18	\$29.35	\$0.11	(\$0.29)	\$30.23	\$30.16	\$0.32	(\$0.24)
APS	\$30.14	\$29.36	\$0.87	(\$0.09)	\$30.47	\$30.15	\$0.36	(\$0.04)
ATSI	\$29.68	\$29.35	(\$0.09)	\$0.41	\$30.86	\$30.08	\$0.38	\$0.40
BGE	\$40.22	\$30.02	\$9.23	\$0.98	\$33.93	\$30.55	\$2.48	\$0.90
ComEd	\$27.63	\$29.49	(\$1.02)	(\$0.84)	\$28.50	\$30.20	(\$0.97)	(\$0.73)
DAY	\$29.43	\$29.39	(\$0.34)	\$0.38	\$31.05	\$30.24	\$0.26	\$0.55
DEOK	\$29.16	\$29.59	\$0.20	(\$0.62)	\$30.70	\$30.30	\$0.88	(\$0.49)
DLCO	\$29.09	\$29.58	(\$0.09)	(\$0.40)	\$30.40	\$30.24	\$0.39	(\$0.22)
Dominion	\$33.03	\$29.88	\$3.03	\$0.12	\$32.49	\$30.51	\$1.60	\$0.37
DPL	\$32.28	\$30.10	\$1.38	\$0.79	\$30.36	\$30.58	(\$0.62)	\$0.40
EKPC	\$28.28	\$29.76	(\$0.65)	(\$0.83)	\$29.72	\$30.63	(\$0.19)	(\$0.72)
JCPL	\$26.90	\$30.10	(\$3.60)	\$0.40	\$29.29	\$30.55	(\$1.38)	\$0.12
Met-Ed	\$26.34	\$29.36	(\$3.09)	\$0.07	\$29.81	\$30.21	(\$0.37)	(\$0.03)
PECO	\$26.29	\$29.62	(\$3.47)	\$0.14	\$28.08	\$30.18	(\$1.99)	(\$0.11)
PENELEC	\$27.87	\$28.98	(\$1.35)	\$0.24	\$29.19	\$29.95	(\$0.76)	\$0.00
Pepco	\$35.02	\$29.65	\$4.83	\$0.54	\$32.78	\$30.36	\$1.81	\$0.61
PPL	\$25.74	\$29.28	(\$3.49)	(\$0.06)	\$28.54	\$30.09	(\$1.31)	(\$0.24)
PSEG	\$27.14	\$29.79	(\$3.09)	\$0.44	\$29.43	\$30.33	(\$1.09)	\$0.18
RECO	\$27.47	\$30.21	(\$3.20)	\$0.46	\$29.76	\$30.60	(\$1.06)	\$0.22
PJM	\$29.69	\$29.54	\$0.17	(\$0.01)	\$30.26	\$30.24	\$0.04	(\$0.02)

Hub Components

The real-time components of LMP for each hub are presented in Table 11-6 for the first nine months of 2016 and the first nine months of 2017.

Table 11-6 Hub real-time, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)				2017 (Jan - Sep)			
	Real-Time LMP	Energy Component	Congestion Component	Loss Component	Real-Time LMP	Energy Component	Congestion Component	Loss Component
AEP Gen Hub	\$27.88	\$29.84	(\$0.70)	(\$1.25)	\$28.87	\$30.11	(\$0.07)	(\$1.17)
AEP-DAY Hub	\$28.95	\$29.53	(\$0.23)	(\$0.34)	\$30.04	\$30.21	\$0.23	(\$0.40)
ATSI Gen Hub	\$29.14	\$29.00	(\$0.03)	\$0.17	\$30.26	\$29.95	\$0.26	\$0.04
Chicago Gen Hub	\$25.71	\$28.71	(\$1.64)	(\$1.36)	\$27.38	\$29.89	(\$1.11)	(\$1.40)
Chicago Hub	\$28.15	\$29.62	(\$0.58)	(\$0.89)	\$29.29	\$30.78	(\$0.56)	(\$0.93)
Dominion Hub	\$31.61	\$29.67	\$2.17	(\$0.23)	\$32.39	\$31.15	\$1.16	\$0.08
Eastern Hub	\$29.61	\$28.68	\$0.10	\$0.83	\$29.55	\$29.67	(\$0.77)	\$0.65
N Illinois Hub	\$27.11	\$29.03	(\$0.84)	(\$1.09)	\$28.08	\$30.12	(\$0.92)	(\$1.12)
New Jersey Hub	\$26.51	\$29.56	(\$3.36)	\$0.31	\$29.35	\$30.50	(\$1.41)	\$0.26
Ohio Hub	\$28.79	\$29.14	(\$0.13)	(\$0.21)	\$30.22	\$30.21	\$0.33	(\$0.32)
West Interface Hub	\$29.88	\$29.16	\$0.94	(\$0.22)	\$30.84	\$30.33	\$0.72	(\$0.21)
Western Hub	\$31.93	\$30.87	\$1.02	\$0.03	\$31.08	\$31.28	(\$0.21)	\$0.01

The day-ahead components of LMP for each hub are presented in Table 11-7 for January 1 through September 30, 2016 and 2017.

Table 11-7 Hub day-ahead, load-weighted average LMP components (Dollars per MWh): January 1 through September 30, 2016 and 2017

	2016 (Jan - Sep)				2017 (Jan - Sep)			
	Day-Ahead LMP	Energy Component	Congestion Component	Loss Component	Day-Ahead LMP	Energy Component	Congestion Component	Loss Component
AEP Gen Hub	\$27.74	\$29.36	(\$0.44)	(\$1.18)	\$29.42	\$30.56	(\$0.04)	(\$1.10)
AEP-DAY Hub	\$28.51	\$29.08	(\$0.19)	(\$0.38)	\$29.89	\$30.00	\$0.27	(\$0.38)
ATSI Gen Hub	\$25.38	\$25.25	\$0.11	\$0.02	\$28.17	\$27.97	\$0.25	(\$0.04)
Chicago Gen Hub	\$24.99	\$28.27	(\$2.04)	(\$1.23)	\$26.46	\$29.16	(\$1.56)	(\$1.15)
Chicago Hub	\$27.37	\$29.13	(\$1.03)	(\$0.73)	\$27.90	\$29.63	(\$1.09)	(\$0.64)
Dominion Hub	\$32.39	\$29.91	\$2.62	(\$0.15)	\$32.19	\$30.66	\$1.36	\$0.17
Eastern Hub	\$32.14	\$29.84	\$1.43	\$0.87	\$30.57	\$30.41	(\$0.32)	\$0.48
N Illinois Hub	\$26.94	\$29.01	(\$1.09)	(\$0.98)	\$27.49	\$29.54	(\$1.19)	(\$0.87)
New Jersey Hub	\$26.97	\$29.78	(\$3.23)	\$0.41	\$29.37	\$30.44	(\$1.23)	\$0.16
Ohio Hub	\$28.47	\$29.01	(\$0.24)	(\$0.30)	\$29.83	\$29.87	\$0.29	(\$0.32)
West Interface Hub	\$30.40	\$29.84	\$0.88	(\$0.32)	\$30.14	\$29.60	\$0.76	(\$0.21)
Western Hub	\$30.42	\$29.10	\$1.35	(\$0.04)	\$30.04	\$30.05	\$0.17	(\$0.18)

Component Costs

Table 11-8 shows the total energy, loss and congestion component costs and the total PJM billing for January 1 through September 30, 2008 through 2017. These totals are actually net energy, loss and congestion costs. Total congestion cost decreased and marginal loss cost decreased in the first nine months of 2017 compared to the first nine months of 2016.

Table 11-8 Total PJM costs by component (Dollars (Millions)): January 1 through September 30, 2008 through 2017^{10 11}

(Jan - Sep)	Component Costs (Millions)				Total Costs	
	Energy Costs	Loss Costs	Congestion Costs	Total Costs	Total PJM Billing	Percent of PJM Billing
2008	(\$976)	\$2,049	\$1,778	\$2,851	\$26,979	10.6%
2009	(\$485)	\$992	\$544	\$1,051	\$19,927	5.3%
2010	(\$619)	\$1,259	\$1,134	\$1,775	\$26,249	6.8%
2011	(\$651)	\$1,153	\$875	\$1,376	\$28,836	4.8%
2012	(\$443)	\$758	\$425	\$740	\$22,119	3.3%
2013	(\$527)	\$797	\$510	\$779	\$25,153	3.1%
2014	(\$834)	\$1,243	\$1,705	\$2,115	\$40,770	5.2%
2015	(\$537)	\$830	\$1,143	\$1,436	\$33,710	4.3%
2016	(\$358)	\$542	\$822	\$1,006	\$29,490	3.4%
2017	(\$344)	\$501	\$455	\$612	\$29,510	2.1%

Congestion

Congestion Accounting

Congestion occurs in the Day-Ahead and Real-Time Energy Markets.¹² Total congestion costs are equal to the net implicit congestion bill plus net explicit congestion costs plus net inadvertent congestion charges, incurred in both the Day-Ahead Energy Market and the balancing energy market.

In the analysis of total congestion costs, load congestion payments are netted against generation congestion credits on an hourly basis, by billing organization, and then summed for the given period.

¹⁰ The energy costs, loss costs and congestion costs include net inadvertent charges.

¹¹ Total PJM billing is provided by PJM. The MMU is not able to verify the calculation.

¹² When the term *congestion charge* is used in documents by PJM's Market Settlement Operations, it has the same meaning as the term *congestion costs* as used here.

Load congestion payments and generation congestion credits are calculated for both the Day-Ahead and balancing energy markets.

- **Day-Ahead Load Congestion Payments.** Day-ahead load congestion payments are calculated for all cleared demand, decrement bids and day-ahead energy market sale transactions. Day-ahead load congestion payments are calculated using MW and the load bus CLMP, the decrement bid CLMP or the CLMP at the source of the sale transaction, as applicable.
- **Day-Ahead Generation Congestion Credits.** Day-ahead generation congestion credits are calculated for all cleared generation, increment offers and day-ahead energy market purchase transactions. Day-ahead generation congestion credits are calculated using MW and the generator bus CLMP, the increment offer's CLMP or the CLMP at the sink of the purchase transaction, as applicable.
- **Balancing Load Congestion Payments.** Balancing load congestion payments are calculated for all deviations between a PJM member's real-time load and energy sale transactions and their day-ahead cleared demand, decrement bids and energy sale transactions. Balancing load congestion payments are calculated using MW deviations and the real-time CLMP for each bus where a deviation exists.
- **Balancing Generation Congestion Credits.** Balancing generation congestion credits are calculated for all deviations between a PJM member's real-time generation and energy purchase transactions and the day-ahead cleared generation, increment offers and energy purchase transactions. Balancing generation congestion credits are calculated using MW deviations and the real-time CLMP for each bus where a deviation exists.
- **Explicit Congestion Costs.** Explicit congestion costs are the net congestion costs associated with point-to-point energy transactions. These costs equal the product of the transacted MW and CLMP differences between sources (origins) and sinks (destinations) in the Day-Ahead Energy Market. Balancing energy market explicit congestion costs equal the product of the deviations between the real-time and day-ahead transacted MW and the differences between the real-time CLMP at the transactions' sources

and sinks. Explicit congestion costs are calculated for internal purchase, import and export transaction, and up to congestion transactions (UTCs.)

- **Inadvertent Congestion Charges.** Inadvertent congestion charges are congestion charges resulting from the differences between the net actual energy flow and the net scheduled energy flow into or out of the PJM control area each hour. This inadvertent interchange of energy may be positive or negative, where positive interchange typically results in a charge while negative interchange typically results in a credit. Inadvertent congestion charges are common costs, not directly attributable to specific participants that are distributed on a load ratio basis.¹³

The congestion costs associated with specific constraints are the sum of the total day-ahead and balancing congestion costs associated with those constraints. The congestion costs in each zone are the sum of the congestion costs associated with each constraint that affects prices in the zone. The network nature of the transmission system means that congestion costs in a zone are frequently the result of constrained facilities located outside that zone.

Congestion costs can be both positive and negative and consequently load payments and generation credits can be both positive and negative. Total congestion costs, when positive, measure the total congestion payment by a PJM member and when negative, measure the total congestion credit paid to a PJM member. Load congestion payments, when positive, measure the total congestion payment by a PJM member and when negative, measure the total congestion credit paid to a PJM member. Generation congestion credits, when negative, measure the total congestion payment by a PJM member and when positive, measure the total congestion credit paid to a PJM member. Explicit congestion costs, when positive, measure the congestion payment by a PJM member and when negative, measure the congestion credit paid to a PJM member. Explicit congestion costs are calculated for up to congestion transactions (UTCs).

¹³ OA Schedule 1 §3.7.

The CLMP is calculated with respect to the system reference bus LMP, also called the system marginal price (SMP). When a transmission constraint occurs, the resulting CLMP is positive on one side of the constraint and negative on the other side of the constraint and the corresponding congestion costs are positive or negative. For each transmission constraint, the CLMP reflects the cost of a constraint at a pricing node and is equal to the product of the constraint shadow price and the distribution factor at the respective pricing node. The total CLMP at a pricing node is the sum of all constraint contributions to LMP and is equal to the difference between the actual LMP that results from transmission constraints, excluding losses, and the SMP. If an area experiences lower prices because of a constraint, the CLMP in that area is negative.¹⁴

The congestion metric requires careful review when considering the significance of congestion. The net congestion bill is calculated by subtracting generating congestion credits from load congestion payments. The logic is that congestion payments by load are offset by congestion revenues to generation, for the area analyzed. The net congestion bill is the source of payments to FTR Holders. When load pays more for congestion in an area than generation receives, the positive difference is the source of payments to FTR Holders as it is a measure of the value of transmission in bringing lower cost generation into the area.

Total congestion costs in PJM in the first nine months of 2017 were \$455.4 million, which was comprised of load congestion payments of \$117.6 million, generation credits of -\$342.3 million and explicit congestion of -\$4.4 million.

Total Congestion

Table 11-9 shows total congestion in the first nine months of 2008 through 2017. Total congestion costs in Table 11-9 include congestion costs associated

¹⁴ For an example of the congestion accounting methods used in this section, see *MMU Technical Reference for PJM Markets*, at "FTRs and ARRs" <http://www.monitoringanalytics.com/reports/Technical_References/docs/2010-som-pjm-technical-reference.pdf>.

with PJM facilities and those associated with reciprocal, coordinated flowgates in MISO and in NYISO.^{15 16}

Table 11-9 Total PJM congestion (Dollars (Millions)): January 1 through September 30, 2008 through 2017

Congestion Costs (Millions)				
(Jan - Sep)	Congestion Cost	Percent Change	Total PJM Billing	Percent of PJM Billing
2008	\$1,778	NA	\$26,979	6.6%
2009	\$544	(69.4%)	\$19,927	2.7%
2010	\$1,134	108.7%	\$26,249	4.3%
2011	\$875	(22.9%)	\$28,836	3.0%
2012	\$425	(51.4%)	\$22,119	1.9%
2013	\$510	19.9%	\$25,153	2.0%
2014	\$1,705	234.6%	\$40,770	4.2%
2015	\$1,143	(33.0%)	\$33,710	3.4%
2016	\$822	(28.1%)	\$29,490	2.8%
2017	\$455	(44.6%)	\$29,510	1.5%

Table 11-10 Total PJM congestion costs by accounting category by market (Dollars (Millions)): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Congestion Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
2008	\$1,126.9	(\$971.2)	\$152.8	\$2,250.9	(\$204.9)	\$90.5	(\$177.3)	(\$472.7)	\$0.0	\$1,778.2
2009	\$245.7	(\$385.0)	\$73.8	\$704.6	(\$35.1)	\$4.1	(\$121.9)	(\$161.0)	\$0.0	\$543.6
2010	\$301.7	(\$932.7)	\$69.5	\$1,303.9	(\$11.5)	\$39.3	(\$118.7)	(\$169.6)	(\$0.0)	\$1,134.3
2011	\$389.3	(\$628.2)	\$45.6	\$1,063.2	\$52.7	\$92.6	(\$148.4)	(\$188.3)	\$0.0	\$874.9
2012	\$106.6	(\$409.8)	\$86.7	\$603.2	(\$3.3)	\$37.1	(\$137.6)	(\$178.0)	\$0.0	\$425.2
2013	\$227.1	(\$452.6)	\$121.6	\$801.4	\$6.8	\$112.2	(\$186.4)	(\$291.8)	\$0.0	\$509.6
2014	\$505.4	(\$1,497.8)	(\$38.5)	\$1,964.6	\$73.1	\$224.4	(\$107.9)	(\$259.2)	\$0.0	\$1,705.4
2015	\$539.3	(\$783.2)	\$24.6	\$1,347.1	\$11.4	\$69.9	(\$145.6)	(\$204.1)	\$0.0	\$1,143.0
2016	\$313.0	(\$529.0)	\$35.7	\$877.8	\$1.9	\$20.0	(\$37.3)	(\$55.5)	(\$0.0)	\$822.2
2017	\$105.1	(\$375.1)	\$2.3	\$482.5	\$12.5	\$32.9	(\$6.7)	(\$27.1)	\$0.0	\$455.4

Table 11-10 shows total congestion by day-ahead and balancing component for the January through September period, by year. Table 11-10 shows that total negative balancing congestion was lower in the first nine months of 2017 than in the first nine months of 2008 through 2016. The decrease in the level of negative balancing congestion was a result of a large decrease in the level of negative balancing congestion explicit costs. Table 11-11 and Table 11-12 show that the decrease in the level of negative balancing explicit costs was the result of a decrease in the level of negative balancing explicit congestion caused by up to congestion (UTCs) which went from -\$39.4 million in the first nine months of 2016 to -\$7.0 million in the first nine months of 2017. The decrease in the level of negative balancing explicit congestion cost by up to congestion (UTCs) was the result of PJM's actions to reduce negative balancing by addressing modelling differences between the day-ahead and real-time market models and the lower overall congestion in the system.

Table 11-11 and Table 11-12 show the total congestion costs for each transaction type in the first nine months of 2017 and 2016. Table 11-11 shows that in the first nine months of 2017 DECs were paid \$1.3 million in congestion credits in the day-ahead market, were paid \$7.9 million in congestion credits in the balancing energy market, and were paid \$9.3 million in total congestion credits. In the first nine months of 2017, INCs paid \$2.7 million in congestion charges in the day-ahead market, were paid \$12.3 million in congestion credits in the balancing energy market and received \$9.6 million in total congestion credits. In the first nine months of 2017, up to congestion (UTCs) paid \$1.7 million in congestion charges in the day-ahead market, were paid \$7.0 million in congestion credits in the balancing market and were paid \$5.3 million in total congestion credits.

¹⁵ See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, LLC," (December 11, 2008) Section 6.1, Effective Date: May 30, 2016. <<http://www.pjm.com/documents/agreements.aspx>>.

¹⁶ See "NYISO Tariffs New York Independent System Operator, Inc.," (May 26, 2016) Section 35.12.1, Effective Date: October 22, 2014. <<http://www.pjm.com/documents/agreements.aspx>>.

Table 11-11 Total PJM congestion costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2017

Transaction Type	Congestion Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
DEC	(\$1.3)	\$0.0	\$0.0	(\$1.3)	(\$7.9)	\$0.0	\$0.0	(\$7.9)	\$0.0	(\$9.3)
Demand	\$24.3	\$0.0	\$0.0	\$24.3	\$24.0	\$0.0	\$0.0	\$24.0	\$0.0	\$48.4
Demand Response	(\$0.0)	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Explicit Congestion Only	\$0.0	\$0.0	\$1.0	\$1.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$1.0
Export	(\$23.1)	\$0.0	(\$0.3)	(\$23.4)	(\$3.1)	\$0.0	\$1.7	(\$1.3)	\$0.0	(\$24.8)
Generation	\$0.0	(\$478.1)	\$0.0	\$478.1	\$0.0	\$24.8	\$0.0	(\$24.8)	\$0.0	\$453.3
Grandfathered Overuse	\$0.0	\$0.0	(\$0.1)	(\$0.1)	\$0.0	\$0.0	(\$0.4)	(\$0.4)	\$0.0	(\$0.4)
Import	\$0.0	\$0.6	\$0.0	(\$0.6)	\$0.0	(\$3.7)	(\$1.0)	\$2.7	\$0.0	\$2.1
INC	\$0.0	(\$2.7)	\$0.0	\$2.7	\$0.0	\$12.3	\$0.0	(\$12.3)	\$0.0	(\$9.6)
Internal Bilateral	\$105.4	\$105.2	(\$0.2)	(\$0.0)	(\$0.5)	(\$0.5)	(\$0.0)	(\$0.0)	\$0.0	(\$0.0)
Up to Congestion	\$0.0	\$0.0	\$1.7	\$1.7	\$0.0	\$0.0	(\$7.0)	(\$7.0)	\$0.0	(\$5.3)
Wheel In	\$0.0	(\$0.1)	\$0.1	\$0.2	\$0.0	(\$0.1)	(\$0.0)	\$0.1	\$0.0	\$0.3
Wheel Out	(\$0.1)	\$0.0	\$0.0	(\$0.1)	(\$0.1)	\$0.0	\$0.0	(\$0.1)	\$0.0	(\$0.3)
Total	\$105.1	(\$375.1)	\$2.3	\$482.5	\$12.5	\$32.9	(\$6.7)	(\$27.1)	\$0.0	\$455.4

Table 11-12 Total PJM congestion costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2016

Transaction Type	Congestion Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
DEC	\$47.9	\$0.0	\$0.0	\$47.9	(\$49.5)	\$0.0	\$0.0	(\$49.5)	\$0.0	(\$1.6)
Demand	\$57.0	\$0.0	\$0.0	\$57.0	\$43.0	\$0.0	\$0.0	\$43.0	\$0.0	\$100.0
Demand Response	\$0.0	\$0.0	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	(\$0.0)	\$0.0	(\$0.0)
Export	\$0.0	\$0.0	\$3.8	\$3.8	\$0.0	\$0.0	\$0.1	\$0.1	\$0.0	\$3.8
Explicit Congestion Only	(\$57.2)	\$0.0	(\$0.4)	(\$57.6)	(\$6.4)	\$0.0	\$1.1	(\$5.3)	\$0.0	(\$62.9)
Generation	\$0.0	(\$814.6)	\$0.0	\$814.6	\$0.0	\$32.8	\$0.0	(\$32.8)	\$0.0	\$781.8
Grandfathered Overuse	\$0.0	\$0.0	\$0.2	\$0.2	\$0.0	\$0.0	\$0.1	\$0.1	\$0.0	\$0.3
Import	\$0.0	(\$7.7)	\$0.1	\$7.8	\$0.0	(\$14.5)	\$0.7	\$15.2	\$0.0	\$23.0
INC	\$0.0	\$26.6	\$0.0	(\$26.6)	\$0.0	(\$13.1)	\$0.0	\$13.1	\$0.0	(\$13.5)
Internal Bilateral	\$281.4	\$282.8	\$1.4	(\$0.0)	\$14.9	\$14.9	\$0.0	\$0.0	\$0.0	\$0.0
Up to Congestion	\$0.0	\$0.0	\$28.4	\$28.4	\$0.0	\$0.0	(\$39.4)	(\$39.4)	\$0.0	(\$11.0)
Wheel In	\$0.0	(\$16.1)	\$2.2	\$18.3	\$0.0	(\$0.1)	\$0.1	\$0.1	\$0.0	\$18.4
Wheel Out	(\$16.1)	\$0.0	\$0.0	(\$16.1)	(\$0.1)	\$0.0	\$0.0	(\$0.1)	\$0.0	(\$16.2)
Total	\$313.0	(\$529.0)	\$35.7	\$877.8	\$1.9	\$20.0	(\$37.3)	(\$55.5)	\$0.0	\$822.2

Table 11-13 shows the change in total congestion cost incurred by transaction type from the first nine months of 2016 and the first nine months of 2017. Total congestion cost incurred by generation decreased by \$328.5 million, total congestion cost incurred by demand decreased by \$51.7 million, and the total congestion payments to up to congestion transactions (UTCs) decreased by \$5.7 million.

Total day-ahead congestion costs paid by UTCs decreased by \$26.7 million from \$28.4 million in the first nine months of 2016 to \$1.7 million in the first nine months of 2017. Over the same period balancing congestion payments to UTCs decreased by \$32.4 million, from \$39.4 million in the first nine months of 2016 to \$7.0 million in the first nine months of 2017. UTCs were paid \$11.0 million in total congestion credits in the first nine months of 2016 and were paid \$5.3 million in total congestion credits the first nine months of 2017.

Table 11-13 Change in total PJM congestion costs by transaction type by market: January 1 through September 30, 2016 and 2017 (Dollars (Millions))

Transaction Type	Change in Congestion Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
DEC	(\$49.3)	\$0.0	\$0.0	(\$49.3)	\$41.6	\$0.0	\$0.0	\$41.6	\$0.0	(\$7.7)
Demand	(\$32.7)	\$0.0	\$0.0	(\$32.7)	(\$19.0)	\$0.0	\$0.0	(\$19.0)	\$0.0	(\$51.7)
Demand Response	(\$0.0)	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Explicit Congestion Only	\$0.0	\$0.0	(\$2.7)	(\$2.7)	\$0.0	\$0.0	(\$0.1)	(\$0.1)	\$0.0	(\$2.8)
Export	\$34.1	\$0.0	\$0.1	\$34.1	\$3.4	\$0.0	\$0.6	\$4.0	\$0.0	\$38.1
Generation	\$0.0	\$336.5	\$0.0	(\$336.5)	\$0.0	(\$8.0)	\$0.0	\$8.0	\$0.0	(\$328.5)
Grandfathered Overuse	\$0.0	\$0.0	(\$0.3)	(\$0.3)	\$0.0	\$0.0	(\$0.4)	(\$0.4)	\$0.0	(\$0.7)
Import	\$0.0	\$8.3	(\$0.1)	(\$8.5)	\$0.0	\$10.8	(\$1.7)	(\$12.5)	\$0.0	(\$21.0)
INC	\$0.0	(\$29.4)	\$0.0	\$29.4	\$0.0	\$25.5	\$0.0	(\$25.5)	\$0.0	\$3.9
Internal Bilateral	(\$176.0)	(\$177.5)	(\$1.5)	(\$0.0)	(\$15.4)	(\$15.3)	(\$0.0)	(\$0.0)	\$0.0	(\$0.0)
Up to Congestion	\$0.0	\$0.0	(\$26.7)	(\$26.7)	\$0.0	\$0.0	\$32.4	\$32.4	\$0.0	\$5.7
Wheel In	\$0.0	\$16.0	(\$2.1)	(\$18.1)	\$0.0	(\$0.1)	(\$0.1)	(\$0.0)	\$0.0	(\$18.1)
Wheel Out	\$16.0	\$0.0	\$0.0	\$16.0	(\$0.1)	\$0.0	\$0.0	(\$0.1)	\$0.0	\$15.9
Total	(\$207.9)	\$153.9	(\$33.4)	(\$395.2)	\$10.6	\$12.8	\$30.6	\$28.4	\$0.0	(\$366.8)

Monthly Congestion

Table 11-14 shows that monthly total congestion costs ranged from \$30.1 million in August to \$98.5 million in September in the first nine months of 2017.

Table 11-14 Monthly PJM congestion costs by market (Dollars (Millions)): January 1, 2016 through September 30, 2017

	Congestion Costs (Millions)							
	2016				2017			
	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total
Jan	\$123.5	(\$16.0)	\$0.0	\$107.6	\$66.4	(\$6.5)	(\$0.0)	\$59.9
Feb	\$123.8	(\$12.5)	\$0.0	\$111.3	\$44.4	\$2.1	\$0.0	\$46.5
Mar	\$75.6	(\$2.2)	(\$0.0)	\$73.3	\$54.1	(\$2.5)	\$0.0	\$51.6
Apr	\$81.2	(\$3.0)	\$0.0	\$78.2	\$30.7	(\$0.1)	\$0.0	\$30.5
May	\$41.6	\$7.5	(\$0.0)	\$49.1	\$36.7	(\$4.0)	\$0.0	\$32.7
Jun	\$68.2	(\$8.6)	(\$0.0)	\$59.6	\$64.5	(\$0.2)	\$0.0	\$64.4
Jul	\$124.4	(\$13.6)	(\$0.0)	\$110.8	\$51.7	(\$10.4)	\$0.0	\$41.3
Aug	\$116.0	(\$5.0)	(\$0.0)	\$111.0	\$34.3	(\$4.2)	\$0.0	\$30.1
Sep	\$123.4	(\$2.1)	(\$0.0)	\$121.4	\$99.7	(\$1.2)	\$0.0	\$98.5
Oct	\$115.7	(\$12.6)	(\$0.0)	\$103.1				
Nov	\$48.9	(\$0.9)	(\$0.0)	\$48.0				
Dec	\$58.0	(\$7.8)	(\$0.0)	\$50.3				
Total	\$1,100.4	(\$76.8)	(\$0.0)	\$1,023.7	\$482.5	(\$27.1)	\$0.0	\$455.4

Figure 11-1 shows PJM monthly total congestion cost for January 1, 2009 through September 30, 2017.

Figure 11-1 PJM monthly total congestion cost (Dollars (Millions)): January 1, 2009 through September 30, 2017

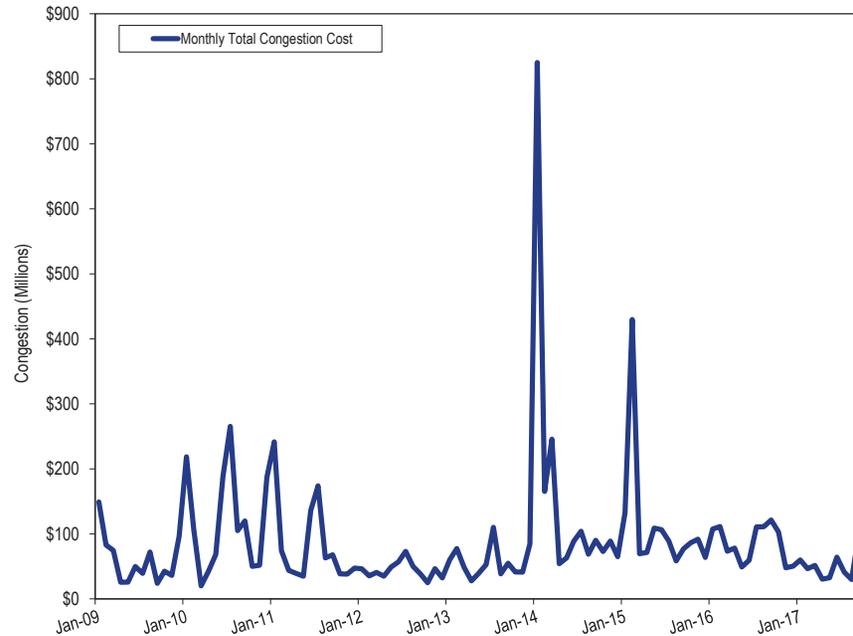


Table 11-15 shows the monthly total congestion costs for each virtual transaction type in the first nine months of 2017 and Table 11-16 shows the monthly total congestion costs for each virtual transaction type in 2016. Virtual transaction congestion costs, when positive, measure the total congestion cost to the virtual transaction and when negative, measure the total congestion credit to the virtual transaction. Table 11-15 and Table 11-16 show that virtuals were paid in the first nine months of 2017 and in the first nine months of 2016.

Table 11-15 Monthly PJM congestion costs by virtual transaction type and by market (Dollars (Millions)): January 1 through September 30, 2017

	Congestion Costs (Millions)								
	Day-Ahead				Balancing				Virtual Grand Total
	DEC	INC	Up to Congestion	Virtual Total	DEC	INC	Up to Congestion	Virtual Total	
Jan	\$1.1	\$0.3	\$2.9	\$4.3	(\$3.0)	(\$1.1)	(\$2.0)	(\$6.1)	(\$1.9)
Feb	(\$0.7)	(\$4.9)	\$0.7	(\$4.8)	(\$1.6)	\$3.4	\$1.7	\$3.5	(\$1.4)
Mar	(\$1.2)	\$2.3	(\$1.4)	(\$0.3)	\$0.4	(\$2.6)	\$1.2	(\$1.0)	(\$1.3)
Apr	(\$1.5)	\$0.2	\$0.7	(\$0.6)	\$1.3	(\$0.6)	\$0.6	\$1.4	\$0.8
May	(\$3.5)	\$1.4	\$0.2	(\$1.8)	\$1.7	(\$3.2)	\$0.6	(\$0.9)	(\$2.7)
Jun	(\$0.3)	\$1.0	(\$0.3)	\$0.3	\$0.2	(\$1.5)	\$1.4	\$0.0	\$0.4
Jul	\$0.6	\$1.1	\$1.0	\$2.7	(\$2.2)	(\$3.2)	(\$5.1)	\$10.5	(\$7.9)
Aug	\$2.0	\$0.4	\$1.6	\$3.9	(\$2.1)	(\$1.3)	(\$2.7)	(\$6.1)	(\$2.2)
Sep	\$2.3	\$0.9	(\$3.8)	(\$0.6)	(\$2.6)	(\$2.2)	(\$2.7)	(\$7.5)	(\$8.1)
Total	(\$1.3)	\$2.7	\$1.7	\$3.1	(\$7.9)	(\$12.3)	(\$7.0)	(\$27.3)	(\$24.2)

Table 11-16 Monthly PJM congestion costs by virtual transaction type and by market (Dollars (Millions)): 2016

	Congestion Costs (Millions)								
	Day-Ahead				Balancing				Virtual Grand Total
	DEC	INC	Up to Congestion	Virtual Total	DEC	INC	Up to Congestion	Virtual Total	
Jan	\$6.8	(\$0.8)	\$4.2	\$10.1	(\$6.1)	(\$1.5)	(\$11.6)	(\$19.2)	(\$9.0)
Feb	\$6.0	(\$1.0)	\$1.2	\$6.1	(\$8.1)	(\$0.5)	(\$6.3)	(\$14.9)	(\$8.8)
Mar	\$5.1	(\$5.3)	\$0.8	\$0.5	(\$3.9)	\$3.8	(\$1.2)	(\$1.3)	(\$0.8)
Apr	\$5.0	(\$3.9)	(\$0.9)	\$0.2	(\$5.1)	\$4.3	(\$0.7)	(\$1.5)	(\$1.3)
May	\$3.4	(\$8.9)	\$0.8	(\$4.8)	(\$2.4)	\$7.4	\$1.8	\$6.9	\$2.1
Jun	\$3.9	\$0.0	\$7.6	\$11.6	(\$2.6)	(\$1.5)	(\$7.2)	(\$11.4)	\$0.2
Jul	\$3.5	\$0.2	\$5.5	\$9.2	(\$6.0)	(\$1.7)	(\$7.5)	(\$15.2)	(\$5.9)
Aug	\$7.4	(\$3.0)	\$4.9	\$9.3	(\$7.4)	\$1.2	(\$5.5)	(\$11.8)	(\$2.5)
Sep	\$6.8	(\$3.9)	\$4.5	\$7.4	(\$7.9)	\$1.6	(\$1.2)	(\$7.6)	(\$0.2)
Oct	\$4.9	(\$3.7)	\$0.1	\$1.3	(\$5.0)	\$3.1	(\$4.0)	(\$5.8)	(\$4.5)
Nov	\$1.7	(\$1.6)	\$1.5	\$1.6	(\$1.8)	\$0.9	(\$1.0)	(\$1.9)	(\$0.3)
Dec	\$1.7	(\$1.1)	\$2.7	\$3.4	(\$3.3)	\$0.1	(\$2.7)	(\$5.9)	(\$2.5)
Total	\$56.3	(\$33.1)	\$32.7	\$55.9	(\$59.6)	\$17.2	(\$47.0)	(\$89.5)	(\$33.5)

Congested Facilities

A congestion event exists when a unit or units must be dispatched out of merit order to control for the potential impact of a contingency on a monitored facility or to control an actual overload. A congestion-event hour exists when a specific facility is constrained for one or more five-minute intervals within an hour. A congestion-event hour differs from a constrained hour, which is any hour during which one or more facilities are congested. Thus, if two facilities are constrained during an hour, the result is two congestion-event hours and one constrained hour. Constraints are often simultaneous, so the number of congestion-event hours usually exceeds the number of constrained hours and the number of congestion-event hours usually exceeds the number of hours in a year.

In order to have a consistent metric for real-time and day-ahead congestion frequency, real-time congestion frequency is measured using the convention that an hour is constrained if any of its component five-minute intervals is constrained. This is consistent with the way in which PJM reports real-time congestion. In the first nine months of 2017, there were 224,543 day-ahead, congestion-event hours compared to 209,600 day-ahead congestion-event hours in the first nine months of 2016. Of the first nine months of 2017 day-ahead congestion-event hours, only 8,091 (3.6 percent) were also constrained in the Real-Time Energy Market. In the first nine months of 2017, there were 16,474 real-time, congestion-event hours compared to 20,396 real-time, congestion-event hours in the first nine months of 2016. Of the first nine months of 2017 real-time congestion-event hours, 7,849 (47.6 percent) were also constrained in the Day-Ahead Energy Market.

The Conastone - Peach Bottom Line was the largest contributor to total congestion costs in the first nine months of 2017. With \$33.6 million in total congestion costs, it accounted for 7.4 percent of the total PJM congestion costs in the first nine months of 2017. The top five constraints in terms of congestion costs contributed \$127.3 million, or 28.0 percent, of the total PJM congestion costs in the first nine months of 2017. The top five constraints were the Conastone - Peach Bottom Line, the Braidwood - East Frankfort Line, the Emilie - Falls Line, the Gracetone - Safe Harbor Line and the Westwood Flowgate.

The top three constraints by total congestion costs changed from Conastone - Northwest Line, Gracetone Transformer, and Bagley - Gracetone Line in the BGE Zone in the first nine months of 2016 to the Conastone - Peach Bottom Line, the Braidwood - East Frankfort Line in the ComEd Zone and the Emilie - Falls Line in the Pepco Zone in the first nine months of 2017. The change in the top constraints in BGE Zone was primarily due to the completion of RTEP upgrades and outages in BGE Zone related to the RTEP upgrades.

Congestion by Facility Type and Voltage

In the first nine months of 2017, day-ahead, congestion-event hours increased on flowgates and transformers and decreased on lines and interfaces.

The increase in day-ahead, congestion-event hours on flowgates was largely a result of the increase of day-ahead, congestion-event hours on MISO flowgates. The day-ahead, congestion-event hours on flowgates in MISO increased from 18,405 event hours in the first nine months of 2016 to 19,458 event hours in the first nine months of 2017. The increase in day-ahead, congestion-event hours on transformers was primarily a result of the increase in day-ahead, congestion-event hours on transformers in the ComEd, PENELEC and PSEG zones. The decrease in day-ahead, congestion-event hours on interfaces was a result of the decrease of day-ahead, congestion-event hours on AEP - DOM and Bedington - Black Oak. The decrease in day-ahead, congestion-event hours on lines was primarily a result of a decrease in day-ahead, congestion-event hours incurred by lines in AECO, DPL and PSEG zones.

Real-time, congestion-event hours increased on flowgates and interfaces and decreased on lines and transformers. The increase in real-time, congestion-event hours on flowgates was primarily a result of the increase in real-time, congestion-event hours on flowgates in MISO. The decrease in real-time, congestion-event hours on lines was primarily a result of a decrease in real-time, congestion-event hours incurred by lines in BGE, ComEd and DPL zones.

Day-ahead congestion costs decreased on all types of facilities in the first nine months of 2017 compared to the first nine months of 2016, primarily as a result of the decrease in day-ahead load-weighted CLMP. The load-weighted

average congestion component decreased \$0.13, or 77.3 percent, from \$0.17 in the first nine months of 2016 to \$0.04 in the first nine months of 2017.

Balancing congestion costs increased on all types of facilities except interfaces in the first nine months of 2017 compared to the first nine months of 2016. Table 11-17 provides congestion-event hour subtotals and congestion cost subtotals comparing the first nine months of 2017 results by facility type: line, transformer, interface, flowgate and unclassified facilities.¹⁷ ¹⁸ Table 11-18 presents this information for the first nine months of 2016.

Table 11-17 Congestion summary (By facility type): January 1 through September 30, 2017

Congestion Costs (Millions)												
Type	Day-Ahead				Balancing				Event Hours			
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day Ahead	Real-Time	
Flowgate	(\$47.5)	(\$157.5)	(\$16.3)	\$93.7	\$6.2	\$7.9	(\$6.0)	(\$7.7)	\$86.0	19,973	4,751	
Interface	\$17.0	(\$12.1)	(\$1.7)	\$27.3	(\$0.2)	\$1.7	\$0.3	(\$1.5)	\$25.8	3,645	305	
Line	\$110.1	(\$174.8)	\$12.9	\$297.8	\$4.4	\$23.4	\$0.7	(\$18.3)	\$279.4	117,470	8,913	
Other	\$5.5	(\$2.7)	\$0.7	\$8.8	\$0.5	\$0.7	\$0.8	\$0.5	\$9.3	15,276	482	
Transformer	\$20.0	(\$28.1)	\$6.6	\$54.8	\$1.8	(\$0.5)	(\$1.9)	\$0.5	\$55.2	68,179	2,023	
Unclassified	\$0.1	(\$0.0)	\$0.0	\$0.1	(\$0.3)	(\$0.3)	(\$0.6)	(\$0.5)	(\$0.5)	NA	NA	
Total	\$105.1	(\$375.1)	\$2.3	\$482.5	\$12.5	\$32.9	(\$6.7)	(\$27.1)	\$455.4	224,543	16,474	

Table 11-18 Congestion summary (By facility type): January 1 through September 30, 2016

Congestion Costs (Millions)												
Type	Day-Ahead				Balancing				Event Hours			
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day Ahead	Real-Time	
Flowgate	(\$16.6)	(\$188.0)	(\$12.6)	\$158.7	(\$0.4)	\$10.9	(\$13.4)	(\$24.7)	\$134.0	18,412	4,622	
Interface	\$23.7	(\$17.8)	(\$1.6)	\$39.9	\$0.3	\$0.3	\$0.2	\$0.2	\$40.1	4,031	145	
Line	\$221.3	(\$225.1)	\$37.7	\$484.1	\$4.0	\$9.0	(\$22.8)	(\$27.8)	\$456.4	123,549	12,862	
Other	\$0.6	(\$1.8)	\$0.8	\$3.2	\$0.3	(\$0.0)	(\$0.7)	(\$0.3)	\$2.9	10,343	109	
Transformer	\$84.0	(\$96.3)	\$11.3	\$191.6	(\$2.1)	\$1.9	(\$3.4)	(\$7.3)	\$184.3	53,265	2,658	
Unclassified	\$0.1	(\$0.1)	\$0.1	\$0.3	(\$0.2)	(\$1.9)	\$2.7	\$4.4	\$4.6	NA	NA	
Total	\$313.0	(\$529.0)	\$35.7	\$877.8	\$1.9	\$20.0	(\$37.3)	(\$55.5)	\$822.2	209,600	20,396	

¹⁷ Unclassified are congestion costs related to nontransmission facility constraints in the Day-Ahead Market and any unaccounted for difference between PJM billed congestion charges and calculated congestion costs including rounding errors. Nontransmission facility constraints include day-ahead market only constraints such as constraints on virtual transactions and constraints associated with phase-angle regulators.

¹⁸ The term flowgate refers to MISO reciprocal coordinated flowgates and NYISO M2M flowgates.

Table 11-19 and Table 11-20 compare day-ahead and real-time congestion event hours. Among the hours for which a facility is constrained in the Day-Ahead Energy Market, the number of hours during which the facility is also constrained in the Real-Time Energy Market are presented in Table 11-19. In the first nine months of 2017, there were 224,543 congestion-event hours in the Day-Ahead Energy Market. Of those day-ahead congestion-event hours, only 8,091 (3.6 percent) were also constrained in the Real-Time Energy Market. In the first nine months of 2016, of the 209,600 day-ahead congestion-event hours, only 10,993 (5.2 percent) were binding in the Real-Time Energy Market.¹⁹

Among the hours for which a facility was constrained in the Real-Time Energy Market, the number of hours during which the facility was also constrained in the Day-Ahead Energy Market are presented in Table 11-20. In the first nine months of 2017, of the 16,474 congestion-event hours in the Real-Time Energy Market, 7,849 (47.6 percent) were also constrained in the Day-Ahead Energy Market. In the first nine months of 2016, of the 20,396 real-time congestion-event hours, 10,961 (53.7 percent) were also in the Day-Ahead Energy Market.

¹⁹ Constraints are mapped to transmission facilities. In the Day-Ahead Energy Market, within a given hour, a single facility may be associated with multiple constraints. In such situations, the same facility accounts for more than one constraint-hour for a given hour in the Day-Ahead Energy Market. Similarly in the real-time market a facility may account for more than one constraint-hour within a given hour.

Table 11-19 Congestion event hours (day-ahead against real-time): January 1 through September 30, 2016 and 2017

Congestion Event Hours						
Type	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Day-Ahead	Corresponding	Percent	Day-Ahead	Corresponding	Percent
	Constrained	Real-Time Constrained		Constrained	Real-Time Constrained	
Flowgate	18,412	2,116	11.5%	19,973	1,942	9.7%
Interface	4,031	75	1.9%	3,645	186	5.1%
Line	123,549	7,086	5.7%	117,470	5,265	4.5%
Other	9,281	9	0.1%	13,062	28	0.2%
Transformer	54,327	1,707	3.1%	70,393	670	1.0%
Total	209,600	10,993	5.2%	224,543	8,091	3.6%

Table 11-20 Congestion event hours (real-time against day-ahead): January 1 through September 30, 2016 and 2017

Congestion Event Hours						
Type	2016 (Jan - Sep)			2017 (Jan - Sep)		
	Real-Time	Corresponding	Percent	Real-Time	Corresponding	Percent
	Constrained	Day-Ahead Constrained		Constrained	Day-Ahead Constrained	
Flowgate	4,622	2,119	45.8%	4,751	1,953	41.1%
Interface	145	85	58.6%	305	219	71.8%
Line	12,862	7,031	54.7%	8,913	5,021	56.3%
Other	109	9	8.3%	482	28	5.8%
Transformer	2,658	1,717	64.6%	2,023	628	31.0%
Total	20,396	10,961	53.7%	16,474	7,849	47.6%

Table 11-21 shows congestion costs by facility voltage class for the first nine months of 2017. Congestion costs in the first nine months of 2017 decreased for all facilities compared to the first nine months of 2016 (Table 11-22).

Table 11-21 Congestion summary (By facility voltage): January 1 through September 30, 2017

Congestion Costs (Millions)											
Voltage (kV)	Day-Ahead				Balancing				Event Hours		
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day Ahead	Real-Time
765	\$0.5	(\$1.0)	\$0.7	\$2.3	(\$0.2)	\$0.0	\$0.0	(\$0.2)	\$2.0	989	35
500	\$54.1	(\$15.8)	(\$1.3)	\$68.6	\$1.8	\$2.9	\$3.7	\$2.6	\$71.2	6,585	1,096
345	(\$10.5)	(\$93.3)	\$3.6	\$86.4	\$6.7	\$6.5	(\$8.9)	(\$8.8)	\$77.6	44,602	2,609
230	\$75.8	(\$27.5)	\$0.7	\$103.9	\$3.9	\$9.5	\$2.2	(\$3.5)	\$100.4	34,485	3,909
161	\$0.0	(\$0.0)	\$0.0	\$0.0	(\$0.1)	\$0.1	(\$0.2)	(\$0.3)	(\$0.3)	8	17
138	(\$17.1)	(\$206.7)	(\$1.5)	\$188.1	\$3.7	\$14.9	(\$6.1)	(\$17.3)	\$170.8	98,648	6,847
115	(\$1.2)	(\$29.2)	(\$0.3)	\$27.7	(\$0.5)	\$3.1	\$2.7	(\$0.8)	\$26.9	23,194	1,434
69	\$3.3	(\$1.5)	\$0.2	\$5.0	(\$2.5)	(\$3.9)	\$0.4	\$1.7	\$6.7	11,377	527
34	\$0.2	\$0.0	\$0.1	\$0.3	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3	3,448	0
18	(\$0.0)	(\$0.1)	\$0.1	\$0.3	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3	1,160	0
17	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	11	0
13	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	36	0
Unclassified	\$0.1	(\$0.0)	\$0.0	\$0.1	(\$0.3)	(\$0.3)	(\$0.6)	(\$0.5)	(\$0.5)	NA	NA
Total	\$105.1	(\$375.1)	\$2.3	\$482.5	\$12.5	\$32.9	(\$6.7)	(\$27.1)	\$455.4	224,543	16,474

Table 11-22 Congestion summary (By facility voltage): January 1 through September 30, 2016

Congestion Costs (Millions)											
Voltage (kV)	Day-Ahead				Balancing				Event Hours		
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day Ahead	Real-Time
765	\$0.6	(\$2.0)	\$1.4	\$3.9	\$0.0	(\$0.0)	(\$0.0)	(\$0.0)	\$3.9	1,465	5
500	\$31.3	(\$38.8)	(\$1.4)	\$68.7	\$4.3	\$4.3	\$3.8	\$3.8	\$72.5	5,814	684
345	(\$10.7)	(\$154.7)	\$17.8	\$161.8	\$1.4	\$17.8	(\$20.1)	(\$36.5)	\$125.3	37,149	3,602
230	\$229.7	(\$102.9)	(\$1.3)	\$331.3	\$10.3	(\$3.6)	\$3.8	\$17.7	\$349.0	33,073	5,978
161	(\$20.3)	(\$60.4)	(\$10.4)	\$29.7	(\$2.4)	\$4.3	\$2.0	(\$4.8)	\$24.9	5,253	1,416
138	\$39.5	(\$169.4)	\$24.8	\$233.7	(\$2.4)	\$13.3	(\$25.7)	(\$41.4)	\$192.3	87,453	4,875
115	\$17.5	(\$13.9)	\$2.8	\$34.2	(\$1.3)	\$1.1	(\$3.5)	(\$5.9)	\$28.3	17,528	1,106
69	\$25.0	\$13.2	\$1.8	\$13.5	(\$7.8)	(\$15.3)	(\$0.3)	\$7.1	\$20.6	18,623	2,671
34	\$0.5	\$0.0	\$0.2	\$0.6	(\$0.0)	\$0.0	\$0.1	\$0.1	\$0.7	3,167	59
13	(\$0.0)	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	54	0
12	(\$0.1)	(\$0.1)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	21	0
Unclassified	\$0.1	(\$0.1)	\$0.1	\$0.3	(\$0.2)	(\$1.9)	\$2.7	\$4.4	\$4.6	NA	NA
Total	\$313.0	(\$529.0)	\$35.7	\$877.8	\$1.9	\$20.0	(\$37.3)	(\$55.5)	\$822.2	209,600	20,396

Constraint Duration

Table 11-23 lists the constraints in the first nine months of 2016 and 2017 that were most frequently binding and Table 11-24 shows the constraints which experienced the largest change in congestion-event hours from the first nine months of 2016 to the first nine months of 2017.

Table 11-23 Top 25 constraints with frequent occurrence: January 1 through September 30, 2016 and 2017

No.	Constraint	Type	Event Hours						Percent of Annual Hours					
			Day-Ahead			Real-Time			Day-Ahead			Real-Time		
			(Jan - Sep)			(Jan - Sep)			(Jan - Sep)			(Jan - Sep)		
			2016	2017	Change	2016	2017	Change	2016	2017	Change	2016	2017	Change
1	Quad Cities	Transformer	341	7,015	6,674	0	0	0	4%	80%	76%	0%	0%	0%
2	Emilie - Falls	Line	2,251	4,600	2,349	287	781	494	26%	52%	27%	3%	9%	6%
3	Olive	Other	4,196	5,271	1,075	0	0	0	48%	60%	12%	0%	0%	0%
4	Waukegan	Transformer	1,290	3,938	2,648	0	0	0	15%	45%	30%	0%	0%	0%
5	Graceton - Safe Harbor	Line	126	2,795	2,669	56	1,021	965	1%	32%	30%	1%	12%	11%
6	Hinchmans	Transformer	0	3,725	3,725	0	0	0	0%	42%	42%	0%	0%	0%
7	Conastone - Peach Bottom	Line	1,063	2,717	1,654	410	810	400	12%	31%	19%	5%	9%	5%
8	Braidwood - East Frankfort	Line	1,708	3,241	1,533	309	248	(61)	19%	37%	17%	4%	3%	(1%)
9	Loretto - Vienna	Line	1,051	3,404	2,353	0	60	60	12%	39%	27%	0%	1%	1%
10	Zion	Line	1,736	3,346	1,610	0	0	0	20%	38%	18%	0%	0%	0%
11	Westwood	Flowgate	5	3,145	3,140	0	198	198	0%	36%	36%	0%	2%	2%
12	East Bend	Transformer	2,020	2,977	957	0	0	0	23%	34%	11%	0%	0%	0%
13	Howard - Shelby	Line	2,978	2,905	(73)	0	0	0	34%	33%	(1%)	0%	0%	0%
14	West Chicago	Transformer	1,596	2,517	921	0	0	0	18%	29%	10%	0%	0%	0%
15	Gould Street - Westport	Line	1,699	2,423	724	27	0	(27)	19%	28%	8%	0%	0%	(0%)
16	Essex Co. RRF	Transformer	359	2,338	1,979	0	0	0	4%	27%	23%	0%	0%	0%
17	West Moulton - City Of St. Marys	Line	2,623	2,248	(375)	0	0	0	30%	26%	(4%)	0%	0%	0%
18	Cherry Valley	Transformer	3,352	2,142	(1,210)	265	92	(173)	38%	24%	(14%)	3%	1%	(2%)
19	Liquid Carbonics	Transformer	1,062	2,214	1,152	0	0	0	12%	25%	13%	0%	0%	0%
20	Elwood	Other	2,467	2,213	(254)	0	0	0	28%	25%	(3%)	0%	0%	0%
21	Saddlebrook	Transformer	1,001	2,201	1,200	0	0	0	11%	25%	14%	0%	0%	0%
22	Tanners Creek	Transformer	1,743	2,049	306	0	0	0	20%	23%	3%	0%	0%	0%
23	Beryl - Westvaco	Line	0	2,038	2,038	0	0	0	0%	23%	23%	0%	0%	0%
24	Electric Junction	Transformer	0	1,997	1,997	0	0	0	0%	23%	23%	0%	0%	0%
25	Kendall Co. Energy Ctr.	Transformer	375	1,980	1,605	0	0	0	4%	23%	18%	0%	0%	0%

Table 11-24 Top 25 constraints with largest year-to-year change in occurrence: January 1 through September 30, 2016 and 2017

No.	Constraint	Type	Event Hours						Percent of Annual Hours					
			Day-Ahead			Real-Time			Day-Ahead			Real-Time		
			(Jan - Sep)			(Jan - Sep)			(Jan - Sep)			(Jan - Sep)		
2016	2017	Change	2016	2017	Change	2016	2017	Change	2016	2017	Change	2016	2017	Change
1	Quad Cities	Transformer	341	7,015	6,674	0	0	0	4%	80%	76%	0%	0%	0%
2	Monroe - Vineland	Line	4,657	203	(4,454)	413	13	(400)	53%	2%	(51%)	5%	0%	(5%)
3	Mercer IP - Galesburg	Flowgate	3,510	0	(3,510)	1,155	0	(1,155)	40%	0%	(40%)	13%	0%	(13%)
4	Graceton	Transformer	3,028	0	(3,028)	1,298	0	(1,298)	35%	0%	(35%)	15%	0%	(15%)
5	Hinchmans	Transformer	0	3,725	3,725	0	0	0	0%	42%	42%	0%	0%	0%
6	Graceton - Safe Harbor	Line	126	2,795	2,669	56	1,021	965	1%	32%	30%	1%	12%	11%
7	Bagley - Graceton	Line	2,672	498	(2,174)	1,408	111	(1,297)	31%	6%	(25%)	16%	1%	(15%)
8	Westwood	Flowgate	5	3,145	3,140	0	198	198	0%	36%	36%	0%	2%	2%
9	East Danville - Banister	Line	3,300	159	(3,141)	20	0	(20)	38%	2%	(36%)	0%	0%	(0%)
10	Emilie - Falls	Line	2,251	4,600	2,349	287	781	494	26%	52%	27%	3%	9%	6%
11	Conastone - Northwest	Line	2,171	690	(1,481)	1,424	165	(1,259)	25%	8%	(17%)	16%	2%	(14%)
12	Waukegan	Transformer	1,290	3,938	2,648	0	0	0	15%	45%	30%	0%	0%	0%
13	Loretto - Vienna	Line	1,051	3,404	2,353	0	60	60	12%	39%	27%	0%	1%	1%
14	Kincaid - Pana North	Line	2,127	0	(2,127)	0	0	0	24%	0%	(24%)	0%	0%	0%
15	Braidwood	Transformer	3,354	1,246	(2,108)	0	0	0	38%	14%	(24%)	0%	0%	0%
16	Conastone - Peach Bottom	Line	1,063	2,717	1,654	410	810	400	12%	31%	19%	5%	9%	5%
17	Mainesburg - Mansfield	Line	2,063	155	(1,908)	141	0	(141)	24%	2%	(22%)	2%	0%	(2%)
18	Beryl - Westvaco	Line	0	2,038	2,038	0	0	0	0%	23%	23%	0%	0%	0%
19	Electric Junction	Transformer	0	1,997	1,997	0	0	0	0%	23%	23%	0%	0%	0%
20	Mardela - Vienna	Line	2,118	499	(1,619)	380	5	(375)	24%	6%	(18%)	4%	0%	(4%)
21	Essex Co. RRF	Transformer	359	2,338	1,979	0	0	0	4%	27%	23%	0%	0%	0%
22	Tidd	Transformer	2,245	276	(1,969)	0	0	0	26%	3%	(22%)	0%	0%	0%
23	logtown - North Delphos	Line	0	1,876	1,876	0	0	0	0%	21%	21%	0%	0%	0%
24	Seneca	Transformer	28	1,871	1,843	0	0	0	0%	21%	21%	0%	0%	0%
25	Dixon - McGirr Rd	Flowgate	1,779	0	(1,779)	0	0	0	20%	0%	(20%)	0%	0%	0%

Constraint Costs

Table 11-25 and Table 11-26 show the top constraints affecting congestion costs by facility for the first nine months of 2017 and 2016. The Conastone – Peach Bottom Line was the largest contributor to congestion costs in the first nine months of 2017. With \$33.6 million in total congestion costs, it accounted for 7.4 percent of the total PJM congestion costs in the first nine months of 2017.

Table 11-25 Top 25 constraints affecting PJM congestion costs (By facility): January 1 through September 30, 2017

No.	Constraint	Type	Location	Congestion Costs (Millions)										Percent of Total PJM Congestion Costs
				Day-Ahead				Balancing						
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	2017 (Jan - Sep)	
1	Conastone - Peach Bottom	Line	500	\$33.2	\$2.0	\$0.1	\$31.4	\$2.0	\$1.3	\$1.6	\$2.2	\$33.6	7.4%	
2	Braidwood - East Frankfort	Line	ComEd	(\$3.1)	(\$38.6)	(\$0.0)	\$35.5	\$0.7	\$2.0	(\$0.6)	(\$1.9)	\$33.6	7.4%	
3	Emilie - Falls	Line	PECO	\$10.2	(\$11.9)	\$0.2	\$22.3	\$0.1	\$1.2	\$0.5	(\$0.6)	\$21.7	4.8%	
4	Graceton - Safe Harbor	Line	BGE	\$25.6	\$5.8	\$0.1	\$19.9	\$1.5	\$2.2	\$1.3	\$0.6	\$20.6	4.5%	
5	Westwood	Flowgate	MISO	(\$21.5)	(\$38.8)	\$0.6	\$17.9	\$1.2	\$0.8	(\$0.5)	(\$0.1)	\$17.8	3.9%	
6	AP South	Interface	500	\$9.8	(\$4.6)	(\$1.2)	\$13.1	(\$0.0)	\$1.3	\$0.9	(\$0.5)	\$12.6	2.8%	
7	Cherry Valley	Transformer	ComEd	\$4.6	(\$7.1)	\$1.3	\$12.9	(\$0.2)	\$0.8	\$0.3	(\$0.7)	\$12.2	2.7%	
8	Conastone - Northwest	Line	BGE	\$10.1	(\$0.9)	(\$0.4)	\$10.6	\$0.2	\$0.5	\$0.9	\$0.5	\$11.1	2.4%	
9	Alpine - Belvidere	Flowgate	MISO	(\$2.3)	(\$14.0)	(\$0.9)	\$10.8	\$0.0	\$0.0	\$0.0	\$0.0	\$10.8	2.4%	
10	Three Mile Island	Transformer	500	\$5.7	(\$3.8)	(\$0.3)	\$9.3	(\$0.0)	(\$0.4)	\$0.9	\$1.3	\$10.6	2.3%	
11	Lake George - Aetna	Flowgate	MISO	(\$1.1)	(\$9.0)	(\$1.5)	\$6.4	(\$2.2)	\$0.9	\$5.8	\$2.7	\$9.2	2.0%	
12	Lakeview - Greenfield	Line	ATSI	(\$2.3)	(\$10.8)	\$0.4	\$8.9	(\$0.1)	\$0.3	\$0.1	(\$0.3)	\$8.6	1.9%	
13	Butler - Shanorma	Line	APS	(\$6.5)	(\$13.0)	\$0.8	\$7.2	\$0.0	\$0.0	\$0.0	\$0.0	\$7.2	1.6%	
14	Bedington - Black Oak	Interface	500	\$4.1	(\$2.8)	(\$0.0)	\$6.9	\$0.0	\$0.2	\$0.4	\$0.2	\$7.1	1.6%	
15	Pleasant View - Ashburn	Line	Dominion	\$5.6	(\$3.5)	(\$0.3)	\$8.7	(\$1.1)	\$1.0	(\$0.1)	(\$2.2)	\$6.5	1.4%	
16	Greentown	Flowgate	MISO	(\$1.4)	(\$7.6)	(\$0.7)	\$5.6	(\$0.8)	(\$0.2)	\$1.1	\$0.5	\$6.1	1.3%	
17	Loretto - Vienna	Line	DPL	\$7.6	\$1.9	\$0.5	\$6.1	(\$0.4)	\$0.1	\$0.2	(\$0.3)	\$5.8	1.3%	
18	Batesville - Hubble	Flowgate	MISO	(\$4.2)	(\$14.0)	(\$3.0)	\$6.8	(\$0.1)	(\$1.0)	(\$2.3)	(\$1.4)	\$5.4	1.2%	
19	Bagley - Graceton	Line	BGE	\$4.6	(\$0.4)	(\$0.0)	\$5.0	\$0.3	\$0.4	\$0.1	(\$0.0)	\$5.0	1.1%	
20	Brunner Island - Yorkanna	Line	Met-Ed	\$3.5	(\$1.2)	(\$0.1)	\$4.6	\$0.0	\$0.0	\$0.0	\$0.0	\$4.6	1.0%	
21	Byron - Cherry Valley	Flowgate	MISO	(\$0.7)	(\$5.4)	(\$0.1)	\$4.6	\$0.0	\$0.0	\$0.0	\$0.0	\$4.6	1.0%	
22	Quarry - Steel City	Line	PPL	(\$0.1)	(\$4.3)	(\$0.1)	\$4.2	\$0.0	(\$0.0)	\$0.3	\$0.3	\$4.5	1.0%	
23	Middletown Jct - Brunner Island	Line	PPL	\$1.9	(\$2.5)	(\$0.2)	\$4.1	\$0.0	\$0.0	\$0.0	\$0.0	\$4.1	0.9%	
24	Havana E - Havana S	Flowgate	MISO	(\$2.0)	(\$6.3)	(\$0.3)	\$4.1	\$0.0	\$0.0	\$0.0	\$0.0	\$4.1	0.9%	
25	Quad Cities	Transformer	ComEd	(\$1.3)	(\$4.7)	\$0.6	\$4.0	\$0.0	\$0.0	\$0.0	\$0.0	\$4.0	0.9%	

Table 11-26 Top 25 constraints affecting PJM congestion costs (By facility): January 1 through September 30, 2016

No.	Constraint	Type	Location	Congestion Costs (Millions)									Percent of Total PJM Congestion Costs	
				Day-Ahead				Balancing					Grand Total	2016 (Jan - Sep)
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total			
1	Conastone - Northwest	Line	BGE	\$83.6	\$3.1	(\$3.1)	\$77.4	\$4.0	(\$1.1)	\$4.8	\$9.9	\$87.3	10.6%	
2	Graceton	Transformer	BGE	\$52.8	(\$20.8)	(\$0.9)	\$72.7	(\$0.9)	(\$4.7)	\$1.8	\$5.6	\$78.4	9.5%	
3	Bagley - Graceton	Line	BGE	\$53.8	\$3.6	(\$1.7)	\$48.4	\$2.4	(\$2.5)	\$2.2	\$7.1	\$55.5	6.8%	
4	Cherry Valley	Transformer	ComEd	\$15.5	(\$17.9)	\$3.3	\$36.7	(\$2.5)	\$2.0	(\$6.1)	(\$10.6)	\$26.1	3.2%	
5	Braidwood - East Frankfort	Line	ComEd	(\$3.5)	(\$34.7)	\$0.8	\$32.0	\$0.5	\$3.3	(\$3.4)	(\$6.1)	\$25.8	3.1%	
6	Mercer IP - Galesburg	Flowgate	MISO	(\$17.1)	(\$49.9)	(\$8.9)	\$23.9	(\$0.2)	\$3.6	\$2.2	(\$1.6)	\$22.3	2.7%	
7	Byron - Cherry Valley	Flowgate	MISO	(\$5.5)	(\$22.6)	\$0.9	\$18.0	\$0.0	\$0.0	\$0.0	\$0.0	\$18.0	2.2%	
8	Dixon - McGirr Rd	Flowgate	MISO	(\$5.0)	(\$22.9)	(\$1.2)	\$16.7	\$0.0	\$0.0	\$0.0	\$0.0	\$16.7	2.0%	
9	Milford - Steele	Line	DPL	(\$8.3)	(\$25.7)	\$0.1	\$17.5	\$2.2	\$1.4	(\$1.7)	(\$0.9)	\$16.6	2.0%	
10	Bedington - Black Oak	Interface	500	\$8.7	(\$5.9)	(\$0.4)	\$14.2	\$0.2	\$0.2	\$0.1	\$0.1	\$14.3	1.7%	
11	Coolspring - Milford	Line	DPL	\$1.3	(\$11.8)	(\$0.0)	\$13.0	(\$1.0)	(\$1.8)	\$0.3	\$1.1	\$14.1	1.7%	
12	AP South	Interface	500	\$11.6	(\$3.9)	(\$1.6)	\$14.0	\$0.1	\$0.0	(\$0.0)	\$0.0	\$14.0	1.7%	
13	Loudoun	Transformer	500	\$1.1	(\$9.8)	(\$0.2)	\$10.6	\$1.5	\$2.2	\$3.4	\$2.7	\$13.3	1.6%	
14	Person - Halifax	Flowgate	MISO	\$29.9	\$16.1	(\$0.2)	\$13.5	\$0.0	\$0.0	(\$0.2)	(\$0.2)	\$13.3	1.6%	
15	Kanawha River - Matt Funk	Line	AEP	\$2.7	(\$17.1)	(\$1.1)	\$18.8	(\$0.7)	\$2.5	(\$3.3)	(\$6.6)	\$12.2	1.5%	
16	Conastone - Peach Bottom	Line	500	\$9.4	(\$2.3)	\$0.1	\$11.8	\$1.3	\$1.3	\$0.0	\$0.0	\$11.8	1.4%	
17	Plymouth Meeting - Whitpain	Line	PECO	(\$0.6)	(\$10.9)	(\$0.1)	\$10.2	(\$0.1)	\$0.1	\$0.2	(\$0.0)	\$10.1	1.2%	
18	Cherry Valley	Flowgate	MISO	(\$0.5)	(\$9.1)	\$0.5	\$9.1	\$0.0	\$0.0	\$0.0	\$0.0	\$9.1	1.1%	
19	Braidwood - East Frankfurt	Flowgate	MISO	(\$0.1)	(\$7.7)	\$0.7	\$8.4	\$0.0	\$0.0	\$0.0	\$0.0	\$8.4	1.0%	
20	Cherry Valley - Silver Lake	Flowgate	MISO	(\$1.8)	(\$9.4)	\$0.8	\$8.4	\$0.0	\$0.0	\$0.0	\$0.0	\$8.4	1.0%	
21	Brambleton - Loudoun	Line	Dominion	(\$2.9)	(\$10.2)	\$0.2	\$7.5	\$0.2	(\$0.1)	\$0.4	\$0.6	\$8.1	1.0%	
22	Kanawha	Transformer	AEP	\$0.1	(\$7.1)	\$0.7	\$7.8	\$0.0	\$0.0	\$0.0	\$0.0	\$7.8	1.0%	
23	Alpine - Belvidere	Flowgate	MISO	(\$1.9)	(\$9.5)	(\$0.1)	\$7.5	\$0.0	\$0.0	\$0.0	\$0.0	\$7.5	0.9%	
24	Mardela - Vienna	Line	DPL	(\$0.7)	(\$3.3)	\$0.1	\$2.7	(\$0.6)	(\$4.1)	\$0.5	\$4.0	\$6.7	0.8%	
25	Kenney - Stockton	Line	DPL	(\$0.1)	(\$0.1)	(\$0.1)	(\$0.0)	(\$0.8)	(\$6.0)	\$1.2	\$6.4	\$6.4	0.8%	

Figure 11-2 shows the locations of the top 10 constraints by total congestion costs on a contour map of the real-time, load-weighted, average CLMP in the first nine months of 2017. Figure 11-3 shows the locations of the top 10 constraints by balancing congestion costs on a contour map of the real-time, load-weighted, average CLMP in the first nine months of 2017. Figure 11-4 shows the locations of the top 10 constraints by day-ahead congestion costs on a contour map of the day-ahead, load-weighted, average CLMP in the first nine months of 2017.

Figure 11-2 Location of the top 10 constraints by PJM total congestion costs: January 1 through September 30, 2017

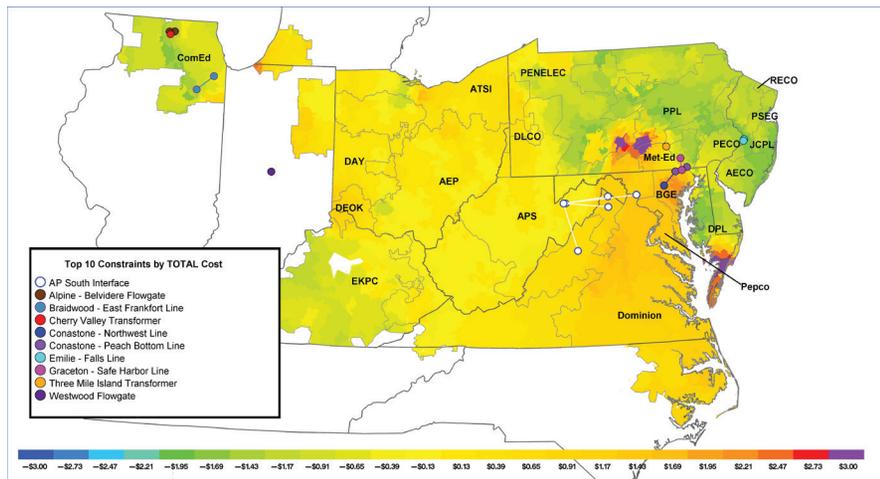


Figure 11-4 Location of the top 10 constraints by PJM day-ahead congestion costs: January 1 through September 30, 2017

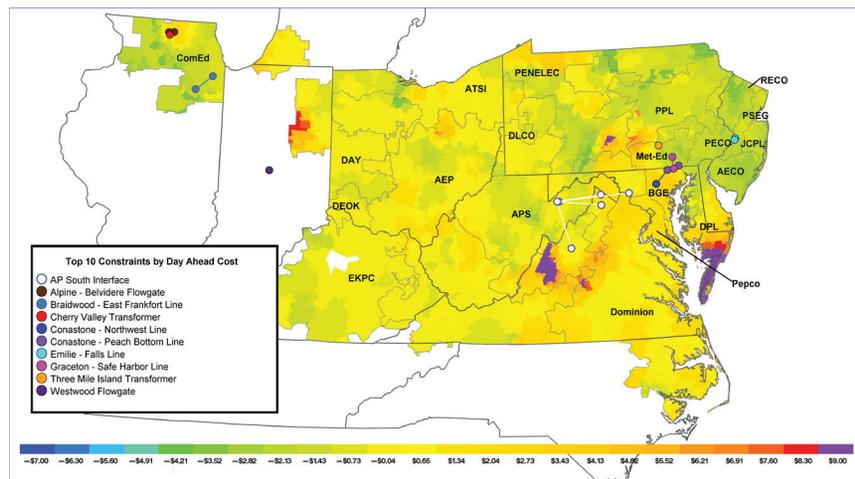
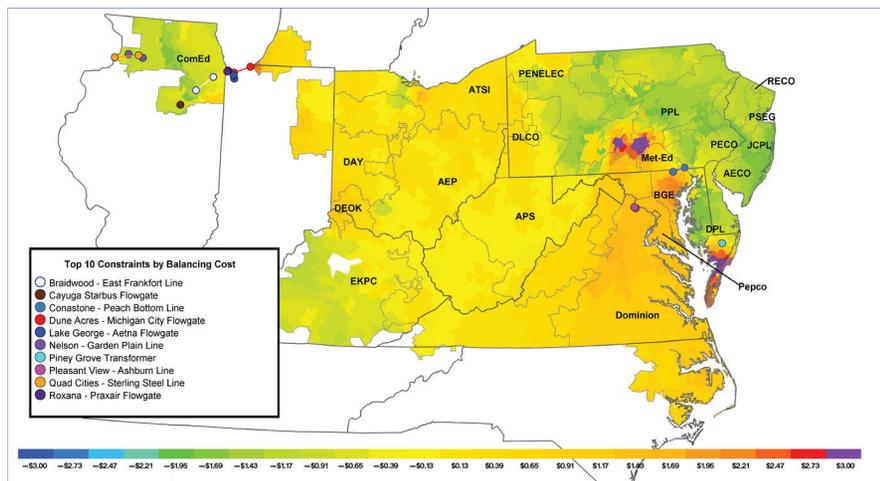


Figure 11-3 Location of the top 10 constraints by PJM balancing congestion costs: January 1 through September 30, 2017



Congestion-Event Summary for MISO Flowgates

PJM and MISO have a joint operating agreement (JOA) which defines a coordinated methodology for congestion management. This agreement establishes reciprocal, coordinated flowgates in the combined footprint whose operating limits are respected by the operators of both organizations.²⁰ A flowgate is a facility or group of facilities that may act as constraint points on the regional system.²¹ PJM models these coordinated flowgates and controls for them in its security-constrained, economic dispatch.

As of September 30, 2017, PJM had 137 flowgates eligible for M2M (Market to Market) coordination and MISO had 250 flowgates eligible for M2M coordination.

Table 11-27 and Table 11-28 show the MISO flowgates which PJM and/or MISO took dispatch action to control during the first nine months of 2017

²⁰ See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.," (December 11, 2008), Section 6.1, Effective Date: May 30, 2016. <<http://www.pjm.com/documents/agreements.aspx>>.

²¹ See "Joint Operating Agreement Between the Midwest Independent Transmission System Operator, Inc. and PJM Interconnection, L.L.C.," (December 11, 2008), Section 2.2.24, Effective Date: February 14, 2017. <<http://www.pjm.com/documents/agreements.aspx>>.

and 2016, and which had the greatest congestion cost impact on PJM. Total congestion costs associated with a given constraint may be positive or negative in value. The top congestion cost impacts for MISO flowgates affecting PJM and MISO dispatch are presented by constraint, in descending order of the absolute value of total congestion costs. Among MISO flowgates in the first nine months of 2017, the Westwood Flowgate made the most significant contribution to positive congestion while the Roxana - Praxair Flowgate made the most significant contribution to negative congestion.

Table 11-27 Top 20 congestion cost impacts from MISO flowgates affecting PJM dispatch (By facility): January 1 through September 30, 2017

Congestion Costs (Millions)												
No.	Constraint	Day-Ahead				Balancing				Event Hours		
		Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time
1	Westwood	(\$21.5)	(\$38.8)	\$0.6	\$17.9	\$1.2	\$0.8	(\$0.5)	(\$0.1)	\$17.8	3,145	198
2	Alpine - Belvidere	(\$2.3)	(\$14.0)	(\$0.9)	\$10.8	\$0.0	\$0.0	\$0.0	\$0.0	\$10.8	339	0
3	Lake George - Aetna	(\$1.1)	(\$9.0)	(\$1.5)	\$6.4	(\$2.2)	\$0.9	\$5.8	\$2.7	\$9.2	483	244
4	Greentown	(\$1.4)	(\$7.6)	(\$0.7)	\$5.6	(\$0.8)	(\$0.2)	\$1.1	\$0.5	\$6.1	425	248
5	Batesville - Hubble	(\$4.2)	(\$14.0)	(\$3.0)	\$6.8	(\$0.1)	(\$1.0)	(\$2.3)	(\$1.4)	\$5.4	140	105
6	Byron - Cherry Valley	(\$0.7)	(\$5.4)	(\$0.1)	\$4.6	\$0.0	\$0.0	\$0.0	\$0.0	\$4.6	175	0
7	Havana E - Havana S	(\$2.0)	(\$6.3)	(\$0.3)	\$4.1	\$0.0	\$0.0	\$0.0	\$0.0	\$4.1	1,603	0
8	Nelson	(\$2.2)	(\$6.4)	(\$0.3)	\$3.9	\$0.0	\$0.0	\$0.0	\$0.0	\$3.9	509	0
9	Roxana - Praxair	(\$0.3)	\$0.8	(\$0.4)	(\$1.5)	\$1.3	\$0.2	(\$3.4)	(\$2.2)	(\$3.7)	1,315	268
10	Brokaw - Leroy	\$0.5	(\$3.4)	(\$1.8)	\$2.2	(\$0.1)	\$0.7	\$1.7	\$1.0	\$3.2	803	317
11	Todd Hunter	(\$0.6)	(\$3.4)	(\$0.0)	\$2.8	\$0.0	\$0.0	\$0.0	\$0.0	\$2.8	871	0
12	Olive - Bosserman	\$1.2	(\$1.5)	(\$0.4)	\$2.3	\$0.0	\$0.0	\$0.0	\$0.0	\$2.3	133	0
13	Shadelnd - Lafaysouth	(\$4.1)	(\$6.7)	\$0.2	\$2.8	\$6.7	\$4.8	(\$2.4)	(\$0.5)	\$2.2	870	647
14	Dune Acres - Michigan City	(\$0.1)	(\$0.9)	(\$0.7)	\$0.0	(\$0.1)	\$0.0	(\$2.0)	(\$2.1)	(\$2.1)	125	70
15	Pleasant Prairie - Zion	(\$0.5)	(\$2.9)	(\$0.1)	\$2.3	\$0.0	\$0.1	(\$0.2)	(\$0.2)	\$2.1	1,555	278
16	Quad Cities	(\$0.9)	(\$2.8)	\$0.2	\$2.0	\$0.0	\$0.0	\$0.0	\$0.0	\$2.0	236	0
17	Reynolds - Magnetation	(\$0.2)	(\$1.3)	\$0.3	\$1.4	\$0.0	(\$0.0)	(\$0.1)	(\$0.0)	\$1.4	256	22
18	Dresden	(\$0.1)	(\$1.6)	(\$0.2)	\$1.3	\$0.0	\$0.0	\$0.0	\$0.0	\$1.3	312	0
19	Newton	(\$0.2)	(\$1.6)	(\$0.2)	\$1.2	\$0.1	(\$0.1)	(\$0.1)	\$0.1	\$1.3	514	173
20	Eugene - Cayuga	(\$0.4)	(\$1.9)	(\$0.2)	\$1.3	\$0.2	\$0.0	(\$0.2)	(\$0.1)	\$1.3	286	84

Table 11-28 Top 20 congestion cost impacts from MISO flowgates affecting PJM dispatch (By facility): January 1 through September 30, 2016

Congestion Costs (Millions)												
No.	Constraint	Day-Ahead				Balancing				Event Hours		
		Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time
1	Mercer IP - Galesburg	(\$17.1)	(\$49.9)	(\$8.9)	\$23.9	(\$0.2)	\$3.6	\$2.2	(\$1.6)	\$22.3	3,510	1,155
2	Byron - Cherry Valley	(\$5.5)	(\$22.6)	\$0.9	\$18.0	\$0.0	\$0.0	\$0.0	\$0.0	\$18.0	298	0
3	Dixon - McGirr Rd	(\$5.0)	(\$22.9)	(\$1.2)	\$16.7	\$0.0	\$0.0	\$0.0	\$0.0	\$16.7	1,779	0
4	Person - Halifax	\$29.9	\$16.1	(\$0.2)	\$13.5	\$0.0	\$0.0	(\$0.2)	(\$0.2)	\$13.3	719	5
5	Cherry Valley	(\$0.5)	(\$9.1)	\$0.5	\$9.1	\$0.0	\$0.0	\$0.0	\$0.0	\$9.1	440	0
6	Braidwood - East Frankfurt	(\$0.1)	(\$7.7)	\$0.7	\$8.4	\$0.0	\$0.0	\$0.0	\$0.0	\$8.4	616	0
7	Cherry Valley - Silver Lake	(\$1.8)	(\$9.4)	\$0.8	\$8.4	\$0.0	\$0.0	\$0.0	\$0.0	\$8.4	484	0
8	Alpine - Belvidere	(\$1.9)	(\$9.5)	(\$0.1)	\$7.5	\$0.0	\$0.0	\$0.0	\$0.0	\$7.5	496	0
9	Dumont	(\$1.2)	(\$8.5)	(\$1.2)	\$6.0	\$0.0	\$0.0	\$0.0	\$0.0	\$6.0	347	0
10	Batesville - Hubble	(\$3.2)	(\$11.3)	(\$1.0)	\$7.1	\$0.5	(\$0.5)	(\$2.3)	(\$1.2)	\$5.8	419	134
11	Reynolds - Magnetation	(\$1.0)	(\$7.9)	\$0.9	\$7.8	\$0.1	\$0.9	(\$2.1)	(\$2.9)	\$4.9	868	369
12	Oak Grove - Galesburg	(\$3.3)	(\$8.3)	(\$1.1)	\$3.9	\$0.1	\$0.2	\$0.2	\$0.1	\$4.0	1,336	174
13	Roxana - Praxair	(\$0.7)	(\$3.0)	(\$1.4)	\$0.8	\$0.6	(\$0.1)	(\$3.7)	(\$3.0)	(\$2.1)	854	421
14	Greentown	(\$0.1)	(\$1.2)	(\$0.1)	\$1.1	\$0.6	\$3.6	(\$0.1)	(\$3.1)	(\$2.0)	164	26
15	Reynold - Monticello	(\$0.2)	(\$1.9)	\$0.5	\$2.2	\$0.0	(\$0.0)	(\$0.3)	(\$0.3)	\$1.9	461	73
16	Pleasant Prairie - Zion	(\$0.6)	(\$2.8)	(\$0.0)	\$2.1	\$0.1	\$0.2	(\$0.2)	(\$0.3)	\$1.9	1,108	402
17	Summer ShadeTVA - Summer Shade Tap	(\$0.2)	(\$1.6)	(\$0.1)	\$1.2	(\$2.2)	\$0.4	(\$0.4)	(\$3.0)	(\$1.8)	223	31
18	West Dekalb - Glidden	(\$0.3)	(\$2.0)	\$0.1	\$1.7	\$0.0	\$0.0	\$0.0	\$0.0	\$1.7	242	0
19	Loretto - Wilton Center	(\$0.1)	(\$1.3)	\$0.4	\$1.7	\$0.0	\$0.0	\$0.0	\$0.0	\$1.7	315	0
20	Cayuga Starbus	(\$0.5)	(\$1.7)	\$0.2	\$1.5	(\$0.4)	\$0.7	(\$2.0)	(\$3.1)	(\$1.6)	72	3

Congestion-Event Summary for NYISO Flowgates

PJM and NYISO have a joint operating agreement (JOA) which defines a coordinated methodology for congestion management. This agreement establishes a structure and framework for the reliable operation of the interconnected PJM and NYISO transmission systems and efficient market operation through M2M coordination.²² Only a subset of all transmission constraints that exist in either market are eligible for coordinated congestion management. This subset of transmission constraints is identified as M2M flowgates. Flowgates eligible for the M2M coordination process are called M2M flowgates.²³

²² See "New York Independent System Operator, Inc. NYISO Tariffs" (May 26, 2016) Section 35.3.1, Effective Date: January 15, 2013. <<http://www.pjm.com/documents/agreements.aspx>>.

²³ See "New York Independent System Operator, Inc. NYISO Tariffs" (May 26, 2016) Section 35.23, Effective Date: June 11, 2014. <<http://www.pjm.com/documents/agreements.aspx>>.

Table 11-29 and Table 11-30 show the NYISO flowgates which PJM and/or NYISO took dispatch action to control during the first nine months of 2017 and 2016, and which had the greatest congestion cost impact on PJM.

Table 11-29 Top congestion cost impacts from NYISO flowgates affecting PJM dispatch (By facility): January 1 through September 30, 2017

Congestion Costs (Millions)															
No.	Constraint	Type	Location	Day-Ahead				Balancing				Event Hours			
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time	
1	Central East	Flowgate	NYISO	(\$2.7)	(\$5.7)	(\$1.7)	\$1.3	\$0.2	\$0.4	(\$0.1)	(\$0.3)	\$1.0	515	332	

Table 11-30 Top three congestion cost impacts from NYISO flowgates affecting PJM dispatch (By facility): January 1 through September 30, 2016

Congestion Costs (Millions)															
No.	Constraint	Type	Location	Day-Ahead				Balancing				Event Hours			
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time	
1	Central East	Flowgate	NYISO	\$0.0	\$0.0	\$0.0	\$0.0	\$0.6	\$1.2	\$0.2	(\$0.4)	(\$0.4)	0	730	
2	West Central Ties	Flowgate	NYISO	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	(\$0.0)	(\$0.0)	(\$0.0)	0	6	
3	Dysinger East	Flowgate	NYISO	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	0	2	

Congestion-Event Summary for the 500 kV System

Constraints on the 500 kV system generally have a regional impact. Table 11-31 and Table 11-32 show the 500 kV constraints affecting congestion costs in PJM for the first nine months of 2017 and 2016. Total congestion costs are the sum of the day-ahead and balancing congestion cost components. Total congestion costs associated with a given constraint may be positive or negative in value. The 500 kV constraints affecting congestion costs in PJM are presented by constraint, in descending order of the absolute value of total congestion costs.

Table 11-31 Regional constraints summary (By facility): January 1 through September 30, 2017

Congestion Costs (Millions)															
No.	Constraint	Type	Location	Day-Ahead				Balancing				Event Hours			
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time	
1	Conastone - Peach Bottom	Line	500	\$33.2	\$2.0	\$0.1	\$31.4	\$2.0	\$1.3	\$1.6	\$2.2	\$33.6	2,717	810	
2	AP South	Interface	500	\$9.8	(\$4.6)	(\$1.2)	\$13.1	(\$0.0)	\$1.3	\$0.9	(\$0.5)	\$12.6	1,082	74	
3	Three Mile Island	Transformer	500	\$5.7	(\$3.8)	(\$0.3)	\$9.3	(\$0.0)	(\$0.4)	\$0.9	\$1.3	\$10.6	417	49	
4	Bedington - Black Oak	Interface	500	\$4.1	(\$2.8)	(\$0.0)	\$6.9	\$0.0	\$0.2	\$0.4	\$0.2	\$7.1	1,013	55	
5	AEP - DOM	Interface	500	\$1.5	(\$1.6)	\$0.1	\$3.3	(\$0.0)	\$0.1	(\$0.3)	(\$0.4)	\$2.8	581	18	
6	West	Interface	500	(\$0.3)	(\$1.8)	(\$0.1)	\$1.3	\$0.0	\$0.0	\$0.0	\$0.0	\$1.3	163	0	
7	5004/5005 Interface	Interface	500	(\$0.5)	(\$1.7)	(\$0.2)	\$1.0	\$0.0	\$0.0	\$0.0	\$0.0	\$1.0	65	1	
8	Conastone	Transformer	500	\$0.3	(\$0.1)	\$0.0	\$0.4	\$0.0	\$0.0	\$0.0	\$0.0	\$0.4	33	2	
9	Cabot - Keystone	Line	500	(\$0.1)	(\$0.5)	\$0.1	\$0.5	\$0.1	\$0.2	(\$0.0)	(\$0.2)	\$0.3	97	18	
10	Belmont	Transformer	500	(\$0.0)	(\$0.2)	(\$0.1)	\$0.1	\$0.0	\$0.1	(\$0.3)	(\$0.4)	(\$0.3)	42	52	
11	East	Interface	500	(\$0.2)	(\$0.4)	(\$0.0)	\$0.2	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2	87	0	
12	502 Junction	Transformer	500	\$0.0	(\$0.1)	\$0.0	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1	42	0	
13	Loudoun	Transformer	500	\$0.0	\$0.0	\$0.0	\$0.0	(\$0.0)	(\$0.1)	\$0.1	\$0.1	\$0.1	0	2	
14	Bristers - Ox	Line	500	\$0.0	(\$0.0)	\$0.0	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1	14	0	
15	Elroy - Hosensack	Line	500	(\$0.0)	(\$0.1)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	7	0	
16	Cabot	Other	500	(\$0.0)	(\$0.1)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	8	0	
17	Juniata	Transformer	500	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	34	0	
18	Keeney - Rockspring	Line	500	(\$0.0)	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	7	0	
19	Cunningham - Elmont	Line	500	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	6	0	
20	Wylie Ridge	Transformer	500	(\$0.0)	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	1	0	

Table 11-32 Regional constraints summary (By facility): January 1 through September 30, 2016

Congestion Costs (Millions)														
No.	Constraint	Type	Location	Day-Ahead				Balancing				Event Hours		
				Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Grand Total	Day-Ahead	Real-Time
1	Bedington - Black Oak	Interface	500	\$8.7	(\$5.9)	(\$0.4)	\$14.2	\$0.2	\$0.2	\$0.1	\$0.1	\$14.3	1,390	105
2	AP South	Interface	500	\$11.6	(\$3.9)	(\$1.6)	\$14.0	\$0.1	\$0.0	(\$0.0)	\$0.0	\$14.0	881	4
3	Loudoun	Transformer	500	\$1.1	(\$9.8)	(\$0.2)	\$10.6	\$1.5	\$2.2	\$3.4	\$2.7	\$13.3	222	69
4	Conastone - Peach Bottom	Line	500	\$9.4	(\$2.3)	\$0.1	\$11.8	\$1.3	\$1.3	\$0.0	\$0.0	\$11.8	1,063	410
5	AEP - DOM	Interface	500	\$2.1	(\$3.1)	\$0.6	\$5.8	\$0.3	(\$0.0)	\$0.1	\$0.3	\$6.1	1,181	5
6	Brambleton - Mosby	Line	500	(\$0.5)	(\$3.5)	\$0.1	\$3.0	\$0.0	\$0.0	\$0.0	\$0.0	\$3.0	151	0
7	502 Junction	Transformer	500	\$0.2	(\$2.9)	\$0.0	\$3.1	\$0.0	\$0.1	(\$0.0)	(\$0.1)	\$3.0	296	2
8	West	Interface	500	(\$0.8)	(\$2.9)	(\$0.1)	\$2.0	\$0.2	(\$0.1)	(\$0.0)	\$0.3	\$2.3	130	2
9	Belmont	Transformer	500	\$0.0	\$0.0	\$0.0	\$0.0	(\$0.2)	\$0.0	(\$0.9)	(\$1.1)	(\$1.1)	0	6
10	5004/5005 Interface	Interface	500	(\$0.2)	(\$1.1)	(\$0.1)	\$0.8	\$0.0	\$0.0	\$0.0	\$0.0	\$0.8	42	0
11	East	Interface	500	(\$0.6)	(\$1.4)	(\$0.0)	\$0.8	\$0.0	\$0.0	\$0.0	\$0.0	\$0.8	96	0
12	Yukon	Transformer	500	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2	\$0.1	\$0.6	\$0.7	\$0.7	0	16
13	Bristers - Ox	Line	500	\$0.0	(\$0.0)	\$0.0	\$0.1	\$0.4	\$0.2	\$0.2	\$0.4	\$0.5	25	6
14	Keeney - Rockspring	Line	500	(\$0.3)	(\$0.7)	\$0.1	\$0.5	\$0.0	\$0.0	\$0.0	\$0.0	\$0.5	81	0
15	Redlion	Transformer	500	(\$0.0)	(\$0.2)	\$0.1	\$0.3	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3	68	0
16	Three Mile Island	Transformer	500	\$0.1	(\$0.1)	\$0.0	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1	36	0
17	Cabot - Keystone	Line	500	(\$0.0)	(\$0.0)	\$0.0	\$0.0	\$0.2	\$0.2	(\$0.2)	(\$0.1)	(\$0.1)	2	10

Congestion Costs by Physical and Financial Participants

In order to evaluate the recipients and payers of congestion, the MMU categorized all participants 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.

Financial entities received \$16.9 million (Table 11-34) in net congestion credits in the first nine months of 2016 and \$16.1 million in net congestion credits in the first nine months of 2017. Physical entities paid \$839.2 million

in congestion charges in the first nine months of 2016 and \$471.5 million in congestion charges in the first nine months of 2017.

Explicit congestion costs are the primary source of congestion credits to financial entities, primarily UTCs. Total explicit congestion cost is equal to day-ahead explicit congestion cost plus balancing explicit congestion cost. In the first nine months of 2016, the total day-ahead explicit congestion cost was \$35.7, of which \$28.4 million (79.6 percent) was credited to UTCs. For the same period, the total balancing explicit congestion cost was -\$37.3 million, of which -\$39.4 million (105.5 percent) was credited to UTCs. In the first nine months of 2017, the total explicit congestion cost was -\$4.4 million, of which -\$5.3 million (120.7 percent) was contributed by UTCs.

Table 11-33 Congestion cost by type of participant: January 1 through September 30, 2017

Congestion Costs (Millions)										
Participant Type	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
Financial	\$1.0	\$1.1	(\$6.2)	(\$6.4)	(\$7.2)	\$4.2	\$1.6	(\$9.7)	\$0.0	(\$16.1)
Physical	\$104.1	(\$376.3)	\$8.5	\$488.9	\$19.6	\$28.6	(\$8.3)	(\$17.4)	\$0.0	\$471.5
Total	\$105.1	(\$375.1)	\$2.3	\$482.5	\$12.5	\$32.9	(\$6.7)	(\$27.1)	\$0.0	\$455.4

Table 11-34 Congestion cost by type of participant: January 1 through September 30, 2016

Congestion Costs (Millions)										
Participant Type	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
Financial	\$11.1	\$0.5	\$10.7	\$21.4	(\$28.7)	(\$10.6)	(\$20.2)	(\$38.3)	\$0.0	(\$16.9)
Physical	\$302.0	(\$529.5)	\$24.9	\$856.4	\$30.6	\$30.6	(\$17.2)	(\$17.2)	\$0.0	\$839.2
Total	\$313.0	(\$529.0)	\$35.7	\$877.8	\$1.9	\$20.0	(\$37.3)	(\$55.5)	\$0.0	\$822.2

Congestion-Event Summary: Impact of Changes in UTC Volumes

FERC issued a notice, effective September 8, 2014, that UTCs could be liable on a retroactive basis for paying uplift charges.²⁴ That potential refund period ended, after 15 months, on December 7, 2015.²⁵

In the first nine months of 2016, the average hourly UTC submitted MW increased 81.4 percent and UTC cleared MW increased 89.2 percent, compared to the first nine months of 2015.²⁶ Day-ahead congestion event hours increased by 48.1 percent from 141,507 congestion event hours in the first nine months of 2015 to 209,600 congestion event hours in the first nine months of 2016.

In the first nine months of 2017, the average hourly UTC submitted MW increased 1.1 percent and UTC cleared MW increased 6.6 percent, compared to the first nine months of 2016. Day-ahead congestion event hours increased

by 7.1 percent from 209,600 congestion event hours in the first nine months of 2016 to 224,543 congestion event hours in the first nine months of 2017.

Figure 11-5 shows the daily day-ahead and real-time congestion event hours for January 1, 2014 through September 30, 2017.

²⁴ See 18 CFR § 385.213 (2014).

²⁵ See 148 FERC ¶ 61,144 (2014); 16 U.S.C. § 824e.

²⁶ See 2016 State of the Market Report for PJM: January through September, Section 3: Energy Market, Table 3-35.

Figure 11-5 Daily congestion event hours: January 1, 2014 through September 30, 2017

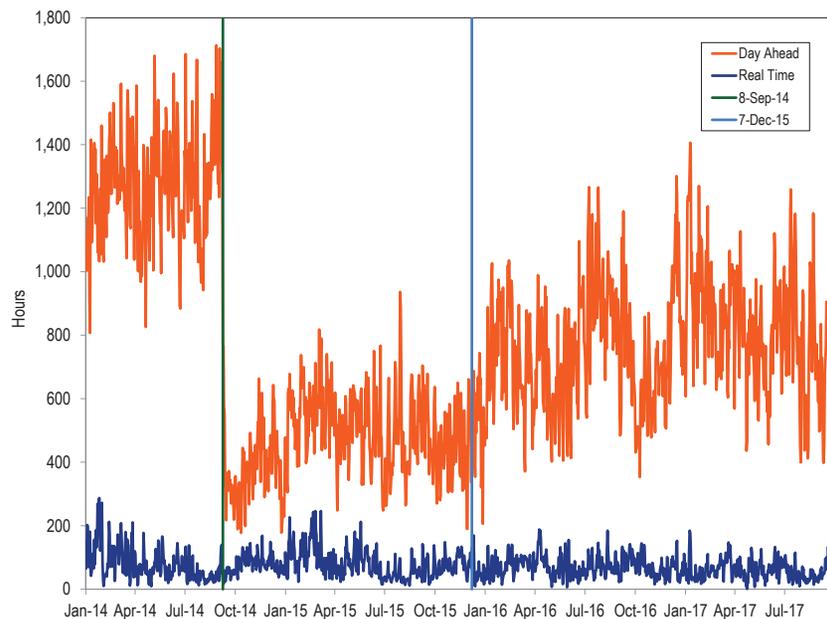
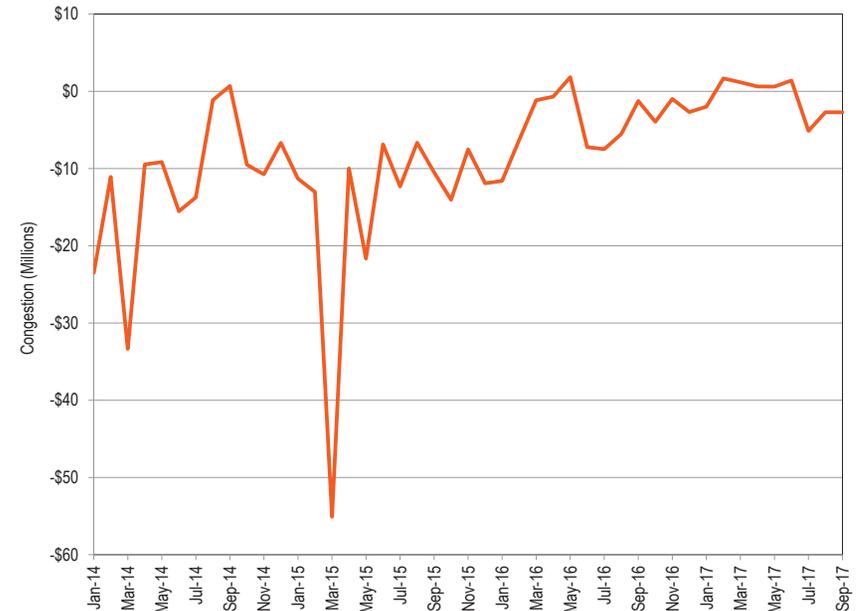


Figure 11-6 shows the change in up to congestion balancing explicit congestion costs from January 1, 2014 through September 30, 2017. Within this period, Figure 11-6 shows the highest monthly payment (\$55.1 million) in balancing congestion credits to up to congestion transactions occurred in March of 2015 and the highest monthly charge (\$1.8 million) in balancing congestion charges occurred in May of 2016.

Figure 11-6 Monthly balancing congestion cost incurred by up to congestion: January 1, 2014 through September 30, 2017



Marginal Losses

Marginal Loss Accounting

Marginal losses occur in the Day-Ahead and Real-Time Energy Markets. PJM calculates marginal loss costs for each PJM member. The loss cost is based on the applicable day-ahead and real-time marginal loss component of LMP (MLMP). Each PJM member is charged for the cost of losses on the transmission system. Total marginal loss costs, analogous to total congestion costs, are equal to the net of the load loss payments minus generation loss credits, plus explicit loss costs, incurred in both the Day-Ahead Energy Market and the balancing energy market.

Total marginal loss costs can be more accurately thought of as net marginal loss costs. Total marginal loss costs equal net implicit marginal loss costs plus

net explicit marginal loss costs plus net inadvertent loss charges. Net implicit marginal loss costs equal load loss payments minus generation loss credits. Net explicit marginal loss costs are the net marginal loss costs associated with point-to-point energy transactions. Net inadvertent loss charges are the losses associated with the hourly difference between the net actual energy flow and the net scheduled energy flow into or out of the PJM control area.²⁷ Unlike the other categories of marginal loss accounting, inadvertent loss charges are common costs not directly attributable to specific participants. Inadvertent loss charges are assigned to participants based on real-time load (excluding losses) ratio share.²⁸ Each of these categories of marginal loss costs is comprised of day-ahead and balancing marginal loss costs.

Marginal loss costs can be both positive and negative and consequently load payments and generation credits can also be both positive and negative. Total loss costs, when positive, measure the total loss payment by a PJM member and when negative, measure the total loss credit paid to a PJM member. Load loss payments, when positive, measure the total loss payment by a PJM member and when negative, measure the total loss credit paid to a PJM member. Generation loss credits, when negative, measure the total loss payment by a PJM member and when positive, measure the total loss credit paid to a PJM member.

The loss component of LMP is calculated with respect to the system marginal price (SMP). An increase in generation at a bus that results in an increase in losses will cause the marginal loss component of that bus to be negative. If the increase in generation at the bus results in a decrease of system losses, then the marginal loss component is positive.

Day-ahead marginal loss costs are based on day-ahead MWh priced at the marginal loss price component of LMP. Balancing marginal loss costs are based on the load or generation deviations between the Day-Ahead and Real-Time Energy Markets priced at the marginal loss price component of LMP in the Real-Time Energy Market. If a participant has real-time generation or load that is greater than its day-ahead generation or load then the deviation will

²⁷ OA Schedule 1 §3.7

²⁸ *Id.*

be positive. If there is a positive load deviation at a bus where the real-time LMP has a positive marginal loss component, positive balancing marginal loss costs will result. Similarly, if there is a positive load deviation at a bus where real-time LMP has a negative marginal loss component, negative balancing marginal loss costs will result. If a participant has real-time generation or load that is less than its day-ahead generation or load then the deviation will be negative. If there is a negative load deviation at a bus where real-time LMP has a positive marginal loss component, negative balancing marginal loss costs will result. Similarly, if there is a negative load deviation at a bus where real-time LMP has a negative marginal loss component, positive balancing marginal loss costs will result.

The total loss surplus is the remaining loss amount from collection of marginal losses, after accounting for total energy costs and net residual market adjustments that is allocated to PJM market participants based on real-time load plus export ratio share as marginal loss credits.²⁹

- **Day-Ahead Load Loss Payments.** Day-ahead load loss payments are calculated for all cleared demand, decrement bids and day-ahead energy market sale transactions. Day-ahead, load loss payments are calculated using MW and the load bus MLMP, the decrement bid MLMP or the MLMP at the source of the sale transaction.
- **Day-Ahead Generation Loss Credits.** Day-ahead generation loss credits are calculated for all cleared generation and increment offers and day-ahead energy market purchase transactions. Day-ahead, generation loss credits are calculated using MW and the generator bus MLMP, the increment offer MLMP or the MLMP at the sink of the purchase transaction.
- **Balancing Load Loss Payments.** Balancing load loss payments are calculated for all deviations between a PJM member's real-time load and energy sale transactions and their day-ahead cleared demand, decrement bids and energy sale transactions. Balancing, load loss payments are calculated using MW deviations and the real-time MLMP for each bus where a deviation exists.

²⁹ See PJM, "Manual 28: Operating Agreement Accounting," Rev. 76 (June 1, 2017) at 70.

- **Balancing Generation Loss Credits.** Balancing generation loss credits are calculated for all deviations between a PJM member's real-time generation and energy purchase transactions and the day-ahead cleared generation, increment offers and energy purchase transactions. Balancing, generation loss credits are calculated using MW deviations and the real-time MLMP for each bus where a deviation exists.
- **Explicit Loss Costs.** Explicit loss costs are the net loss costs associated with point to point energy transactions, including UTCs. These costs equal the product of the transacted MW and MLMP differences between sources (origins) and sinks (destinations) in the Day-Ahead Energy Market. Balancing energy market explicit loss costs equal the product of the differences between the real-time and day-ahead transacted MW and the differences between the real-time MLMP at the transactions' sources and sinks.
- **Inadvertent Loss Charges.** Inadvertent loss charges are the net loss charges resulting from the differences between the net actual energy flow and the net scheduled energy flow into or out of the PJM control area each hour. This inadvertent interchange of energy may be positive or negative, where positive interchange typically results in a charge while negative interchange typically results in a credit. Inadvertent loss charges are common costs, not directly attributable to specific participants, that are distributed on a load ratio basis.³⁰

Total Marginal Loss Cost

The total marginal loss cost in PJM for the first nine months of 2017 was \$501.0 million, which was comprised of load loss payments of -\$38.6 million, generation loss credits of -\$568.1 million, explicit loss costs of -\$28.4 million and inadvertent loss charges of \$0.0 million (Table 11-36).

Monthly marginal loss costs in the first nine months of 2017 ranged from \$44.2 million in April to \$71.6 million in July. Total marginal loss surplus decreased in the first nine months of 2017 by \$24.5 million or 13.5 percent from \$181.0 million in the first nine months of 2016 to \$156.5 million in the first nine months of 2017.

³⁰ OA Schedule 1 §3.7.

Table 11-35 shows the total marginal loss costs as a component of total energy related costs for January 1 through September 30, 2008 through 2017.

Table 11-35 Total component costs (Dollars (Millions)): January 1 through September 30, 2008 through 2017³¹

(Jan - Sep)	Loss Costs	Percent Change	Total PJM Billing	Percent of PJM Billing
2008	\$2,049	NA	\$26,979	7.6%
2009	\$992	(51.6%)	\$19,927	5.0%
2010	\$1,259	26.9%	\$26,249	4.8%
2011	\$1,153	(8.5%)	\$28,836	4.0%
2012	\$758	(34.3%)	\$22,119	3.4%
2013	\$797	5.2%	\$25,153	3.2%
2014	\$1,243	56.0%	\$40,770	3.0%
2015	\$830	(33.3%)	\$33,710	2.5%
2016	\$542	(34.7%)	\$29,490	1.8%
2017	\$501	(7.5%)	\$29,510	1.7%

Table 11-36 shows PJM total marginal loss costs by accounting category for January 1 through September 30, 2008 through 2017. Table 11-37 shows PJM total marginal loss costs by accounting category by market for January 1 through September 30, 2008 through 2017.

Table 11-36 Total PJM marginal loss costs by accounting category (Dollars (Millions)): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Marginal Loss Costs (Millions)				Total
	Load Payments	Generation Credits	Explicit Costs	Inadvertent Charges	
2008	(\$210.3)	(\$2,185.9)	\$73.3	\$0.0	\$2,048.9
2009	(\$62.0)	(\$1,028.3)	\$26.1	\$0.0	\$992.4
2010	(\$73.8)	(\$1,301.6)	\$31.5	(\$0.0)	\$1,259.3
2011	(\$138.8)	(\$1,277.7)	\$13.7	\$0.0	\$1,152.6
2012	(\$17.3)	(\$790.0)	(\$15.1)	\$0.0	\$757.6
2013	(\$3.3)	(\$834.4)	(\$34.1)	(\$0.0)	\$797.0
2014	(\$47.6)	(\$1,343.7)	(\$52.9)	\$0.0	\$1,243.1
2015	(\$26.1)	(\$872.8)	(\$16.9)	\$0.0	\$829.8
2016	(\$41.7)	(\$605.4)	(\$21.8)	(\$0.0)	\$541.9
2017	(\$38.6)	(\$568.1)	(\$28.4)	\$0.0	\$501.0

³¹ The loss costs include net inadvertent charges.

Table 11-37 Total PJM marginal loss costs by accounting category by market (Dollars (Millions)): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Marginal Loss Costs (Millions)									
	Day-Ahead				Balancing					
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	Inadvertent Charges	Grand Total
2008	(\$132.3)	(\$2,133.4)	\$100.8	\$2,101.8	(\$77.9)	(\$52.5)	(\$27.4)	(\$52.9)	\$0.0	\$2,048.9
2009	(\$65.9)	(\$1,025.7)	\$53.2	\$1,013.0	\$3.9	(\$2.6)	(\$27.1)	(\$20.6)	\$0.0	\$992.4
2010	(\$94.4)	(\$1,307.1)	\$61.5	\$1,274.2	\$20.6	\$5.6	(\$30.0)	(\$14.9)	(\$0.0)	\$1,259.3
2011	(\$174.3)	(\$1,313.6)	\$51.7	\$1,191.1	\$35.5	\$36.0	(\$38.0)	(\$38.5)	\$0.0	\$1,152.6
2012	(\$42.2)	(\$805.6)	\$12.7	\$776.0	\$24.9	\$15.6	(\$27.8)	(\$18.5)	\$0.0	\$757.6
2013	(\$30.3)	(\$857.9)	\$44.0	\$871.6	\$27.0	\$23.5	(\$78.1)	(\$74.6)	(\$0.0)	\$797.0
2014	(\$95.5)	(\$1,380.8)	\$62.7	\$1,347.9	\$47.9	\$37.1	(\$115.6)	(\$104.8)	\$0.0	\$1,243.1
2015	(\$47.0)	(\$883.1)	\$24.7	\$860.8	\$20.9	\$10.3	(\$41.6)	(\$31.0)	\$0.0	\$829.8
2016	(\$48.4)	(\$606.0)	\$37.8	\$595.4	\$6.6	\$0.5	(\$59.5)	(\$53.4)	(\$0.0)	\$541.9
2017	(\$45.9)	(\$568.9)	\$43.1	\$566.0	\$7.3	\$0.8	(\$71.5)	(\$65.0)	\$0.0	\$501.0

Table 11-38 and Table 11-39 show the total loss costs for each transaction type in the first nine months of 2017 and 2016. In the first nine months of 2017, generation paid loss costs of \$536.4 million, 107.1 percent of total loss costs. In the first nine months of 2016, generation paid loss costs of \$558.6 million, 103.1 percent of total loss costs.

Virtual transaction loss costs, when positive, measure the total loss costs to virtual transactions and when negative, measure the total loss credits to virtual transaction. In the first nine months of 2017, DECs were paid \$7.1 million in loss credits in the day-ahead market, paid \$5.6 million in congestion costs in the balancing energy market and received \$1.5 million in net payment for losses. In the first nine months of 2017, INCs paid \$11.8 million in loss costs in the day-ahead market, were paid \$10.1 million in congestion credits in the balancing energy market and paid \$1.7 million in net payment for losses. In the first nine months of 2017, up to congestion paid \$42.9 million in loss costs in the day-ahead market, were paid \$71.4 million in loss credits in the balancing energy market and received \$28.5 million in net payment for losses.

Table 11-38 Total PJM loss costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2017

Transaction Type	Loss Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
DEC	(\$7.1)	\$0.0	\$0.0	(\$7.1)	\$5.6	\$0.0	\$0.0	\$5.6	\$0.0	(\$1.5)
Demand	(\$4.4)	\$0.0	\$0.0	(\$4.4)	\$7.7	\$0.0	\$0.0	\$7.7	\$0.0	\$3.3
Demand Response	(\$0.0)	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Export	(\$14.1)	\$0.0	\$0.1	(\$14.0)	(\$7.1)	\$0.0	\$0.5	(\$6.6)	\$0.0	(\$20.6)
Generation	\$0.0	(\$535.4)	\$0.0	\$535.4	\$0.0	(\$1.0)	\$0.0	\$1.0	\$0.0	\$536.4
Grandfathered Overuse	\$0.0	\$0.0	(\$0.3)	(\$0.3)	\$0.0	\$0.0	(\$0.3)	(\$0.3)	\$0.0	(\$0.7)
Import	\$0.0	(\$1.4)	\$0.0	\$1.4	\$0.0	(\$9.3)	(\$0.2)	\$9.1	\$0.0	\$10.5
INC	\$0.0	(\$11.8)	\$0.0	\$11.8	\$0.0	\$10.1	\$0.0	(\$10.1)	\$0.0	\$1.7
Internal Bilateral	(\$20.3)	(\$20.3)	\$0.0	(\$0.0)	\$1.0	\$1.0	\$0.0	(\$0.0)	\$0.0	(\$0.0)
Up to Congestion	\$0.0	\$0.0	\$42.9	\$42.9	\$0.0	\$0.0	(\$71.4)	(\$71.4)	\$0.0	(\$28.5)
Wheel In	\$0.0	\$0.0	\$0.4	\$0.4	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.4
Total	(\$45.9)	(\$568.9)	\$43.1	\$566.0	\$7.3	\$0.8	(\$71.5)	(\$65.0)	\$0.0	\$501.0

Table 11-39 Total PJM loss costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2016

Transaction Type	Loss Costs (Millions)									
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total		
DEC	(\$2.9)	\$0.0	\$0.0	(\$2.9)	\$1.5	\$0.0	\$0.0	\$1.5	\$0.0	(\$1.4)
Demand	(\$4.2)	\$0.0	\$0.0	(\$4.2)	\$7.9	\$0.0	\$0.0	\$7.9	\$0.0	\$3.7
Demand Response	(\$0.0)	\$0.0	\$0.0	(\$0.0)	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Export	(\$13.7)	\$0.0	\$0.3	(\$13.4)	(\$3.8)	\$0.0	\$0.4	(\$3.3)	\$0.0	(\$16.7)
Generation	\$0.0	(\$564.8)	\$0.0	\$564.8	\$0.0	\$6.2	\$0.0	(\$6.2)	\$0.0	\$558.6
Grandfathered Overuse	\$0.0	\$0.0	(\$0.6)	(\$0.6)	\$0.0	\$0.0	(\$0.2)	(\$0.2)	\$0.0	(\$0.8)
Import	\$0.0	(\$4.8)	\$0.7	\$5.6	\$0.0	(\$15.5)	\$0.5	\$16.0	\$0.0	\$21.6
INC	\$0.0	(\$9.0)	\$0.0	\$9.0	\$0.0	\$8.8	\$0.0	(\$8.8)	\$0.0	\$0.2
Internal Bilateral	(\$27.5)	(\$27.3)	\$0.2	(\$0.0)	\$1.0	\$1.0	\$0.0	\$0.0	\$0.0	\$0.0
Up to Congestion	\$0.0	\$0.0	\$36.1	\$36.1	\$0.0	\$0.0	(\$60.3)	(\$60.3)	\$0.0	(\$24.2)
Wheel In	\$0.0	\$0.0	\$1.0	\$1.0	\$0.0	\$0.0	(\$0.0)	(\$0.0)	\$0.0	\$1.0
Total	(\$48.4)	(\$606.0)	\$37.8	\$595.4	\$6.6	\$0.5	(\$59.5)	(\$53.4)	\$0.0	\$541.9

Monthly Marginal Loss Costs

Table 11-40 shows a monthly summary of marginal loss costs by market type for January 1, 2016 through September 30, 2017.

Table 11-40 Monthly marginal loss costs by market (Millions): January 1, 2016 through September 30, 2017

Marginal Loss Costs (Millions)								
	2016				2017			
	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total
Jan	\$78.2	(\$6.2)	\$0.0	\$72.0	\$75.5	(\$13.2)	(\$0.0)	\$62.3
Feb	\$61.3	(\$3.8)	\$0.0	\$57.5	\$54.2	(\$7.8)	\$0.0	\$46.4
Mar	\$43.8	(\$3.2)	(\$0.0)	\$40.6	\$70.2	(\$7.4)	\$0.0	\$62.8
Apr	\$52.1	(\$6.0)	\$0.0	\$46.1	\$50.8	(\$6.6)	\$0.0	\$44.2
May	\$40.4	(\$3.9)	(\$0.0)	\$36.6	\$55.0	(\$4.9)	\$0.0	\$50.1
Jun	\$59.6	(\$6.5)	(\$0.0)	\$53.1	\$59.0	(\$4.2)	\$0.0	\$54.8
Jul	\$93.8	(\$7.5)	(\$0.0)	\$86.4	\$78.7	(\$7.1)	\$0.0	\$71.6
Aug	\$95.6	(\$9.8)	(\$0.0)	\$85.8	\$64.4	(\$7.6)	\$0.0	\$56.8
Sep	\$70.6	(\$6.6)	(\$0.0)	\$64.0	\$58.3	(\$6.2)	\$0.0	\$52.0
Oct	\$51.6	(\$6.6)	(\$0.0)	\$45.0				
Nov	\$49.0	(\$6.9)	(\$0.0)	\$42.1				
Dec	\$77.2	(\$9.7)	(\$0.0)	\$67.5				
Total	\$773.2	(\$76.7)	(\$0.0)	\$696.5	\$566.0	(\$65.0)	\$0.0	\$501.0

Figure 11-7 shows PJM monthly marginal loss costs for January 1, 2008 through September 30, 2017.

Figure 11-7 PJM monthly marginal loss costs (Dollars (Millions)): January 1, 2008 through September 30, 2017

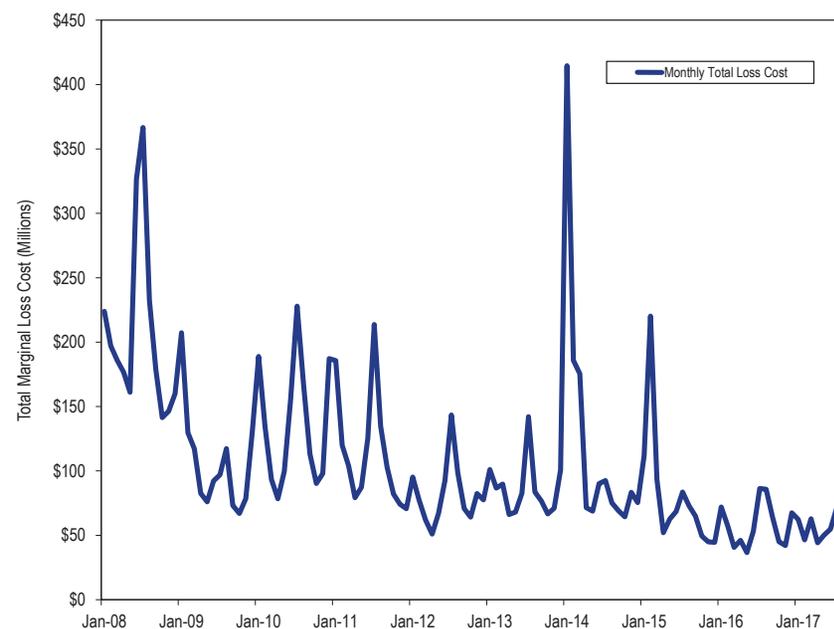


Table 11-41 and Table 11-42 show the monthly total loss costs for each virtual transaction type in the first nine months of 2017 and 2016.

Table 11-41 Monthly PJM loss costs by virtual transaction type and by market (Dollars (Millions)): January 1 through September 30, 2017

	Loss Costs (Millions)								
	Day-Ahead				Balancing				Virtual Grand Total
	DEC	INC	Up to Congestion	Virtual Total	DEC	INC	Up to Congestion	Virtual Total	
Jan	(\$0.6)	\$1.5	\$6.7	\$7.6	(\$0.0)	(\$1.3)	(\$13.4)	(\$14.7)	(\$7.1)
Feb	(\$0.6)	\$1.3	\$5.3	\$6.0	\$0.4	(\$1.1)	(\$7.7)	(\$8.4)	(\$2.4)
Mar	(\$1.1)	\$2.6	\$5.3	\$6.7	\$0.7	(\$2.0)	(\$8.1)	(\$9.3)	(\$2.6)
Apr	(\$1.1)	\$0.8	\$4.5	\$4.2	\$1.0	(\$0.9)	(\$6.8)	(\$6.6)	(\$2.4)
May	(\$1.3)	\$1.6	\$4.3	\$4.6	\$1.1	(\$1.3)	(\$6.4)	(\$6.7)	(\$2.1)
Jun	(\$0.8)	\$1.1	\$3.8	\$4.1	\$0.8	(\$0.9)	(\$5.8)	(\$5.9)	(\$1.7)
Jul	(\$1.0)	\$1.4	\$5.1	\$5.5	\$0.9	(\$0.9)	(\$8.0)	(\$8.1)	(\$2.7)
Aug	(\$0.3)	\$0.6	\$5.0	\$5.3	\$0.3	(\$0.6)	(\$7.8)	(\$8.1)	(\$2.8)
Sep	(\$0.4)	\$1.0	\$2.9	\$3.5	\$0.5	(\$1.1)	(\$7.4)	(\$8.0)	(\$4.5)
Total	(\$7.1)	\$11.8	\$42.9	\$47.6	\$5.6	(\$10.1)	(\$71.4)	(\$75.9)	(\$28.3)

Table 11-42 Monthly PJM loss costs by virtual transaction type and by market (Dollars (Millions)): 2016

	Loss Costs (Millions)								
	Day-Ahead				Balancing				Virtual Grand Total
	DEC	INC	Up to Congestion	Virtual Total	DEC	INC	Up to Congestion	Virtual Total	
Jan	\$0.3	\$1.2	\$3.7	\$5.1	(\$0.6)	(\$1.1)	(\$6.8)	(\$8.5)	(\$3.3)
Feb	\$0.1	\$0.8	\$1.9	\$2.8	(\$0.0)	(\$0.8)	(\$4.3)	(\$5.2)	(\$2.4)
Mar	(\$0.0)	\$1.1	\$1.3	\$2.4	(\$0.1)	(\$1.0)	(\$3.4)	(\$4.5)	(\$2.0)
Apr	(\$0.1)	\$1.0	\$3.9	\$4.8	(\$0.1)	(\$0.8)	(\$6.3)	(\$7.3)	(\$2.5)
May	(\$0.3)	\$0.7	\$2.1	\$2.4	\$0.0	(\$0.5)	(\$4.7)	(\$5.2)	(\$2.8)
Jun	(\$0.7)	\$1.0	\$4.8	\$5.1	\$0.7	(\$1.0)	(\$7.6)	(\$7.9)	(\$2.8)
Jul	(\$1.0)	\$1.4	\$5.8	\$6.2	\$0.7	(\$1.2)	(\$8.5)	(\$9.0)	(\$2.7)
Aug	(\$0.5)	\$1.0	\$7.7	\$8.2	\$0.4	(\$1.3)	(\$11.6)	(\$12.5)	(\$4.3)
Sep	(\$0.7)	\$0.8	\$5.0	\$5.1	\$0.5	(\$1.1)	(\$7.0)	(\$7.6)	(\$2.5)
Oct	(\$0.8)	\$0.9	\$4.6	\$4.7	\$0.5	(\$0.7)	(\$6.3)	(\$6.5)	(\$1.8)
Nov	(\$0.3)	\$0.8	\$4.6	\$5.1	(\$0.3)	(\$0.7)	(\$6.9)	(\$7.9)	(\$2.8)
Dec	(\$1.1)	\$1.1	\$6.3	\$6.3	\$0.5	(\$0.9)	(\$11.3)	(\$11.7)	(\$5.3)
Total	(\$5.2)	\$11.9	\$51.6	\$58.3	\$2.2	(\$11.1)	(\$84.8)	(\$93.7)	(\$35.4)

Marginal Loss Costs and Loss Credits

Total loss surplus are calculated by adding the total energy costs, the total marginal loss costs and net residual market adjustments. The total energy costs are equal to the net implicit energy costs (load energy payments minus generation energy credits) plus net explicit energy costs plus net inadvertent energy charges. Total marginal loss costs are equal to the net implicit marginal loss costs (generation loss credits less load loss payments) plus net explicit loss costs plus net inadvertent loss charges.

Ignoring interchange, total generation MWh must be greater than total load MWh in any hour in order to provide for losses. Since the hourly integrated energy component of LMP is the same for every bus within every hour, the net energy bill is negative (ignoring net interchange), with more generation credits than load payments in every hour. Total energy costs plus total marginal loss costs plus net residual market adjustments equal marginal loss credits which are distributed to the PJM market participants according to the ratio of their real-time load plus their real-time exports to total PJM real-time load plus real-time exports as marginal loss credits. The net residual market adjustment is calculated as known day-ahead error value minus day-ahead loss MW congestion value and minus balancing loss MW congestion value.

Table 11-43 shows the total energy costs, the total marginal loss costs collected, the net residual market adjustments and total marginal loss credits redistributed for January 1 through September 30, 2008 through 2017. The total marginal loss surplus decreased \$24.5 million in the first nine months of 2017 from the first nine months of 2016.

Table 11-43 Marginal loss credits (Dollars (Millions)): January 1 through September 30, 2008 through 2017³²

Loss Credit Accounting (Millions)						
Net Residual Market Adjustment						
(Jan - Sep)	Total Energy Charges	Total Marginal Loss Charges	Known Day-ahead Error	Day-ahead Loss MW Congestion	Balancing Loss MW Congestion	Total Loss Surplus
2008	(\$976.0)	\$2,048.9	\$0.0	\$0.0	\$0.0	\$1,073.0
2009	(\$484.6)	\$992.4	\$0.0	(\$0.6)	(\$0.1)	\$508.5
2010	(\$618.6)	\$1,259.3	\$0.1	\$1.3	(\$0.0)	\$639.6
2011	(\$651.3)	\$1,152.6	\$0.1	(\$0.7)	\$0.0	\$502.1
2012	(\$442.6)	\$757.6	\$0.0	\$1.7	\$0.0	\$313.3
2013	(\$527.2)	\$797.0	\$0.1	\$2.2	(\$0.0)	\$267.6
2014	(\$833.9)	\$1,243.1	(\$0.0)	\$5.1	\$0.1	\$404.1
2015	(\$536.5)	\$829.8	(\$0.3)	\$4.7	(\$0.1)	\$288.3
2016	(\$358.3)	\$541.9	\$0.0	\$2.8	(\$0.2)	\$181.0
2017	(\$344.0)	\$501.0	\$0.0	\$0.7	(\$0.1)	\$156.5

Energy Costs

Energy Accounting

The energy component of LMP is the system reference bus LMP, also called the system marginal price (SMP). The energy cost is based on the day-ahead and real-time energy components of LMP. Total energy costs, analogous to total congestion costs or total loss costs, are equal to the load energy payments minus generation energy credits, plus explicit energy costs, incurred in both the Day-Ahead Energy Market and the balancing energy market, plus net inadvertent energy charges. Total energy costs can be more accurately thought of as net energy costs.

Total Energy Costs

The total energy cost for the first nine months of 2017 was -\$344.0 million, which was comprised of load energy payments of \$26,082.1 million, generation energy credits of \$26,430.6 million, explicit energy costs of \$0.0 million and inadvertent energy charges of \$4.5 million. The monthly energy costs for the

³² The net residual market adjustments included in the table are comprised of the known day-ahead error value minus the sum of the day-ahead loss MW congestion value, balancing loss MW congestion value and measurement error caused by missing data.

first nine months of 2017 ranged from -\$48.2 million in January to -\$31.0 million in April.

Table 11-44 shows total energy component costs and total PJM billing, for January 1 through September 30, 2008 through 2017. The total energy component costs are net energy costs.

Table 11-44 Total PJM costs by energy component (Dollars (Millions)): January 1 through September 30, 2008 through 2017³³

(Jan - Sep)	Energy Costs	Percent Change	Total PJM Billing	Percent of PJM Billing
2008	(\$976)	NA	\$26,979	(3.6%)
2009	(\$485)	(50.3%)	\$19,927	(2.4%)
2010	(\$619)	27.6%	\$26,249	(2.4%)
2011	(\$651)	5.3%	\$28,836	(2.3%)
2012	(\$443)	(32.0%)	\$22,119	(2.0%)
2013	(\$527)	19.1%	\$25,153	(2.1%)
2014	(\$834)	58.2%	\$40,770	(2.0%)
2015	(\$537)	(35.7%)	\$33,710	(1.6%)
2016	(\$358)	(33.2%)	\$29,490	(1.2%)
2017	(\$344)	(4.0%)	\$29,510	(1.2%)

Energy costs for January 1 through September 30, 2008, through 2017 are shown in Table 11-45 and Table 11-46. Table 11-45 shows PJM energy costs by accounting category for January 1 through September 30, 2008, through 2017 and Table 11-46 shows PJM energy costs by market category for January 1 through September 30, 2008, through 2017.

³³ The energy costs include net inadvertent charges.

Table 11-45 Total PJM energy costs by accounting category (Dollars (Millions)): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Energy Costs (Millions)				
	Load Payments	Generation Credits	Explicit Costs	Inadvertent Charges	Total
2008	\$91,391.9	\$92,368.9	\$0.0	\$1.0	(\$976.0)
2009	\$32,472.4	\$32,960.8	\$0.0	\$3.8	(\$484.6)
2010	\$41,562.3	\$42,169.5	\$0.0	(\$11.4)	(\$618.6)
2011	\$38,515.2	\$39,193.0	\$0.0	\$26.5	(\$651.3)
2012	\$28,303.5	\$28,754.0	\$0.0	\$7.9	(\$442.6)
2013	\$32,756.8	\$33,279.9	\$0.0	(\$4.2)	(\$527.2)
2014	\$50,415.3	\$51,245.6	\$0.0	(\$3.6)	(\$833.9)
2015	\$33,772.7	\$34,311.9	\$0.0	\$2.6	(\$536.5)
2016	\$25,858.3	\$26,213.7	\$0.0	(\$2.9)	(\$358.3)
2017	\$26,082.1	\$26,430.6	\$0.0	\$4.5	(\$344.0)

Table 11-46 Total PJM energy costs by market category (Dollars (Millions)): January 1 through September 30, 2008 through 2017

(Jan - Sep)	Energy Costs (Millions)										
	Day-Ahead				Balancing				Inadvertent Charges	Grand Total	
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total			
2008	\$67,568.7	\$68,653.8	\$0.0	(\$1,085.1)	\$23,823.2	\$23,715.1	\$0.0	\$108.1	\$1.0	(\$976.0)	
2009	\$32,628.0	\$33,162.4	\$0.0	(\$534.4)	(\$155.6)	(\$201.6)	\$0.0	\$45.9	\$3.8	(\$484.6)	
2010	\$41,665.6	\$42,289.1	\$0.0	(\$623.5)	(\$103.4)	(\$119.7)	\$0.0	\$16.3	(\$11.4)	(\$618.6)	
2011	\$38,908.1	\$39,530.7	\$0.0	(\$622.6)	(\$392.9)	(\$337.7)	\$0.0	(\$55.3)	\$26.5	(\$651.3)	
2012	\$28,423.3	\$28,853.1	\$0.0	(\$429.8)	(\$119.9)	(\$99.2)	\$0.0	(\$20.7)	\$7.9	(\$442.6)	
2013	\$32,797.0	\$33,398.3	\$0.0	(\$601.3)	(\$40.2)	(\$118.4)	\$0.0	\$78.2	(\$4.2)	(\$527.2)	
2014	\$50,428.5	\$51,603.0	\$0.0	(\$1,174.5)	(\$13.2)	(\$357.4)	\$0.0	\$344.2	(\$3.6)	(\$833.9)	
2015	\$33,910.7	\$34,549.7	\$0.0	(\$639.0)	(\$138.0)	(\$237.8)	\$0.0	\$99.8	\$2.6	(\$536.5)	
2016	\$25,986.4	\$26,469.9	\$0.0	(\$483.5)	(\$128.1)	(\$256.2)	\$0.0	\$128.1	(\$2.9)	(\$358.3)	
2017	\$26,360.1	\$26,844.5	\$0.0	(\$484.4)	(\$278.0)	(\$413.9)	\$0.0	\$135.9	\$4.5	(\$344.0)	

Table 11-47 and Table 11-48 show the total energy costs for each transaction type in the first nine months of 2017 and 2016. In the first nine months of 2017, generation was paid \$18,175.7 million and demand paid \$17,363.1 million in net energy payment. In the first nine months of 2016, generation was paid \$18,075.3 million and demand paid \$17,687.3 million in net energy payment.

Table 11-47 Total PJM energy costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2017

Energy Costs (Millions)									
Transaction Type	Day-Ahead				Balancing				Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	
DEC	\$872.8	\$0.0	\$0.0	\$872.8	(\$874.9)	\$0.0	\$0.0	(\$874.9)	(\$2.1)
Demand	\$17,347.6	\$0.0	\$0.0	\$17,347.6	\$15.5	\$0.0	\$0.0	\$15.5	\$17,363.1
Demand Response	(\$0.4)	\$0.0	\$0.0	(\$0.4)	\$0.4	\$0.0	\$0.0	\$0.4	(\$0.0)
Export	\$533.7	\$0.0	\$0.0	\$533.7	\$284.8	\$0.0	\$0.0	\$284.8	\$818.6
Generation	\$0.0	\$18,242.5	\$0.0	(\$18,242.5)	\$0.0	(\$66.8)	\$0.0	\$66.8	(\$18,175.7)
Import	\$0.0	\$60.0	\$0.0	(\$60.0)	\$0.0	\$285.6	\$0.0	(\$285.6)	(\$345.6)
INC	\$0.0	\$935.7	\$0.0	(\$935.7)	\$0.0	(\$928.9)	\$0.0	\$928.9	(\$6.9)
Internal Bilateral	\$7,606.4	\$7,606.4	\$0.0	\$0.0	\$296.0	\$296.0	\$0.0	\$0.0	\$0.0
Total	\$26,360.1	\$26,844.6	\$0.0	(\$484.5)	(\$278.1)	(\$414.0)	\$0.0	\$135.9	(\$348.6)

Table 11-48 Total PJM energy costs by transaction type by market (Dollars (Millions)): January 1 through September 30, 2016

Energy Costs (Millions)									
Transaction Type	Day-Ahead				Balancing				Grand Total
	Load Payments	Generation Credits	Explicit Costs	Total	Load Payments	Generation Credits	Explicit Costs	Total	
DEC	\$926.8	\$0.0	\$0.0	\$926.8	(\$920.8)	\$0.0	\$0.0	(\$920.8)	\$6.0
Demand	\$17,496.5	\$0.0	\$0.0	\$17,496.5	\$190.9	\$0.0	\$0.0	\$190.9	\$17,687.3
Demand Response	(\$0.9)	\$0.0	\$0.0	(\$0.9)	\$0.8	\$0.0	\$0.0	\$0.8	(\$0.1)
Export	\$464.2	\$0.0	\$0.0	\$464.2	\$203.9	\$0.0	\$0.0	\$203.9	\$668.1
Generation	\$0.0	\$18,255.6	\$0.0	(\$18,255.6)	\$0.0	(\$180.3)	\$0.0	\$180.3	(\$18,075.3)
Import	\$0.0	\$175.2	\$0.0	(\$175.2)	\$0.0	\$449.8	\$0.0	(\$449.8)	(\$625.0)
INC	\$0.0	\$939.3	\$0.0	(\$939.3)	\$0.0	(\$922.8)	\$0.0	\$922.8	(\$16.5)
Internal Bilateral	\$7,099.8	\$7,099.8	\$0.0	(\$0.0)	\$397.1	\$397.1	\$0.0	\$0.0	(\$0.0)
Total	\$25,986.4	\$26,469.9	\$0.0	(\$483.5)	(\$128.1)	(\$256.2)	\$0.0	\$128.1	(\$355.4)

Monthly Energy Costs

Table 11-49 shows a monthly summary of energy costs by market type for January 1, 2016 through September 30, 2017. Marginal total energy costs in the first nine months of 2017 increased from the first nine months of 2016. Monthly total energy costs in the first nine months of 2017 ranged from -\$48.2 million in January to -\$31.0 million in April.

Table 11-49 Monthly energy costs by market type (Dollars (Millions)): January 1, 2016 through September 30, 2017

	Energy Costs (Millions)							
	2016				2017			
	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total	Day-Ahead Total	Balancing Total	Inadvertent Charges	Grand Total
Jan	(\$63.8)	\$15.4	\$0.6	(\$47.7)	(\$75.6)	\$28.9	(\$1.5)	(\$48.2)
Feb	(\$50.0)	\$11.1	\$0.4	(\$38.5)	(\$48.3)	\$16.5	\$0.0	(\$31.8)
Mar	(\$36.6)	\$9.3	(\$0.1)	(\$27.4)	(\$59.9)	\$17.5	\$0.2	(\$42.2)
Apr	(\$43.6)	\$12.7	\$0.3	(\$30.6)	(\$46.7)	\$15.2	\$0.5	(\$31.0)
May	(\$37.4)	\$11.5	(\$0.3)	(\$26.1)	(\$46.2)	\$12.6	\$1.0	(\$32.6)
Jun	(\$50.9)	\$17.6	(\$0.6)	(\$33.8)	(\$45.8)	\$8.6	\$0.7	(\$36.4)
Jul	(\$74.3)	\$17.5	(\$0.9)	(\$57.8)	(\$61.3)	\$14.7	\$1.2	(\$45.4)
Aug	(\$72.9)	\$18.2	(\$1.2)	(\$55.9)	(\$52.7)	\$12.8	\$1.1	(\$38.9)
Sep	(\$54.0)	\$14.8	(\$1.2)	(\$40.5)	(\$47.9)	\$9.0	\$1.3	(\$37.5)
Oct	(\$42.7)	\$16.4	(\$3.5)	(\$29.9)				
Nov	(\$43.9)	\$16.7	(\$1.5)	(\$28.8)				
Dec	(\$70.4)	\$22.9	(\$1.8)	(\$49.4)				
Total	(\$640.6)	\$184.0	(\$9.8)	(\$466.3)	(\$484.4)	\$135.9	\$4.5	(\$344.0)

Figure 11-8 shows PJM monthly energy costs for January 1, 2008 through September 30, 2017.

Figure 11-8 PJM monthly energy costs (Millions): January 1, 2008 through September 30, 2017

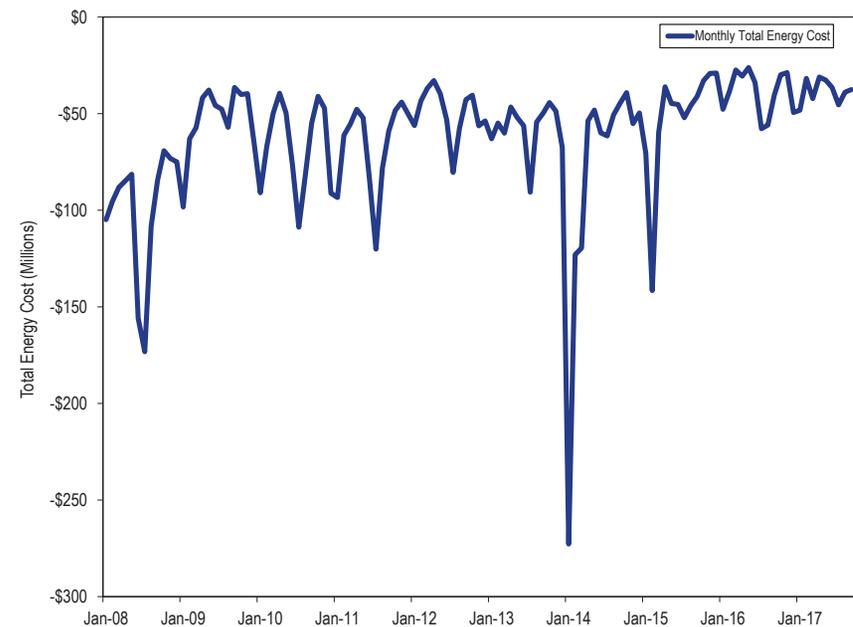


Table 11-50 and Table 11-51 show the monthly total energy costs for each virtual transaction type in the first nine months of 2017 and the first nine months of 2016. In the first nine months of 2017, DECs paid \$872.8 million in energy costs in the day-ahead market, were paid \$874.9 million in energy credits in the balancing energy market and were paid \$2.1 million in net payment for energy. In the first nine months of 2017, INCs were paid \$935.7 million in energy credits in the day-ahead market, paid \$928.9 million in energy costs in the balancing market and received \$6.9 million in net payment for energy. In the first nine months of 2016, DECs paid \$926.8 million in energy costs in the day-ahead market, were paid \$920.8 million in energy credits in the balancing energy market and paid \$6.0 million in net payment for energy. In the first nine months of 2016, INCs were paid \$939.3 million in energy credits in the day-ahead market, paid \$922.8 million in energy cost in

the balancing energy market and received \$16.5 million in net payment for energy.

Table 11-50 Monthly PJM energy costs by virtual transaction type and by market (Dollars (Millions)): January 1 through September 30, 2017

Energy Costs (Millions)							
Day-Ahead			Balancing			Virtual Grand Total	
	DEC	INC	Virtual Total	DEC	INC	Virtual Total	
Jan	\$115.3	(\$134.8)	(\$19.5)	(\$116.4)	\$135.6	\$19.2	(\$0.3)
Feb	\$82.8	(\$107.0)	(\$24.2)	(\$79.8)	\$103.3	\$23.5	(\$0.7)
Mar	\$123.9	(\$150.0)	(\$26.1)	(\$124.5)	\$149.2	\$24.7	(\$1.4)
Apr	\$109.6	(\$106.8)	\$2.9	(\$104.2)	\$102.0	(\$2.2)	\$0.7
May	\$112.6	(\$123.9)	(\$11.3)	(\$114.0)	\$124.9	\$10.9	(\$0.4)
Jun	\$88.3	(\$77.5)	\$10.8	(\$87.2)	\$76.6	(\$10.6)	\$0.2
Jul	\$90.2	(\$92.9)	(\$2.7)	(\$93.2)	\$95.0	\$1.8	(\$0.9)
Aug	\$68.5	(\$70.2)	(\$1.6)	(\$66.9)	\$68.5	\$1.5	(\$0.1)
Sep	\$81.6	(\$72.7)	\$8.9	(\$88.6)	\$73.8	(\$14.8)	(\$6.0)
Total	\$872.8	(\$935.7)	(\$62.9)	(\$874.9)	\$928.9	\$54.0	(\$8.9)

Table 11-51 Monthly PJM energy costs by virtual transaction type and by market (Dollars (Millions)): 2016

Energy Costs (Millions)							
Day-Ahead			Balancing			Virtual Grand Total	
	DEC	INC	Virtual Total	DEC	INC	Virtual Total	
Jan	\$102.0	(\$109.3)	(\$7.2)	(\$101.0)	\$106.1	\$5.1	(\$2.1)
Feb	\$85.5	(\$87.5)	(\$2.1)	(\$81.3)	\$84.3	\$3.0	\$1.0
Mar	\$68.6	(\$100.2)	(\$31.6)	(\$63.8)	\$93.0	\$29.2	(\$2.4)
Apr	\$84.9	(\$109.3)	(\$24.3)	(\$86.5)	\$112.0	\$25.6	\$1.2
May	\$78.3	(\$87.2)	(\$8.9)	(\$79.4)	\$86.1	\$6.8	(\$2.1)
Jun	\$105.0	(\$91.0)	\$14.0	(\$110.0)	\$94.5	(\$15.5)	(\$1.5)
Jul	\$139.7	(\$130.5)	\$9.2	(\$128.9)	\$119.4	(\$9.6)	(\$0.3)
Aug	\$138.1	(\$119.8)	\$18.3	(\$145.6)	\$123.4	(\$22.2)	(\$3.8)
Sep	\$124.7	(\$104.7)	\$20.0	(\$124.3)	\$104.0	(\$20.4)	(\$0.3)
Oct	\$111.4	(\$110.5)	\$1.0	(\$107.4)	\$106.9	(\$0.5)	\$0.5
Nov	\$84.6	(\$100.7)	(\$16.1)	(\$82.9)	\$98.5	\$15.6	(\$0.6)
Dec	\$131.2	(\$124.7)	\$6.5	(\$128.2)	\$122.2	(\$6.1)	\$0.4
Total	\$1,254.0	(\$1,275.2)	(\$21.2)	(\$1,239.3)	\$1,250.4	\$11.1	(\$10.2)

Generation and Transmission Planning¹ Overview

Planned Generation and Retirements

- **Planned Generation.** As of September 30, 2017, 95,508.9 MW of capacity were in generation request queues for construction through 2024, compared to an average installed capacity of 201,573.5 MW as of September 30, 2017. Of the capacity in queues, 8,900.7 MW, or 9.3 percent, are uprates and the rest are new generation. Wind projects account for 15,580.9 MW of nameplate capacity or 16.3 percent of the capacity in the queues. Natural gas fired projects account for 59,943.8 MW of capacity or 62.8 percent of the capacity in the queues.
- **Generation Retirements.** As shown in Table 12-5, 32,150.7 MW have been, or are planned to be, retired between 2011 and 2020. Of that, 6,427.3 MW are planned to retire after September 30, 2017. In the first nine months of 2017, 2,072.8 MW were retired. Of the 6,427.3 MW pending retirement, 4,125.0 MW (64.2 percent) are coal units. The coal unit retirements were a result of low gas prices, low capacity prices and the investments required for compliance with the EPA's Mercury and Air Toxics Standards (MATS) for some units.
- **Generation Mix.** A significant shift in the distribution of unit types within the PJM footprint continues as natural gas fired units enter the queue and coal fired steam units retire. There are 199.0 MW of coal fired steam capacity and 59,943.8 MW of gas fired capacity in the queue. The replacement of coal fired steam units by units burning natural gas will significantly affect future congestion, the role of firm and interruptible gas supply, and natural gas supply infrastructure.

Generation and Transmission Interconnection Planning Process

- Any entity that requests interconnection of a new generating facility, including increases to the capacity of an existing generating unit, or that requests interconnection of a merchant transmission facility, must follow the process defined in the PJM tariff to obtain interconnection service.² PJM's process is designed to ensure that new generation is added in a reliable and systematic manner. The process is complex and time consuming at least in part as a result of the required analyses. The cost, time and uncertainty associated with interconnecting to the grid may create barriers to entry for potential entrants.
- The queue contains a substantial number of projects that are not likely to be built. The queue process results in a substantial number of projects that drop out. Excluding currently active projects and projects currently under construction, 3,590 projects, representing 465,477.1 MW, have entered the queue process since its inception. Of those, 734 projects, representing 49,788.4 MW, went into service. Of the projects that entered the queue process, 56.9 percent of the MW withdrew prior to completion. Such projects may create barriers to entry for projects that would otherwise be completed by taking up queue positions, increasing interconnection costs and creating uncertainty.
- Feasibility, impact and facilities studies may be delayed for reasons including disputes with developers, circuit and network issues and retooling as a result of projects being withdrawn. The Earlier Queue Submittal Task Force (EQSTF) was established in August 2015 to address delays associated with the submittal of large numbers of requests at the end of the queue window, which resulted in revisions to the PJM Open Access Transmission Tariff, effective October 31, 2016.^{3 4} On December 15, 2016, the Commission issued a notice of proposed rulemaking proposing additional queue reforms intended to improve certainty, promote more informed interconnection, and enhance interconnection processes.⁵

² See OATT Parts IV & VI.

³ See Earlier Queue Submittal Task Force at <<http://www.pjm.com/committees-and-groups/closed-groups/eqstf.aspx>>

⁴ See Letter Order, ER16-2518-000 (Oct. 7, 2016).

⁵ 157 FERC ¶ 61,212 (2016).

¹ Totals presented in this section include corrections to historical data and may not match totals presented in previous reports.

- A transmission owner (TO) is an “entity that owns, leases or otherwise has a possessory interest in facilities used for the transmission of electric energy in interstate commerce under the tariff.”⁶ Where the transmission owner is a vertically integrated company that also owns generation, there is a potential conflict of interest when the transmission owner evaluates the interconnection requirements of new generation which is a competitor to the generation of the parent company and when the transmission owner evaluates the interconnection requirements of new generation which is part of the same company as the transmission owner. There is also a potential conflict of interest when the transmission owner evaluates the interconnection requirements of a merchant transmission developer which is a competitor of the transmission owner.

Regional Transmission Expansion Plan (RTEP)

- Artificial Island is an area in southern New Jersey that includes nuclear units at Salem and at Hope Creek in the PSEG Zone. On April 29, 2013, PJM issued a request for proposal (RFP), seeking technical solutions to improve stability issues and operational performance under a range of anticipated system conditions, and the elimination of potential planning criteria violations in this area. On July 30, 2015, the PJM Board of Managers accepted PJM’s recommendation to assign the project to LS Power, a merchant developer, PSEG, and PHI with a total cost estimate between \$263M and \$283M.⁷ ⁸ On August 5, 2016, PJM announced that the Artificial Island project was to be suspended immediately due to unanticipated project complexities and significant cost overruns. On March 3, 2017, PJM held a special Transmission Expansion Advisory Committee (TEAC) meeting to discuss their updated analysis of the Artificial Island project. PJM staff presented updated assumptions that went into the new project analysis. In consultation with project developers and stakeholders, PJM made several major revisions to the project. These included switching the interconnection point from the Salem Substation to the Hope Creek Substation, removal of the New Freedom switched

⁶ See OATT § 1 (Transmission Owner).

⁷ See “Artificial Island Recommendations,” presented at the TEAC meeting on April 28, 2015 at <<http://www.pjm.com/~media/committees-groups/committees/teac/20150428-ai/20150428-artificial-island-recommendations.ashx>>.

⁸ See letter from Terry Boston concerning the Artificial Island Project at <<http://www.pjm.com/~media/library/reports-notices/special-reports/board-statement-on-artificial-island-project.ashx?la=en>>.

vertical circuit (SVC) from the project scope, and removal of the optical ground wire (OPGW) from the project scope. These revisions led to a revised total project cost estimate of \$280 million, \$140 million less than the previous \$420 million project cost estimate released in February 2016. On April 6, 2017, the PJM Board lifted a suspension of the project. It is expected to be in service by June 2020.

- On October 25, 2012, Schedule 12 of the tariff and Schedule 6 of the OA were changed to address FERC Order No. 1000 reforms to the cost allocation requirements for local and regional transmission planning projects that were formerly defined in Order No. 890. The new approach was applied for the first time to the 2013 RTEP. The allocation process has been upheld by FERC despite repeated challenges.⁹
- The TEAC regularly reviews internal and external proposals to improve transmission reliability throughout PJM. On July 26, 2017, the PJM Board of Managers authorized more than \$417 million in electric transmission projects for reliability. The approved projects include a large substation that serves critical infrastructure customers in Newark, N.J., a \$275 million PSEG Newark Switch substation project to replace aging equipment, and additional equipment upgrades and improvements in areas served by: American Electric Power; Dominion; Atlantic City Electric Company; PECO Energy Company; Pennsylvania Electric Company; American Transmission Systems, Inc.; East Kentucky Power Cooperative, Inc. and Dayton Power & Light. Most of the individual projects cost less than \$5 million.¹⁰

Backbone Facilities

- PJM baseline transmission projects are implemented to resolve reliability criteria violations. PJM backbone transmission projects are a subset of significant baseline projects, which are intended to resolve multiple

⁹ See 155 FERC ¶ 61,090 (2016); 155 FERC ¶ 61,089 (2016); 155 FERC ¶ 61,088 (2016); see also Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh’g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff’d sub nom.* 762 F.3d 41, 412 (D.C. Cir. 2014); 142 FERC ¶ 61,074 (2013) (accepting the proposed PJM cost allocation method, effective February 1, 2013, subject to the outcome of PJM’s Order No. 1000 regional compliance filing proceeding); 142 FERC ¶ 61,214 (2013), *order on reh’g and compliance*, 147 FERC ¶ 61,128 (2014), *order on reh’g and compliance*, 150 FERC ¶ 61,038 (2015), *order on reh’g and compliance*, 151 FERC ¶ 61,250 (2015).

¹⁰ See PJM, “PJM Board approves \$417 million investment in transmission improvements,” <<http://www.pjm.com/~media/about-pjm/newsroom/2017-releases/20170726-pjm-board-approves-417-million-investment-in-transmission-improvements.ashx>> (July 26, 2017).

reliability criteria violations and congestion issues and which may have substantial impacts on energy and capacity markets. There are currently three backbone projects under development, Surry Skiffes Creek 500kV, and the conversion of the Marion-Bayonne and Bayway-Linden lines from 138 kV to 345 kV.¹¹

Transmission Facility Outages

- PJM maintains a list of reportable transmission facilities. When the reportable transmission facilities need to be taken out of service, PJM transmission owners are required to report planned transmission facility outages as early as possible. PJM processes the transmission facility outage requests according to rules in PJM's Manual 3 to decide if the outage is on time or late and whether or not they will allow the outage.¹²
- There were 10,186 transmission outage requests submitted in the 2017/2018 planning period. Of the requested outages, 69.4 percent were planned for five days or shorter and 9.5 percent were planned for longer than 30 days. Of the requested outages, 38.3 percent were late according to the rules in PJM's Manual 3.

Recommendations

The MMU recommends improvements to the planning process.

- The MMU recommends that PJM continue to incorporate the principle that the goal of transmission planning should be the incorporation of transmission investment decisions into market driven processes as much as possible. (Priority: Low. First reported 2001. Status: Not adopted.)
- The MMU recommends the creation of a mechanism to permit a direct comparison, or competition, between transmission and generation alternatives, including which alternative is less costly and who bears the risks associated with each alternative. (Priority: Low. First reported 2013. Status: Not adopted.)

- The MMU recommends that rules be implemented to permit competition to provide financing for transmission projects. This competition could reduce the cost of capital for transmission projects and significantly reduce total costs to customers. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that rules be implemented to require that project cost caps on new transmission projects be part of the evaluation of competing projects. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that barriers to entry be addressed in a timely manner in order to help ensure that the capacity market will result in the entry of new capacity to meet the needs of PJM market participants and reflect the uncertainty and resultant risks in the cost of new entry used to establish the capacity market demand curve in RPM. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that the question of whether Capacity Injection Rights (CIRs) should persist after the retirement of a unit be addressed. Even if the treatment of CIRs remains unchanged, the rules need to ensure that incumbents cannot exploit control of CIRs to block or postpone entry of competitors.¹³ (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends outsourcing interconnection studies to an independent party to avoid potential conflicts of interest. Currently, these studies are performed by incumbent transmission owners under PJM's direction. This creates potential conflicts of interest, particularly when transmission owners are vertically integrated and the owner of transmission also owns generation. (Priority: Low. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM establish fair terms of access to rights of way and property, such as at substations, in order to remove any barriers to entry and permit competition between incumbent transmission providers and merchant transmission providers in the RTEP. (Priority: Medium. First reported 2014. Status: Not adopted.)

¹¹ See "2017 RTEP Process Scope and Input Assumptions White Paper," P 25. <<http://www.pjm.com/-/media/library/reports-notices/2017-rtep/20170731-rtep-input-assumptions-and-scope-whitepaper.aspx?la=en>> Accessed October 5, 2017.

¹² PJM. "Manual 03: Transmission Operations," Rev. 51 (June 1, 2017), Section 4.

¹³ See "Comments of the Independent Market Monitor for PJM," Docket No. ER12-1177-000 <http://www.monitoringanalytics.com/reports/Reports/2012/IMM_Comments_ER12-1177-000_20120312.pdf>.

- The MMU recommends that PJM enhance the transparency and queue management process for merchant transmission investment. Issues related to data access and complete explanations of cost impacts should be addressed. The goal should be to remove barriers to competition from merchant transmission. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends consideration of changing the minimum distribution factor in the allocation from 0.01 to 0.00 and adding a threshold minimum usage impact on the line. (Priority: Medium. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM reevaluate all transmission outage tickets as on time or late as if they were new requests when an outage is rescheduled and apply the standard rules for late submissions to any such outages. (Priority: Low. First reported 2014. Status: Not adopted.)
- The MMU recommends that PJM draft a clear definition of the congestion analysis required for transmission outage requests to include in Manual 3 after appropriate review. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM modify the rules to reduce or eliminate the approval of late outage requests submitted or rescheduled after the FTR auction bidding opening date. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM not permit transmission owners to divide long duration outages into smaller segments to avoid complying with the requirements for long duration outages. (Priority: Low. First reported 2015. Status: Not adopted.)
- The MMU recommends improvements in queue management including that PJM establish a review process to ensure that projects are removed from the queue if they are not viable, as well as a process to allow commercially viable projects to advance in the queue ahead of projects which have failed to make progress, subject to rules to prevent gaming. (Priority: Medium. First reported 2013. Status: Partially adopted.)

- The MMU recommends an analysis of the study phase of PJM's transmission planning to reduce the need for postponements of study results, to decrease study completion times, and to improve the likelihood that a project at a given phase in the study process will successfully go into service. (Priority: Medium. First reported 2014. Status: Partially adopted.)

Conclusion

The goal of PJM market design should be to enhance competition and to ensure that competition is the driver for all the key elements of PJM markets. But transmission investments have not been fully incorporated into competitive markets. The construction of new transmission facilities has significant impacts on the energy and capacity markets. But when generating units retire or load increases, there is no market mechanism in place that would require direct competition between transmission and generation to meet loads in the affected area. In addition, despite FERC Order No. 1000, there is not yet a transparent, robust and clearly defined mechanism to permit competition to build transmission projects, to ensure that competitors provide a total project cost cap, or to obtain least cost financing through the capital markets.

The addition of a planned transmission project changes the parameters of the capacity auction for the area, changes the amount of capacity needed in the area, changes the capacity market supply and demand fundamentals in the area and may effectively forestall the ability of generation to compete. But there is no mechanism to permit a direct comparison, let alone competition, between transmission and generation alternatives. There is no mechanism to evaluate whether the generation or transmission alternative is less costly, whether there is more risk associated with the generation or transmission alternatives, or who bears the risks associated with each alternative. Creating such a mechanism should be an explicit goal of PJM market design.

Managing the generation queues is a highly complex process. The PJM queue evaluation process has been substantially improved in recent years and it is more efficient and effective as a result. The PJM queue evaluation process should continue to be improved to help ensure that barriers to competition for

new generation investments are not created. Issues that need to be addressed include the ownership rights to CIRs, whether transmission owners should perform interconnection studies, and improvements in queue management to ensure that projects are removed from the queue if they are not viable, as well as a process to allow commercially viable projects to advance in the queue ahead of projects which have failed to make progress.

The PJM rules for competitive transmission development through the RTEP should build upon FERC Order No. 1000 to create real competition between incumbent transmission providers and merchant transmission providers. PJM should enhance the transparency and queue management process for merchant transmission investment. Issues related to data access and complete explanations of cost impacts should be addressed. The goal should be to remove barriers to competition from merchant transmission. Another element of opening competition would be to consider transmission owners' ownership of property and rights of way at or around transmission substations. In many cases, the land acquired included property intended to support future expansion of the grid. Incumbents have included the costs of the property in their rate base. Because PJM now has the responsibility for planning the development of the grid under its RTEP process, property bought to facilitate future expansion should be a part of the RTEP process and be made available to all providers on equal terms.

There are currently no market incentives for transmission owners to submit and complete transmission outages in a timely and efficient manner. Requiring transmission owners to pay does not create an effective incentive when those payments are passed through to transmission customers. The process for the submission of planned transmission outages needs to be carefully reviewed and redesigned to limit the ability of transmission owners to submit transmission outages that are late for FTR auction bid submission dates and are late for the Day-Ahead Energy Market. The submission of late transmission outages can inappropriately affect market outcomes when market participants do not have the ability to modify market bids and offers.

Planned Generation and Retirements

Planned Generation Additions

Expected net revenues provide incentives to build new generation to serve PJM markets. The amount of planned new generation in PJM reflects investors' perception of the incentives provided by the combination of revenues from the PJM energy, capacity and ancillary service markets. On September 30, 2017, 95,508.9 MW of capacity were in generation request queues for construction through 2024, compared to an average installed capacity of 201,573.5 MW as of September 30, 2017. Although it is clear that not all generation in the queues will be built, PJM has added capacity.¹⁴ In the first nine months of 2017, 3,352.4 MW of nameplate capacity went into service in PJM.

PJM Generation Queues

Generation request queues are groups of proposed projects, including new units, reratings of existing units, capacity resources and energy only resources. Each queue is open for a fixed amount of time. Studies commence on all projects in a given queue when that queue closes. The duration of the queue period has varied. Queues A and B were open for a year. Queues C through T were open for six months. Starting in February 2008, Queues U through Y1 were open for three months. Starting in May 2012, the duration of the queue period was reset to six months, starting with Queue Y2. Queue AD1 closed on September 30, 2017. Queue AD2 began on October 1, 2017.

All projects that have been entered in a queue have a status assigned. Projects listed as active are undergoing one of the studies (feasibility, system impact, facility) required to proceed. Other status options are under construction, suspended, and in service. Withdrawn projects are removed from the queue and listed separately. A project cannot be suspended until it has reached the status of under construction. Any project that entered the queue before February 1, 2011, can be suspended for up to three years. Projects that entered the queue after February 1, 2011, face an additional restriction in that the suspension period is reduced to one year if they affect any project later in the

¹⁴ See Monitoring Analytics, "New Generation in the PJM Capacity Market: MW and Funding Sources for Delivery Years 2007/2008 through 2018/2019," <http://www.monitoringanalytics.com/reports/Reports/2016/New_Generation_in_the_PJM_Capacity_Market_20160504.pdf>.

queue.¹⁵ When a project is suspended, PJM extends the scheduled milestones by the duration of the suspension. If, at any time, a milestone is not met, PJM will initiate the termination of the Interconnection Service Agreement (ISA) and the corresponding cancellation costs must be paid by the customer.¹⁶

Table 12-1 shows MW in queues by expected completion date and MW changes in the queues between December 31, 2016, and September 30, 2017, for ongoing projects, i.e. projects with the status active, under construction or suspended.¹⁷ Projects that are already in service are not included here. The total MW in queues increased by 13,572.6 MW, or 16.6 percent, from 81,936.3 MW at the end of 2016 to 95,508.9 MW on September 30, 2017.

Table 12-1 Queue comparison by expected completion year (MW): December 31, 2016 to September 30, 2017¹⁸

Year	Nine Month Change			
	As of 12/31/2016	As of 9/30/2017	MW	Percent
2016	21,064.0	0.0	(21,064.0)	(100.0%)
2017	12,957.0	12,887.3	(69.7)	(0.5%)
2018	14,859.6	23,560.5	8,700.9	58.6%
2019	18,416.5	25,720.8	7,304.3	39.7%
2020	10,869.3	20,763.7	9,894.4	91.0%
2021	1,925.9	9,485.7	7,559.8	392.5%
2022	250.0	3,090.9	2,840.9	1,136.4%
2023	0.0	0.0	0.0	0.0%
2024	1,594.0	0.0	(1,594.0)	(100.0%)
Total	81,936.3	95,508.9	13,572.6	16.6%

Table 12-2 shows the project status changes in more detail and how scheduled queue capacity has changed between December 31, 2016, and September 30, 2017. For example, 19,639.2 MW entered the queue between January 1, 2017 and September 30, 2017. Of those 19,639.2 MW, 7,190.3 MW have been withdrawn. Of the total 63,728.9 MW marked as active at the beginning of 2017, 6,212.6 MW were withdrawn, 1,955.0 MW were suspended, 1,828.0 MW started construction, and 234.1 MW went into service by September 30, 2017. The Under Construction column shows that 791.4 MW came out of suspension

¹⁵ See PJM, "Manual 14C: Generation and Transmission Interconnection Process," Rev. 12 (June 22, 2017) Section 3.7.

¹⁶ PJM does not track the duration of suspensions or PJM termination of projects.

¹⁷ Expected completion dates are entered when the project enters the queue. Actual completion dates are generally different than expected completion dates.

¹⁸ Wind and solar capacity in Table 12-1 through Table 12-4 have not been adjusted to reflect derating.

and 1,828.0 MW began construction in the first nine months of 2017, in addition to the 17,584.5 MW of capacity that maintained the status under construction from December 31, 2016 through September 30, 2017.

Table 12-2 Change in project status (MW): December 31, 2016 to September 30, 2017

Status at 12/31/2016 (Entered during 2017)	Total at 12/31/2016	Status at 9/30/2017				
		Active	Suspended	Under Construction	In Service	Withdrawn
		12,448.9	0.0	0.0	0.0	7,190.3
Active	63,728.9	53,499.2	1,955.0	1,828.0	234.1	6,212.6
Suspended	5,790.0	0.0	4,356.5	791.4	0.0	642.2
Under Construction	24,014.4	108.9	2,936.7	17,584.5	3,150.3	234.1
In Service	46,404.0	0.0	0.0	0.0	46,404.0	0.0
Withdrawn	305,900.6	0.0	0.0	0.0	0.0	305,900.6
Total	445,837.9	66,056.9	9,248.2	20,203.9	49,788.4	320,179.8

Table 12-3 shows the amount of capacity active, in service, under construction, suspended, or withdrawn for each queue since the beginning of the RTEP process and the total amount of capacity that had been included in each queue. All items in queues A-M are either in service or have been withdrawn. As of September 30, 2017, there are 95,508.9 MW of capacity in queues that are not yet in service, of which 9.7 percent are suspended, 21.2 percent are under construction and 69.2 percent have not begun construction.

Table 12-3 Capacity in PJM queues (MW): September 30, 2017¹⁹

Queue	Active	In Service	Under			Withdrawn	Total
			Construction	Suspended			
A Expired 31-Jan-98	0.0	8,103.0	0.0	0.0	0.0	17,252.0	25,355.0
B Expired 31-Jan-99	0.0	4,645.5	0.0	0.0	0.0	15,656.7	20,302.2
C Expired 31-Jul-99	0.0	531.0	0.0	0.0	0.0	3,474.8	4,005.8
D Expired 31-Jan-00	0.0	850.6	0.0	0.0	0.0	7,369.0	8,219.6
E Expired 31-Jul-00	0.0	795.2	0.0	0.0	0.0	8,033.8	8,829.0
F Expired 31-Jan-01	0.0	52.0	0.0	0.0	0.0	3,092.5	3,144.5
G Expired 31-Jul-01	0.0	1,189.6	0.0	0.0	0.0	17,980.8	19,170.4
H Expired 31-Jan-02	0.0	702.5	0.0	0.0	0.0	8,421.9	9,124.4
I Expired 31-Jul-02	0.0	103.0	0.0	0.0	0.0	3,738.3	3,841.3
J Expired 31-Jan-03	0.0	40.0	0.0	0.0	0.0	846.0	886.0
K Expired 31-Jul-03	0.0	98.9	0.0	0.0	0.0	485.3	584.2
L Expired 31-Jan-04	0.0	256.5	0.0	0.0	0.0	4,033.7	4,290.2
M Expired 31-Jul-04	0.0	504.8	0.0	0.0	0.0	3,705.6	4,210.4
N Expired 31-Jan-05	0.0	2,398.8	38.0	0.0	0.0	8,090.2	10,527.0
O Expired 31-Jul-05	0.0	1,668.2	437.0	0.0	0.0	5,466.8	7,572.0
P Expired 31-Jan-06	0.0	3,037.3	253.0	0.0	0.0	5,320.5	8,610.8
Q Expired 31-Jul-06	0.0	3,147.9	0.0	0.0	0.0	11,385.7	14,533.6
R Expired 31-Jan-07	0.0	1,986.4	60.0	1,288.3	0.0	19,420.6	22,755.3
S Expired 31-Jul-07	0.0	3,549.5	120.0	70.0	0.0	12,396.5	16,136.0
T Expired 31-Jan-08	0.0	3,014.0	1,208.0	300.0	0.0	23,013.3	27,535.3
U Expired 31-Jan-09	200.0	837.3	649.9	820.0	0.0	30,829.6	33,336.8
V Expired 31-Jan-10	390.0	2,748.6	36.1	761.0	0.0	12,877.6	16,813.3
W Expired 31-Jan-11	292.0	2,138.5	875.8	989.8	0.0	19,759.2	24,055.3
X Expired 31-Jan-12	1,689.0	4,598.2	3,268.9	2,289.5	0.0	18,498.8	30,344.5
Y Expired 30-Apr-13	814.5	1,661.1	3,808.6	267.2	0.0	19,188.2	25,739.5
Z Expired 30-Apr-14	997.0	677.4	5,580.4	135.1	0.0	6,910.8	14,300.7
AA1 Expired 31-Oct-14	3,448.4	156.7	2,224.0	396.1	0.0	5,773.5	11,998.7
AA2 Expired 30-Apr-15	5,639.0	220.9	796.4	1,730.1	0.0	7,679.9	16,066.3
AB1 Expired 31-Oct-15	11,992.9	64.0	715.9	121.4	0.0	7,549.4	20,443.6
AB2 Expired 31-Mar-16	10,930.2	10.0	131.8	45.2	0.0	4,147.3	15,264.5
AC1 Through 30-Sep-16	16,883.7	1.1	0.0	34.5	0.0	3,169.1	20,088.5
AC2 Through 30-Apr-17	7,877.1	0.0	0.0	0.0	0.0	4,547.6	12,424.7
AD1 Through 30-Sep-17	4,903.1	0.0	0.0	0.0	0.0	64.8	4,967.9
Total	66,056.9	49,788.4	20,203.9	9,248.2	320,179.8	465,477.1	

¹⁹ Projects listed as partially in service are counted as in service for the purposes of this analysis.

Distribution of Units in the Queues

Table 12-4 shows the projects under construction, suspended, or active, by unit type, and control zone.²⁰ As of September 30, 2017, 95,508.9 MW of capacity were in generation request queues for construction through 2024, compared to 93,533.3 MW at December 31, 2016.²¹ Table 12-4 also shows the planned retirements for each zone.

Table 12-4 Queue capacity by LDA, control zone and fuel (MW): September 30, 2017²²

LDA	Zone	Biomass	CC	CT	Diesel	Fuel Cell	Hydro	Nuclear	Solar	Steam	Storage	Wind	Total Queue Capacity	Planned Retirements
EMAAC	AECO	0.0	1,674.6	462.0	0.0	1.9	0.0	0.0	75.3	0.0	20.0	25.0	2,258.8	303.0
	DPL	4.0	802.0	0.0	13.6	0.0	0.0	0.0	1,431.2	0.0	25.0	649.6	2,925.4	0.0
	JCPL	0.0	1,767.1	0.0	0.0	0.4	0.0	0.0	201.8	0.0	85.0	0.0	2,054.3	614.5
	PECO	0.0	1,221.0	0.0	4.5	0.0	0.0	94.0	18.0	0.0	0.0	0.0	1,337.5	50.8
	PSEG	0.0	2,566.5	677.0	5.0	3.6	0.0	0.0	79.1	24.0	0.0	0.0	3,355.2	611.0
	RECO	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
EMAAC Total		4.0	8,031.2	1,139.0	23.1	5.9	0.0	94.0	1,805.4	24.0	130.0	674.6	11,931.2	1,579.3
SWMAAC	BGE	0.0	0.0	0.0	0.0	1.3	0.0	0.4	30.3	22.0	0.0	0.1	0.0	135.0
	Pepco	0.0	0.0	1,857.6	0.0	0.0	0.0	0.0	0.0	62.5	0.0	0.0	0.0	0.0
	SWMAAC Total		0.0	0.0	1,857.6	0.0	1.3	0.0	0.4	30.3	84.5	0.0	0.1	1,974.2
WMAAC	Met-Ed	0.0	485.0	34.1	0.0	0.0	0.0	0.0	158.0	30.0	0.0	0.0	707.1	805.0
	PENELEC	0.0	1,170.0	521.1	121.1	0.0	17.0	0.0	63.5	590.0	0.0	458.8	2,941.5	0.0
	PPL	16.0	5,818.0	19.9	19.9	0.0	0.0	0.0	30.0	0.0	30.0	441.1	6,374.9	0.0
	WMAAC Total		16.0	7,473.0	575.1	141.0	0.0	17.0	0.0	251.5	620.0	30.0	899.8	10,023.4
Non-MAAC	AEP	0.0	10,156.0	394.0	15.2	0.0	46.5	28.0	4,274.8	149.0	90.0	7,387.0	22,540.5	0.0
	APS	0.0	5,805.1	30.0	99.6	0.0	15.0	0.0	669.6	10.0	37.8	1,010.7	7,677.8	0.0
	ATSI	0.0	5,191.0	0.0	0.9	0.0	0.0	0.0	426.0	0.0	0.0	815.7	6,433.5	776.0
	ComEd	0.0	8,270.2	1,127.0	18.8	0.0	22.7	0.0	495.0	64.0	85.5	3,445.5	13,528.7	0.0
	DAY	0.0	1,150.0	0.0	0.0	0.0	0.0	0.0	762.9	12.0	39.9	300.0	2,264.8	2,404.0
	DEOK	0.0	513.0	0.0	0.0	0.0	0.0	0.0	290.0	20.0	19.8	0.0	842.8	0.0
	DLCO	0.0	205.0	0.0	0.0	0.0	0.0	0.0	11.7	0.0	20.0	0.0	236.7	0.0
	Dominion	62.5	6,879.7	155.0	8.0	0.0	5.6	0.0	9,709.1	14.0	34.0	1,047.5	17,915.5	728.0
	EKPC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0	0.0	100.0	0.0
	RMU	0.0	0.0	0.0	0.0	0.0	0.0	0.0	40.0	0.0	0.0	0.0	40.0	0.0
	Non-MAAC Total		62.5	38,170.0	1,706.0	142.4	0.0	89.8	28.0	16,779.1	269.0	327.0	14,006.4	71,580.2
Total in PJM	Total	82.5	53,674.2	5,277.7	306.5	7.2	106.8	122.4	18,866.3	997.5	487.0	15,580.9	95,508.9	6,427.3

²⁰ Unit types designated as reciprocating engines are classified as diesel.

²¹ Since wind resources cannot be dispatched on demand, PJM rules previously required that the unforced capacity of wind resources be derated to 20 percent of nameplate capacity until actual generation data are available. Beginning with Queue U, PJM derates wind resources to 13 percent of nameplate capacity until there is operational data to support a different conclusion. PJM derates solar resources to 38 percent of nameplate capacity. Based on the derating of 15,580.9 MW of wind resources and 18,866.3 MW of solar resources, the 95,508.9 MW currently active in the queue would be reduced to 70,256.5 MW.

²² This data includes only projects with a status of active, under-construction, or suspended.

A significant shift in the distribution of unit types within the PJM footprint continues to develop as natural gas fired units enter the queue and coal fired steam units retire. As of September 30, 2017, there were 15,954.2 MW of gas fired capacity under construction in PJM. As of September 30, 2017, there were only 108.0 MW of coal fired steam capacity under construction in PJM. With respect to retirements, 4,125.0 MW of coal fired steam capacity and 661.8 MW of natural gas capacity are slated for deactivation between September 30, 2017, and December 31, 2020. The replacement of coal fired

steam units by natural gas units could significantly affect future congestion, the role of firm and interruptible gas supply, and natural gas supply infrastructure.

Planned Retirements

As shown in Table 12-5, 32,150.7 MW have been, or are planned to be, retired between 2011 and 2020.²³ Of that, 6,427.3 MW are planned to retire after the first nine months of 2017. In the first nine months of 2017, 2,072.8 MW were retired. Of the 6,427.3 MW pending retirement, 4,125.0 MW are coal units. The coal unit

²³ See PJM "Generator Deactivation Summary Sheets," at <<http://www.pjm.com/planning/generation-deactivation/gd-summaries.aspx>> (October 4, 2017).

retirements were a result of low gas prices, low capacity prices and the investments required for compliance with the EPA's Mercury and Air Toxics Standards (MATS) for some units.

Table 12-5 Summary of PJM unit retirements by fuel (MW): 2011 through 2020

	Battery	Coal	Diesel	Heavy Oil	Hydro	Kerosene	Landfill Gas	Light Oil	Natural Gas	Nuclear	Waste Coal	Wind	Wood Waste	Total
Retirements 2011	0.0	543.0	0.0	0.0	0.0	0.0	0.0	131.0	522.5	0.0	0.0	0.0	0.0	1,196.5
Retirements 2012	0.0	5,907.9	0.0	0.0	0.0	0.0	0.0	788.0	250.0	0.0	0.0	0.0	16.0	6,961.9
Retirements 2013	0.0	2,558.9	2.9	166.0	0.0	0.0	7.0	3.0	82.0	0.0	31.0	0.0	8.0	2,858.8
Retirements 2014	0.0	2,239.0	50.0	0.0	0.0	184.0	15.3	188.0	294.0	0.0	0.0	0.0	0.0	2,970.3
Retirements 2015	0.0	7,064.8	0.0	0.0	0.0	644.2	2.0	222.3	1,319.0	0.0	0.0	10.4	0.0	9,262.7
Retirements 2016	0.0	243.0	51.0	0.0	0.5	0.0	9.9	22.0	74.0	0.0	0.0	0.0	0.0	400.4
Retirements 2017 (Jan-Sep)	0.0	2,038.0	0.0	0.0	0.0	0.0	0.8	0.0	34.0	0.0	0.0	0.0	0.0	2,072.8
Planned Retirements (Oct 2017 and later)	40.0	4,125.0	2.4	148.0	0.0	0.0	0.0	30.6	661.8	1,419.5	0.0	0.0	0.0	6,427.3
Total	40.0	24,719.6	106.3	314.0	0.5	828.2	35.0	1,384.9	3,237.3	1,419.5	31.0	10.4	24.0	32,150.7

A map of the retirements between 2011 and 2020 is shown in Figure 12-1 with a mapping to unit names identified in Table 12-6.

Figure 12-1 Map of PJM unit retirements: 2011 through 2020

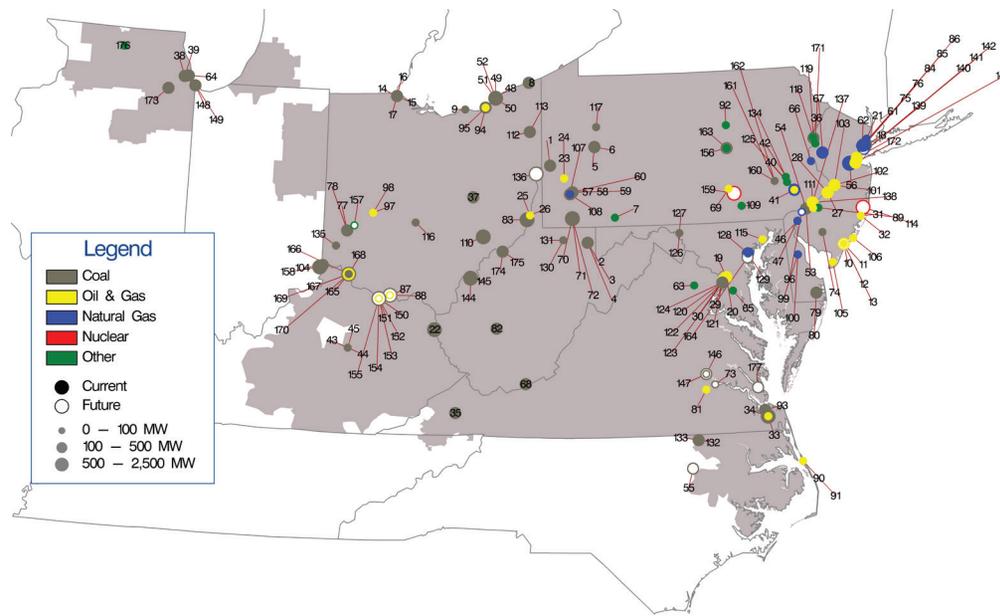


Table 12-6 Unit identification for map of PJM unit retirements: 2011 through 2020

ID	Unit	ID	Unit	ID	Unit	ID	Unit	ID	Unit
1	AES Beaver Valley	31	Cedar 1	61	Essex 10-11	91	Kitty Hawk GT 2	121	Potomac River 2
2	Albright 1	32	Cedar 2	62	Essex 12	92	Koppers Co. IPP	122	Potomac River 3
3	Albright 2	33	Chesapeake 1-4	63	Fauquier County Landfill	93	Lake Kingman	123	Potomac River 4
4	Albright 3	34	Chesapeake 7-10	64	Fisk Street 19	94	Lake Shore 18	124	Potomac River 5
5	Armstrong 1	35	Clinch River 3	65	GUDE Landfill	95	Lake Shore EMD	125	Pottstown LF (Moser)
6	Armstrong 2	36	Columbia Dam Hydro	66	Gilbert 1-4	96	MH50 Markus Hook Co-gen	126	R Paul Smith 3
7	Arnold (Green Mtn. Wind Farm)	37	Conesville 3	67	Glen Gardner 1-8	97	Mad River CTs A	127	R Paul Smith 4
8	Ashtabula 5	38	Crawford 7	68	Glen Lyn 5-6	98	Mad River CTs B	128	Riverside 4
9	Avon Lake 7	39	Crawford 8	69	Harrisburg 4 CT	99	McKee 1	129	Riverside 6
10	BL England 1	40	Cromby 1	70	Hatfield's Ferry 1	100	McKee 2	130	Riversville 5
11	BL England 2	41	Cromby 2	71	Hatfield's Ferry 2	101	Mercer 1	131	Riversville 6
12	BL England 3	42	Cromby D	72	Hatfield's Ferry 3	102	Mercer 2	132	Roanoke Valley 1
13	BL England Diesel Units 1-4	43	Dale 1-2	73	Hopewell James River Cogeneration	103	Mercer 3	133	Roanoke Valley 2
14	Bay Shore 1	44	Dale 3	74	Howard Down 10	104	Miami Fort 6	134	Rolling Hills Landfill Generator
15	Bay Shore 2	45	Dale 4	75	Hudson 1	105	Middle 1-3	135	SMART Paper
16	Bay Shore 3	46	Deepwater 1	76	Hudson 2	106	Missouri Ave B,C,D	136	Sammis 1-4
17	Bay Shore 4	47	Deepwater 6	77	Hutchings 1-3, 5-6	107	Mitchell 2	137	Schuylkill 1
18	Bayonne Cogen Plant (CC)	48	Eastlake 1	78	Hutchings 4	108	Mitchell 3	138	Schuylkill Diesel
19	Benning 15	49	Eastlake 2	79	Indian River 1	109	Modern Power Landfill NUG	139	Sewaren 1
20	Benning 16	50	Eastlake 3	80	Indian River 3	110	Muskingum River 1-5	140	Sewaren 2
21	Bergen 3	51	Eastlake 4	81	Ingenco Petersburg	111	National Park 1	141	Sewaren 3
22	Big Sandy 2	52	Eastlake 5	82	Kanawha River 1-2	112	Niles 1	142	Sewaren 4
23	Brunot Island 1B	53	Eddystone 1	83	Kanmer 1-3	113	Niles 2	143	Sewaren 6
24	Brunot Island 1C	54	Eddystone 2	84	Kearny 10	114	Oyster Creek	144	Sporn 1-4
25	Burger 3	55	Edgecomb NUG (Rocky 1-2)	85	Kearny 11	115	Perryman 2	145	Sporn 5
26	Burger EMD	56	Edison 1-3	86	Kearny 9	116	Picway 5	146	Spruance NUG1 (Rich 1-2)
27	Burlington 8,11	57	Elrama 1	87	Killen 2	117	Piney Creek NUG	147	Spruance NUG2 (Rich 3-4)
28	Burlington 9	58	Elrama 2	88	Killen CT	118	Portland 1	148	State Line 3
29	Buzzard Point East Banks 1,2,4-8	59	Elrama 3	89	Kinsley Landfill	119	Portland 2	149	State Line 4
30	Buzzard Point West Banks 1-9	60	Elrama 4	90	Kitty Hawk GT 1	120	Potomac River 1	150	Stuart 1

The list of pending retirements is shown in Table 12-7.

Table 12-7 Planned retirement of PJM units: September 30, 2017²⁴

Unit	Zone	ICAP (MW)	Fuel	Unit Type	Projected Deactivation Date
Yorktown 1-2	Dominion	323.0	Coal	Steam	13-Dec-17
Tait Battery	DAY	40.0	Battery	Battery	31-Dec-17
Hopewell James River Cogeneration	Dominion	89.0	Coal	Steam	31-May-18
Killen 2	DAY	600.0	Coal	Steam	01-Jun-18
Stuart 2	DAY	577.0	Coal	Steam	01-Jun-18
Stuart 3	DAY	577.0	Coal	Steam	01-Jun-18
Stuart 4	DAY	577.0	Coal	Steam	01-Jun-18
Stuart Diesels 1-4	DAY	2.4	Diesel	Diesel	01-Jun-18
Killen CT	DAY	24.0	Light Oil	CT	01-Jun-18
Stuart Diesels 1-4	DAY	6.6	Light Oil	Diesel	01-Jun-18
Sewaren 1	PSEG	104.0	Natural Gas	Steam	01-Jun-18
Sewaren 2	PSEG	118.0	Natural Gas	Steam	01-Jun-18
Sewaren 3	PSEG	107.0	Natural Gas	Steam	01-Jun-18
Sewaren 4	PSEG	124.0	Natural Gas	Steam	01-Jun-18
Bayonne Cogen Plant (CC)	PSEG	158.0	Natural Gas	Steam	01-Nov-18
Spruance NUG1 (aka Spruance 1 Rich 1-2)	Dominion	115.5	Coal	Steam	12-Jan-19
Spruance NUG2 (aka Spruance 2 Rich 3-4)	Dominion	85.0	Coal	Steam	12-Jan-19
BL England 2	AECO	155.0	Coal	Steam	30-Apr-19
BL England 3	AECO	148.0	Heavy Oil	Steam	30-Apr-19
MH50 Markus Hook Co-gen	PECO	50.8	Natural Gas	Steam	13-May-19
Three Mile Island Unit 1 Nuclear Generating Station	Met-Ed	805.0	Nuclear	Nuclear	30-Sep-19
Oyster Creek Nuclear Generating Station	JCPL	614.5	Nuclear	Nuclear	31-Dec-19
Sammis 1-4	ATSI	640.0	Coal	Steam	31-May-20
Wagner 2	BGE	135.0	Coal	Steam	01-Jun-20
Bay Shore 1	ATSI	136.0	Coal	Steam	01-Oct-20
Edgecomb NUG (aka Edgecomb Rocky 1-2)	Dominion	115.5	Coal	Steam	31-Oct-20
Total		6,427.3			

²⁴ Units designated as external installed capacity have been removed

Table 12-8 shows the capacity, average size, and average age of units retiring in PJM, from 2011 through 2020, while Table 12-9 shows these retirements by state. The majority, 76.9 percent, of all MW retiring during this period are coal fired steam units. These coal fired steam units have an average age of 54.4 years and an average size of 172.9 MW. Over half of the retiring coal fired steam units, 55.7 percent, are located in either Ohio or Pennsylvania. Retirements have generally consisted of smaller subcritical coal fired steam units and those without adequate environmental controls to remain viable beyond 2017.

Table 12-8 Retirements by fuel type: 2011 through 2020

Fuel	Number of Units	Avg. Size (MW)	Avg. Age at Retirement (Years)	Total MW	Percent
Battery	1	40.0	4.3	40.0	0.1%
Coal	143	172.9	54.4	24,719.6	76.9%
Diesel	5	21.3	39.8	106.3	0.3%
Heavy Oil	2	157.0	49.5	314.0	1.0%
Hydro	1	0.5	113.8	0.5	0.0%
Kerosene	20	41.4	45.5	828.2	2.6%
Landfill Gas	9	3.9	14.0	35.0	0.1%
Light Oil	30	46.2	43.2	1,384.9	4.3%
Natural Gas	55	58.9	47.3	3,237.3	10.1%
Nuclear	2	709.8	47.8	1,419.5	4.4%
Waste Coal	1	31.0	20.3	31.0	0.1%
Wind	1	10.4	15.6	10.4	0.0%
Wood Waste	2	12.0	23.2	24.0	0.1%
Total	272	118.2	48.9	32,150.7	100.0%

Table 12-9 Retirements (MW) by fuel type and state: 2011 through 2020

State	Battery	Coal	Heavy				Kerosene	Landfill		Light		Nuclear	Waste		Wood	Total
			Diesel	Oil	Hydro	Gas		Oil	Gas	Coal	Wind					
DC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	788.0	0.0	0.0	0.0	0.0	0.0	0.0	788.0	
DE	0.0	254.0	0.0	0.0	0.0	0.0	0.0	0.0	34.0	0.0	0.0	0.0	0.0	0.0	288.0	
IL	0.0	1,624.0	0.0	0.0	0.0	0.0	6.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,630.4	
IN	0.0	982.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	982.0	
KY	0.0	995.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	995.0	
MD	0.0	250.0	51.0	0.0	0.0	0.0	0.8	0.0	189.0	0.0	0.0	0.0	0.0	0.0	490.8	
NC	0.0	324.5	0.0	0.0	0.0	0.0	0.0	31.0	0.0	0.0	0.0	0.0	0.0	0.0	355.5	
NJ	0.0	1,543.0	0.0	148.0	0.5	828.2	9.8	220.0	2,680.5	614.5	0.0	0.0	0.0	0.0	6,044.5	
OH	40.0	9,248.6	52.4	0.0	0.0	0.0	0.0	228.9	0.0	0.0	0.0	0.0	0.0	0.0	9,569.9	
PA	0.0	4,517.0	0.0	166.0	0.0	0.0	16.0	49.7	333.8	805.0	31.0	10.4	24.0	0.0	5,952.9	
VA	0.0	2,340.5	2.9	0.0	0.0	0.0	2.0	67.3	0.0	0.0	0.0	0.0	0.0	0.0	2,412.7	
WV	0.0	2,641.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,641.0	
Total	40.0	24,719.6	106.3	314.0	0.5	828.2	35.0	1,384.9	3,237.3	1,419.5	31.0	10.4	24.0	0.0	32,150.7	

Generation Deactivations in 2017

Table 12-10 shows the units that were deactivated in the first nine months of 2017.

Table 12-10 Unit deactivations in January 1 through September 30, 2017

Company	Unit Name	ICAP (MW)	Primary Fuel	Zone Name	Average Age (Years)	Retirement Date
Dominion Resources, Inc.	Roanoke Valley 1	165.0	Coal	Dominion	22.8	01-Mar-17
Dominion Resources, Inc.	Roanoke Valley 2	44.0	Coal	Dominion	21.8	01-Mar-17
City of Dover	McKee 1	17.0	Natural Gas	DPL	55.4	31-May-17
City of Dover	McKee 2	17.0	Natural Gas	DPL	55.3	31-May-17
Public Service Enterprise Group Incorporated	Hudson 2	620.0	Coal	PSEG	48.5	01-Jun-17
Public Service Enterprise Group Incorporated	Mercer 1	316.0	Coal	PSEG	56.5	01-Jun-17
Public Service Enterprise Group Incorporated	Mercer 2	316.0	Coal	PSEG	56.0	01-Jun-17
Northeast Maryland Waste Disposal Authority	GUDE Landfill	0.8	Landfill Gas	Pepco	8.8	24-Aug-17
Dynegy Inc.	Stuart 1	225.0	Coal	DAY	46.5	30-Sep-17
The AES Corporation	Stuart 1	202.0	Coal	DAY	46.5	30-Sep-17
American Electric Power Company, Inc.	Stuart 1	150.0	Coal	DAY	46.5	30-Sep-17
Total		2,072.8				

Existing Generation Mix

As of September 30, 2017, PJM had an installed capacity of 201,573.5 MW (Table 12-11). This measure differs from capacity market installed capacity because it includes energy-only units, excludes all external units, and uses nameplate values for solar and wind resources.

Table 12-11 Existing PJM capacity: September 30, 2017 (By zone and unit type (MW))²⁵

ZONE	CC	CT	Diesel	Fuel Cell	Hydro	Nuclear	Solar	Steam	Storage	Wind	Total
AECO	901.9	570.7	14.6	0.0	0.0	0.0	59.4	815.9	0.0	7.5	2,370.0
AEP	6,800.0	3,682.2	80.3	0.0	1,071.9	2,071.0	14.7	18,897.8	6.0	2,254.0	34,877.9
APS	1,749.0	1,560.9	47.9	0.0	129.2	0.0	46.1	5,409.0	78.9	1,191.5	10,212.5
ATSI	1,570.5	1,618.3	63.7	0.0	0.0	2,134.0	0.0	5,719.0	0.0	0.0	11,105.5
BGE	0.0	936.6	22.4	0.0	0.4	1,716.0	1.1	2,921.5	0.0	0.0	5,598.0
ComEd	3,146.1	7,244.0	109.1	0.0	0.0	10,473.5	9.0	5,166.1	127.6	3,081.9	29,357.3
DAY	0.0	1,368.5	47.5	0.0	0.0	0.0	1.1	2,908.0	40.0	0.0	4,365.1
DEOK	47.2	654.0	4.8	0.0	112.0	0.0	0.0	3,981.0	20.0	0.0	4,819.0
DLCO	244.0	15.0	0.0	0.0	6.3	1,777.0	0.0	660.0	0.0	0.0	2,702.3
Dominion	8,371.6	4,092.7	171.8	0.0	3,589.3	3,581.3	217.8	7,566.0	0.0	208.0	27,798.5
DPL	2,498.5	1,820.4	162.1	30.0	0.0	0.0	118.4	1,586.0	0.0	0.0	6,215.4
EKPC	0.0	774.0	0.0	0.0	70.0	0.0	0.0	1,687.0	0.0	0.0	2,531.0
JCPL	2,682.5	763.1	16.1	0.0	400.0	614.5	260.6	15.0	0.0	0.0	4,751.8
Met-Ed	2,630.8	401.7	33.4	0.0	19.5	805.0	0.0	200.0	0.0	0.0	4,090.4
PECO	3,209.0	834.0	2.9	0.0	3,284.0	4,546.8	3.0	979.1	1.0	0.0	12,859.8
PENELEC	850.0	407.5	150.0	0.0	590.8	0.0	0.0	6,799.5	28.4	958.8	9,785.0
Pepco	1,827.0	1,204.7	11.9	0.0	0.0	0.0	0.0	3,649.1	0.0	0.0	6,692.7
PPL	2,657.9	602.5	55.5	0.0	706.6	2,520.0	15.0	5,169.9	20.0	219.7	11,967.1
PSEG	4,000.3	1,134.0	11.1	0.0	5.0	3,493.0	182.7	644.1	4.0	0.0	9,474.2
RECO	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	43,186.3	29,684.8	1,005.1	30.0	9,985.0	33,732.1	928.9	74,774.0	325.9	7,921.4	201,573.5

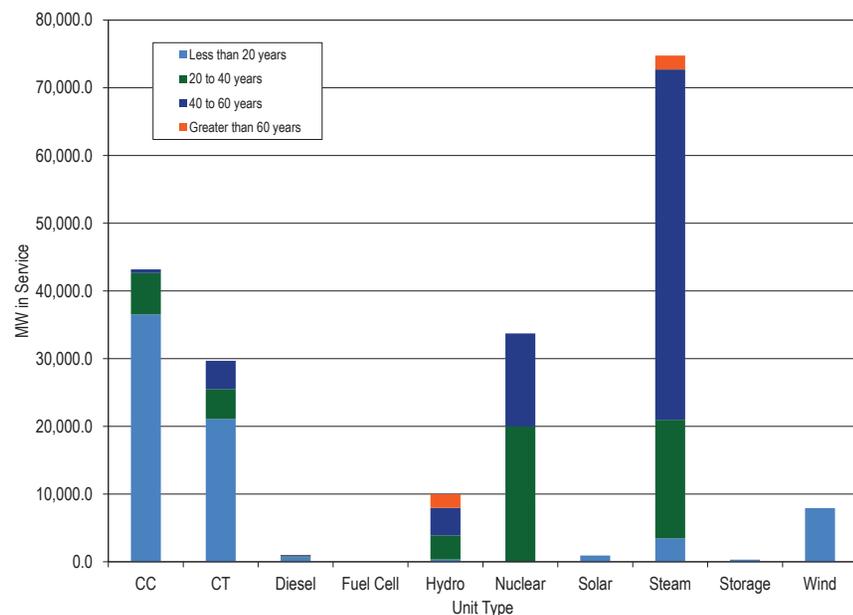
Figure 12-2 and Table 12-12 show the age of PJM generators by unit type. Units older than 40 years comprise 78,553.0 MW, or 39.0 percent, of the total capacity of 201,573.5 MW.

Table 12-12 PJM capacity (MW) by age (years): September 30, 2017

Age (years)	CC	CT	Diesel	Fuel Cell	Hydro	Nuclear	Solar	Steam	Storage	Wind	Total
Less than 20	36,530.8	21,078.8	667.6	30.0	339.7	0.0	928.9	3,487.4	325.9	7,921.4	71,310.4
20 to 40	6,123.5	4,435.4	117.9	0.0	3,563.2	19,977.9	0.0	17,492.1	0.0	0.0	51,710.0
40 to 60	532.0	4,170.6	215.6	0.0	4,063.0	13,754.2	0.0	51,723.5	0.0	0.0	74,458.9
Greater than 60	0.0	0.0	4.0	0.0	2,019.1	0.0	0.0	2,071.0	0.0	0.0	4,094.1
Total	43,186.3	29,684.8	1,005.1	30.0	9,985.0	33,732.1	928.9	74,774.0	325.9	7,921.4	201,573.5

²⁵ The capacity described in this section refers to all capacity in PJM at the summer installed capacity rating, regardless of whether the capacity entered the RPM Auction. This table previously included external units.

Figure 12-2 PJM capacity (MW) by age (years): September 30, 2017



Generation and Transmission Interconnection Planning Process

PJM made changes to the queue process in May 2012.²⁶ These changes included reducing the length of the queues, creating an alternate queue for some small projects, and adjustments to the rules regarding suspension rights and Capacity Interconnection Rights (CIR). PJM staff reported on June 11, 2015, that due to these and other process improvements, the study backlog has been significantly reduced.²⁷ The Earlier Queue Submittal Task Force (EQSTF) was established in August 2015, to further address the issue.²⁸

²⁶ See PJM Interconnection, L.L.C., Docket No. ER12-1177 (Feb. 29, 2012).

²⁷ See "PJM Interconnection Queue Status & Statistics Update Database Snapshot on 05/27/2015," presented by Dave Egan to the PJM Planning Committee (June 11, 2015).

²⁸ See Earlier Queue Submittal Task Force at <<http://www.pjm.com/committees-and-groups/closed-groups/eqstf.aspx>>.

The Earlier Queue Submittal Task Force

In 2015 and 2016, participants of the Earlier Queue Submittal Task Force (EQSTF) drafted rule changes to the Interconnection Queue process meant to address high levels of deficient project applications being submitted to PJM for review.

To discourage incomplete interconnection project requests, the EQSTF proposed to only assign queue positions for project applications that had submitted all required project elements including site control. In addition, all project applications would be required to remedy any deficiencies by the end of the queue window in order to be considered in feasibility studies or be terminated and withdrawn. Queue positions had historically been assigned to project developers that paid the study deposit and submitted a project application by the appropriate submission deadline. Project applications with missing information were assigned queue numbers so long as these two criteria were met.

The EQSTF also proposed rule changes to interconnection study fee structures that would discourage the submission of speculative or incomplete queue projects. Under the old rules, deposits provided by developers for interconnection studies could not be charged until after a queue position was accepted. Under the new rules, these deposits would be available for charging before a queue position is assigned.

In addition, rather than socializing the study costs for deficient applications from project developers, the EQSTF proposed that these project costs be assigned directly to the developer that submitted the project. This would significantly increase the cost burden that developers would experience if a project is found to be deficient in the review process.

The EQSTF proposed to change the timing of queue windows and Feasibility Study dates to enable more generation projects to participate in the PJM Base Residual Auction. The EQSTF proposed shifting start dates for the queue windows back a month from May 1 to April 1 and Nov 1 to October 1. The

EQSTF also proposed shifting feasibility study dates from Dec 1 to Nov 1 and June 1 to May 1.

Revisions to the OATT developed by the EQSTF were approved by the FERC effective October 31, 2016.²⁹

On December 15, 2016, the Commission issued a notice of proposed rulemaking proposing additional queue reforms intended to improve certainty, promote more informed interconnection, and enhance interconnection processes.

Interconnection Queue Analysis

In the study phase of the interconnection planning process, a series of studies are performed to determine the feasibility, impact, and cost of projects in the queue. Table 12-13 is an overview of PJM's study process. System impact and facilities studies are often redone when a project is withdrawn in order to determine the impact on the projects remaining in the queue.

Table 12-13 PJM generation planning process

Process Step	Start on	Financial Obligation	Days for PJM to Complete	Days for Applicant to Decide Whether to Continue
Feasibility Study	Close of current queue	Cost of study (partially refundable deposit)	90	30
System Impact Study	Upon acceptance of the System Impact Study Agreement	Cost of study (partially refundable deposit)	120	30
Facilities Study	Upon acceptance of the Facilities Study Agreement	Cost of study (refundable deposit)	Varies	60
Schedule of Work	Upon acceptance of Interconnection Service Agreement (ISA)	Letter of credit for upgrade costs	Varies	37
Construction (only for new generation)	Upon acceptance of Interconnection Construction Service Agreement (ICSA)	None	Varies	NA

Manual 14B requires PJM to apply a commercial probability factor at the feasibility study stage to improve the accuracy of capacity and cost estimates. The commercial probability factor is based on the historical incidence of projects dropping out of the queue at the impact study stage.³⁰ The impact and facilities studies are performed using the full amount of planned generation in the queues. The actual withdrawal rates are shown in Table 12-14 and Table 12-15.

Withdrawn Projects

Table 12-14 shows the milestone status when projects were withdrawn, for all withdrawn projects. Of the projects withdrawn, 52.3 percent were withdrawn before the system impact study was completed. Once an Interconnection Service Agreement (ISA) or a Wholesale Market Participation Agreement (WMPA) is executed, the financial obligation for any necessary transmission upgrades cannot be retracted.^{31 32} Withdrawing at or beyond this point is uncommon; only 251 projects, or 12.3 percent, of all projects withdrawn were withdrawn after reaching this milestone.

²⁹ See Letter Order, ER16-2518-000 (Oct. 7, 2016).

³⁰ See PJM, "Manual 14B: PJM Region Transmission Planning Process," Rev. 38 (July 27, 2017), p.80.

³¹ "Generators planning to connect to the local distribution systems at locations that are not under FERC jurisdiction and wish to participate in PJM's market need to execute a PJM Wholesale Market Participation Agreement (WMPA)..." instead of an ISA. See PJM, "Manual 14C: Generation and Transmission Interconnection Facility Construction," Rev. 12 (June 22, 2017).

³² See PJM, "Manual 14C: Generation and Transmission Interconnection Facility Construction," Rev. 12 (June 22, 2017).

Table 12-14 Last milestone at time of withdrawal: January 1, 1997 through September 30, 2017

Milestone Completed	Projects			Maximum Days
	Withdrawn	Percent	Average Days	
Never Started	244	11.9%	165	1,235
Feasibility Study	826	40.4%	341	3,238
System Impact Study	461	22.5%	606	3,174
Facilities Study	263	12.9%	1,335	4,210
Construction Service Agreement (CSA) or beyond	251	12.3%	1,498	4,249
Total	2,045	100.0%		

Table 12-15 and Table 12-16 show the time spent at various stages in the queue process and the completion time for the studies performed. For completed projects, there is an average time of 996 days, or 2.7 years, between entering a queue and going into service. For withdrawn projects, there is an average time of 649 days, or 1.8 years, between entering a queue and withdrawing.

Table 12-15 Average project queue times (days): September 30, 2017

Status	Average (Days)	Standard Deviation	Minimum	Maximum
Active	928	532	21	3,745
In-Service	996	713	1	4,024
Suspended	2,123	1,203	705	5,185
Under Construction	1,823	1,028	378	4,977
Withdrawn	649	680	1	4,249

Average Time in Queue

Table 12-16 presents information on the time in the stages of the queue for those projects not yet in service. Of the 811 projects in the queue as of September 30, 2017, 68 had a completed feasibility study and 142 were under construction.

Table 12-16 PJM generation planning summary: September 30, 2017

Milestone Reached	Number of Projects	Percent of Total Projects	Average Days	Maximum Days
Under Review	414	51.0%	818	2,039
Feasibility Study	68	8.4%	1,089	1,972
System Impact Study	116	14.3%	998	3,099
Facilities Study	71	8.8%	2,104	4,260
Construction Service Agreement (CSA) or beyond	142	17.5%	2,282	5,185
Total	811	100.0%		

Queue Analysis by Fuel Group

The time it takes to complete a study depends on the backlog and the number of projects in the queue, but not on the size of the project. Table 12-17 shows the number of projects that entered the queue by year. The number of queue entries has increased during the past three years, primarily by renewable projects (solar, hydro, storage, biomass, wind). Of the 895 projects entered in 2014, 2015, and 2016, 626 projects, 69.9 percent, were renewable. Of the 321 projects entered in the first nine months of 2017, 256 projects, 79.8 percent, were renewable.

Table 12-17 Number of projects entered in the queue: September 30, 2017

Year Entered	Fuel Group			Grand Total
	Nuclear	Renewable	Traditional	
1997	2	0	11	13
1998	0	0	18	18
1999	1	5	85	91
2000	2	3	79	84
2001	4	6	83	93
2002	3	14	33	50
2003	1	35	17	53
2004	4	17	32	53
2005	3	78	51	132
2006	9	78	70	157
2007	9	68	142	219
2008	3	114	99	216
2009	10	113	50	173
2010	5	382	54	441
2011	6	265	78	349
2012	2	73	80	155
2013	1	78	73	152
2014	0	122	68	190
2015	0	192	114	306
2016	2	312	85	399
2017	2	256	63	321
Total	69	2,211	1,385	3,665

Even though renewable projects comprise the majority of projects entered in the queue, as well as what is currently active in the queue, renewable projects only account for 40.3 percent of the nameplate MW currently active in the queue (Table 12-18).

Table 12-18 Queue details by fuel group: September 30, 2017

Fuel Group	Number of Projects	Percent of Projects	MW	Percent MW
Nuclear	8	0.9%	152.3	0.1%
Renewable	632	71.3%	41,260.6	40.3%
Traditional	246	27.8%	60,902.4	59.5%
Total	886	100.0%	102,315.3	100.0%

Queue Analysis by Fuel Type and Project Classification

Table 12-19 shows the current status of all generation queue projects by fuel type and project classification from January 1, 1997, through September 30, 2017. For example, between January 1, 1997 and September 30, 2017, 156 nameplate capacity upgrades at natural gas fired facilities have completed the queue process and are in service.

Since 1997, there have been a total of 3,590 projects in PJM generation queues. A total of 2,933 projects have been classified as new generation and 657 projects have been classified as upgrades. Wind, solar and natural gas projects have accounted for 2,827 projects, or 78.7 percent, of all 3,590 generation queue projects. A total of 52 new projects from either project classification entered the generation queue between July 1, 2017 and September 30, 2017.

Table 12-19 Status of all generation queue projects: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Number of Projects												TOTAL
		Natural Gas	Wind	Coal	Solar	Nuclear	Hydro	Oil	Biomass	Storage	Other	LFG	Diesel	
In Service	New Generation	92	62	9	110	1	10	4	7	18	3	75	6	397
	Upgrade	156	15	45	16	42	16	14	6	3	4	17	3	337
Under Construction	New Generation	31	20	0	43	0	4	0	0	23	0	2	0	123
	Upgrade	22	1	4	2	0	1	0	1	2	0	0	1	34
Suspended	New Generation	16	22	0	34	0	0	0	1	6	0	1	0	80
	Upgrade	5	3	0	0	0	0	0	0	3	0	0	0	11
Withdrawn	New Generation	430	374	55	748	9	40	9	38	78	10	77	12	1,880
	Upgrade	79	15	13	12	9	2	13	2	7	2	10	1	165
Active	New Generation	74	43	0	315	1	1	0	0	16	0	3	0	453
	Upgrade	65	7	5	15	7	2	0	1	6	0	1	1	110
Total Projects	New Generation	643	521	64	1,250	11	55	13	46	141	13	158	18	2,933
	Upgrade	327	41	67	45	58	21	27	10	21	6	28	6	657

Table 12-20 shows the MW in Table 12-19 by share by classification as new generation or upgrade. Within a fuel type the shares of upgrades add to 100 percent and the shares of new generation add to 100 percent. For example, 76.2 percent of all hydro projects classified as upgrades are currently in service in PJM, 9.5 percent of hydro upgrades were withdrawn, 4.8 percent of hydro upgrades are under construction, and 9.5 percent of hydro upgrades are active in the queue. From January 1, 1997, through September 30, 2017, solar projects have had the lowest completion rate across all technology types for projects classified as new generation and storage projects have had the lowest completion rate across all technology types for projects classified as upgrades. Landfill gas projects have had the highest completion rate across all technology types for projects classified as new generation and hydro projects have had the highest completion rate across all technology types for projects classified as upgrades.

Table 12-20 Status of all generation queue projects as a percent of total projects by classification: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Percent of Total Projects by Classification											
		Natural Gas	Wind	Coal	Solar	Nuclear	Hydro	Oil	Biomass	Storage	Other	LFG	Diesel
In Service	New Generation	14.3%	11.9%	14.1%	8.8%	9.1%	18.2%	30.8%	15.2%	12.8%	23.1%	47.5%	33.3%
	Upgrade	47.7%	36.6%	67.2%	35.6%	72.4%	76.2%	51.9%	60.0%	14.3%	66.7%	60.7%	50.0%
Under Construction	New Generation	4.8%	3.8%	0.0%	3.4%	0.0%	7.3%	0.0%	0.0%	16.3%	0.0%	1.3%	0.0%
	Upgrade	6.7%	2.4%	6.0%	4.4%	0.0%	4.8%	0.0%	10.0%	9.5%	0.0%	0.0%	16.7%
Suspended	New Generation	2.5%	4.2%	0.0%	2.7%	0.0%	0.0%	0.0%	2.2%	4.3%	0.0%	0.6%	0.0%
	Upgrade	1.5%	7.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%	0.0%	0.0%	0.0%
Withdrawn	New Generation	66.9%	71.8%	85.9%	59.8%	81.8%	72.7%	69.2%	82.6%	55.3%	76.9%	48.7%	66.7%
	Upgrade	24.2%	36.6%	19.4%	26.7%	15.5%	9.5%	48.1%	20.0%	33.3%	33.3%	35.7%	16.7%
Active	New Generation	11.5%	8.3%	0.0%	25.2%	9.1%	1.8%	0.0%	0.0%	11.3%	0.0%	1.9%	0.0%
	Upgrade	19.9%	17.1%	7.5%	33.3%	12.1%	9.5%	0.0%	10.0%	28.6%	0.0%	3.6%	16.7%

Table 12-21 shows the nameplate generating capacity of projects in the PJM generation queue by technology type and project classification. For example, the 374 new generation wind projects that have been withdrawn from the queue as of September 30, 2017, listed in Table 12-19 constitute 58,811.1 MW of nameplate capacity. The 509 new generation and upgrade natural gas projects that have been withdrawn in the same time period constitute 197,194.6 MW of nameplate capacity.

Table 12-21 Status of all generation capacity (MW) in the PJM generation queue: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Project MW												TOTAL
		Natural Gas	Wind	Coal	Solar	Nuclear	Hydro	Oil	Biomass	Storage	Other	LFG	Diesel	
In Service	New Generation	24,990.1	6,871.2	1,378.0	873.4	9.0	565.6	607.0	225.7	161.4	50.0	406.9	69.5	36,207.7
	Upgrade	7,413.4	33.7	747.5	19.4	3,912.8	605.6	125.8	58.8	36.4	547.5	54.5	25.3	13,580.6
Under Construction	New Generation	14,469.1	3,149.7	0.0	768.6	0.0	35.6	0.0	0.0	40.6	0.0	11.2	0.0	18,474.8
	Upgrade	1,485.1	0.0	108.0	4.5	0.0	17.0	0.0	62.5	52.0	0.0	0.0	0.0	1,729.1
Suspended	New Generation	4,491.7	3,706.0	0.0	387.1	0.0	0.0	0.0	16.0	75.8	0.0	0.9	0.0	8,677.5
	Upgrade	365.7	175.0	0.0	0.0	0.0	0.0	0.0	0.0	30.0	0.0	0.0	0.0	570.7
Withdrawn	New Generation	188,341.0	58,811.0	33,511.6	12,407.6	8,161.0	1,988.0	1,721.0	1,061.5	792.0	843.8	443.4	63.9	308,145.9
	Upgrade	8,853.6	380.6	865.0	167.8	916.0	56.0	589.0	37.1	92.1	24.0	48.7	4.0	12,033.9
Active	New Generation	34,094.7	8,285.3	0.0	16,823.4	28.0	15.0	0.0	0.0	189.9	0.0	19.8	0.0	59,456.0
	Upgrade	5,037.5	264.8	91.0	936.9	124.3	39.6	0.0	4.0	98.8	0.0	0.0	4.0	6,600.9
Total Projects	New Generation	266,386.6	80,823.3	34,889.6	31,260.1	8,198.0	2,604.2	2,328.0	1,303.2	1,259.6	893.8	882.1	133.4	430,961.9
	Upgrade	23,155.3	854.0	1,811.5	1,128.6	4,953.1	718.2	714.8	162.4	309.3	571.5	103.2	33.3	34,515.2

Figure 12-3 shows the project MW that have entered the PJM generation queue by fuel type and year of entry. In 2015 and 2016, natural gas, wind, and solar projects accounted for the majority of all new projects entering the generation queue. The increase in solar projects entering the queue in 2016 from 2015 was primarily a result of new projects in Dominion. The increase in solar projects entering the queue in the first nine months of 2017 was primarily a result of new projects in AEP.

Figure 12-3 Queue project MW by fuel type and queue entry year: January 1, 1997 through September 30, 2017

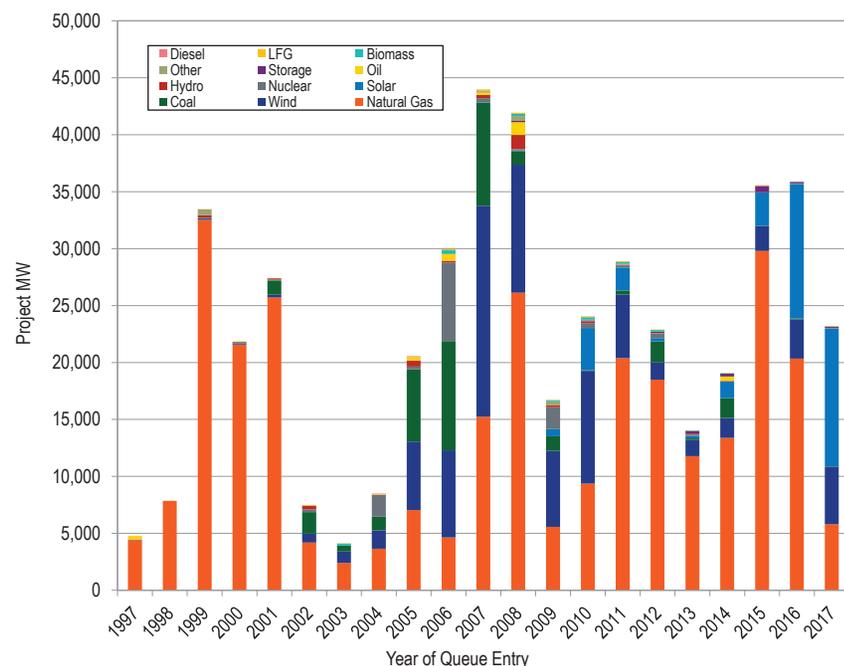


Table 12-22 shows the MW in Table 12-21 by share by classification as new generation or upgrade. Within a fuel type the shares of upgrades add to 100 percent and the shares of new generation add to 100 percent. For example, 72.8 percent of wind projects classified as new generation have been withdrawn from the queue between January 1, 1997, and September 30, 2017.

Natural Gas Project Analysis

Table 12-23 shows the status of all natural gas projects by number of projects that entered PJM generation queues from January 1, 1997 through September 30, 2017, by zone. Of the 139 natural gas projects classified either as new generation or upgrade currently active in the PJM generation queue, 60 projects, 43.2 percent, are located within AEP, ComEd and APS.

Table 12-22 Status of all generation queue projects as percent of total MW in project classification: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Percent of Total Project MW by Classification											
		Natural Gas	Wind	Coal	Solar	Nuclear	Hydro	Oil	Biomass	Storage	Other	LFG	Diesel
In Service	New Generation	9.4%	8.5%	3.9%	2.8%	0.1%	21.7%	26.1%	17.3%	12.8%	5.6%	46.1%	52.1%
	Upgrade	32.0%	3.9%	41.3%	1.7%	79.0%	84.3%	17.6%	36.2%	11.8%	95.8%	52.8%	76.0%
Under Construction	New Generation	5.4%	3.9%	0.0%	2.5%	0.0%	1.4%	0.0%	0.0%	3.2%	0.0%	1.3%	0.0%
	Upgrade	6.4%	0.0%	6.0%	0.4%	0.0%	2.4%	0.0%	38.5%	16.8%	0.0%	0.0%	0.0%
Suspended	New Generation	1.7%	4.6%	0.0%	1.2%	0.0%	0.0%	0.0%	1.2%	6.0%	0.0%	0.1%	0.0%
	Upgrade	1.6%	20.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9.7%	0.0%	0.0%	0.0%
Withdrawn	New Generation	70.7%	72.8%	96.1%	39.7%	99.5%	76.3%	73.9%	81.5%	62.9%	94.4%	50.3%	47.9%
	Upgrade	38.2%	44.6%	47.8%	14.9%	18.5%	7.8%	82.4%	22.8%	29.8%	4.2%	47.2%	12.0%
Active	New Generation	12.8%	10.3%	0.0%	53.8%	0.3%	0.6%	0.0%	0.0%	15.1%	0.0%	2.2%	0.0%
	Upgrade	21.8%	31.0%	5.0%	83.0%	2.5%	5.5%	0.0%	2.5%	31.9%	0.0%	0.0%	12.0%

Table 12-23 Status of all natural gas generation queue projects: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Number of Projects																				
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG	RECO	TOTAL
In Service	New Generation	7	1	7	2	6	2	0	1	5	7	0	0	8	3	6	8	7	9	12	0	91
	Upgrade	7	15	9	1	1	12	6	0	30	16	0	0	5	2	9	5	5	6	27	0	156
Under Construction	New Generation	3	2	3	1	1	0	0	1	3	0	1	0	1	1	2	3	2	5	2	0	31
	Upgrade	0	1	1	1	0	2	0	0	3	0	0	0	1	0	5	0	1	4	3	0	22
Suspended	New Generation	2	2	4	0	0	0	0	0	0	1	0	0	1	0	0	5	1	0	0	0	16
	Upgrade	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	2	0	0	0	5
Withdrawn	New Generation	26	17	39	13	8	10	0	1	17	17	2	3	25	25	42	50	33	39	61	2	430
	Upgrade	6	7	5	4	0	2	0	1	7	4	0	0	5	8	3	4	3	4	16	0	79
Active	New Generation	4	11	6	4	0	11	1	0	3	1	0	0	1	0	1	5	0	5	21	0	74
	Upgrade	4	9	6	4	0	17	0	0	11	1	0	0	2	3	0	2	0	5	1	0	65
Total Projects	New Generation	42	33	59	20	15	23	1	3	28	26	3	3	36	29	51	71	43	58	96	2	642
	Upgrade	17	32	22	10	1	33	6	1	51	21	0	0	14	13	17	12	11	19	47	0	327

Table 12-24 shows the status of all gas projects by MW that entered PJM generation queues from January 1, 1997 through September 30, 2017, by zone. Of the 39,132.2 MW of natural gas projects classified either as new generation or upgrade currently active in the PJM generation queue, 21,416.8 MW, 54.7 percent, are located within AEP, ComEd and APS.

Table 12-24 Status of all natural gas generation capacity (MW) in the PJM generation queue: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Project MW																				
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG	RECO	TOTAL
In Service	New Generation	1,016.2	580.0	1,701.0	815.5	390.0	629.0	0.0	20.0	4,011.0	1,122.2	0.0	0.0	2,070.3	1,397.0	2,464.0	1,267.1	840.0	2,826.9	2,804.9	0.0	23,955.1
	Upgrade	265.7	414.0	857.7	40.0	2.5	864.0	60.0	0.0	1,446.7	200.0	0.0	0.0	224.0	665.0	780.5	87.0	121.1	327.3	1,057.9	0.0	7,413.4
Under Construction	New Generation	453.5	1,417.0	954.4	800.0	1.3	0.0	0.0	513.0	2,855.1	0.0	205.0	0.0	0.4	450.0	760.5	1,659.9	755.0	3,074.0	570.0	0.0	14,469.1
	Upgrade	0.0	6.0	0.0	161.0	0.0	32.6	0.0	0.0	225.0	0.0	0.0	0.0	0.0	0.0	241.0	0.0	64.5	524.0	231.0	0.0	1,485.1
Suspended	New Generation	606.0	1,579.0	574.7	0.0	0.0	0.0	0.0	0.0	0.0	291.0	0.0	0.0	440.0	0.0	0.0	107.0	894.0	0.0	0.0	0.0	4,491.7
	Upgrade	0.0	0.0	20.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	200.0	0.0	0.0	1.6	144.1	0.0	0.0	0.0	365.7
Withdrawn	New Generation	6,923.8	9,575.0	16,744.0	5,420.7	3,122.1	4,533.0	0.0	134.5	10,475.0	4,608.4	665.0	991.8	11,461.2	13,001.0	23,120.0	17,174.0	20,414.2	16,451.7	23,518.7	6.9	188,341.0
	Upgrade	122.8	711.0	579.0	111.0	0.0	75.0	0.0	36.0	305.3	668.0	0.0	0.0	253.0	1,742.0	240.0	1,040.6	85.0	480.0	2,404.9	0.0	8,853.6
Active	New Generation	805.4	7,203.0	3,960.9	4,047.0	0.0	6,779.2	1,150.0	0.0	3,544.5	451.0	0.0	0.0	1,092.2	0.0	220.0	542.7	0.0	1,898.8	2,400.0	0.0	34,094.7
	Upgrade	273.6	387.0	424.7	183.0	0.0	2,662.0	0.0	0.0	410.1	60.0	0.0	0.0	34.9	99.1	0.0	91.0	0.0	361.0	51.1	0.0	5,037.5
Total Projects	New Generation	9,805.0	20,354.0	23,935.0	11,083.2	3,513.4	11,941.2	1,150.0	667.5	20,885.6	6,472.6	870.0	991.8	15,064.1	14,848.0	26,564.5	20,750.7	22,903.2	24,251.4	29,293.6	6.9	265,351.6
	Upgrade	662.1	1,518.0	1,881.4	495.0	2.5	3,633.6	60.0	36.0	2,387.1	928.0	0.0	0.0	711.9	2,506.1	1,261.5	1,220.2	414.7	1,692.3	3,744.9	0.0	23,155.3

Wind Project Analysis

Table 12-25 shows the status of all wind generation projects that entered PJM generation queues from January 1, 1997 through September 30, 2017, by zone. Of the 77 wind projects to achieve in service status, 68 projects, 88.3 percent are located within ComEd, AEP, APS and PENELEC. Of the 50 wind projects currently active in the PJM generation queue, 40 projects, 80.0 percent are located within ComEd, AEP, APS and PENELEC.

Table 12-25 Status of all wind generation queue projects: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Number of Projects																				
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG	RECO	TOTAL
In Service	New Generation	1	9	11	0	0	17	0	0	0	0	0	0	0	0	0	20	0	4	0	0	62
	Upgrade	0	0	3	0	0	2	0	0	0	0	0	0	0	0	0	6	0	4	0	0	15
Under Construction	New Generation	0	5	5	0	0	4	0	0	4	1	0	0	0	0	0	1	0	0	0	0	20
	Upgrade	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Suspended	New Generation	1	11	2	1	0	1	2	0	1	0	0	0	0	0	0	2	0	1	0	0	22
	Upgrade	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Withdrawn	New Generation	15	81	39	6	0	94	13	0	16	7	0	1	0	0	0	61	0	40	1	0	374
	Upgrade	1	0	6	0	0	1	0	0	1	0	0	0	0	0	0	4	0	2	0	0	15
Active	New Generation	0	19	2	2	0	12	0	0	2	2	0	0	0	0	0	1	0	3	0	0	43
	Upgrade	0	0	2	0	0	2	0	0	1	0	0	0	0	0	0	2	0	0	0	0	7
Total Projects	New Generation	17	125	59	9	0	128	15	0	23	10	0	1	0	0	0	85	0	48	1	0	521
	Upgrade	2	1	13	0	0	5	0	0	2	0	0	0	0	0	0	12	0	6	0	0	41

Table 12-26 shows the wind project capacity in MW of all wind generation projects that have entered the PJM generation queue from January 1, 1997 through September 30, 2017, by zone. Of the 6,904.9 MW of wind generation capacity to achieve in service status, 6,670.9 MW, or 96.6 percent of nameplate capacity is located within ComEd, AEP, APS and PENELEC. Of the 8,550.1 MW of wind generation capacity currently active in the PJM generation queue, 7,163.2 MW of generation capacity or 83.8 percent is located within ComEd, AEP, APS and PENELEC.

Table 12-26 Status of all wind generation capacity (MW) in the PJM generation queue: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Project MW																				
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG	RECO	TOTAL
In Service	New Generation	7.5	2,252.0	1,004.0	0.0	0.0	2,413.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	995.0	0.0	199.2	0.0	0.0	6,871.2
	Upgrade	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.4	0.0	27.3	0.0	0.0	33.7
Under Construction	New Generation	0.0	638.3	572.6	0.0	0.0	978.5	0.0	0.0	740.3	150.0	0.0	0.0	0.0	0.0	0.0	70.0	0.0	0.0	0.0	0.0	3,149.7
	Upgrade	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Suspended	New Generation	20.0	1,878.3	151.1	500.0	0.0	500.0	300.0	0.0	76.6	0.0	0.0	0.0	0.0	0.0	0.0	180.0	0.0	100.0	0.0	0.0	3,706.0
	Upgrade	5.0	100.0	70.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	175.0
Withdrawn	New Generation	3,626.4	15,048.1	2,935.1	645.6	0.0	22,115.8	1,828.0	0.0	2,361.5	2,255.0	0.0	150.3	0.0	0.0	0.0	5,059.0	0.0	2,766.3	20.0	0.0	58,811.1
	Upgrade	0.0	0.0	100.0	0.0	0.0	4.0	0.0	0.0	78.0	0.0	0.0	0.0	0.0	0.0	0.0	192.6	0.0	6.0	0.0	0.0	380.6
Active	New Generation	0.0	4,770.5	197.0	315.7	0.0	1,797.0	0.0	0.0	226.6	499.6	0.0	0.0	0.0	0.0	0.0	138.0	0.0	341.1	0.0	0.0	8,285.3
	Upgrade	0.0	0.0	20.0	0.0	0.0	170.0	0.0	0.0	4.0	0.0	0.0	0.0	0.0	0.0	0.0	70.8	0.0	0.0	0.0	0.0	264.8
Total Projects	New Generation	3,653.9	24,587.2	4,859.8	1,461.3	0.0	27,804.8	2,128.0	0.0	3,405.0	2,904.6	0.0	150.3	0.0	0.0	0.0	6,442.0	0.0	3,406.6	20.0	0.0	80,823.3
	Upgrade	5.0	100.0	190.0	0.0	0.0	174.0	0.0	0.0	82.0	0.0	0.0	0.0	0.0	0.0	0.0	269.7	0.0	33.3	0.0	0.0	854.0

Solar Project Analysis

Table 12-27 shows the status of all solar generation projects that have entered the PJM generation queue from January 1, 1997 through September 30, 2018, by zone. Of a total of 1,294 solar projects ever to enter the PJM generation queue, 513 projects, or 39.6 percent, have been located in JCPL, AECO and PSEG, all zones in New Jersey. Of these three zones, AECO has the lowest completion rates for new generation and upgrade solar projects. Excluding currently active projects, only 5.0 percent of solar projects classified as new generation or upgrades in AECO are either in service or under construction. Of these three zones, PSEG has the highest completion rates. Excluding currently active projects, 41.1 percent of solar projects classified as either new generation or upgrades in PSEG are either in service or under construction.

The number of currently active new generation solar projects is also highly concentrated in several zones. Out of 329 active new generation solar projects, 138 projects, or 41.9 percent of all currently active new generation solar projects are located in Dominion. Out of 329 active new generation solar projects, 61, or 18.5 percent of all currently active new generation solar projects are located in AEP.

Table 12-27 Status of all solar generation queue projects: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Number of Projects																				
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG	RECO	TOTAL
In Service	New Generation	5	4	3	0	1	1	1	0	7	9	0	0	39	0	1	0	0	2	37	0	110
	Upgrade	0	0	0	0	0	0	0	0	2	8	0	0	6	0	0	0	0	0	0	0	16
Under Construction	New Generation	3	2	3	0	2	0	1	0	12	5	0	0	8	0	0	0	0	0	7	0	43
	Upgrade	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	2
Suspended	New Generation	0	5	15	0	0	0	1	0	1	2	0	0	6	1	0	1	0	0	2	0	34
	Upgrade	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Withdrawn	New Generation	150	41	48	7	10	8	7	10	81	98	0	3	160	12	6	10	9	27	61	0	748
	Upgrade	1	1	0	0	0	0	0	0	5	0	0	0	5	0	0	0	0	0	0	0	12
Active	New Generation	8	60	13	3	0	16	10	3	129	46	1	2	4	2	1	1	3	2	10	0	314
	Upgrade	0	1	0	0	0	0	0	1	9	1	0	0	0	1	0	0	0	1	1	0	15
Total Projects	New Generation	166	112	82	10	13	25	20	13	230	160	1	5	217	15	8	12	12	31	117	0	1249
	Upgrade	1	2	0	0	0	0	0	1	17	10	0	0	11	1	0	0	0	1	1	0	45

Table 12-28 shows the status of all solar generation project MW that have entered the PJM generation queue from January 1, 1997 through September 30, 2017, by zone. Of a total of 32,348.7 MW of solar nameplate capacity ever to enter the PJM generation queue, 4,246.2 MW, or 13.1 percent, have been located in JCPL, AECO and PSEG, all of which are zones in New Jersey. Solar projects in Dominion have accounted for 13,325.8 MW or 41.2 percent of all solar project nameplate capacity in the PJM queue from January 1, 1997 through September 30, 2017. Solar projects in DPL have accounted for 2,881.0 MW or 8.9 percent of all solar project nameplate capacity in the PJM queue from January 1, 1997 through September 30, 2017.

Table 12-28 Current status of all solar generation capacity (MW) in the PJM generation queue: January 1, 1997 through September 30, 2017

Project Status	Project Classification	Project MW																			TOTAL	
		AECO	AEP	APS	ATSI	BGE	ComEd	DAY	DEOK	Dominion	DPL	DLCO	EKPC	JCPL	Met-Ed	PECO	PENELEC	Pepco	PPL	PSEG		RECO
In Service	New Generation	38.5	14.7	44.0	0.0	1.1	9.0	2.5	0.0	172.0	118.4	0.0	0.0	266.9	0.0	3.3	0.0	0.0	15.0	188.0	0.0	873.4
	Upgrade	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	0.0	16.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	19.4
Under Construction	New Generation	20.8	30.0	27.8	0.0	22.0	0.0	3.4	0.0	458.1	43.0	0.0	0.0	128.9	0.0	0.0	0.0	0.0	0.0	34.6	0.0	768.6
	Upgrade	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.5
Suspended	New Generation	0.0	59.9	188.7	0.0	0.0	0.0	20.0	0.0	5.0	25.5	0.0	0.0	59.1	3.0	0.0	13.5	0.0	0.0	12.4	0.0	387.1
	Upgrade	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Withdrawn	New Generation	1,632.0	1,781.6	892.1	116.1	31.3	86.8	200.5	159.4	3,313.5	1,331.4	0.0	189.9	1,291.8	467.0	51.4	34.3	122.1	283.7	422.7	0.0	12,407.6
	Upgrade	10.0	6.0	0.0	0.0	0.0	0.0	0.0	0.0	128.0	0.0	0.0	0.0	23.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	167.8
Active	New Generation	54.5	4,164.9	453.1	426.0	0.0	495.0	739.5	215.0	8,440.9	1,342.7	11.7	100.0	13.8	135.0	18.0	50.0	62.5	30.0	30.8	0.0	16,783.4
	Upgrade	0.0	20.0	0.0	0.0	0.0	0.0	0.0	75.0	800.6	20.0	0.0	0.0	0.0	20.0	0.0	0.0	0.0	0.0	1.3	0.0	936.9
Total Projects	New Generation	1,745.8	6,051.1	1,605.7	542.1	54.4	590.8	965.9	374.4	12,389.6	2,861.0	11.7	289.9	1,760.5	605.0	72.7	97.8	184.6	328.7	688.6	0.0	31,220.1
	Upgrade	10.0	26.0	0.0	0.0	0.0	0.0	0.0	75.0	936.2	20.0	0.0	0.0	40.1	20.0	0.0	0.0	0.0	0.0	1.3	0.0	1,128.6

Relationship Between Project Developer and Transmission Owner

Table 12-29 shows the relationship between the project developer and Transmission Owner for all project MW that have entered the PJM generation queue from January 1, 1997, through September 30, 2017, by zone and technology type. A project where the developer is or is affiliated with the Transmission Owner is classified as related. A project where the developer is not affiliated with the Transmission Owner is classified as unrelated. For example, 36.0 MW of natural gas fired generation projects that have entered the PJM generation queue in DEOK were projects developed by Duke Energy or subsidiaries of Duke Energy, the Transmission Owner for DEOK. These project MW are classified as related. There have been 154.5 MW of natural gas fired projects that have entered the PJM generation queue in DEOK by developers not affiliated with Duke Energy. These project MW are classified as “unrelated.”

Table 12-29 Relationship between project developer and Transmission Owner for all interconnection queue projects MW by fuel type: January 1, 1997 through September 30, 2017

Parent Company	Transmission Owner	Related To Developer	Number of Projects	MW by Fuel Type										
				Biomass	Coal	Diesel	Hydro	Landfill Gas	Natural Gas	Nuclear	Other	Solar	Wind	Total MW
AEP	AEP	Related	49	0.0	3,965.0	0.0	34.0	3.0	3,027.0	214.0	0.0	74.7	0.0	7,317.7
		Unrelated	403	501.1	10,292.0	7.5	448.4	83.8	24,246.0	0.0	66.0	6,998.4	26,467.0	69,110.2
AES	DAY	Related	16	0.0	1,347.5	0.0	0.0	0.0	51.0	0.0	0.0	24.0	0.0	1,422.5
		Unrelated	39	1.9	0.0	0.0	0.0	10.0	9.0	0.0	0.0	871.9	2,128.0	3,020.8
DLCO	DLCO	Related	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	23	0.0	2,810.0	0.0	106.0	19.2	870.0	1,879.0	0.0	63.3	0.0	5,747.5
Dominion	Dominion	Related	83	64.0	301.0	0.0	340.0	0.0	13,215.0	1,944.0	0.0	251.4	142.0	16,257.4
		Unrelated	358	343.7	20.0	10.0	35.1	184.0	12,105.1	0.0	156.3	16,977.8	3,067.0	32,899.0
Duke	DEOK	Related	4	0.0	0.0	0.0	0.0	0.0	36.0	0.0	0.0	0.0	0.0	36.0
		Unrelated	26	0.0	120.0	0.0	112.0	4.8	154.5	0.0	0.0	509.3	0.0	900.6
EKPC	EKPC	Related	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	10	0.0	0.0	0.0	0.0	0.0	2,216.8	0.0	0.0	240.0	150.3	2,607.1
Exelon	AECO	Related	3	0.0	0.0	0.0	0.0	0.0	730.0	0.0	0.0	0.0	0.0	730.0
		Unrelated	273	29.8	15.0	13.0	0.0	31.0	9,791.8	0.0	0.0	1,786.3	3,808.9	15,475.8
	BGE	Related	14	0.0	10.0	0.0	0.0	0.0	1,037.0	3,373.3	0.0	20.0	0.0	4,440.3
		Unrelated	59	0.0	0.0	29.0	140.4	9.5	4,152.9	0.0	132.0	34.4	0.0	4,498.2
	ComEd	Related	18	0.0	0.0	0.0	0.0	0.0	0.0	1,185.0	0.0	9.0	396.0	1,590.0
		Unrelated	276	90.0	1,926.0	42.0	22.7	112.9	15,669.4	0.0	20.0	1,218.3	28,784.5	47,885.8
	DPL	Related	10	0.0	0.0	0.0	0.0	0.0	1,716.0	0.0	0.0	31.4	0.0	1,747.4
		Unrelated	266	84.0	653.0	0.0	0.0	70.0	6,773.6	0.0	30.0	2,996.9	2,809.6	13,417.1
	PECO	Related	29	0.0	7.0	0.0	45.0	0.0	6,420.0	437.8	0.0	0.0	0.0	6,909.8
		Unrelated	79	0.0	0.0	12.1	220.0	18.7	21,578.8	0.0	0.0	73.4	0.0	21,903.0
	Pepco	Related	1	0.0	0.0	0.0	0.0	0.0	0.0	1,640.0	0.0	0.0	0.0	1,640.0
		Unrelated	69	0.0	0.0	0.0	0.0	12.5	22,698.9	0.0	0.0	180.8	0.0	22,892.2
First Energy	APS	Related	14	0.0	1,745.0	0.0	252.0	0.0	4,790.0	0.0	0.0	0.0	0.0	6,787.0
		Unrelated	317	177.2	4,057.0	53.8	371.3	125.8	22,568.4	0.0	96.0	1,875.7	5,522.7	34,847.8
	ATSI	Related	8	0.0	0.0	0.0	0.0	0.0	1,678.0	16.0	0.0	0.6	0.0	1,694.6
		Unrelated	57	0.0	0.0	0.0	0.0	35.3	9,154.7	0.0	135.0	564.5	1,961.7	11,851.2
	JCPL	Related	2	0.0	0.0	0.0	20.0	0.0	100.0	0.0	0.0	0.0	0.0	120.0
		Unrelated	323	30.0	0.0	0.0	1.6	24.4	15,796.0	0.0	0.0	1,821.4	90.6	17,763.9
	Met-Ed	Related	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	90	90.4	0.0	8.0	0.0	57.9	16,839.6	93.0	11.0	625.0	70.0	17,794.9
	PENELEC	Related	8	0.0	1,860.0	0.0	32.0	0.0	1,174.0	0.0	0.0	0.0	0.0	3,066.0
		Unrelated	223	0.0	561.0	8.0	53.3	50.9	20,796.8	0.0	621.0	177.8	6,454.1	28,722.8
PPL	PPL	Related	36	0.0	139.0	0.0	0.0	7.7	2,294.0	1,988.0	0.0	0.0	0.0	4,428.7
		Unrelated	192	28.5	6,868.6	10.4	2.6	99.5	21,726.5	0.0	152.5	329.8	3,380.8	32,599.2
PSEG	PSEG	Related	101	0.0	24.0	0.0	0.0	11.7	12,802.1	381.0	0.0	125.2	0.0	13,344.0
		Unrelated	185	0.0	0.0	0.0	1,000.0	24.4	18,676.0	0.0	45.5	574.5	20.0	20,340.3
	RECO	Related	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	2	0.0	0.0	0.0	0.0	0.0	7.1	0.0	0.0	0.0	0.0	7.1
Consolidated Edison, Inc.		Related	396	64.0	9,398.5	0.0	723.0	22.4	49,070.1	11,179.1	0.0	536.3	538.0	71,531.4
		Unrelated	3,270	1,376.6	27,322.6	193.8	2,513.4	974.6	245,831.8	1,972.0	1,465.3	37,919.4	84,715.1	404,284.5

Table 12-30 Relationship between project developer and Transmission Owner for all solar projects MW in PJM interconnection queue: January 1, 1997 through September 30, 2017

Parent Company	Transmission Owner	Related To Developer	MW by Project Status					Total MW
			In Service	Under Construction	Suspended	Withdrawn	Active	
AEP	AEP	Related	2.5	12.2	0.0	0.0	60.0	74.7
		Unrelated	0.0	20.0	51.7	1,046.5	4,845.6	5,963.7
AES	DAY	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	2.5	23.4	0.0	151.5	468.5	645.9
DLCO	DLCO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	40.0	40.0
Dominion	Dominion	Related	20.0	0.0	0.0	7.0	224.4	251.4
		Unrelated	140.1	122.9	205.0	2,083.5	12,935.1	15,486.6
Duke	DEOK	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	159.4	290.0	449.4
EKPC	EKPC	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	80.0	160.0	240.0
Exelon	AECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	38.5	20.8	0.0	1,638.8	88.1	1,786.3
	BGE	Related	0.0	20.0	0.0	0.0	0.0	20.0
		Unrelated	1.1	2.0	0.0	9.2	22.1	34.4
	ComEd	Related	9.0	0.0	0.0	0.0	0.0	9.0
		Unrelated	0.0	0.0	0.0	84.8	317.0	401.8
	DPL	Related	7.4	0.0	0.0	24.0	0.0	31.4
		Unrelated	21.0	159.5	0.0	1,126.5	1,679.9	2,986.9
	PECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	3.3	0.0	0.0	50.1	20.0	73.4
Pepco	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	0.0	0.0	0.0	118.1	60.0	178.1	
First Energy	APS	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	34.0	32.5	38.9	806.0	769.3	1,680.7
	ATSI	Related	0.0	0.0	0.0	0.6	0.0	0.6
		Unrelated	0.0	0.0	0.0	59.5	485.0	544.5
	JCPL	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	204.1	175.5	92.9	1,259.0	89.7	1,821.2
Met-Ed	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	0.0	0.0	3.0	367.0	255.0	625.0	
PENELEC	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	0.0	0.0	13.5	34.3	50.0	97.8	
PPL	PPL	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	15.0	16.0	0.0	268.8	30.0	329.8
PSEG	PSEG	Related	105.8	10.0	0.0	8.2	1.2	125.2
		Unrelated	53.8	46.2	9.7	394.8	60.0	564.5
RECO	RECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
Consolidated Edison, Inc.	Consolidated Edison, Inc.	Related	144.7	42.2	0.0	39.8	285.6	512.3
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
Total		Unrelated	513.4	618.8	414.7	9,737.6	22,665.4	33,949.9

Table 12-30 shows the relationship between the project developer and Transmission Owner for all solar project MW that have entered the PJM generation queue from January 1, 1997 through September 30, 2017, by zone and project status. Of the 1,319.1 solar project MW that have achieved in service or under construction status during this time period, 186.9 MW, or 14.2 percent have been developed by Transmission Owners building in their own service territory. Of that 186.9 MW of solar projects, 115.8 MW or 62.0 percent have been developed by PSEG in the PSEG Zone and 20.0 MW or 10.7 percent have been developed by Dominion in the Dominion Zone.

Table 12-31 shows the relationship between the project developer and Transmission Owner for all natural gas fired project MW that have entered the PJM generation queue from January 1, 1997 through September 30, 2017, by zone and project status. Of the 46,198.0 natural gas project MW that have achieved in service or under construction status during this time period, 10,382.0 MW, or 22.5 percent have been developed by Transmission Owners building in their own service territory. Of that 10,382.0 MW of natural gas projects, 5,571.0 MW or 53.7 percent have been developed by Dominion in the Dominion Zone and 1,972.0 MW or 19.0 percent have been developed by PSEG in the PSEG Zone.

Table 12-31 Relationship between project developer and Transmission Owner for all natural gas project MW in PJM interconnection queue: January 1, 1997 through September 30, 2017

Parent Company	Transmission Owner	Related To Developer	MW by Project Status					Total MW
			In Service	Under Construction	Suspended	Withdrawn	Active	
AEP	AEP	Related	717.0	0.0	0.0	0.0	2,310.0	3,027.0
		Unrelated	1,142.0	3,355.0	525.0	9,008.0	10,216.0	24,246.0
AES	DAY	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	60.0	0.0	0.0	0.0	0.0	60.0
DLCO	DLCO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	205.0	0.0	665.0	0.0	870.0
Dominion	Dominion	Related	3,823.0	1,748.0	0.0	7,476.0	168.0	13,215.0
		Unrelated	771.7	1,799.1	0.0	3,949.3	5,585.0	12,105.1
Duke	DEOK	Related	0.0	0.0	0.0	36.0	0.0	36.0
		Unrelated	20.0	0.0	0.0	134.5	0.0	154.5
EKPC	EKPC	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	377.8	1,764.0	2,141.8
Exelon	AECO	Related	0.0	0.0	0.0	730.0	0.0	730.0
		Unrelated	1,281.9	460.5	606.0	6,325.4	1,118.0	9,791.8
	BGE	Related	367.0	0.0	0.0	670.0	0.0	1,037.0
		Unrelated	29.5	1.3	0.0	4,122.1	0.0	4,152.9
	ComEd	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	1,478.5	112.6	0.0	4,023.0	10,055.3	15,669.4
	DPL	Related	411.0	0.0	0.0	1,305.0	0.0	1,716.0
		Unrelated	900.2	0.0	291.0	5,014.4	568.0	6,773.6
	PECO	Related	5.0	0.0	0.0	6,415.0	0.0	6,420.0
		Unrelated	3,174.3	892.5	0.0	17,060.0	364.0	21,490.8
Pepco	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	160.1	2,498.5	0.0	19,854.2	111.1	22,623.9	
First Energy	APS	Related	701.0	0.0	0.0	4,089.0	0.0	4,790.0
		Unrelated	1,796.7	962.5	70.1	13,533.6	6,205.5	22,568.4
	ATSI	Related	0.0	0.0	0.0	1,678.0	0.0	1,678.0
		Unrelated	40.0	961.0	0.0	3,833.8	4,249.9	9,084.7
	JCPL	Related	0.0	0.0	0.0	100.0	0.0	100.0
		Unrelated	2,294.3	440.0	200.0	10,879.2	1,982.5	15,796.0
Met-Ed	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	2,062.0	0.0	0.0	14,216.5	561.1	16,839.6	
PENELEC	Related	5.0	0.0	0.0	1,169.0	0.0	1,174.0	
	Unrelated	1,267.8	88.7	59.7	16,426.7	2,553.9	20,396.8	
PPL	PPL	Related	633.0	0.0	0.0	1,661.0	0.0	2,294.0
		Unrelated	2,420.9	3,924.0	0.0	12,575.7	2,805.9	21,726.5
PSEG	PSEG	Related	1,972.0	0.0	0.0	9,871.1	959.0	12,802.1
		Unrelated	1,047.8	167.6	0.0	14,906.0	2,554.6	18,676.0
Consolidated Edison, Inc.	RECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	6.9	0.2	7.1
		Related	8,634.0	1,748.0	0.0	35,200.1	3,437.0	49,019.1
Total		Unrelated	19,947.7	15,868.3	1,751.8	156,912.0	50,695.1	245,174.8

Table 12-32 Relationship between project developer and Transmission Owner for all wind project MW in PJM interconnection queue: January 1, 1997 through September 30, 2017

Parent Company	Transmission Owner	Related To Developer	MW by Project Status					Total MW
			In Service	Under Construction	Suspended	Withdrawn	Active	
AEP	AEP	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	2,052.0	966.6	1,650.0	14,383.8	6,331.4	25,383.8
AES	DAY	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	300.0	1,828.0	0.0	2,128.0
DLCO	DLCO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
Dominion	Dominion	Related	0.0	12.0	0.0	130.0	0.0	142.0
		Unrelated	0.0	673.9	300.0	1,880.9	212.2	3,067.0
Duke	DEOK	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
EKPC	EKPC	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	150.3	0.0	150.3
Exelon	AECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	7.5	150.0	25.0	3,626.4	0.0	3,808.9
	BGE	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
	ComEd	Related	396.0	0.0	0.0	0.0	0.0	396.0
		Unrelated	2,238.5	802.5	710.0	20,859.8	2,769.0	27,379.8
	DPL	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	100.0	0.0	2,210.0	499.6	2,809.6
	PECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
Pepco	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	0.0	0.0	0.0	0.0	0.0	0.0	
First Energy	APS	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	1,031.4	426.0	130.0	3,027.5	747.8	5,362.7
	ATSI	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	500.0	0.0	645.6	315.7	1,461.3
	JCPL	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	30.6	0.0	0.0	60.0	0.0	90.6
Met-Ed	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	70.0	0.0	0.0	0.0	0.0	70.0	
PENELEC	Related	0.0	0.0	0.0	0.0	0.0	0.0	
	Unrelated	862.5	38.3	150.0	4,927.6	475.8	6,454.1	
PPL	PPL	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	226.5	0.0	100.0	2,443.8	610.5	3,380.8
PSEG	PSEG	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	20.0	0.0	20.0
Consolidated Edison, Inc.	RECO	Related	0.0	0.0	0.0	0.0	0.0	0.0
		Unrelated	0.0	0.0	0.0	0.0	0.0	0.0
Total	Unrelated	Related	396.0	12.0	0.0	130.0	0.0	538.0
		Unrelated	6,519.0	3,657.3	3,365.0	56,063.7	11,961.9	81,566.8

Table 12-32 shows the relationship between the project developer and Transmission Owner for all wind project MW that have entered the PJM generation queue from January 1, 1997 through September 30, 2017, by zone and project status. Of the 10,584.3 wind project MW that have achieved in service or under construction status during this time period, 408.0 MW, or 3.9 percent have been developed by Transmission Owners building in their own service territory. Of that 408.0 MW of wind projects, 396.0 MW or 97.1 percent have been developed by Exelon in the ComEd Zone.

Transmission Facility Outages

Scheduling Transmission Facility Outage Requests

A transmission facility is designated as reportable by PJM if a change in its status can affect a transmission constraint on any Monitored Transmission Facility or could impede free flowing ties within the PJM RTO and/or adjacent areas.³³ When one of the reportable transmission facilities needs to be taken out of service, the TO is required to submit an outage request as early as possible. The specific timeline is shown in Table 12-34.³⁴

Transmission outages have significant impacts on PJM markets. There are impacts on FTR auctions, on congestion, and on expected market outcomes in the day-ahead and real-time markets. It is important for the efficient functioning of the markets that there be clear, enforceable rules governing transmission outages.

Transmission outages are categorized by duration: greater than 30 calendar days; less than or equal to 30 calendar days and greater than five calendar days; or less than or equal to five calendar days.³⁵ Table 12-33 shows that 69.4 percent of the requested outages were planned for less than or equal to five days and 9.5 percent of requested outages were planned for greater than 30 days in the 2017/2018 planning period. It also shows that 77.3 percent of the requested outages were planned for less than or equal to five days and

6.7 percent of requested outages were planned for greater than 30 days in the 2016/2017 planning period.

All of the outage data in this section except in the analysis for the day-ahead market are for outages scheduled to occur in the planning periods 2016/2017 and 2017/2018, regardless of when they were initially submitted.³⁶ The outage data in the analysis for the day-ahead market are for outages scheduled to occur from January 1, 2015, through September 30, 2017.

Table 12-33 Transmission facility outage request summary by planned duration: planning periods 2016/2017 and 2017/2018

Planned Duration (Days)	2016/2017		2017/2018	
	Outage Requests	Percent	Outage Requests	Percent
<=5	15,609	77.3%	7,073	69.4%
>5 <=30	3,223	16.0%	2,149	21.1%
>30	1,348	6.7%	964	9.5%
Total	20,180	100.0%	10,186	100.0%

After receiving a transmission facility outage request from a TO, PJM assigns a received status to the request based on its submission date and outage planned duration. The received status can be On Time or Late, as defined in Table 12-34.³⁷

The purpose of the rules defined in Table 12-34 is to require the TOs to submit transmission facility outages prior to the Financial Transmission Right (FTR) auctions so that market participants have complete information about market conditions on which to base their FTR bids and so that PJM can accurately model market conditions.³⁸

³³ If a transmission facility is not modeled in the PJM EMS or the facility is not expected to significantly impact PJM system security or congestion management, it is not reportable. See PJM. "Manual 3A: Energy Management System (EMS) Model Updates and Quality Assurance (QA), Rev. 13 (September 29, 2017).

³⁴ See PJM. "Manual 3: Transmission Operations," Rev. 51 (June 1, 2017), p.69.

³⁵ *Id.* p.70.

³⁶ The hotline tickets, EMS tripping tickets or test outage tickets were excluded. We only included all the transmission outage tickets submitted by PJM internal companies which are currently active.

³⁷ See PJM. "Manual 3: Transmission Operations," Rev. 51 (June 1, 2017), at 69-70.

³⁸ See "Report of PJM Interconnection, LLC on Transmission Oversight Procedures," Docket No. EL01-122-000 (November 2, 2001).

Table 12-34 PJM transmission facility outage request received status definition

Planned Duration (Calendar Days)	Request Submitted	Received Status
<=5	Before the first of the month one month prior to the starting month of the outage	On Time
	After or on the first of the month one month prior to the starting month of the outage	Late
> 5 < =30	Before the first of the month six months prior to the starting month of the outage	On Time
	After or on the first of the month six months prior to the starting month of the outage	Late
>30	The earlier of 1) February 1, 2) the first of the month six months prior to the starting month of the outage	On Time
	After or on the earlier of 1) February 1, 2) the first of the month six months prior to the starting month of the outage	Late

Table 12-35 shows a summary of requests by received status. In the 2017/2018 planning period, 38.3 percent of outage requests received were late. In the 2016/2017 planning period, 51.3 percent of outage requests received were late.

Table 12-35 Transmission facility outage request summary by received status: planning periods 2016/2017 and 2017/2018

Planned Duration (Days)	2016/2017				2017/2018			
	On Time	Late	Total	Percent Late	On Time	Late	Total	Percent Late
<=5	7,885	7,724	15,609	49.5%	4,359	2,714	7,073	38.4%
>5 < =30	1,492	1,731	3,223	53.7%	1,469	680	2,149	31.6%
>30	441	907	1,348	67.3%	458	506	964	52.5%
Total	9,818	10,362	20,180	51.3%	6,286	3,900	10,186	38.3%

Once received, PJM processes outage requests in priority order: emergency transmission outage request; transmission outage requests submitted on time; and transmission outage request submitted late. PJM retains the right to deny all transmission outage requests that are submitted late unless the request is an emergency.

Outages with emergency status will be approved even if submitted late after PJM determines that the outage does not result in Emergency Procedures. PJM cancels or withholds approval of any outage that results in Emergency

Procedures.³⁹ Table 12-36 is a summary of outage requests by emergency status. Of all outage requests scheduled to occur in the 2017/2018 planning period, 9.6 percent were for emergency outages. Of all outage requests scheduled to occur in the 2016/2017 planning period, 13.8 percent were for emergency outages.

Table 12-36 Transmission facility outage request summary by emergency: planning periods 2016/2017 and 2017/2018

Planned Duration (Days)	2016/2017				2017/2018			
	Emergency	Non Emergency	Total	Percent Emergency	Emergency	Non Emergency	Total	Percent Emergency
<=5	2,173	13,436	15,609	13.9%	729	6,344	7,073	10.3%
>5 < =30	430	2,793	3,223	13.3%	151	1,998	2,149	7.0%
>30	188	1,160	1,348	13.9%	100	864	964	10.4%
Total	2,791	17,389	20,180	13.8%	980	9,206	10,186	9.6%

PJM will approve all transmission outage requests that are submitted on time and do not jeopardize the reliability of the PJM system. PJM will approve all transmission outage requests that are submitted late and are not expected to cause congestion on the PJM system and do not jeopardize the reliability of the PJM system. Each outage is studied and if it is expected to cause a constraint to exceed a limit, PJM will flag the outage ticket as “congestion expected.”⁴⁰

After PJM determines that a late request may cause congestion, PJM informs the Transmission Owner of solutions available to eliminate the congestion. For example, if a generator planned or maintenance outage request is contributing to the congestion, PJM can request that the Generation Owner defer the outage. If no solutions are available, PJM may require the Transmission Owner to reschedule or cancel the outage.

Table 12-37 is a summary of outage requests by congestion status. Of all outage requests submitted to occur in the 2017/2018 planning period, 9.5 percent were expected to cause congestion. Of all the outage requests that were expected to cause congestion, 3.1 percent (30 out of 966) were denied

³⁹ PJM. “Manual 3: Transmission Operations,” Rev. 51 (June 1, 2017) at 81.

⁴⁰ PJM added this definition to Manual 38 in February 2017. PJM. “Manual 38: Operations Planning,” Rev. 10 (February 1, 2017) at 17.

by PJM in the 2017/2018 planning period and 15.8 percent (153 out of 966) were cancelled (Table 12-39). Of all outage requests submitted to occur in the 2016/2017 planning period, 8.6 percent were expected to cause congestion. Of all the outage requests that were expected to cause congestion, 3.7 percent (64 out of 1,744) were denied by PJM in the 2016/2017 planning period and 18.0 percent (314 out of 1,744) were cancelled (Table 12-39).

Table 12-37 Transmission facility outage request summary by congestion: planning periods 2016/2017 and 2017/2018

Planned Duration (Days)	2016/2017				2017/2018			
	Congestion Expected	No Congestion Expected	Total	Percent Congestion Expected	Congestion Expected	No Congestion Expected	Total	Percent Congestion Expected
<=5	1,298	14,311	15,609	8.3%	598	6,475	7,073	8.5%
>5 Et <=30	329	2,894	3,223	10.2%	257	1,892	2,149	12.0%
>30	117	1,231	1,348	8.7%	111	853	964	11.5%
Total	1,744	18,436	20,180	8.6%	966	9,220	10,186	9.5%

Table 12-38 shows the outage requests summary by received status, congestion status and emergency status. In the 2017/2018 planning period, 28.8 percent of requests were submitted late and were nonemergency while 1.4 percent of requests (146 out of 10,186) were late, nonemergency, and expected to cause congestion. In the 2016/2017 planning period, 37.6 percent of request were submitted late and were nonemergency while 1.9 percent of requests (385 out of 20,180) were late, nonemergency, and expected to cause congestion.

Table 12-38 Transmission facility outage request summary by received status, emergency and congestion: planning periods 2016/2017 and 2017/2018

Received Status		2016/2017				2017/2018			
		Congestion Expected	No Congestion Expected	Total	Percent	Congestion Expected	No Congestion Expected	Total	Percent
Late	Emergency	114	2,662	2,776	13.8%	52	914	966	9.5%
	Non Emergency	385	7,201	7,586	37.6%	146	2,788	2,934	28.8%
On Time	Emergency	1	14	15	0.1%	2	12	14	0.1%
	Non Emergency	1,244	8,559	9,803	48.6%	766	5,506	6,272	61.6%
Total		1,744	18,436	20,180	100.0%	966	9,220	10,186	100.0%

Once PJM processes an outage request, the outage request is labelled as Submitted, Received, Denied, Approved, Cancelled by Company, PJM Admin Closure, Revised, Active or Complete according to the processed stage of a request.⁴¹ Table 12-39 shows the detailed process status for outage requests only for the outage requests that are expected to cause congestion. Status Submitted and status Received are in the In Process category and status Cancelled by Company and status PJM Admin Closure are in the Cancelled category in Table 12-39. Table 12-39 shows that of all the outage requests that were expected to cause congestion, 3.1 percent (30 out of 966) were denied by PJM in the 2017/2018 planning period, 41.3 percent were complete and 15.8 percent (153 out of 966) were cancelled. Of all the outage requests that were expected to cause congestion, 3.7 percent (64 out of 1,744) were denied by PJM in the 2016/2017 planning period, 78.1 percent were complete and 18.0 percent (314 out of 1,744) were cancelled.

⁴¹ See PJM Markets & Operations, PJM Tools "Outage Information," <<http://www.pjm.com/markets-and-operations/etools/oasis/system-information/outage-info.aspx>>(2017).

Table 12-39 Transmission facility outage requests that might cause congestion status summary: planning periods 2016/2017 and 2017/2018

		2016/2017						2017/2018					
Submission Status		Cancelled	Complete	In Process	Denied	Congestion Expected	Percent Complete	Cancelled	Complete	In Process	Denied	Congestion Expected	Percent Complete
Late	Emergency	10	103	0	1	114	90.4%	8	38	4	0	52	73.1%
	Non Emergency	63	280	2	40	385	72.7%	17	79	35	13	146	54.1%
On Time	Emergency	0	1	0	0	1	100.0%	2	0	0	0	2	0.0%
	Non Emergency	241	978	2	23	1,244	78.6%	126	282	333	17	766	36.8%
Total		314	1,362	4	64	1,744	78.1%	153	399	372	30	966	41.3%

There are clear rules defined for assigning On Time or Late status for submitted outage requests in both the PJM Tariff and PJM Manuals.⁴² However, the On Time or Late status only affects the priority that PJM assigns for processing the outage request. In the 2016/2017 planning period, many (72.7 percent or 280 out of 385) outages that were nonemergency, expected to cause congestion, and late transmission outages were approved and completed. The expected impact on congestion is the basis for PJM's treatment of late outage requests. But there is no rule or clear definition of this congestion analysis in the PJM Manuals. The MMU recommends that PJM draft a clear definition of the congestion analysis required for transmission outage requests to include in Manual 3 after appropriate review.

or rescheduled by TOs at least once. If an outage request was submitted, approved and subsequently rescheduled at least once, the outage request will be counted as Approved and Rescheduled. If an outage request was submitted, approved and subsequently cancelled at least once, the outage request will be counted as Approved and Cancelled. In the 2017/2018 planning period, 19.1 percent of transmission outage requests were approved by PJM and then rescheduled by the TOs, and 7.5 percent of the transmission outages were approved by PJM and subsequently cancelled by the TOs. In the 2016/2017 planning period, 29.5 percent of transmission outage requests were approved by PJM and then rescheduled by the TO, and 10.1 percent of the transmission outages were approved by PJM and subsequently cancelled by the TO.

Rescheduling Transmission Facility Outage Requests

Table 12-40 Rescheduled and cancelled transmission outage request summary: planning periods 2016/2017 and 2017/2018

Days	2016/2017					2017/2018				
	Outage Requests	Approved and Rescheduled	Approved and Rescheduled	Approved and Cancelled	Approved and Cancelled	Outage Requests	Approved and Rescheduled	Approved and Rescheduled	Approved and Cancelled	Approved and Cancelled
<=5	15,609	3,153	20.2%	1,809	11.6%	7,073	1,039	14.7%	679	9.6%
>5 <=30	3,223	1,890	58.6%	186	5.8%	2,149	549	25.5%	61	2.8%
>30	1,348	903	67.0%	38	2.8%	964	353	36.6%	22	2.3%
Total	20,180	5,946	29.5%	2,033	10.1%	10,186	1,941	19.1%	762	7.5%

A TO can reschedule or cancel an outage after initial submission. Table 12-40 is a summary of all the outage requests planned for the planning periods 2016/2017 and 2017/2018 which were approved and then cancelled

⁴² OA Schedule 1 § 1.9.2.

If a requested outage is determined to be late and TO reschedules the outage, the outage will be reevaluated by PJM again as On Time or Late.

A transmission outage ticket with duration of five days or less with an On Time status can retain its On Time status if the outage is rescheduled within the original scheduled month.⁴³ This rule allows a TO to reschedule within the same month with very little notice.

A transmission outage ticket with a duration exceeding five days with an On Time status can retain its On Time status if the outage is rescheduled to a future month, and the revision is submitted by the first of the month prior to the revised month in which the outage will occur.⁴⁴ This rescheduling rule is much less strict than the rule that applies to the first submission of outage requests with similar duration. When first submitted, the outage request with a duration exceeding five days needs to be submitted before the first of the month nine months prior to the month in which the outage was expected to occur.

The MMU recommends that PJM reevaluate all transmission outage tickets as On Time or Late as if they were new requests when an outage is rescheduled and apply the standard rules for late submissions to any such outages.

Long Duration Transmission Facility Outage Requests

PJM rules (Table 12-34) define a transmission outage request as On Time or Late based on the planned outage duration and the time of submission. The rule has stricter submission requirements for transmission outage requests planned for longer than 30 days. In order to avoid the stricter submission requirement, some transmission owners divided the duration of outage requests longer than 30 days into shorter segments for the same equipment and submitted one request for each segment. The MMU recommends that PJM not permit transmission owners to divide long duration outages into smaller segments to avoid complying with the requirements for long duration outages.

⁴³ PJM. "Manual 3: Transmission Operations," Rev. 51 (June 7, 2017) at 70.
⁴⁴ *Id.*

Table 12-41 shows that there were 7,201 transmission equipment planned outages in the 2017/2018 planning period, of which 1,024 were planned outages longer than 30 days, and of which 147 or 2.0 percent were scheduled longer than 30 days if the duration of the outages were combined for the same equipment. The duration of those outages could potentially be longer than 30 days, however were divided into shorter periods by transmission owners.

Table 12-41 Transmission outage summary: planning periods 2016/2017 and 2017/2018

Duration	Divided into Shorter Periods	2016/2017		2017/2018	
		Number of Outages	Percent	Number of Outages	Percent
> 30 Days	No	1,173	9.5%	877	12.2%
	Yes	221	1.8%	147	2.0%
<= 30 Days		10,897	88.7%	6,177	85.8%
Total		12,291	100.0%	7,201	100.0%

Table 12-42 shows the details of potentially long duration (> 30 days) outages when combining the duration of the outages for the same equipment. The actual duration of scheduled outages would be longer than 30 days if the duration of the outages were combined for the same equipment within a period of days. In the 2017/2018 planning period, there would have been 28 outages with a combined duration longer than 30 days that were instead scheduled to occur as shorter outages within a period of more than 31 days and less than 62 days.

Table 12-42 Summary of potentially long duration (> 30 days) outages: planning periods 2016/2017 and 2017/2018

Days	2016/2017		2017/2018	
	Number of Outages	Percent	Number of Outages	Percent
<=31	4	1.8%	0	0.0%
>31 <=62	26	11.8%	28	19.0%
>62 <=93	12	5.4%	24	16.3%
>93	179	81.0%	95	64.6%
Total	221	100.0%	147	100.0%

Transmission Facility Outage Analysis for the FTR Market

Transmission facility outages affect the price and quantity outcomes of FTR Auctions. The purpose of the rules governing outage reporting is to ensure that outages are known with enough lead time prior to FTR Auctions so that market participants can understand market conditions and so that PJM can accurately model market conditions.

There are Long Term, Annual and Monthly Balance of Planning Period auctions in the FTR Market. For each type of auction, PJM includes a set of outages to be modeled.

Annual FTR Market

The Annual FTR Market includes the Annual ARR Allocation and the Annual FTR Auction. When determining transmission outages to be modeled in the simultaneous feasibility test used in the Annual FTR Market, PJM considers all outages with planned duration longer than or equal to two months and may consider outages with planned durations shorter than two months. PJM may exercise significant discretion in selecting outages to be modeled. PJM posts an FTR outage list to the FTR web page usually at least one week before the auction bidding opening day.⁴⁵

In the 2017/2018 planning period, 224 outage requests were included in the annual FTR market outage list and 9,962 outage requests were not included. In the 2016/2017 planning period, 212 outage requests were included in the annual FTR market outage list and 19,968 outage requests were not included. Table 12-43, Table 12-44, Table 12-45 and Table 12-46 show the summary information on the modeled outage requests and Table 12-47 and Table 12-48 show the summary information on outages that were not included in the Annual FTR Market.

Table 12-43 shows that 3.1 percent of the outage requests modeled in the Annual FTR Market for the 2017/2018 planning period had a planned duration

of less than two weeks and that 12.1 percent of the outage requests (27 out of 224) modeled in the Annual FTR Market for the planning period were submitted late according to outage submission rules. It also shows that 5.2 percent of the outage requests modeled in the Annual FTR Market for the 2016/2017 planning period had a planned duration of less than two weeks and that 12.3 percent of the outage requests (26 out of 212) modeled in the Annual FTR Market for the planning period were submitted late according to outage submission rules.

Table 12-43 Annual FTR market modeled transmission facility outage requests by received status: planning periods 2016/2017 and 2017/2018

Planned Duration	2016/2017				2017/2018			
	On Time	Late	Total	Percent	On Time	Late	Total	Percent
<2 weeks	10	1	11	5.2%	5	2	7	3.1%
>=2 weeks & <2 months	78	2	80	37.7%	86	9	95	42.4%
>=2 months	98	23	121	57.1%	106	16	122	54.5%
Total	186	26	212	100.0%	197	27	224	100.0%

Table 12-44 shows the annual FTR market modeled outage requests summary by emergency status and received status. All the annual FTR market modeled outages expected to occur in the 2017/2018 planning period were nonemergency outages. Two of the modeled outages expected to occur in the 2016/2017 planning period were emergency outages.

⁴⁵ PJM Financial Transmission Rights, "Annual ARR Allocation and FTR Auction Transmission Outage Modeling," <<http://www.pjm.com/~media/markets-ops/ptr/annual-ftr-auction/2017-2018/2017-2018-annual-outage-modeling.ashx>> (February 21, 2017).

Table 12-44 Annual FTR market modeled transmission facility outage requests by emergency and received status: planning periods 2016/2017 and 2017/2018

	Planned Duration	2016/2017				2017/2018			
		Emergency	Non Emergency	Total	Percent Non Emergency	Emergency	Non Emergency	Total	Percent Non Emergency
On Time	<2 weeks	0	10	10	100.0%	0	5	5	100.0%
	>=2 weeks < 2 months	0	78	78	100.0%	0	86	86	100.0%
	>=2 months	0	98	98	100.0%	0	106	106	100.0%
	Total	0	186	186	100.0%	0	197	197	100.0%
Late	<2 weeks	0	1	1	100.0%	0	2	2	100.0%
	>=2 weeks < 2 months	0	2	2	100.0%	0	9	9	100.0%
	>=2 months	2	21	23	91.3%	0	16	16	100.0%
	Total	2	24	26	92.3%	0	27	27	100.0%

PJM determines expected congestion for both On Time and Late outage requests. A Late outage request may be denied or cancelled if it is expected to cause congestion. Table 12-45 shows a summary of requests by expected congestion and received status. Overall, 11.1 percent (3 out of 27) of all the annual FTR market modeled outages expected to occur in the 2017/2018 planning period and submitted late were expected to cause congestion. Of all the annual FTR market modeled outages expected to occur in the 2016/2017 planning period and submitted late, 11.5 percent (3 out of 26) were expected to cause congestion.

Table 12-45 Annual FTR market modeled transmission facility outage requests by congestion and received status: planning periods 2016/2017 and 2017/2018

	Planned Duration	2016/2017				2017/2018			
		Congestion Expected	No Congestion Expected	Total	Percent Congestion Expected	Congestion Expected	No Congestion Expected	Total	Percent Congestion Expected
On Time	<2 weeks	2	8	10	20.0%	2	3	5	40.0%
	>=2 weeks < 2 months	17	61	78	21.8%	22	64	86	25.6%
	>=2 months	25	73	98	25.5%	24	82	106	22.6%
	Total	44	142	186	23.7%	48	149	197	24.4%
Late	<2 weeks	0	1	1	0.0%	0	2	2	0.0%
	>=2 weeks < 2 months	0	2	2	0.0%	1	8	9	11.1%
	>=2 months	3	20	23	13.0%	2	14	16	12.5%
	Total	3	23	26	11.5%	3	24	27	11.1%

Table 12-46 shows that 17.9 percent of outage requests modeled in the annual FTR market for the 2017/2018 planning period and with a duration of two weeks or longer but shorter than two months were cancelled, compared to 40.0 percent for the 2016/2017 planning period. Table 12-46 also shows that 11.5 percent of outages requests modeled in the Annual FTR Market for the 2017/2018 planning period and with a duration of two months or longer were cancelled, compared to 23.1 percent for the 2016/2017 planning period.

Table 12-46 Annual FTR market modeled transmission facility outage requests by processed status: planning periods 2016/2017 and 2017/2018

Planned Duration	Processed Status	2016/2017		2017/2018	
		Outage Requests	Percent	Outage Requests	Percent
<2 weeks	In Progress	0	0.0%	2	28.6%
	Denied	0	0.0%	0	0.0%
	Cancelled	1	9.1%	3	42.9%
	Revised	0	0.0%	0	0.0%
	Active	0	0.0%	0	0.0%
	Completed	10	90.9%	2	28.6%
Total Submission		11	100.0%	7	100.0%
>=2 weeks & <2 months	In Progress	0	0.0%	45	47.4%
	Approved	0	0.0%	2	2.1%
	Cancelled	32	40.0%	17	17.9%
	Revised	0	0.0%	1	1.1%
	Active	0	0.0%	23	24.2%
	Completed	48	60.0%	7	7.4%
Total Submission		80	100.0%	95	100.0%
>=2 months	In Progress	0	0.0%	52	42.6%
	Approved	0	0.0%	0	0.0%
	Cancelled	28	23.1%	14	11.5%
	Revised	0	0.0%	1	0.8%
	Active	5	4.1%	50	41.0%
	Completed	88	72.7%	5	4.1%
Total Submission		121	100.0%	122	100.0%

More outage requests were not modeled in the Annual FTR Market than were modeled in the Annual FTR Market. In the 2017/2018 planning period, 224 outage requests were modeled and 9,962 outage requests were not modeled in the Annual FTR Market. In the 2016/2017 planning period, 212 outage requests were modeled and 19,968 outage requests were not modeled in the Annual FTR Market.

Table 12-47 shows that 8.3 percent of outage requests not modeled in the Annual FTR Auction with duration longer than or equal to two months, labelled On Time according to the rules, were submitted after the Annual FTR Auction bidding opening date for the 2017/2018 planning period. Table 12-47 also shows that 18.6 percent of outage requests not modeled in the Annual FTR Auction with duration longer than or equal to two months, labelled Late according to the rules, were submitted after the Annual FTR Auction bidding opening date in the 2017/2018 planning period.

Table 12-47 Transmission facility outage requests not modeled in Annual FTR Auction: planning periods 2016/2017 and 2017/2018

Planned Duration	2016/2017						2017/2018					
	On Time			Late			On Time			Late		
	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After
<2 weeks	1,341	7,444	84.7%	257	8,535	97.1%	1,485	3,609	70.8%	163	2,921	94.7%
>=2 weeks & <2 months	418	327	43.9%	148	914	86.1%	627	259	29.2%	102	387	79.1%
>=2 months	83	19	18.6%	168	314	65.1%	100	9	8.3%	168	132	44.0%
Total	1,842	7,790	80.9%	573	9,763	94.5%	2,212	3,877	63.7%	433	3,440	88.8%

Table 12-48 shows that 31.1 percent of late outage requests which were not modeled in the Annual FTR Auction with duration longer than or equal to two months and submitted after the Annual FTR Auction bidding opening date were approved and completed in the 2017/2018 planning period. It also shows that 77.4 percent of late outage requests which were not modeled in the Annual FTR Auction with duration longer than or equal to two months and submitted after the Annual FTR Auction bidding opening date were approved and completed in the 2016/2017 planning period.

Table 12-48 Late transmission facility outage requests not modeled in Annual FTR Auction and submitted after annual bidding opening date: planning periods 2016/2017 and 2017/2018

Planned Duration	2016/2017			2017/2018		
	Completed Outages	Total	Percent	Completed Outages	Total	Percent
<2 weeks	7,383	8,535	86.5%	2,234	2,921	76.5%
>=2 weeks & <2 months	834	914	91.2%	215	387	55.6%
>=2 months	243	314	77.4%	41	132	31.1%
Total	8,460	9,763	86.7%	2,490	3,440	72.4%

Although the definition of late outages was developed in order to prevent outages for the planning period being submitted after the opening of bidding in the Annual FTR Auction, the rules have not functioned effectively because the rule has no direct connection to the date on which bidding opens for the Annual FTR Auction. By requiring all long-duration transmission outages to be submitted before February 1, PJM outage submission rules only prevent long-duration transmission outages from being submitted late. The rule does not address the situation in which long-duration transmission outages are submitted on time, but are rescheduled so that they are late. There is no rule to address the situation in which short-duration outages (duration \leq 5 days) are submitted on time, but are changed to long-duration transmission outages after the outages are approved and active. The Annual FTR Auction model may consider transmission outages planned for longer than two weeks but less than two months. Those outages not only include long duration outages but also include outages shorter than 30 days. In those cases, PJM outage submission rules failed to prevent long duration transmission outages from

being submitted late. The MMU recommends that PJM modify the rules to eliminate the approval of outage requests submitted or rescheduled after the opening of bidding in the Annual FTR Auction.

Monthly FTR Market

When determining transmission outages to be modeled in the simultaneous feasibility test used in the Monthly Balance of Planning Period FTR Auction, PJM considers all outages with planned duration longer than five days and may consider outages with planned durations shorter than or equal to five days. PJM may exercise significant discretion in selecting outages to be modeled. PJM posts an FTR outage list to the FTR webpage usually at least one week before the auction bidding opening day.⁴⁶ Table 12-49 and Table 12-50 show the summary information on outage requests modeled in the Monthly Balance of Planning Period FTR Auction and Table 12-51 and Table 12-52 show the summary information on outage requests not modeled in the Monthly Balance of Planning Period FTR Auction.

Table 12-49 shows that on average, 35.2 percent of the outage requests modeled in the Monthly Balance of Planning Period FTR Auction were submitted late according to outage submission rules in the 2017/2018 planning period. On average, 30.8 percent of the outage requests modeled in the Monthly Balance of Planning Period FTR Auction were submitted late according to outage submission rules in the 2016/2017 planning period.

⁴⁶ PJM Financial Transmission Rights, "2015/2016 Monthly FTR Auction Transmission Outage Modeling," <<http://www.pjm.com/-/media/markets-ops/ftr-allocations/monthly-ftr-auctions/2015-2016-monthly-transmission-outages-that-may-cause-infeasibilities.ashx?la=en>> (December 9, 2015).

Table 12-49 Monthly Balance of Planning Period FTR Auction modeled transmission facility outage requests by received status: planning periods 2016/2017 and 2017/2018

Month	2016/2017				2017/2018			
	On Time	Late	Total	Late Percent	On Time	Late	Total	Late Percent
JUN	170	94	264	35.6%	134	116	250	46.4%
JUL	67	57	124	46.0%	83	72	155	46.5%
AUG	77	63	140	45.0%	100	73	173	42.2%
SEP	367	129	496	26.0%	394	125	519	24.1%
OCT	542	195	737	26.5%				
NOV	365	172	537	32.0%				
DEC	289	130	419	31.0%				
JAN	162	90	252	35.7%				
FEB	162	89	251	35.5%				
MAR	310	132	442	29.9%				
APR	395	162	557	29.1%				
MAY	411	165	576	28.6%				
Avg	276	123	400	30.8%	178	97	274	35.2%

Table 12-50 shows that on average, 18.6 percent of outage requests modeled in the Monthly Balance of Planning Period FTR Auction were cancelled in the 2017/2018 planning period. On average, 20.4 percent of outage requests modeled in the Monthly Balance of Planning Period FTR Auction were cancelled in the 2016/2017 planning period.

Table 12-51 shows that on average, 8.8 percent of outage requests not modeled in the Monthly Balance of Planning Period FTR Auction, labeled On Time according to the rules, were submitted after the monthly FTR auction bidding opening dates in the 2017/2018 planning period, compared to 9.9 percent in the 2016/2017 planning period. On average, 72.4 percent of outage requests not modeled in the Monthly Balance of Planning Period FTR Auction, labeled Late according to the rules, were submitted after the Monthly Balance of Planning Period FTR Auction bidding opening dates in the 2017/2018 planning period, compared to 70.6 percent in the 2016/2017 planning period.

Table 12-50 Monthly Balance of Planning Period FTR Auction modeled transmission facility outage requests by processed status: planning periods 2016/2017 and 2017/2018

Planning Year	Month	In Process	Denied	Approved	Cancelled	Revised	Active	Complete	Total	Cancelled
										Percent
2016/2017	JUN	18	3	5	51	1	53	133	264	19.3%
	JUL	10	12	2	19	0	41	40	124	15.3%
	AUG	9	1	2	31	0	52	45	140	22.1%
	SEP	47	4	11	85	0	165	184	496	17.1%
	OCT	75	5	19	172	0	196	270	737	23.3%
	NOV	46	1	10	104	0	162	214	537	19.4%
	DEC	25	4	11	87	0	66	226	419	20.8%
	JAN	35	0	7	60	0	75	75	252	23.8%
	FEB	22	2	4	42	1	87	93	251	16.7%
	MAR	48	2	9	94	0	120	169	442	21.3%
	APR	55	2	7	101	1	154	237	557	18.1%
	MAY	26	1	18	134	0	119	278	576	23.3%
Avg	35	3	9	82	0	108	164	400	20.4%	
2017/2018	JUN	19	5	5	52	0	64	105	250	20.8%
	JUL	11	2	8	25	0	54	55	155	16.1%
	AUG	10	0	1	27	0	64	71	173	15.6%
	SEP	67	8	13	100	3	161	167	519	19.3%
	Avg	27	4	7	51	1	86	100	274	18.6%

Table 12-51 Transmission facility outage requests that are not modeled in Monthly Balance of Planning Period FTR Auction: planning periods 2016/2017 and 2017/2018

	2016/2017						2017/2018					
	On Time			Late			On Time			Late		
	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After	Before Bidding Opening Date	After Bidding Opening Date	Percent After
JUN	694	103	12.9%	336	894	72.7%	649	89	12.1%	309	848	73.3%
JUL	274	74	21.3%	251	698	73.6%	296	46	13.5%	246	607	71.2%
AUG	413	92	18.2%	259	733	73.9%	349	20	5.4%	213	649	75.3%
SEP	964	156	13.9%	292	772	72.6%	887	56	5.9%	261	594	69.5%
OCT	1,092	89	7.5%	430	901	67.7%						
NOV	888	56	5.9%	389	832	68.1%						
DEC	604	44	6.8%	340	723	68.0%						
JAN	435	32	6.9%	243	592	70.9%						
FEB	463	24	4.9%	303	672	68.9%						
MAR	1,070	92	7.9%	359	804	69.1%						
APR	1,144	99	8.0%	340	789	69.9%						
MAY	1,151	146	11.3%	356	966	73.1%						
Avg	766	84	9.9%	325	781	70.6%	545	53	8.8%	257	675	72.4%

Table 12-52 shows that on average, 71.0 percent of late outage requests which were not modeled in the Monthly Balance of Planning Period FTR Auction, submitted after the Monthly Balance of Planning Period FTR Auction bidding opening dates, were approved and complete in the 2017/2018 planning period, compared to 69.5 percent in the 2016/2017 planning period.

Table 12-52 Late transmission facility outage requests that are not modeled in Monthly Balance of Planning Period FTR Auction and submitted after monthly bidding opening date: planning periods 2016/2017 and 2017/2018

	2016/2017			2017/2018		
	Completed Outages	Total	Percent	Completed Outages	Total	Percent
JUN	639	894	71.5%	627	848	73.9%
JUL	476	698	68.2%	410	607	67.5%
AUG	523	733	71.4%	473	649	72.9%
SEP	495	772	64.1%	406	594	68.4%
OCT	644	901	71.5%			
NOV	536	832	64.4%			
DEC	534	723	73.9%			
JAN	401	592	67.7%			
FEB	447	672	66.5%			
MAR	580	804	72.1%			
APR	575	789	72.9%			
MAY	668	966	69.2%			
Avg	543	781	69.5%	479	675	71.0%

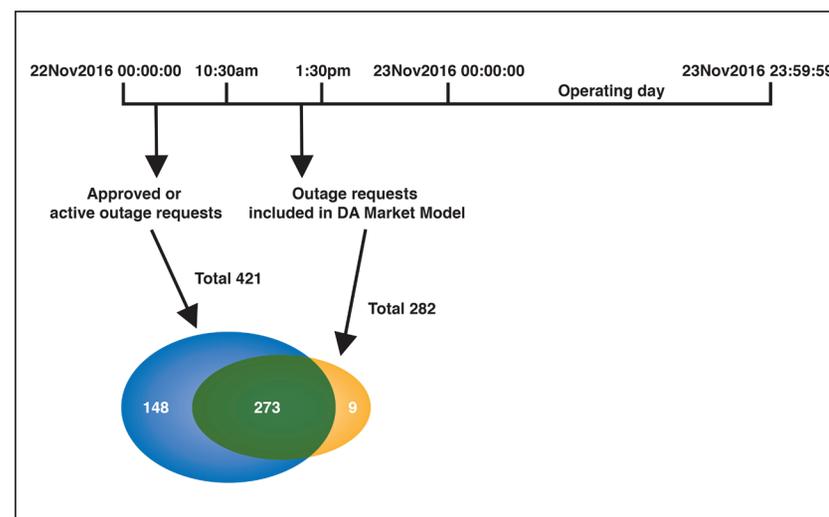
Transmission Facility Outage Analysis in the Day-Ahead Energy Market

Transmission facility outages also affect the energy market. Just as with the FTR Market, it is critical that outages that affect the operating day are known prior to the submission of offers in the Day-Ahead Energy Market so that market participants can understand market conditions and so that PJM can accurately model market conditions in the day-ahead market. PJM requires transmission owners to submit changes to outages scheduled for the next two days no later than 09:30 am.⁴⁷

In order to analyze the market impact, the outage requests that affect the operating day are compared: before the day-ahead market is closed; when the day-ahead market save cases are created; and during the operating day. The list of approved or active outage requests before the day-ahead market is closed is the view of outages available to market participants. The day-ahead market model uses a list of outages as an input. The list of outages that actually occurred during the operating day are the outages that affect the real-time market. If the three sets of outages are the same, there is no potential impact on markets. If the three sets of outages differ, there is a potential impact on markets.

For example for the operating day of November 23, 2016, Figure 12-4 shows that: there were 421 approved or active outages seen by market participants before the day-ahead market was closed; there were 282 outage requests included in the day-ahead market model; there were 273 outage request included in both sets of outage; there were 148 outage requests approved or active before the day-ahead market was closed but not included as inputs in day-ahead market model; and there were nine outage requests included in day-ahead market model but not available to market participants prior to the day-ahead market.

Figure 12-4 Illustration of day-ahead market analysis on November 22, 2016



⁴⁷ PJM. "Manual 3: Transmission Operations," Rev. 51 (June 7, 2017) at 74

Figure 12-5 compares the weekly average number of active or approved outages available to market participants prior to the close of the day-ahead market with the outages included as inputs to the day-ahead market by PJM.

Figure 12-5 Approved or active outage requests: January 1, 2015 through September 30, 2017

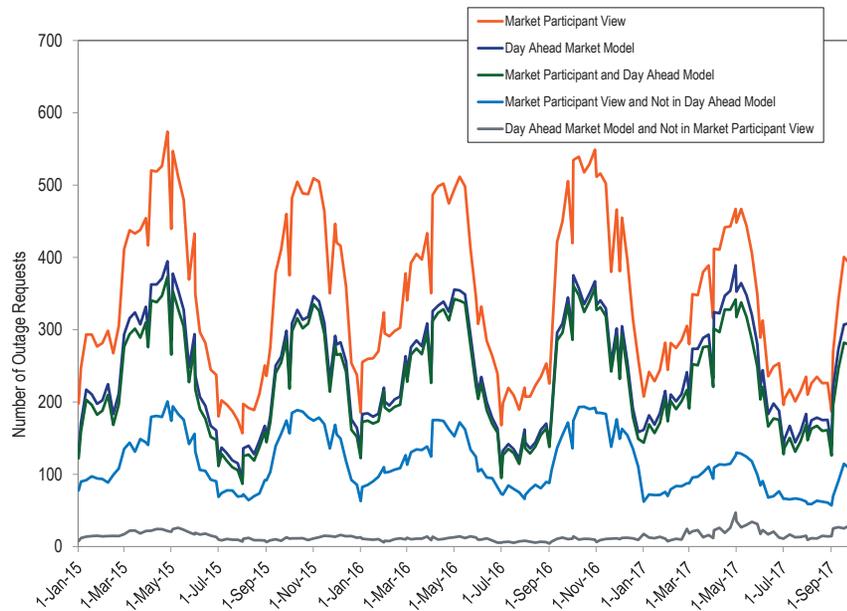


Figure 12-6 compares the weekly average number of outages included as inputs to the day-ahead market by PJM with the outages that actually occurred during the operating day.

Figure 12-6 Day-ahead market model outages: January 1, 2015 through September 30, 2017

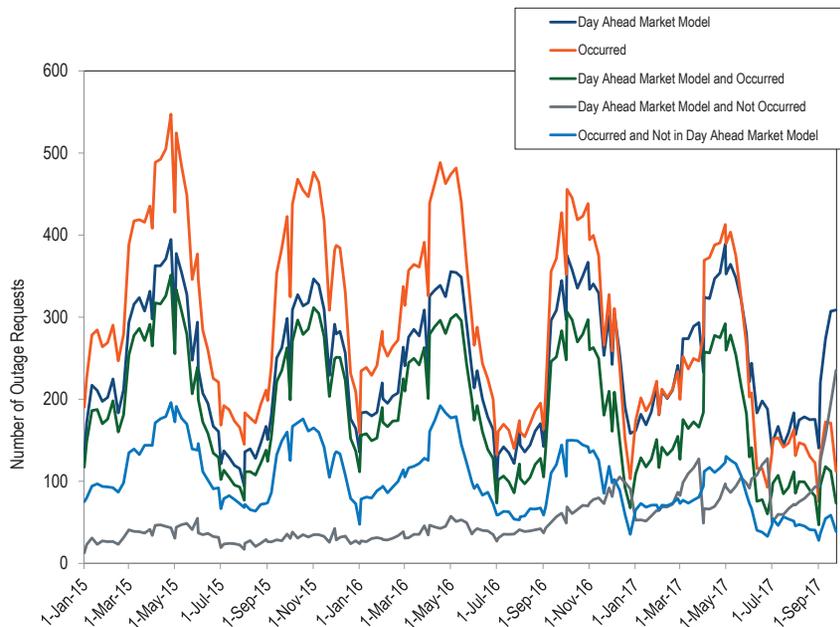


Figure 12-7 compares the weekly average number of active or approved outages available to market participants prior to the close of the day-ahead market with the outages that actually occurred during the operating day.

Figure 12-7 Approved or active outage requests: January 1, 2015 through September 30, 2017

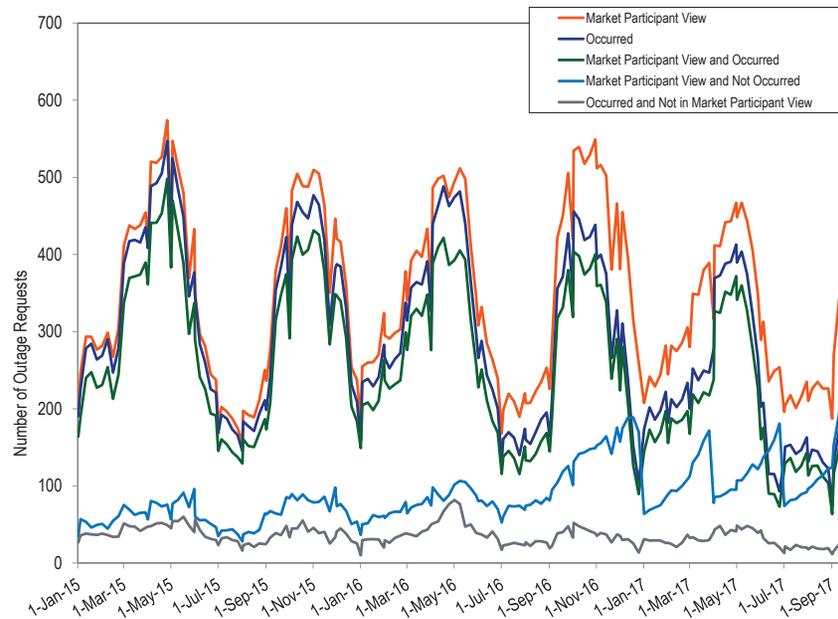


Figure 12-5, Figure 12-6, and Figure 12-7 show that on a weekly average basis, the active or approved outages available to day-ahead market participants, the outages included as inputs in the day-ahead market model and the outages that actually occurred in real time are not consistent. The active or approved outages available to day-ahead market participants are more consistent with the outages that actually occurred in real time than with the outages included in the day-ahead market model.

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 received the low cost generation.

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 April 1, 1999, FTRs were introduced with the LMP market, there was a real-time market but no day-ahead market, and FTRs returned real-time congestion revenue to load. Effective June 1, 2000, the day-ahead market was introduced and FTRs returned total congestion including day-ahead and balancing congestion to load. 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 86.5 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2015/2016 planning period. One of the reasons for this inefficiency is the link, established by PJM member companies in their initial FTR filings prior to the opening of the PJM market, 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 a nodal, network system with locational marginal pricing. 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.

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

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

On September 15, 2016, FERC ordered PJM to address the allocation of congestion credits in the FTR Market, portfolio netting within the FTR Market and the use of historical resources for the Annual ARR allocation process.³ PJM made a compliance filing on November 14, 2016, outlining their plans to address these issues.⁴ Under the order, PJM will allocate the costs of balancing congestion and market-to-market payments to load and exports. PJM will allocate all excess congestion revenue from the day-ahead market to FTR Holders. PJM will allocate excess auction revenue, which is what FTR Holders were willing to pay for FTRs in excess of what is provided to ARR holders, to FTR Holders. FERC ordered the continued use of portfolio netting with the corresponding cross subsidies among participants in the FTR Market. FERC directed PJM to replace generation to load paths based on retired generation with generation to load paths based on existing generation resources.

If the original PJM FTR design had been designed to return congestion revenues to load without use of the generation to load paths, 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.

The *2017 Quarterly State of the Market Report for PJM: January through September* focuses on the 2016/2017 Monthly Balance of Planning Period FTR Auctions for the 2015/2016 and 2016/2017 planning periods, covering January 1, 2017, through September 30, 2017.

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

³ See 156 FERC ¶ 61,180 (2016).

⁴ See Compliance Filing concerning Modifications to ARR and FTR Provisions, Docket No. EL16-6 (November 14, 2016).

- Market structure was evaluated as competitive because the FTR Auction is voluntary and the ownership positions resulted from the distribution of ARRs and voluntary participation. But it is not clear, in a competitive market, why the ownership structure of Long Term FTRs is so highly concentrated.
- Participant behavior was evaluated as competitive because there was no evidence of anticompetitive 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. But it is not clear, in a competitive market, why FTR purchases by financial entities remain persistently profitable.
- Market design was evaluated as flawed because there are significant flaws with the basic ARR/FTR design. The market design is not an efficient or effective way to ensure that all congestion revenues are returned to load.

Overview

Auction Revenue Rights

Market Structure

- **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. Residual ARRs with negative target allocations are not allocated to participants. Instead they are removed and the model is rerun until a minimum of negative target allocation residual ARRs are found.

In the first four months of the 2017/2018 planning period, PJM allocated a total of 27,657.9 MW of residual ARRs, down from 29,478.9 MW in the

first four months of the 2016/2017 planning period, with a total target allocation of \$4.8 million for the first four months of the 2017/2018 planning period, down from \$5.7 million for the first four months of the 2016/2017 planning period.

- **ARR Reassignment for Retail Load Switching.** There were 22,714 MW of ARRs associated with \$6139,300 of revenue that were reassigned in the first four months of the 2017/2018 planning period. There were 33,567 MW of ARRs associated with \$172,300 of revenue that were reassigned for the first four months of the 2016/2017 planning period.

Market Performance

- **Revenue Adequacy.** For the first four months of the 2017/2018 planning period, the ARR target allocations, which are based on the nodal price differences from the Annual FTR Auction, were \$550.4 million, while PJM collected \$558.4 million from the combined Long Term, Annual and Monthly Balance of Planning Period FTR Auctions, making ARRs revenue adequate. For the 2016/2017 planning period, the ARR target allocations were \$914.2 million while PJM collected \$941.5 million from the combined Long Term, Annual and Monthly Balance of Planning Period FTR Auctions. The year over year decrease in ARR target allocations and auction revenue is a result of decreased prices from the previous planning period resulting from continued reduced allocation of Stage 1B and Stage 2 ARRs. ARR revenue adequacy is also affected by PJM's clearing of additional counter flow FTRs to alleviate infeasibilities from Stage 1A.
- **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, which include congestion in the Day-Ahead Energy Market and the balancing energy market, for the 2014/2015 planning period. In the first four months of the 2017/2018 planning period, which reallocated balancing congestion and M2M payments to load, total ARR and self scheduled FTR revenues offset 79.7 percent of total congestion costs. The goal of the design should be to return 100 percent of the congestion revenues to the load.

Financial Transmission Rights

Market Structure

- **Supply.** Market participants can sell FTRs. In the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period, total participant FTR sell offers were 2,084,830 MW, up from 2,078,673 MW for the same period during the 2016/2017 planning period.
- **Demand.** The total FTR buy bids from the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period decreased 15.2 percent from 10,167,079 MW for the same time period of the prior planning period, to 8,621,736 MW.
- **Patterns of Ownership.** For the Monthly Balance of Planning Period Auctions, financial entities purchased 72.6 percent of prevailing flow and 81.9 percent of counter flow FTRs January through September of 2017. Financial entities owned 58.8 percent of all prevailing and counter flow FTRs, including 49.2 percent of all prevailing flow FTRs and 71.5 percent of all counter flow FTRs during the period from January through September 2017.

Market Behavior

- **FTR Forfeitures.** FTR forfeitures were not billed after January 19, 2017, pending retroactive implementation of a new FTR forfeiture rule. As of the September bill, PJM has begun retroactive billing under the new FTR forfeiture rule.
- **Credit Issues.** There were two collateral defaults in the first nine months of 2017 for a total of \$318,746. Both defaults were cured reasonable promptly.

Market Performance

- **Volume.** In the first four months of the 2017/2018 planning period Monthly Balance of Planning Period FTR Auctions cleared 1,232,334 MW (14.3 percent) of FTR buy bids and 478,581 MW (23.0 percent) of FTR sell offers cleared.
- **Price.** The weighted average buy bid cleared FTR price in the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period was \$0.10, down from \$0.13 per MW for the same period in the 2016/2017 planning period.
- **Revenue.** The Monthly Balance of Planning Period FTR Auctions generated \$16.2 million in net revenue for all FTRs for the first four months of the 2017/2018 planning period, down from \$17.3 million for the same time period in the 2016/2017 planning period.
- **Revenue Adequacy.** FTRs were paid at 100 percent of the target allocation level for the first four months of the 2017/2018 planning period. This high level of revenue adequacy was at least partially a result of FERC redefining the FTR congestion calculation to exclude balancing congestion and M2M payments.
- **Profitability.** FTR profitability is the difference between the revenue received for an FTR and the cost of the FTR. In the first four months of the 2017/2018 planning period, physical entities made \$69.9 million in profits, largely due to self scheduled FTRs, and financial entities made \$46.4 million. Revenues from self scheduled FTRs are more accurately described as a return of congestion rather than profits.

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
2017/2020 Long Term	6/2/2017	12/12/2017
2016/2017 ARR	2/27/2017	3/31/2017
2016/2017 Annual	4/4/2017	5/1/2017

Recommendations

- The MMU recommends that the ARR/FTR design be modified to ensure that the rights to all congestion revenues are assigned to load. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that all FTR auction revenue be distributed to ARR holders. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that FTR auction revenues not be used to buy counter flow FTRs for the purpose of improving FTR payout ratios.⁵ (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that all historical generation to load paths be eliminated as a basis for allocating ARRs. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that counter flow FTRs be eliminated. (Priority: High. First reported 2015. Status: Not adopted.)
- The MMU recommends that PJM eliminate portfolio netting to eliminate cross subsidies among FTR market participants. (Priority: High. First reported 2012. Status: Not adopted.)
- 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 implement a seasonal ARR and FTR allocation system to better represent outages. (Priority: Medium. First reported 2013. Status: Not adopted.)

⁵ See PJM. "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55.

- 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: Adopted.)
- 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.)
- The MMU recommends that PJM improve transmission outage modeling in the FTR auction models. (Priority: Low. First reported 2013. Status: Not adopted.)
- 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, 2014/2015 planning period.)
- 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: Adopted 2016.)
- The MMU recommends that Long Term FTRs be modified to include only a one year ahead FTR. (Priority: High. First reported 2017. Status: Not adopted.)

Conclusion

The annual ARR allocation should be designed to ensure that the rights to all congestion revenues are assigned to firm transmission service customers, without requiring contract path physical transmission rights that are 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

the benefits of firm low cost generation delivered using the transmission system in the form of revenues which offset congestion. 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 and loads pay congestion. 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 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 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 the rights to all the congestion revenues and 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, 86.5 and 98.1 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014/2015, 2015/2016 and 2016/2017 planning periods.

As of the 2017/2018 planning period, balancing congestion and M2M payments are assigned to load, rather than to FTR holders. Under the new allocation of balancing congestion and M2M payments, for the first four months of the 2017/2018 planning period, ARRs and self scheduled FTRs offset 79.7 percent of total congestion costs.

Load should never be required to subsidize payments to FTR Holders, regardless of the reason. Such subsidies have been suggested repeatedly.⁶ The FERC order of September 15, 2016, introduced a subsidy to FTR Holders at the expense of ARR holders.⁷ The order requires PJM to ignore balancing congestion when calculating total congestion dollars available to fund FTRs. This approach ignores 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. Eliminating balancing congestion from the FTR revenue calculation requires load to pay twice for congestion. Load will have to continue paying for the physical transmission system, will have to continue paying in excess of generator revenues and load will 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 will 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.

The Commission's order will shift substantial revenue from load to the holders of FTRs and reduce the ability of load to offset congestion. Under the old allocation rule ARR holders would have had an effective offset of 98.4 percent of congestion in the first four months of the 2017/2018 planning period rather than the 79.7 percent effective offset that resulted from the new rule, a loss of \$21.4 million.

If these new allocation rules had been in place beginning with the 2011/2012 planning period, ARR holders would have received \$1,034.2 million less in congestion offsets from the 2011/2012 through the 2016/2017 planning period. The total overpayment to FTR Holders for the 2011/2012 through 2016/2017 planning period would have been \$944.4 million. The underpayment to load and the overpayment to FTR Holders is a result of several factors in the new rules all of which mean the transfer of revenues to FTR Holders and the shifting of costs to load. Load is now required to pay for balancing congestion, which significantly increases costs to load and significantly increases revenues paid

⁶ See FERC Dockets Nos. EL13-47-000, EL12-19-000.

⁷ See 156 FERC ¶ 61,180.

to FTR Holders. PJM will continue to clear counter flow FTRs using excess auction revenues in order to make it possible to sell more prevailing flow FTRs. FTR Holders will receive excess day-ahead congestion revenues in excess of target allocations. FTR Holders will receive excess auction revenue, which is what FTR Holders were willing to pay for FTRs in excess of what is provided to ARR 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 balancing 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.

PJM used a more conservative approach to modeling the transmission capability for the 2014/2015 through 2016/2017 planning periods compared to the 2013/2014 planning period. PJM simply used 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 bid prices, increased clearing prices and reduced clearing quantities. For the 2017/2018 planning period PJM assigned all balancing congestion and M2M payments to load and exports. As a result, PJM also reversed course and increased the availability of Stage 1B and Stage 2 FTRs. The market response to the increased supply of FTRs was lower bid prices and clearing prices.

Clearing prices fell and cleared quantities increased from the 2010/2011 planning period through the 2013/2014 planning period. The market response to lower revenue adequacy was to reduce bid prices and to increase bid volumes and offer volumes. In the 2014/2015, 2015/2016 and 2016/2017 planning periods, due to reduced ARR allocations, FTR volume decreased relative to the 2013/2014 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 2013/2014 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 2013/2014 planning period from the reported 72.8 percent to 91.0 percent. For the 2014/2015, 2015/2016 and 2016/2017 planning periods 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 are 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. There is a reason that transmission is not built to address the Stage 1A overallocation issue. PJM's transmission planning process (RTEP) does not identify a need for new transmission because there is, in fact, no need for new transmission associated with Stage 1A ARR. The Stage 1A overallocation issue is a fiction based on the use of outdated and irrelevant generation to load paths to assign Stage 1A rights that have nothing to do with actual power flows.

The result of removing portfolio netting, applying a payout ratio to counter flow FTRs and eliminating Stage 1A ARR overallocation in the 2013/2014 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 different line ratings, 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; the payment of congestion revenues to UTCs; 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.

It is not clear, in a competitive market, why FTR purchases by financial entities remain persistently profitable. In a competitive market, it would be expected that profits would be competed away. It is also not clear, in a competitive market, why the ownership structure of long term FTRs is so highly concentrated. The apparent lack of competition to purchase Long Term FTRs (three year product), results in low prices when compared to the resale prices in Annual FTR Auctions. In a competitive market the price of Long Term FTRs (three year product) would be expected to converge with the prices of Annual FTRs, but there has been a persistent, wide divergence that has made the purchase of Long Term FTRs very profitable.

For the 2014/2015, 2015/2016 and 2016/2017 planning periods FTRs have been revenue adequate. This is not because the underlying market design 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.

Load is significantly worse off as a result of the changes made to the FTR/ARR process by PJM based on the FERC order of September 15, 2016. ARR revenues were significantly reduced for the 2017/2018 FTR Auction, the first

auction under the new rules. In addition, the certainty of the ARR offset to congestion, whatever the level, was eliminated by the assignment of 100 percent of balancing congestion to load. ARR holders will be worse off as a result of paying balancing congestion but will not know exactly how much worse off until the end of the planning year.

It has become increasingly clear that the Long Term FTR Auction should be limited to one year ahead. Ownership of the three year product is extremely highly concentrated. The buyers of the product resell the annual segments of the product for multiples of the purchase price. The prices in the Long Term FTR Auction are much lower than those in the Annual FTR Auction. The difference in revenue over the previous four planning periods is \$337.2 million. PJM cannot model transmission upgrades past the one year ahead product. There is no reason for the very small number of purchasers to continue to be subsidized.

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.⁸ 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 a 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 the rights to all the congestion revenues, and has the ability to receive the auction revenues associated with all the potential congestion revenues. The MMU recommends that all FTR auction revenues 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

⁸ 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.

decline the IARR allocation during the annual ARR allocation process.⁹ 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 2003/2004 planning period. The initial allocation covered the Mid-Atlantic Region and the APS Control Zone. For the 2006/2007 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 2007/2008 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.

ARR Allocation

For the 2007/2008 planning period, the annual ARR allocation process was revised to include Long Term ARRs that would be in effect for 10 consecutive planning periods.¹⁰ 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 zonal base load, based on generation to load paths that reflect generation resources that had served

⁹ PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 31; "IARRs for RTEP Upgrades Allocated for 2016/2017 Planning Period," <<http://www.pjm.com/~media/markets-ops/ftr/annual-arr-allocation/2016-2017/2016-2017-iarrs-for-rtep-upgrades-allocated.ashx>>.

¹⁰ See *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.

load prior to markets 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.¹¹ While transmission upgrades are being implemented, Stage 1A ARRs, and therefore FTRs, are overallocated.

- **Stage 1B.** ARRs 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 zonal peak load, based on generation to load paths that reflect generation resources that had served load prior to markets 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

¹¹ See PJM "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 22.

simultaneously feasible following the return of such ARRs.¹² Participants may seek additional ARRs in the Stage 2 allocation.

Effective for the 2015/2016 planning period, when residual zone pricing was 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.¹³

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.¹⁴ PJM may also adjust the outages modeled, adjust line limits and account for potential closed loop interfaces to address expected revenue issues. 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

Individual prorated MW = (Constraint capability) \times (Individual requested MW / Total requested MW) \times (1 / MW effect on line).¹⁵

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

¹² *Id.* at 21.

¹³ 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>>.

¹⁴ PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55-56.

¹⁵ 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>.

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.

FERC Order on EL16-121: Stage 1A ARR Allocation

FERC ordered PJM to more accurately represent system usage when allocating Stage 1A ARRs by removing retired resources from their allocation methodology.¹⁶ PJM made a compliance filing, accepted by FERC, stating that retired units would be replaced with qualified replacement resources (QRRs).¹⁷ PJM proposed to categorize QRRs as built under a rate base approach or a non-rate base (market) approach. PJM proposed to give priority to load delivery from their own rate based units in deciding between competing ARR claims.

Under the new allocation methodology, PJM will replace retired units or units whose ICAP is less than their historical capacity with QRRs. A QRR will be a unit, or combination of units, whose ICAP value can meet the historically allocated MW quantity that was allocated based on the retired resource. QRRs will be classified as rate base or non-rate base units and ranked by rate base/non-rate base and by economics within each category. Participants will have to provide evidence that a unit is a rate-base unit to qualify for the designation in the Stage 1A ARR allocation. PJM will assign the historical MW to rate base QRRs within the zone, and then intra zonally to all generation units to replace retired resource capacity. These reassignments must all pass the simultaneous feasibility test.

The method PJM has implemented continues to rely on a contract path based approach. PJM is not applying this method to all Stage 1A units, so over allocations may persist. Existing, non-retired, Stage 1A resources will still be given their current allocations, while ARR allocations to QRRs that replace

¹⁶ 156 FERC ¶ 61,180 (2016).

¹⁷ See FERC Docket No. EL16-6-003.

retired Stage 1A resources will be prorated based on the feasibility of these of ARR after existing resources are allocated. As a result of this proration, the new ARRs will have lower priority than the non-retired Stage 1A resources, which could affect the value of the newly assigned ARRs.

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

For the 2014/2015, 2015/2016 and 2016/2017 planning periods, FTR revenue adequacy was over 100 percent. Not every month was revenue adequate, but there was excess revenue from other months to ensure that the planning period was revenue adequate. The last time there were four months of consecutive funding of 100 percent or more was in the 2009/2010 planning period.

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 use 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 cannot be prorated.

For the 2014/2015 through 2016/2017 planning periods PJM reduced Stage 1B and Stage 2 ARRs to increase the payout ratio to FTR Holders. For the 2017/2018 planning period PJM assigned all balancing congestion and M2M payments to load and exports. As a result, PJM also reversed course and increased the availability of Stage 1B and Stage 2 FTRs by reversing the

conservative outage modeling. The market response to the increased supply of FTRs was lower bid prices and clearing prices.

Figure 13-1 shows the historic allocations for Stage 1B and Stage 2 ARRs from the 2011/2012 to 2017/2018 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 2013/2014 planning period to the 2014/2015 planning period. Total Stage 1B and Stage 2 ARR allocations increased slightly in the 2015/2016 planning year over the 2014/2015 planning year allocations, from 3,497.6 MW to 5,219.6 MW. But the ARR allocations for the 2015/2016 planning year were still 78.8 percent below 2013/2014 planning period volumes of 34,444.0 MW. For the 2016/2017 planning period there was another relatively small increase in available Stage 1B and Stage 2 capacity from 5,319.6 MW to 12,821.6 MW, but available ARRs were still 48.9 percent below 2013/2014 planning period volumes. For the 2017/2018 planning period, Stage 1B and Stage 2 ARRs returned to 2013/2014 volumes.

Figure 13-1 Historic Stage 1B and Stage 2 ARR Allocations from the 2011/2012 through 2017/2018 planning periods



Table 13-3 shows the ARR allocations for the 2011/2012 through 2017/2018 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 2011/2012 through 2013/2014 planning periods, but were very significantly reduced in the 2014/2015 planning period as a result of PJM's arbitrary increase in modeled outages designed to increase revenue adequacy. PJM made available a small increase in Stage 1B and Stage 2 ARR volume from the 2014/2015 planning period to the 2015/2016 planning period and a small increase for the 2016/2017 planning period based on high payout ratios. In the 2017/2018 planning period, there was a large increase in ARR volume due to PJM's changes to Stage 1B and Stage 2 ARR allocations.

Table 13-3 Historic Stage 1B and Stage 2 ARR Allocations from the 2011/2012 through 2017/2018 planning periods

Stage	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018
Stage 1A	64,159.9	67,299.6	67,861.4	68,837.7	71,874.0	69,089.1	70,874.7
Stage 1B	22,208.3	18,431.7	15,782.0	2,389.6	3,643.1	5,525.7	16,592.3
Stage 2-1	3,072.5	2,700.6	3,519.2	360.9	643.8	1,197.1	1,725.0
Stage 2-2	6,652.6	3,334.3	3,200.0	455.9	511.2	2,368.8	2,675.0
Stage 2-3	6,382.6	6,218.7	2,611.8	291.2	521.5	3,730.0	4,093.0
Total Stage 2	16,107.7	12,253.6	9,331.0	1,108.0	1,676.5	7,295.9	8,493.0
Total Allocations	102,475.9	97,984.9	92,974.4	72,335.3	77,193.6	81,910.7	95,960.0

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.¹⁸ 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 44,056 MW of ARRs associated with \$492,500 of revenue that were reassigned in the 2016/2017 planning period. There were 22,714 MW of ARRs associated with \$139,300 of revenue that were reassigned for the first four months of the 2017/2018 planning period.

¹⁸ See PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 28.

Table 13-4 summarizes ARR MW and associated revenue automatically reassigned for network load in each control zone where changes occurred between June 2015 and September 2017.

Table 13-4 ARRs and ARR revenue automatically reassigned for network load changes by control zone: June 1, 2016, through September 30, 2017

Control Zone	ARRs Reassigned (MW-day)		ARR Revenue Reassigned [Dollars (Thousands) per MW-day]	
	2016/2017 (12 months)	2017/2018 (4 months)	2016/2017 (12 months)	2017/2018 (4 months)
AECO	451	183	\$4.0	\$1.1
AEP	1,952	1,187	\$11.8	\$6.5
APS	1,617	786	\$33.4	\$8.4
ATSI	8,415	3,066	\$45.8	\$9.9
BGE	2,213	1,544	\$131.5	\$19.0
ComEd	3,468	2,052	\$113.9	\$34.2
DAY	822	1,148	\$2.4	\$2.1
DEOK	3,335	2,336	\$19.1	\$11.9
DLCO	5,464	3,216	\$12.9	\$9.8
DPL	1,538	839	\$31.3	\$12.1
Dominion	55	1	\$0.2	\$0.0
EKPC	0	0	\$0.0	\$0.0
JCPL	1,105	447	\$3.7	\$0.9
Met-Ed	825	281	\$6.8	\$2.0
PECO	3,468	1,817	\$8.8	\$3.1
PENELEC	1,150	203	\$17.3	\$1.8
PPL	4,055	1,392	\$5.0	\$1.5
PSEG	1,640	562	\$23.0	\$6.6
Pepco	2,419	1,565	\$21.3	\$8.4
RECO	65	91	\$0.1	\$0.0
Total	44,056	22,714	\$492.5	\$139.3

Residual ARRs

Residual ARRs are available if 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. Residual ARRs are a separate product from incremental ARRs.

Only ARR holders that had their Stage 1 ARRs prorated are eligible to receive Residual ARRs which cannot be declined, with positive or negative target allocations. Stage 1 ARR holders have a priority right to 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 13-5 shows the Residual ARRs automatically allocated to eligible participants, along with the target allocations from the effective month. In the first four months of the 2017/2018 planning period, PJM allocated a total of 27,657.9 MW of residual ARRs with a target allocation of \$4.8 million. In the 2016/2017 planning period, PJM allocated a total of 35,034.9 MW of residual ARRs, up from 30,118.1 MW for the 2015/2016 planning period. Residual ARRs had a total target allocation of \$7.0 million for the 2016/2017 planning period, down from \$7.7 million for the 2015/2016 planning period. PJM's conservative modeling results in some ARRs that could have been allocated in Stage 1B are now being allocated as Residual ARRs on a month to month basis without the option to self schedule.

Beginning June 2017, Residual ARRs that would have cleared with a negative target allocation are not assigned to participants.

Table 13-5 Residual ARR allocation volume and target allocation: 2017

Month	Bid and Requested		Cleared Volume	Target Allocation
	Volume (MW)	Cleared Volume (MW)		
Jan-17	3,253.4	2,186.7	67.2%	\$1,148,805
Feb-17	5,885.1	2,273.7	38.6%	\$905,697
Mar-17	9,304.9	2,391.6	25.7%	\$286,710
Apr-17	8,334.5	3,313.8	39.8%	\$347,694
May-17	6,312.2	3,268.7	51.8%	\$55,180
Jun-17	4,241.0	3,666.1	86.4%	\$805,206
Jul-17	6,018.8	3,850.9	64.0%	\$1,773,770
Aug-17	4,714.5	3,421.9	72.6%	\$872,879
Sep-17	6,835.2	3,284.5	48.1%	\$1,303,420
Total	54,899.6	27,657.9	50.4%	\$7,499,361

Market Performance

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 to ensure 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.¹⁹

There is a reason that transmission is not actually built to address the Stage 1A overallocation issue. PJM's transmission planning process (RTEP) does not identify a need for new transmission because there is, in fact, no need for new transmission associated with Stage 1A ARRs. The Stage 1A overallocation issue is a fiction based on the use of outdated and irrelevant generation to load paths to assign Stage 1A rights that have nothing to do with actual power flows.

For the 2017/2018 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 OATT, the capability limits of the

¹⁹ See PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 22.

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 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.

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.

Table 13-6 shows the value of 2016/2017 and 2017/2018 allocated ARRs at FTR prices from both planning periods. For example, in the 2017/2018 planning period, ARRs allocated in that planning period are expected to be worth a total of \$545.2 million. The MMU calculates that the same allocated ARRs, but at 2016/2017 planning period prices, would have been worth \$1,139.8 million. This substantial reduction in expected revenue from the same set of ARRs is a result of a significant reduction in FTR prices, and therefore ARR revenue, resulting from PJM's modeling decisions following the allocation of balancing congestion to load and exports. The predicted increased value to ARR holders from shifting balancing congestion out of FTR funding did not occur, and in fact ARR holders can expect to receive less total revenue while FTR Holders experience increased profits and revenue stability.²⁰

Table 13-6 ARR Revenue at 2016/2017 and 2017/2018 planning period FTR prices

	2016/2017 ARRs	2017/2018 ARRs
2016/2017 Value	\$907,756,156	\$454,527,372
2017/2018 Value	\$1,139,824,163	\$545,229,437

²⁰ See "Post-Technical Conference Comments of DC Energy, LLC; Inertia Power, LP; Saracen Energy East LP; and Vitol Inc.," Docket No. EL16-6 (March 15, 2016), at 28.

Revenue Adequacy

As with FTRs, revenue adequacy for ARR holders must be distinguished from the adequacy of ARR 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.

Total net FTR auction revenue for the 2016/2017 planning period, before accounting for self scheduling, load shifts or residual ARRs, was \$941.5 million. The FTR auction revenue collected pays ARR holders' credits. During 2017/2018 planning period, total net FTR auction revenue was \$558.4 million.

Table 13-7 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 2016/2017 planning period and the first four months of the 2017/2018 planning periods.

Table 13-7 Projected ARR revenue adequacy (Dollars (Millions)): Planning periods 2016/2017 and 2017/2018

	2016/2017*	2017/2018**
Total FTR auction net revenue	\$941.5	\$558.4
Annual FTR Auction net revenue	\$909.0	\$542.2
Monthly Balance of Planning Period FTR Auction net revenue*	\$32.5	\$16.2
ARR target allocations	\$914.2	\$550.4
ARR credits	\$914.2	\$550.4
Surplus auction revenue	\$27.4	\$8.0
ARR payout ratio	100%	100%
FTR payout ratio*	100%	100%

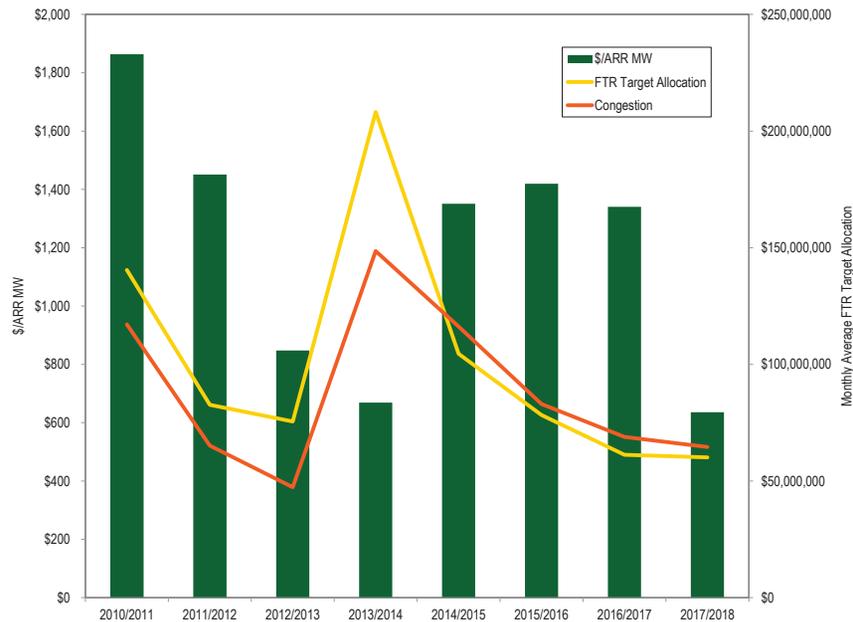
* Shows twelve months for 2016/2017 ** Shows four months for 2017/2018.

Figure 13-2 shows the dollars per ARR MW held for each month of the 2010/2011 planning period through the first four months of the 2017/2018 planning periods. The ARR MW held do not include self scheduled FTRs but do include Residual ARRs starting in August 2012. FTR prices increased in the 2014/2015 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 2014/2015 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 2015/2016 planning period, the dollars per MW of ARR allocation was \$10,641.54. For the 2016/2017 planning period, the dollars per MW of ARR allocation were \$10,411.

The dollar per MW value of ARRs in the first four months of the 2017/2018 planning period decreased 39.4 percent from the previous planning period. ARR value was expected to increase in the 2017/2018 planning period from higher FTR prices paid in expectation of increased revenue with no balancing congestion offset, but this increased value did not materialize. FTRs buyers paid less. Figure 13-2 shows that the total congestion and FTR target allocations did not change significantly from the 2016/2017 to 2017/2018 planning period, but that ARR value returned to 2013/2014 planning period levels while load is paying balancing congestion costs.

Figure 13-2 Dollars per ARR MW paid to ARR holders compared to congestion and FTR target allocations: 2010/2011 through 2017/2018



Excess Auction Revenue

Figure 13-3 shows the monthly excess auction revenue from the 2011/2012 through 2017/2018 planning periods. Excess auction revenue is the revenue collected each month from FTR auctions in excess of ARR target allocations.

Beginning with the 2014/2015 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.²¹ This allows PJM to use the excess auction revenue to pay prevailing flow FTRs without increasing prevailing flow obligations. The result is to increase FTR funding. This action removes money from the ARR revenue stream and caused the decrease in excess ARR revenue beginning

21 See PJM. "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55.

in June 2014. Excess auction revenue is allocated pro rata to FTR Holders at the end of the planning period. All excess FTR auction revenue should be distributed to ARR holders.

Figure 13-3 Monthly excess ARR revenue: Planning periods 2011/2012 through 2017/2018

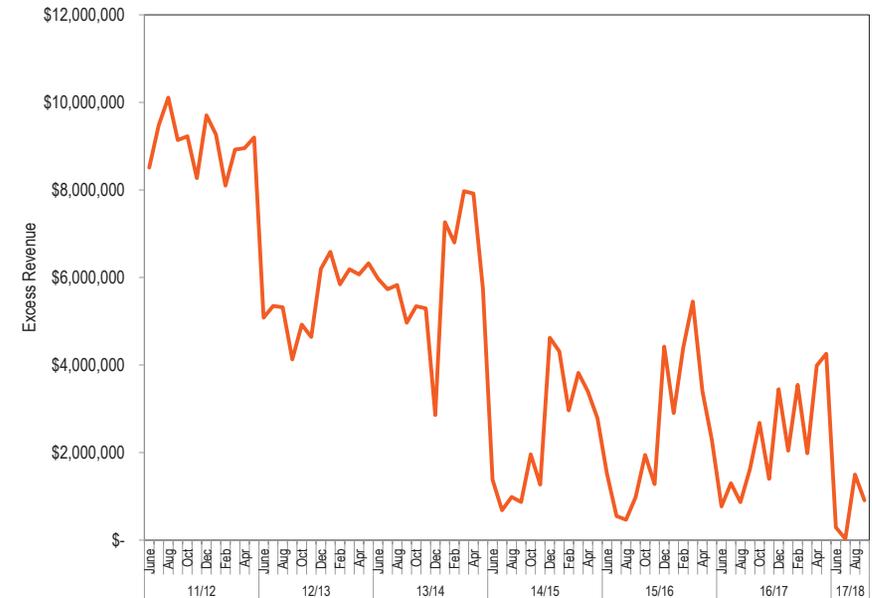


Table 13-8 shows the excess auction revenue, by planning period, for planning periods 2010/2011 through 2017/2018.

Table 13-8 Excess Auction Revenue: Planning periods 2010/2011 through 2017/2018

Planning Period	Excess Auction Revenue
2010/2011	\$29,704,562
2011/2012	\$108,874,342
2012/2013	\$66,652,822
2013/2014	\$71,687,937
2014/2015*	\$29,045,590
2015/2016	\$29,612,591
2016/2017	\$27,917,175
2017/2018**	\$2,727,926
Total	\$366,222,945

*Start of counter flow "buy back"

**Through September 30, 2017

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 total congestion revenue including day-ahead and balancing congestion. The value of the day-ahead congestion price differences, termed the FTR target allocation, defines the maximum, but not guaranteed, payout for FTRs. The target allocation of an FTR reflects the difference in day-ahead 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. 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. 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. 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 by ARR holders are available only as obligations and 24-hour product class, consistent with the associated ARRs, and only in the Annual FTR Auction.

Market Structure

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.²² 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 transmission capacity in the model on the affected facilities. The capacity modeled in the Annual ARR Allocation is used as the capacity for the Annual FTR Auction to simultaneously accommodate 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 starting in the 2014/2015 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

²² See "PJM Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 38.

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.²³ 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 goals.

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.²⁴ 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.

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

²³ See PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 55.

²⁴ See 2017 Quarterly State of the Market Report for PJM: January through September, Volume 2, Section 12B: Transmission Facility Outages.

the planning period. FTRs in the auctions include obligations and options and 24-hour, on peak and off peak products.²⁵

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 entire 2015/2016 planning period and the 2016/2017 planning period were 25,686,865 MW and 20,144,884 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.

²⁵ See PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 39.

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 13-9 presents the Monthly Balance of Planning Period FTR Auction cleared FTRs for 2017 by trade type, organization type and FTR direction. Financial entities purchased 72.6 percent of prevailing flow FTRs, down 0.7 percent, and 81.9 percent of counter flow FTRs, up 6.0 percent, for the year, with the result that financial entities purchased 77.0 percent, up 2.5 percent, of all prevailing and counter flow FTR buy bids in the Monthly Balance of Planning Period FTR Auction cleared FTRs for 2017.

Table 13-9 Monthly Balance of Planning Period FTR Auction patterns of ownership by FTR direction: 2017

Trade Type	Organization Type	FTR Direction		
		Prevailing Flow	Counter Flow	All
Buy Bids	Physical	27.4%	18.1%	23.0%
	Financial	72.6%	81.9%	77.0%
	Total	100.0%	100.0%	100.0%
Sell Offers	Physical	16.5%	16.9%	16.7%
	Financial	83.5%	83.1%	83.3%
	Total	100.0%	100.0%	100.0%

Table 13-10 presents the average daily net position ownership for all FTRs for 2017, by FTR direction.

Table 13-10 Daily FTR net position ownership by FTR direction: 2017

Organization Type	FTR Direction		
	Prevailing Flow	Counter Flow	All
Physical	50.8%	28.5%	41.2%
Financial	49.2%	71.5%	58.8%
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.²⁶

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.²⁷

Table 13-11 shows the quoted and cleared participant count and volume for the Long Term FTR Auctions by period type, along with the HHI. Quoted and cleared participant counts are the unique participants for that period type, not for the entire auction. The percent of cleared calculates the percentage of cleared volume held by a physical or financial participant. The calculated HHIs provide a measure of market concentration both at the quoted, to indicate participant interest, and cleared levels.

The HHI for the YRALL period type is highly concentrated, meaning only a small number of individuals hold all YRALL long term FTRs. For example, for the YRALL product auctioned in the 2017/2020 Long Term FTR Auction, three participants held all of the volume, with the single financial participant holding 83.6 percent of the YRALL product. The YR1, YR2 and YR3 cleared volume is not concentrated, but all the volume is held by approximately half the number of participants that cleared FTRs in the 2017/2018 Annual FTR

²⁶ See PJM, "Manual 6: Financial Transmission Rights," Rev. 18 (June 1, 2017) at 56.

²⁷ See *id.*

Auction. In other words, the concentration of held long term FTRs is not high, but all the volume is held by only around half of FTR participants.

Financial participants are purchasing an increasingly large volume of long term FTRs. Financial participants held 51.2, 60.6, 66.2 and 69.6 percent of all long term FTRs for the 2014/2017, 2015/2018, 2016/2019 and 2017/2020 Long Term FTR Auctions.

Table 13-12 Long Term and Annual Auction total cleared FTR MW

Long Term FTR Product						
Planning Period	Year 3	Year 2	Year 1	Total Long Term	Annual (including self scheduled)	Long Term Percent of Total Cleared
2014/2015	81,666	86,754	131,911	300,330	356,522	45.7%
2015/2016	89,419	99,329	123,400	312,148	355,682	46.7%
2016/2017	97,837	95,637	107,182	300,656	397,258	43.1%
2017/2018	69,161	86,323	108,126	263,609	493,683	34.8%

Table 13-11 Long Term FTR Auction quoted and cleared volume

		Physical						Financial						HHI	
		Quoted		Cleared		% of Cleared	Quoted		Cleared		% of Cleared	Quoted HHI	Cleared HHI		
		Participants	Quoted MW	Participants	Cleared MW		Participants	Quoted MW	Participants	Cleared MW					
2014/2017	YR1	47	42,331.9	41	13,108.8	48.8%	23	49,055.7	23	13,746.5	51.2%	716	583		
	YR2	41	38,582.7	35	11,115.5	51.9%	18	33,957.3	17	10,320.5	48.1%	936	748		
	YR3	34	24,838.7	29	8,747.4	49.3%	16	28,458.7	15	8,985.1	50.7%	990	788		
	YRALL	0	0.0	0	0.0	0.0%	3	4,173.9	2	1,528.5	100.0%	9,949	8,263		
2015/2018	YR1	52	39,155.6	36	11,013.6	42.7%	26	44,861.8	26	14,790.6	57.3%	744	599		
	YR2	47	23,791.8	33	7,540.8	35.8%	22	38,721.4	22	13,498.4	64.2%	1,061	856		
	YR3	34	19,702.7	28	6,223.3	43.7%	20	25,588.7	20	8,019.2	56.3%	927	621		
	YRALL	0	0.0	0	0.0	0.0%	2	5,066.6	2	1,779.9	100.0%	9,521	6,321		
2016/2019	YR1	61	32,541.1	51	9,322.1	36.8%	30	44,100.8	30	16,007.3	63.2%	639	546		
	YR2	48	21,209.4	44	6,981.7	36.2%	26	33,867.6	25	12,305.6	63.8%	792	643		
	YR3	38	16,482.6	36	4,881.7	27.4%	20	35,185.7	19	12,945.4	72.6%	1,290	697		
	YRALL	13	281.3	10	31.7	8.6%	3	1,091.1	3	335.7	91.4%	5,591	4,349		
2017/2020	YR1	63	25,060.2	55	7,819.3	37.1%	37	41,622.1	36	13,249.8	62.9%	429	353		
	YR2	54	15,471.2	51	4,993.1	25.6%	30	40,992.7	30	14,514.9	74.4%	1,635	1,069		
	YR3	45	12,012.4	40	3,586.4	27.1%	27	27,253.3	26	9,642.4	72.9%	1,303	898		
	YRALL	3	68.0	2	26.0	16.4%	3	725.8	1	132.7	83.6%	8,696	5,638		

Table 13-12 provides a comparison of cleared FTR obligations (not options) acquired in the Long Term FTR Auctions versus the Annual FTR Auction, for FTRs in the 2014/2015 through 2017/2018 planning periods. A three year FTR is distributed to each individual planning period during its three year effective period. Long term FTRs that are effective in a single planning period comprise an average of 42.8 percent of total FTR volume in the 2014/2015 through 2017/2018 planning periods.

Table 13-13 provides the Monthly Balance of Planning Period FTR Auction market volume for the entire 2016/2017 and the first four months of the 2017/2018 planning periods. There were 7,143,252 MW of FTR obligation buy bids and 1,478,484 MW of FTR obligation sell offers for all bidding periods in the first four months of the 2017/2018 planning period. The Monthly Balance of Planning Period FTR Auction cleared 1,206,478 MW (16.9 percent) of FTR obligation buy bids and 405,736 MW (22.3 percent) of FTR obligation sell offers.

There were 1,478,484 MW of FTR option buy bids and 263,583 MW of FTR option sell offers for all bidding periods in the Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period. The monthly auctions cleared 25,856 MW (1.7 percent) of FTR option buy bids, and 72,845 MW (27.6 percent) of FTR option sell offers.

Table 13-13 Monthly Balance of Planning Period FTR Auction market volume: 2017

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-17	Obligations	Buy bids	241,099	1,077,550	123,675	11.5%	953,876	88.5%
		Sell offers	96,626	234,411	54,042	23.1%	180,370	76.9%
	Options	Buy bids	3,709	228,387	2,199	1.0%	226,187	99.0%
		Sell offers	7,276	28,852	11,745	40.7%	17,107	59.3%
Feb-17	Obligations	Buy bids	260,651	1,042,481	131,660	12.6%	910,821	87.4%
		Sell offers	94,844	208,036	48,565	23.3%	159,471	76.7%
	Options	Buy bids	2,826	190,661	2,187	1.1%	188,474	98.9%
		Sell offers	6,148	26,709	8,897	33.3%	17,812	66.7%
Mar-17	Obligations	Buy bids	259,179	1,004,570	166,466	16.6%	838,104	83.4%
		Sell offers	105,362	261,780	55,611	21.2%	206,168	78.8%
	Options	Buy bids	2,403	136,494	5,659	4.1%	130,835	95.9%
		Sell offers	6,941	32,989	10,691	32.4%	22,298	67.6%
Apr-17	Obligations	Buy bids	215,326	826,778	136,306	16.5%	690,472	83.5%
		Sell offers	111,753	219,164	58,063	26.5%	161,102	73.5%
	Options	Buy bids	1,734	71,002	2,431	3.4%	68,571	96.6%
		Sell offers	4,938	25,045	9,789	39.1%	15,255	60.9%
May-17	Obligations	Buy bids	144,990	554,023	96,709	17.5%	457,314	82.5%
		Sell offers	67,250	119,645	33,324	27.9%	86,320	72.1%
	Options	Buy bids	875	41,671	1,970	4.7%	39,701	95.3%
		Sell offers	2,325	12,564	6,287	50.0%	6,277	50.0%
Jun-17	Obligations	Buy bids	424,924	1,890,242	261,153	13.8%	1,629,089	86.2%
		Sell offers	245,103	441,623	103,552	23.4%	338,071	76.6%
	Options	Buy bids	2,850	95,975	3,466	3.6%	92,509	96.4%
		Sell offers	13,125	87,201	24,446	28.0%	62,754	72.0%
Jul-17	Obligations	Buy bids	462,676	2,004,974	365,860	18.2%	1,639,114	81.8%
		Sell offers	270,091	467,185	99,257	21.2%	367,928	78.8%
	Options	Buy bids	4,839	526,023	6,728	1.3%	519,295	98.7%
		Sell offers	9,090	60,642	16,226	26.8%	44,416	73.2%
Aug-17	Obligations	Buy bids	404,905	1,719,427	287,275	16.7%	1,432,152	83.3%
		Sell offers	250,573	488,090	104,763	21.5%	383,327	78.5%
	Options	Buy bids	3,918	521,524	10,630	2.0%	510,894	98.0%
		Sell offers	7,694	48,901	14,652	30.0%	34,249	70.0%
Sep-17	Obligations	Buy bids	368,917	1,528,610	292,194	19.1%	1,236,416	80.9%
		Sell offers	217,010	424,349	98,165	23.1%	326,184	76.9%
	Options	Buy bids	2,893	334,962	5,033	1.5%	329,929	98.5%
		Sell offers	8,035	66,839	17,520	26.2%	49,319	73.8%
2016/2017*	Obligations	Buy bids	3,910,604	16,452,696	2,250,750	13.7%	14,201,947	86.3%
		Sell offers	1,888,130	3,845,238	843,507	21.9%	3,001,731	78.1%
	Options	Buy bids	83,045	3,692,188	61,247	1.7%	3,630,941	98.3%
		Sell offers	119,139	497,083	161,155	32.4%	335,928	67.6%
2017/2018**	Obligations	Buy bids	1,661,422	7,143,252	1,206,478	16.9%	5,936,774	83.1%
		Sell offers	982,777	1,821,247	405,736	22.3%	1,415,511	77.7%
	Options	Buy bids	14,500	1,478,484	25,856	1.7%	1,452,628	98.3%
		Sell offers	37,944	263,583	72,845	27.6%	190,738	72.4%

* Shows twelve months for 2016/2017; ** Shows four months ended Sep 30 for 2017/2018

Table 13-14 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 2017 was 211,295.2 MW. The average monthly cleared volume for 2016 was 219,630.6 MW.

Table 13-14 Monthly Balance of Planning Period FTR Auction buy-bid, bid and cleared volume (MW per period): 2017

Monthly Auction	MW Type	Prompt Month	Second Month	Third Month	Q1	Q2	Q3	Q4	Total
Jan-17	Bid	614,939	263,340	198,667				228,991	1,305,937
	Cleared	72,086	25,184	10,841				17,763	125,874
Feb-17	Bid	617,074	230,889	201,187				183,993	1,233,142
	Cleared	82,727	24,497	13,321				13,302	133,847
Mar-17	Bid	582,068	237,341	219,040				102,614	1,141,063
	Cleared	100,495	34,460	27,873				9,297	172,125
Apr-17	Bid	641,003	256,777						897,780
	Cleared	100,962	37,775						138,737
May-17	Bid	595,694							595,694
	Cleared	98,679							98,679
Jun-17	Bid	694,826	242,835	225,724	140,632	249,241	220,255	212,703	1,986,217
	Cleared	115,341	32,654	26,230	15,601	28,384	24,559	21,850	264,619
Jul-17	Bid	848,864	393,988	263,694	342,147	337,546	344,757	2,530,997	
	Cleared	157,587	63,616	19,649	42,089	46,476	43,197	372,615	
Aug-17	Bid	819,359	303,118	269,085	233,292	300,527	315,570	2,240,951	
	Cleared	137,299	43,044	25,896	20,256	37,199	34,210	297,904	
Sep-17	Bid	698,343	258,610	248,071	142,865	255,214	260,469	1,863,571	
	Cleared	136,468	44,276	33,029	11,932	38,125	33,427	297,258	

Figure 13-4 shows cleared auction volumes as a percent of the total FTR cleared volume by calendar months for June 2004 through September 2017, 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 a corresponding increase in the share of Annual FTRs.

Figure 13-4 Cleared auction volume (MW) as a percent of total FTR cleared volume by calendar month: June 1, 2004 through September 30, 2017

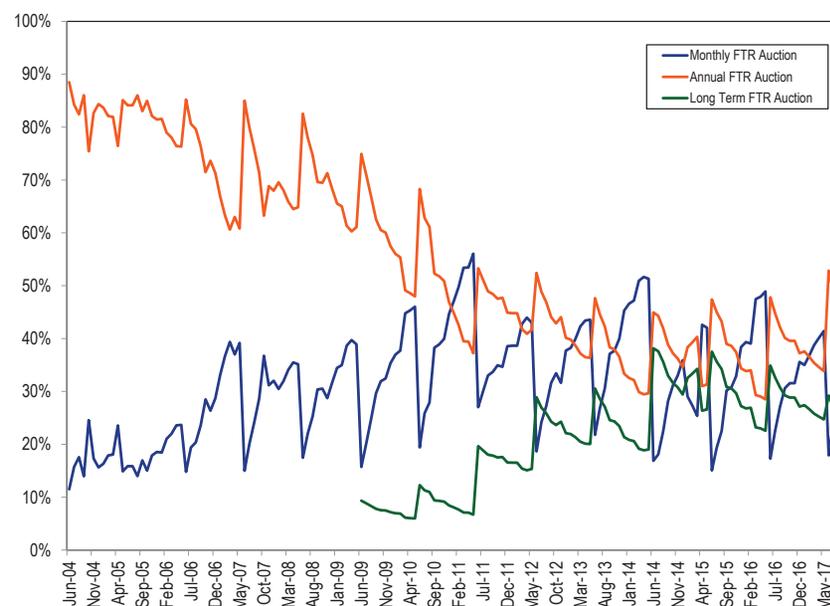


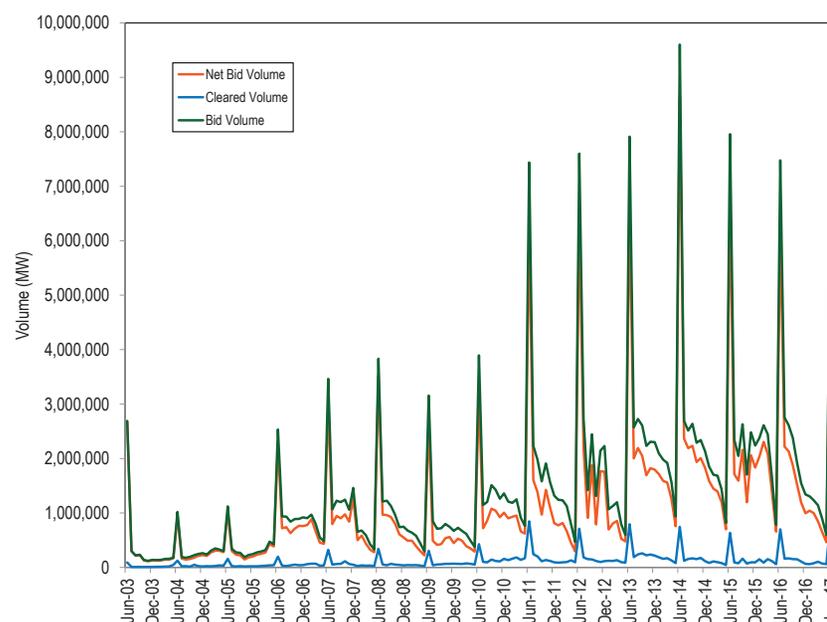
Table 13-15 provides the secondary bilateral FTR market volume for the entire 2016/2017 and 2017/2018 planning periods.

Table 13-15 Secondary bilateral FTR market volume: Planning periods 2016/2017 and 2017/2018²⁸

Planning Period	Type	Class Type	Volume (MW)
2016/2017	Obligation	24-Hour	538.5
		On Peak	7,414.4
		Off Peak	13,955.7
		Total	21,908.6
Option	24-Hour	On Peak	0.0
		Off Peak	678.0
		Off Peak	104.5
		Total	782.5
2017/2018	Obligation	24-Hour	167.4
		On Peak	6,800.2
		Off Peak	4,218.1
		Total	11,185.7
Option	24-Hour	On Peak	0.0
		Off Peak	0.0
		Off Peak	0.0
		Total	0.0

Figure 13-5 shows the FTR bid, cleared and net bid volume from June 2003 through June 2017 for Long Term, Annual and Monthly Balance of Planning Period Auctions.²⁹ 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 13-5 Long Term, Annual and Monthly FTR Auction bid and cleared volume: June 1, 2003 through September 30, 2017



Price

Table 13-16 compiles the buy bid, buy bid revenue and \$/MW of buy bids for the six latest planning periods. In the 2014/2015 planning period the \$/MW increased significantly from the 2013/2014 planning period due to PJM's decisions to limit capacity through conservative modeling. In the 2017/2018 Annual FTR Auction, the \$/MW decreased to lower than 2013/2014 levels, due in part to the partial relaxation of PJM's conservative modeling practices due to the reassignment of balancing congestion and M2M payments to load and exports.

²⁸ The 2015/2016 planning period covers bilateral FTRs that are effective for any time between June 1, 2015 through May 31, 2016, which originally had been purchased in a Long Term FTR Auction, Annual FTR Auction or Monthly Balance of Planning Period FTR Auction.

²⁹ The data for this table are available in 2016 State of the Market Report for PJM, Volume 2, Appendix H.

Table 13-16 Cleared Volume, Revenue and \$/MW for planning periods 2012/2013 through 2017/2018 Annual FTR Auction

	Cleared Buy Bid Volume	% Cleared	Buy Bid Revenue	Buy Bid Revenue (\$/MW)
2012/2013	371,295	14.5%	\$627.3	\$1,689
2013/2014	420,489	12.8%	\$567.6	\$1,350
2014/2015	365,843	11.2%	\$789.7	\$2,159
2015/2016	378,328	15.4%	\$948.6	\$2,507
2016/2017	420,198	16.2%	\$918.0	\$2,185
2017/2018	513,263	22.3%	\$555.2	\$1,082

Table 13-17 shows the weighted average cleared buy-bid price in the Monthly Balance of Planning Period FTR Auctions by bidding period for January through September 2017. For example, for the January 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 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 September 2017 was \$0.09 per MW, down from \$0.13 per MW in the same time last year, a 30.8 percent decrease in FTR prices. The cleared weighted-average price for the current planning period was \$0.10, down 23.1 percent from \$0.13 for the previous planning period.

Table 13-17 Monthly Balance of Planning Period FTR Auction cleared, weighted-average, buy-bid price per period (Dollars per MW): January through September, 2017

Monthly Auction	Prompt Month	Second Month	Third Month	Q1	Q2	Q3	Q4	Total
Jan-17	\$0.14	\$0.23	\$0.05				\$0.09	\$0.13
Feb-17	\$0.07	\$0.09	\$0.05				\$0.06	\$0.07
Mar-17	\$0.09	\$0.12	\$0.13				\$0.02	\$0.09
Apr-17	\$0.09	\$0.10					\$0.00	\$0.10
May-17	\$0.06						\$0.00	\$0.06
Jun-17	\$0.07	\$0.14	\$0.11	\$0.15	\$0.11	\$0.20	\$0.11	\$0.12
Jul-17	\$0.08	\$0.10	\$0.06		\$0.11	\$0.12	\$0.08	\$0.10
Aug-17	\$0.09	\$0.09	\$0.12		\$0.18	\$0.12	\$0.12	\$0.12
Sep-17	\$0.08	\$0.11	\$0.08		\$0.04	\$0.08	\$0.06	\$0.08

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 for financial entities regardless of the payout ratio raises questions about the competitiveness of the market. Accounting for direct profitability and the distribution of excess congestion, financial entities were not profitable in 2012/2013 and were profitable in every planning year from 2013/2014 through 2016/2017, and were profitable if summed over the entire period (Table 13-20). It is not clear, in a competitive market, why FTR purchases by financial entities remain persistently profitable. In a competitive market, it would be expected that profits would be competed to zero or a de minimis level.

Table 13-18 lists FTR profits by organization type and FTR direction for the first four months of the 2017/2018 planning period. Some participants classified as physical, such as a company that holds one generator, are not eligible for ARRs but do have a physical presence on the PJM system. Such entities would be under the Physical category, while any entity that holds an ARR will be under the Physical ARR Holder category. FTR profits are the sum of the daily FTR target allocations, including for self scheduled FTRs, adjusted by the payout ratio 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 FTR credits also do not include any excess congestion revenue distributions made at the end of the planning period. 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. FTR profitability is the difference between the revenue received for an FTR and the cost of the FTR. In the first four months of the 2017/2018 planning period, companies made profits of \$116.3 million, largely due to \$49.0 million from self scheduled FTRs, which are zero cost, and \$68.0 million from counter flow FTRs. Revenues from self scheduled FTRs are more accurately described as a return of congestion rather than profits.

Table 13-18 FTR profits by organization type and FTR direction for the 2017/2018 planning period

Organization Type	FTR Direction				All
	Prevailing Flow	Self Scheduled		Self Scheduled Counter Flow	
		Prevailing Flow	Counter Flow		
Financial	\$2,439,783		\$43,944,756		\$46,384,539
Physical	(\$14,509,682)		\$11,220,780		(\$3,288,902)
Physical ARR Holder	\$11,640,936	\$48,956,050	\$12,790,099	(\$175,428)	\$73,211,658
Total	(\$428,962)	\$48,956,050	\$67,955,636	(\$175,428)	\$116,307,295

Table 13-19 lists the monthly FTR profits for the 2016/2017 and 2017/2018 planning periods by organization type.

Table 13-19 Monthly FTR profits by organization type for the 2016/2017 and 2017/2018 planning periods

Month	Organization Type			Total
	Physical	Physical ARR Holders	Financial	
Jun-16	(\$2,861,362)	\$11,479,035	(\$6,163,265)	\$2,454,408
Jul-16	\$289,899	\$31,469,056	\$570,363	\$32,329,318
Aug-16	\$3,152,454	\$14,805,612	\$9,898,169	\$27,856,234
Sep-16	\$5,595,192	\$48,212,525	\$12,909,228	\$66,716,944
Oct-16	\$4,111,015	\$54,156,867	(\$3,486,077)	\$54,781,805
Nov-16	(\$3,395,815)	(\$3,164,053)	(\$8,477,147)	(\$15,037,015)
Dec-16	(\$540,576)	(\$11,109,102)	(\$6,540,942)	(\$18,190,621)
Jan-17	(\$1,748,872)	(\$10,641,034)	\$82,092	(\$12,307,814)
Feb-17	(\$2,264,649)	(\$1,608,316)	\$3,282,949	(\$590,017)
Mar-17	(\$3,884,155)	(\$1,226,096)	(\$673,693)	(\$5,783,943)
Apr-17	(\$5,227,387)	(\$42,835,333)	(\$7,180,585)	(\$55,243,305)
May-17	(\$4,464,887)	(\$38,593,461)	(\$7,740,915)	(\$50,799,263)
Summary for Planning Period 2016/2017				
Total	(\$11,239,145)	\$50,945,701	(\$13,519,824)	\$26,186,732
Jun-17	\$764,708	\$36,311,598	\$14,019,198	\$51,095,505
Jul-17	(\$2,987,829)	\$4,706,027	\$7,306,611	\$9,024,810
Aug-17	(\$3,234,012)	(\$4,331,463)	\$2,414,244	(\$5,151,230)
Sep-17	\$2,168,231	\$36,525,495	\$22,644,485	\$61,338,211
Summary for Planning Period 2017/2018				
Total	(\$3,288,902)	\$73,211,658	\$46,384,539	\$116,307,295

Table 13-20 lists the historical profits by calendar year by organization type beginning in the 2012/2013 planning period. The profits include any end of planning period excess distribution or uplift that will impact total profitability.

Table 13-20 Planning period FTR profits by organization type: 2012/2013 through 2017/2018 planning periods

	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018*	
Financial	Profit	\$63,457,511	\$557,583,317	\$236,692,290	\$41,264,165	(\$13,519,824)	(\$3,288,902)
	Excess	(\$80,450,357)	(\$256,820,253)	\$44,410,625	\$11,897,525	\$20,968,663	
	Total	(\$16,992,846)	\$300,763,064	\$281,102,915	\$53,161,690	\$7,448,839	(\$3,288,902)
Physical	Profit	(\$25,069,434)	\$217,693,500	\$65,085,246	(\$16,904,899)	(\$11,239,145)	\$73,211,658
	Excess	(\$83,332,665)	(\$104,947,376)	\$14,485,066	\$5,072,985	\$10,533,444	
	Total	(\$108,402,099)	\$112,746,125	\$79,570,312	(\$11,831,914)	(\$705,701)	\$73,211,658
Physical ARR	Profit	\$132,630,382	\$594,766,545	\$444,764,762	\$250,258,035	\$50,945,701	\$46,384,539
	Excess	(\$128,497,763)	(\$316,929,138)	\$80,692,482	\$25,484,394	\$44,883,161	
	Total	\$4,132,619	\$277,837,407	\$525,457,245	\$275,742,429	\$95,828,862	\$46,384,539
Total	(\$121,262,326)	\$691,346,596	\$886,130,472	\$317,072,206	\$102,572,000	\$116,307,295	

* Four months of the 2017/2018 planning period

Revenue

The total net of all buy and sell offers in the Annual FTR Auction, not including self scheduled FTRs, was \$606.8 million for the 2016/2017 planning period and \$393.5 million for the 2017/2018 planning period, a 35.2 percent reduction in revenue. The total buy bids were 393,509.0 MW for the 2016/2017 planning period and 488,734.1 MW for the 2017/2018 planning period. The value of FTRs per MW decreased from \$1,564.83 for the 2016/2017 planning period to \$831.72 for the 2017/2018 planning period, a 46.8 percent decrease. The expected return to load from the redefinition of balancing congestion did not occur. Load receives lower ARR revenues in addition to the fact that load has to bear 100 percent of the costs of balancing congestion.

Table 13-21 provides a comparison of FTR auction net revenue raised by PJM in Long Term FTR Auctions versus the Annual FTR Auction for the 2014/2015 through 2017/2018 planning periods. Despite the fact that the volume of FTRs traded in Long Term FTR Auctions is similar to the volume in Annual FTR Auctions, for these planning periods, average buy bid Long Term FTR Auction revenue was only 3.0 percent of the buy bid Annual FTR Auction revenue. In properly functioning market, the Long Term FTR Auction revenue should be comparable to the Annual FTR Auction revenue, especially since the long term FTR volume is close to annual FTR volume.

Table 13-21 FTR Auction net revenue: Long Term FTR Auction compared to Annual FTR Auction

Planning Period	Long Term FTR Product			Total Long Term	Annual (including self scheduled)	Long Term Percent of Total Net Revenue
	Year 3	Year 2	Year 1			
2014/2015	\$13,016,512	\$7,176,209	\$6,863,135	\$27,055,856	\$735,998,448	3.5%
2015/2016	\$12,479,874	\$7,378,550	\$5,156,206	\$25,014,630	\$893,043,415	2.7%
2016/2017	\$7,624,149	\$2,105,984	\$11,087,250	\$20,817,382	\$861,031,182	2.4%
2017/2018	\$1,670,521	\$7,210,445	\$9,763,312	\$18,644,279	\$513,587,222	3.5%

FTRs sold in Long Term FTR Auctions are sold at a substantial discount to the same FTR sold in an Annual FTR Auction. Table 13-22 shows the increase in total auction revenue that would have resulted for the 2014/2015 through 2017/2018 planning periods if long term FTRs were sold at annual auction clearing prices. This \$337 million represents a loss in revenue which should go to ARR holders. This also raises questions, together with the high degree of concentration in the three year FTR product, about whether PJM should continue to sell Long Term FTRs.

Table 13-22 Estimated additional Long Term FTR Auction revenue at Annual FTR Auction prices

Planning Period	Long Term FTR Product				Total Difference
	Year 3	Year 2	Year 1	Three-year	
2014/2015	\$59,598,642	\$30,284,173	\$52,030,909	\$926,989	\$142,840,713
2015/2016	\$67,896,588	\$40,975,278	\$9,936,078	\$303,082	\$119,111,026
2016/2017	\$42,378,048	\$3,854,373	\$11,055,824	\$1,079,901	\$58,368,147
2017/2018	\$6,134,076	(\$1,841,715)	\$12,396,817	\$227,524	\$16,916,702
Total	\$176,007,354	\$73,272,109	\$85,419,628	\$2,537,496	\$337,236,587

Monthly Balance of Planning Period FTR Auction Revenue

Table 13-23 shows Monthly Balance of Planning Period FTR Auction revenue by trade type, type and class type for January through September 2017. The Monthly Balance of Planning Period FTR Auctions for the first four months of the 2017/2018 planning period netted \$16.2 million in revenue, the difference between buyers paying \$76.3 million and sellers receiving \$60.1. For the entire 2016/2017 planning period, the Monthly Balance of Planning Period FTR Auctions netted \$32.5 million in revenue with buyers paying \$158.3 million and sellers receiving \$125.7 million.

Table 13-23 Monthly Balance of Planning Period FTR Auction revenue: 2017

Monthly Auction	Type	Trade Type	Class Type			
			24-Hour	On Peak	Off Peak	All
Jan-17	Obligations	Buy bids	\$2,064,395	\$3,326,398	\$1,880,556	\$7,271,349
		Sell offers	(\$1,166,330)	\$2,100,570	\$568,999	\$1,503,239
	Options	Buy bids	\$0	\$436,831	\$124,595	\$561,427
		Sell offers	\$14,107	\$2,241,105	\$1,851,251	\$4,106,463
Feb-17	Obligations	Buy bids	\$19,605	\$2,333,806	\$1,386,196	\$3,739,608
		Sell offers	(\$73,596)	(\$379,460)	(\$408,832)	(\$861,888)
	Options	Buy bids	\$0	\$112,477	\$48,121	\$160,598
		Sell offers	\$10,443	\$1,587,969	\$1,091,908	\$2,690,320
Mar-17	Obligations	Buy bids	(\$931,344)	\$4,194,358	\$2,656,930	\$5,919,943
		Sell offers	(\$28,037)	\$3,554,009	\$632,253	\$4,158,225
	Options	Buy bids	\$0	\$281,337	\$130,792	\$412,129
		Sell offers	\$5,795	\$1,219,568	\$675,806	\$1,901,170
Apr-17	Obligations	Buy bids	\$56,196	\$2,794,792	\$1,942,194	\$4,793,183
		Sell offers	(\$424,330)	\$1,893,838	\$1,219,145	\$2,688,653
	Options	Buy bids	\$1	\$170,667	\$70,317	\$240,985
		Sell offers	\$5,510	\$837,677	\$642,171	\$1,485,359
May-17	Obligations	Buy bids	(\$148,725)	\$1,298,130	\$954,626	\$2,104,031
		Sell offers	(\$18,257)	\$596,555	\$356,062	\$934,361
	Options	Buy bids	\$0	\$10,894	\$10,626	\$21,520
		Sell offers	\$1,172	\$470,594	\$320,693	\$792,459
Jun-17	Obligations	Buy bids	\$1,449,554	\$12,156,206	\$5,881,196	\$19,486,956
		Sell offers	\$263,150	\$6,840,938	\$3,132,765	\$10,236,854
	Options	Buy bids	\$189	\$308,906	\$167,990	\$477,085
		Sell offers	\$20,477	\$3,257,891	\$1,572,561	\$4,850,929
Jul-17	Obligations	Buy bids	\$2,661,155	\$11,806,212	\$7,534,773	\$22,002,140
		Sell offers	\$264,884	\$8,580,489	\$6,077,539	\$14,922,913
	Options	Buy bids	\$14	\$267,280	\$179,853	\$447,146
		Sell offers	\$17,257	\$2,116,842	\$1,188,629	\$3,322,728
Aug-17	Obligations	Buy bids	\$2,899,252	\$11,362,501	\$5,698,898	\$19,960,651
		Sell offers	\$92,888	\$8,936,893	\$4,916,782	\$13,946,563
	Options	Buy bids	\$0	\$569,359	\$268,821	\$838,180
		Sell offers	\$6,894	\$2,058,782	\$964,953	\$3,030,629
Sep-17	Obligations	Buy bids	\$5,672,712	\$4,859,316	\$1,891,283	\$12,423,312
		Sell offers	\$113,479	\$4,342,957	\$2,203,121	\$6,659,556
	Options	Buy bids	\$0	\$430,151	\$265,489	\$695,640
		Sell offers	\$7,008	\$1,992,795	\$1,134,426	\$3,134,229
2016/2017*	Obligations	Buy bids	\$33,300,850	\$74,471,786	\$35,210,649	\$142,983,284
		Sell offers	\$1,054,010	\$54,037,503	\$22,053,221	\$77,144,734
	Options	Buy bids	\$370,193	\$9,383,661	\$5,521,874	\$15,275,728
		Sell offers	\$587,564	\$29,503,924	\$18,494,976	\$48,586,464
	Net Total		\$32,029,469	\$314,020	\$184,325	\$32,527,815
2017/2018**	Obligations	Buy bids	\$12,682,674	\$40,184,235	\$21,006,151	\$73,873,060
		Sell offers	\$734,401	\$28,701,277	\$16,330,208	\$45,765,886
	Options	Buy bids	\$203	\$1,575,696	\$882,152	\$2,458,050
		Sell offers	\$51,636	\$9,426,311	\$4,860,568	\$14,338,515
	Net Total		\$11,896,840	\$3,632,343	\$697,527	\$16,226,709

* Shows Twelve Months; ** Shows Four 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 first four months of the 2017/2018 planning period. Figure 13-6 shows the 10 largest positive and negative FTR target allocations, summed by sink, for the first four months of the 2017/2018 planning period. The top 10 sinks that produced financial benefit accounted for 33.5 percent of total positive target allocations during the 2017/2018 planning period with the Northern Illinois Hub accounting for 10.3 percent of all positive target allocations. The top 10 sinks that created liability accounted for 19.8 percent of total negative target allocations with the PECO Zone accounting for 6.1 percent of all negative target allocations.

Figure 13-6 Ten largest positive and negative FTR target allocations summed by sink: 2017/2018 planning period

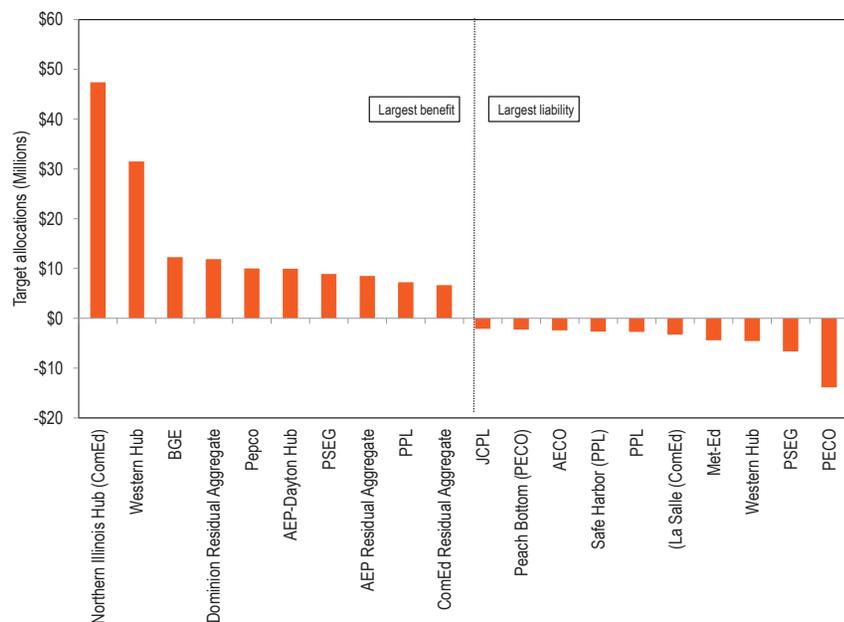
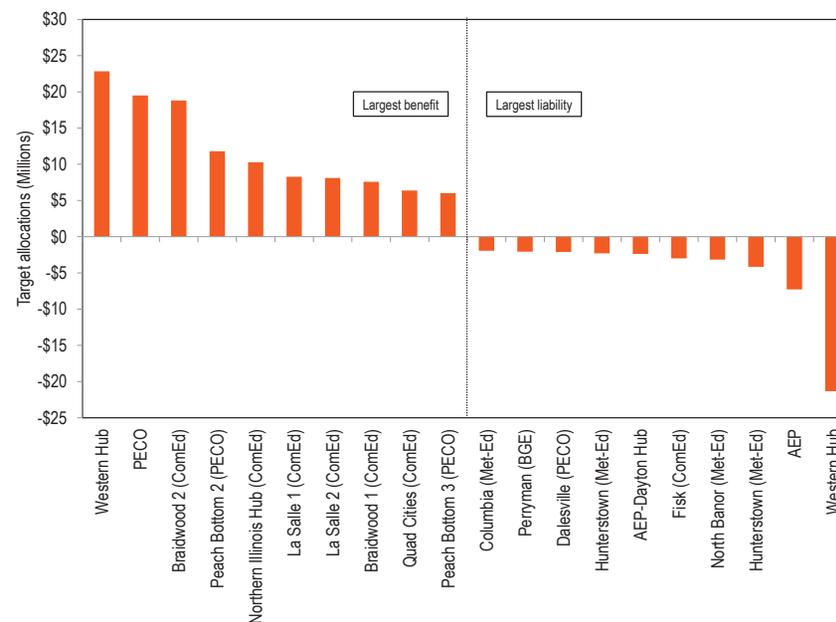


Figure 13-7 shows the 10 largest positive and negative FTR target allocations, summed by source, for the first four months of the 2017/2018 planning period. The top 10 sources with a positive target allocation accounted for 25.9 percent of total positive target allocations with Western Hub accounting for 5.0 percent of total positive target allocations. The top 10 sources with a negative target allocation accounted for 21.9 percent of all negative target allocations, with the Western Hub accounting for 9.4 percent.

Figure 13-7 Ten largest positive and negative FTR target allocations summed by source: 2017/2018 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. 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, is assigned 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.³⁰ That is the source of the congestion revenue to pay holders of ARRs and FTRs. If PJM allocated FTRs equal to the transmission capability into constrained areas, FTR payouts would equal the sum of congestion.

Revenue adequacy must be distinguished from the adequacy of ARRs/FTRs as an offset against total congestion. Revenue adequacy is a narrower concept that compares total congestion revenues, including day-ahead and balancing congestion, to the total target allocations, based only on day-ahead congestion, 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 ARRs/FTRs as an offset for load against congestion compares ARR and self scheduled FTR revenues to total congestion on the system.

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 2013/2014 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

2014/2015 planning period, which was 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.³¹ FTR revenues also include ARR excess revenues, which equal the difference between ARR target allocations and FTR auction revenues, and negative FTR target allocations, which are a source of revenue 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 13-24 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.³²

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 nonmonitoring RTO's real-time market flow is greater than their FFE plus the approved MW adjustment from day-ahead coordination, then the nonmonitoring RTO will pay the monitoring RTO based on the difference between their market flow and their FFE. If the nonmonitoring 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 nonmonitoring RTO for congestion relief provided by the

³⁰ 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."

³¹ When hourly congestion revenues are negative, it is defined as a net negative congestion hour.

³² See "Joint Operating Agreement between the Midwest Independent System Operator, Inc. and PJM Interconnection, LLC." (December 11, 2008), Section 6.1 <<http://pjm.com/media/documents/merged-tariffs/miso-joa.pdf>>. (Accessed February 23, 2016)

non-monitoring RTO based on the difference between the nonmonitoring RTO's market flow and their FFE.

For the 2014/2015, 2015/2016 and the 2016/2017 planning periods, PJM paid MISO and NYISO a combined \$33.2 million, \$41.5 million and \$43.5 million for redispatch on the designated M2M flowgates. 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 2014/2015 and 2015/2016 planning periods. Congestion revenues are allocated to FTR Holders based on FTR target allocations. PJM collected \$1,457.1 million, \$1,003.3 million and \$828.7 million of FTR revenues during the 2014/2015, 2015/2016 and the 2016/2017 planning periods. 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 2015/2016 planning period, the top sink and top source with the highest positive FTR target allocations were the Northern Illinois Hub and Byron. The top sink and top source with the largest negative FTR target allocation was PSEG and the Western Hub.

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 2014/2015 planning period, Stage 1B and Stage 2 ARR allocations were reduced by 84.9 percent and 88.1 percent from the 2013/2014 planning period. For the 2015/2016 planning period, Stage 1B and Stage 2 ARR allocations were reduced by 76.9 percent and 82.0 percent from the 2013/2014 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.

Table 13-24 presents the PJM FTR revenue detail for the 2016/2017 planning period and the 2017/2018 planning period.

Table 13-24 Total annual PJM FTR revenue detail (Dollars (Millions)): Planning periods 2016/2017 and 2017/2018

Accounting Element	2016/2017	2017/2018*
ARR information		
ARR target allocations	\$934.3	\$190.7
FTR auction revenue	\$962.2	\$193.4
ARR excess	\$27.9	\$2.7
FTR targets		
Positive target allocations	\$929.1	\$308.4
Negative target allocations	(\$194.1)	(\$74.0)
FTR target allocations	\$735.0	\$234.5
Adjustments:		
Adjustments to FTR target allocations	(\$0.4)	\$0.0
Total FTR targets	\$734.6	\$234.5
FTR revenues		
ARR excess	\$27.9	\$2.7
Congestion		
Net Negative Congestion (enter as negative)	(\$16.9)	\$0.0
Hourly congestion revenue	\$843.6	\$250.3
Midwest ISO M2M (credit to PJM minus credit to Midwest ISO)	(\$43.5)	(\$6.5)
Adjustments:		
Excess revenues carried forward into future months	\$20.4	\$0.0
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	\$20.4	\$0.0
Net Negative Congestion charged to DA Operating Reserves	\$0.0	\$0.0
Total FTR congestion credits	\$831.4	\$252.8
Total congestion credits on bill (includes CEPSW and end-of-year distribution)	\$831.4	\$252.8
Remaining deficiency	(\$76.4)	(\$18.4)

* Four months of 2017/2018 planning period

FTR target allocations are based on hourly prices in the Day-Ahead Energy Market for FTR paths and are defined to be the revenue required to compensate FTR Holders for day-ahead congestion on those paths. FTR credits are paid to FTR holders and, depending on market conditions, can be less than the target

allocations. Table 13-25 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 13-25 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. September 2016 and October 2016 had revenue shortfalls totaling \$2.6 million and \$6.1 million, but were fully funded using excess revenue from previous months.

Table 13-25 Monthly FTR accounting summary (Dollars (Millions)): Planning period 2016/2017 and 2017/2018

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-16	\$60.5	\$55.1	100.0%	\$60.5	100.0%	(\$5.4)
Jul-16	\$112.1	\$87.1	100.0%	\$112.1	100.0%	(\$24.9)
Aug-16	\$110.9	\$82.2	100.0%	\$110.9	100.0%	(\$28.7)
Sep-16	\$117.7	\$120.4	97.7%	\$120.4	100.0%	\$2.6
Oct-16	\$104.9	\$110.9	94.5%	\$110.9	100.0%	\$6.1
Nov-16	\$45.7	\$38.2	100.0%	\$45.7	100.0%	(\$7.4)
Dec-16	\$52.9	\$42.3	100.0%	\$52.9	100.0%	(\$10.7)
Jan-17	\$61.1	\$44.0	100.0%	\$61.1	100.0%	(\$17.1)
Feb-17	\$47.5	\$51.8	91.7%	\$51.8	100.0%	\$4.4
Mar-17	\$44.4	\$48.9	90.8%	\$48.9	100.0%	\$4.6
Apr-17	\$28.0	\$25.3	100.0%	\$28.0	100.0%	(\$2.6)
May-17	\$25.6	\$28.4	90.3%	\$28.4	100.0%	\$2.7
Summary for Planning Period 2016/2017						
Total	\$811.3	\$734.5		\$831.5		(\$76.4)
Jun-17	\$64.8	\$60.1	100.0%	\$64.8	100.0%	(\$4.7)
Jul-17	\$51.8	\$45.4	100.0%	\$51.8	100.0%	(\$6.3)
Aug-17	\$35.7	\$31.8	100.0%	\$35.7	100.0%	\$3.9
Sep-17	\$100.5	\$97.0	100.0%	\$100.5	100.0%	\$3.5
Summary for Planning Period 2017/2018						
Total	\$252.8	\$234.5		\$252.8		(\$3.7)

Figure 13-8 shows the original PJM reported FTR payout ratio by month, excluding excess revenue distribution, for January 2004 through June 2017. 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 13-8 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 13-8 FTR payout ratio by month, excluding and including excess revenue distribution: January 1, 2004 through September 30, 2017

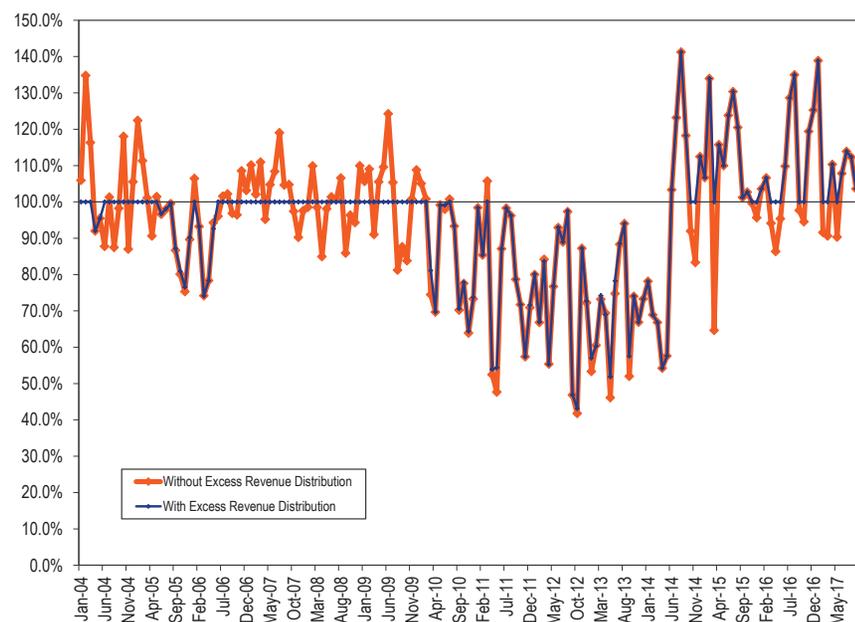


Table 13-26 shows the FTR payout ratio by planning period from the 2003/2004 planning period forward. Planning period 2013/2014 includes the additional revenue from unallocated congestion charges from Balancing Operating Reserves. For the 2014/2015, 2015/2016 and 2016/2017 planning periods, there was excess congestion revenue to pay target allocations resulting in a payout ratio of 116.2 percent, 106.8 and 113.1 percent for the planning periods. This excess will be distributed to all FTR participants, pro rata, based on their net positive target allocations.

Table 13-26 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%
2016/2017	100.0%
2017/2018	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 13-27 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 10 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 13-27 End of planning period FTR uplift charge example

Participant	Net Target Allocation	Total		Uplift Charge	Net Payout	Payout Change	Monthly Payout Ratio	EOPP Payout Ratio
		Monthly Payment	Monthly Deficiency					
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)	\$0.00	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

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. There are several reasons for the disconnect between congestion revenues and ARR/FTR revenues. The reasons include unavoidable modeling differences, avoidable modeling differences, such as outage modeling decisions, cross subsidies among and between FTR participants ARR holders and the construction of the Stage 1A ARR system which is based on historical, rather than physical, pathways.

The issuance of the September 15, 2016, FERC order increases the gap between congestion revenue and ARR/FTR revenue collected. Allocating balancing congestion and M2M payments, along with allocating excess congestion revenue to FTR Holders solely, increases revenue adequacy for FTRs, but reduces payments to load and increases costs to load, undermining the ability of load to offset their congestion costs. Supporting FTR portfolio netting leads to cross subsidies among FTR participants. Restructuring Stage 1A allocations using QRRs for retired resources is an attempt to fix a flawed system, but retains the core problem which is reliance on contract path congestion revenue rights. The accepted rule change does not address the problem with using contract paths, does not address the deficiencies for active units and

gives priority to units based on financial, not physical, determinations. The purpose of the FTR/ARR system is to return congestion revenue to load. The current and newly accepted rules do not meet this goal.

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 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 13-28 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 13-28 Example of FTR payouts from portfolio netting and without portfolio netting

Participant	Positive Target Allocation	Negative Target Allocation	Percent	FTR Netting Net TA	FTR Netting Payout (Current)	No Netting Payout (Proposed)	Percent Change
			Negative Target Allocation				
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	-

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 13-29 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 13–29 Change in positive target allocation payout ratio given portfolio construction

Participant	Congestion = \$4,750 Net TA = \$9,500			Reported Payout Ratio	With Netting			Without Netting		
	Positive Target Allocations	Negative Target Allocations	Net Target Allocations		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 13-31 shows the effects on a participant with and without portfolio netting under three distinct scenarios. Table 13-30 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 significantly 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 13-30 Nodal day-ahead CLMPs

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

Table 13-31 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

FERC Order on FTRs: Portfolio Netting

On September 15, 2016, FERC decided that PJM's current practice of portfolio netting was just and reasonable.³³ FERC did not agree that portfolio netting led to subsidization of portfolios with counterflow positions. The MMU and PJM demonstrated that eliminating portfolio netting would eliminate a cross subsidy among FTR portfolios without changing the amount of total revenue available revenue to pay to portfolios. Table 13-28 and Table 13-29 examples demonstrate that portfolio netting in PJM leads to incorrect payments based on participant FTR portfolios. Including portfolio netting in FTR accounting

³³ See 156 FERC ¶ 61,180 (2016).

treats FTRs differently depending on the composition of a participant's FTR portfolio.

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 13-32 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 13-32 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 13-33 Counter flow FTR payout ratio adjustment impacts: Planning period 2016/2017 and 2017/2018

	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-17	\$155,454,345	(\$111,435,198)	\$44,019,146	\$61,102,571	100.0%	\$172,537,769	100.0%	100.0%	\$172,537,769	\$0
Feb-17	\$164,114,064	(\$112,258,132)	\$51,855,933	\$47,485,194	91.6%	\$159,743,326	100.0%	100.0%	\$161,202,653	\$1,459,327
Mar-17	\$176,027,074	(\$128,158,531)	\$47,868,543	\$44,355,740	92.7%	\$172,514,271	100.0%	100.0%	\$173,686,238	\$1,171,967
Apr-17	\$120,235,925	(\$94,891,539)	\$25,344,386	\$27,953,520	100.0%	\$122,845,060	100.0%	100.0%	\$122,845,060	\$0
May-17	\$145,660,505	(\$116,932,244)	\$28,728,260	\$25,612,240	89.2%	\$142,544,484	100.0%	100.0%	\$143,609,312	\$1,064,828
Jun-17	\$166,308,515	(\$106,169,103)	\$60,139,412	\$64,838,041	100.0%	\$171,007,144	100.0%	100.0%	\$171,007,144	\$0
Jul-17	\$162,370,963	(\$116,930,204)	\$45,440,759	\$51,751,599	100.0%	\$168,681,803	100.0%	100.0%	\$168,681,803	\$0
Aug-17	\$111,856,310	(\$80,024,026)	\$31,832,284	\$35,736,334	100.0%	\$115,760,360	100.0%	100.0%	\$115,760,360	\$0
Sep-17	\$320,680,546	(\$223,634,276)	\$97,046,270	\$100,498,783	100.0%	\$324,133,059	100.0%	100.0%	\$324,133,059	\$0
Total 2016/2017	\$2,359,360,349	(\$1,624,936,255)	\$734,424,094	\$819,886,355	100.0%	\$2,444,822,610	100.0%	100.0%	\$2,351,900,338	\$3,770,798
Total 2017/2018	\$761,216,334	(\$526,757,609)	\$234,458,725	\$252,824,757	100.0%	\$779,582,366	100.0%	100.0%	\$761,216,334	\$0

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

Table 13-33 shows the monthly positive, negative and total target allocations.³⁴ Table 13-33 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 2013/2014 planning period. If this change were implemented after excess planning period revenue was distributed, it would not result in additional revenue for the 2014/2015, 2015/2016, 2016/2017 or 2017/2018 planning periods. 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 as a slight difference in the total revenue and adjusted counter flow total revenue columns for February and March 2017 that were not revenue adequate. The result of this would be \$4.3 million in additional revenue generated for the 2015/2016 planning period and an increase of \$3.8 million for the 2016/2017 planning period.

³⁴ Reported payout ratio may differ between Table 13-23 and Table 13-28 due to rounding differences when netting target allocations and considering each FTR individually.

The result of removing portfolio netting and applying a payout ratio to counter flow FTRs would increase the calculated payout ratio for the 2013/2014 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.

Figure 13-9 shows the FTR surplus, collected day-ahead, balancing and total congestion payments from January 2005 through September 2017. May 2016 had positive total balancing congestion of \$7.5 million. March 2015 had balancing congestion of -\$70.0 million.

Figure 13-9 FTR surplus and the collected day-ahead, balancing and total congestion: January 1, 2005 through September 30, 2017

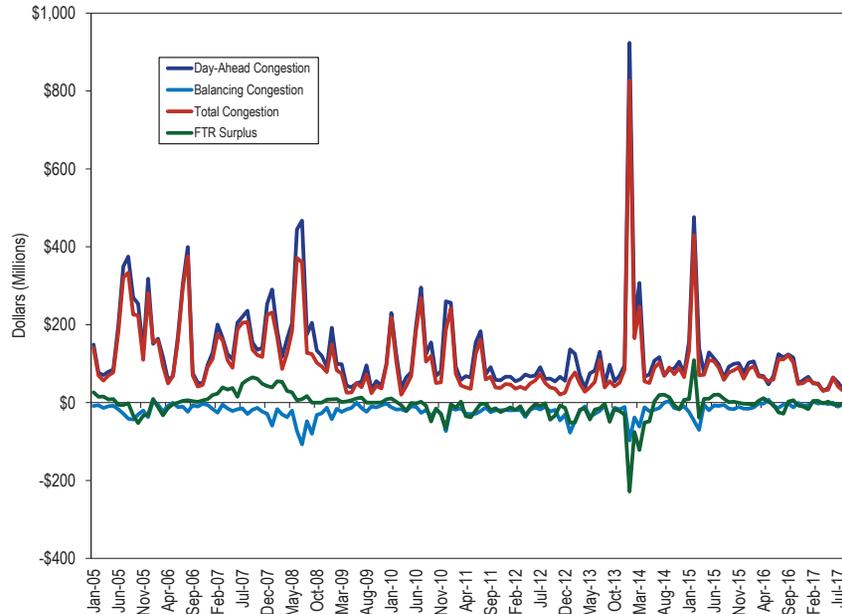
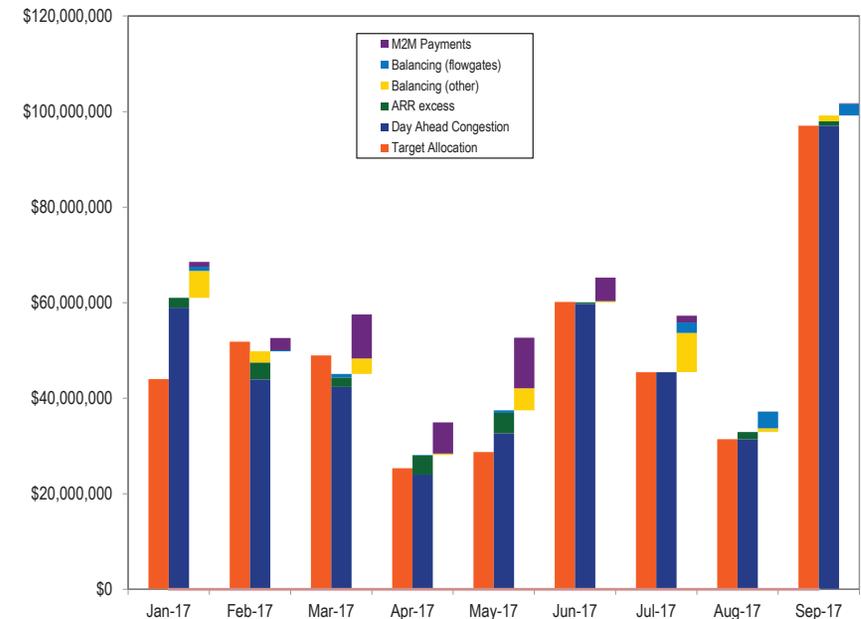


Figure 13-10 shows the relationship among monthly target allocations, balancing congestion, M2M payments and day-ahead congestion. The left column is the target allocations for all FTRs for the month. The total height of the middle and right most columns are day-ahead congestion revenues. The

middle column is all the positive revenue collected. The right most column is negative revenue. When the total height of the solid segments in the middle column exceeds the height of the left column, the month is revenue adequate. If the right most column is higher than the target allocation, but the middle column is not, negative revenue resulted in revenue inadequacy for that month. For example, February 2017 was revenue adequate by \$4.4 million. March was revenue inadequate by \$4.6 million, but there was enough excess revenue in other months in the planning period to fully fund both months.

Figure 13-10 FTR target allocation compared to sources of positive and negative congestion revenue



ARRs as an Offset to Congestion for Load

Load pays for the transmission system and contributes congestion revenues. FTRs and later ARR 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.

FERC Order on FTRs: Balancing Congestion and M2M Payment Allocation

On September 15, 2016, FERC issued an order removing balancing congestion and market to market (M2M) payments from the FTR funding equation and assigned them, on a load ratio basis, to load and exports.³⁵ The MMU has petitioned the U.S. Court of Appeals for the District of Columbia Circuit to reverse the order and restore the longstanding approach to calculating congestion revenues.³⁶ The case has been consolidated with appeals filed by others and is now pending. The Market Monitor and joint petitioners filed an initial brief on July 11, 2017, and a reply brief on October 25, 2017.³⁷

The new rule for calculating congestion revenues went into effect on June 1, 2017, for the 2017/2018 planning period.

In its compliance filing PJM redefined balancing congestion as balancing congestion plus market to market (M2M) payments between MISO and NYISO. Under the order, load and exports will pay balancing congestion and M2M payments proportionally. On average from the 2011/2012 planning period on, load comprises 94.8 percent of all demand. From the 2011/2012 planning period onward, total balancing congestion and M2M payments were \$1,537.8 million, so load would have been responsible for an additional \$1,034.2 million in charges to subsidize FTR Holders.

In addition, FERC ordered that all excess congestion revenue, which includes day-ahead congestion in excess of FTR target allocations and excess FTR auction revenue, belongs to FTR Holders. PJM initially proposed returning

excess day-ahead congestion and excess FTR auction revenue to ARR holders, but that proposal was rejected by FERC. Under this new rule, from the 2011/2012 onward FTR Holders would have received an additional \$944.4 million over their target allocations.

The MMU continues to propose that excess FTR auction revenue should be allocated to ARR holders and all congestion rents, including balancing congestion, should be allocated to FTRs.

The reallocation of balancing congestion and M2M payments from FTR Holders to load, and the allocation of excess auction revenues to FTR Holders subsidizes FTR Holders at the expense of ARR holders. It is inconsistent with the logic that FTRs are a day-ahead only product because excess auction revenues are not day-ahead revenues.

Table 13-34 shows the congestion offset available to load with and without allocating balancing congestion to load. Table 13-34 also shows the congestion offset available to load under the new balancing congestion allocation rules, the change in the congestion offset available to load and the overpayment to FTRs under the new rules. The new congestion offset is calculated as the ARR credits and the FTR credits excluding balancing congestion and M2M payments, divided by the total congestion and the load share of balancing and M2M payments. The proposed new revenue is the sum of the ARR credits, adjusted FTR credits and the load share of balancing congestion and M2M payments. The FTR over payment is the excess day-ahead congestion revenue and excess auction revenue FTR Holders received over their FTR target allocations.

If these rules had been in place beginning with the 2011/2012 planning period, ARR holders would have received \$1,034.2 million less in congestion offsets from the 2011/2012 through the 2016/2017 planning period. The total overpayment to FTR Holders for the 2011/2012 through 2016/2017 planning period would have been \$944.4 million. The actual underpayment to load in the first four months of the 2017/2018 planning period was \$21.4 million with an \$18.5 million overpayment to FTR Holders. The underpayment to load and

³⁵ See 156 FERC ¶ 61,180 (2016), *reh'g denied*, 156 FERC ¶ 61,093 (2017).

³⁶ U.S. Court of Appeals for the District of Columbia Circuit. *NJBPU v. FERC*, Case No. 17-1106 (March 31, 2017).

³⁷ Joint Opening Brief of Petitioners, Case Nos. 17-1106 et al. (D.C. Cir July 11, 2017); Joint Reply Brief of Petitioners (October 25, 2017).

the overpayment to FTR Holders is a result of several factors in the new rules all of which mean the transfer of revenues to FTR Holders and the shifting of costs to load. Load is now required to pay for balancing congestion, which significantly increases costs to load and significantly increases revenues paid to FTR Holders. PJM will continue to clear counter flow FTRs using excess auction revenues in order to make it possible to sell more prevailing flow FTRs. FTR Holders will receive excess day-ahead congestion revenues in excess of target allocations. FTR Holders will receive excess auction revenue, which is what FTR Holders were willing to pay for FTRs in excess of what is provided to ARR holders.

Table 13–34 ARR and FTR total congestion offset (in millions) for ARR holders under PJM's proposed FTR funding: Planning periods 2011/2012 through 2017/2018

Planning Period	Old					New				
	ARR Credits	FTR Credits	Total Congestion	Total ARR/FTR Offset	Percent Offset	New Offset	Old Revenue Received	New Revenue Received	ARR Holder Change	FTR Over Payment
2011/2012	\$512.2	\$249.8	\$770.6	\$762.0	98.9%	83.3%	\$762.0	\$598.6	(\$163.4)	\$113.9
2012/2013	\$349.5	\$181.9	\$575.8	\$531.4	92.3%	68.0%	\$531.4	\$275.9	(\$255.5)	\$62.1
2013/2014	\$337.7	\$456.4	\$1,777.1	\$794.0	44.7%	43.2%	\$794.0	\$574.1	(\$219.9)	\$0.0
2014/2015	\$482.4	\$404.4	\$1,390.9	\$886.8	63.8%	57.2%	\$886.8	\$686.6	(\$200.2)	\$400.6
2015/2016	\$635.3	\$223.4	\$992.6	\$858.8	86.5%	78.2%	\$858.8	\$744.8	(\$113.9)	\$188.9
2016/2017	\$640.0	\$169.1	\$824.6	\$809.1	98.1%	89.5%	\$809.1	\$727.7	(\$81.4)	\$179.0
2017/2018*	\$190.7	\$39.7	\$234.3	\$230.4	98.4%	79.7%	\$230.4	\$209.0	(\$21.4)	\$18.5
Total	\$3,147.8	\$1,724.6	\$6,565.8	\$4,872.5	74.2%	64.8%	\$4,872.5	\$3,816.8	(\$1,055.7)	\$962.9

* Four months of 2017/2018 planning period

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. The current allocation of congestion revenue resulted in a total of \$1,714.8 million in unreturned congestion revenue to ARR holders, and a 73.9 percent congestion offset, over the last seven planning periods.

Credit Issues

There were two collateral defaults in the first nine months of 2017 for a total of \$318,746. Both defaults were cured reasonably promptly.

FTR Forfeitures

FERC Order on FTR Forfeitures

On January 19, 2017, FERC determined that the application of the current FTR forfeiture rule to INCs, DECs and UTCs was unjust and unreasonable.³⁸ In their determination, FERC ordered that a method should be developed to consider the net impact of a participant's entire portfolio of virtual bids on a constraint related to an FTR position. The new rule will be more transparent and will depend on an individual participant's net impact on a constraint. FERC also explicitly ordered counter flow FTRs to be considered for FTR forfeiture.

In response to this, PJM determined that no FTR forfeitures will be billed to participants after January 19, 2017, under the prior rules. Instead, participants will be retroactively billed their FTR forfeiture amounts based on the new FTR forfeiture rule once it is in place.

Until January 19, 2017, 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.

After January 19, 2017, participants will be subject to the new FTR forfeiture rule. PJM began retroactively billing forfeitures back to January 19, 2017,

³⁸ See 158 FERC ¶ 61,038 (2017).

and billing for the prompt month FTR forfeitures, starting with the September bill. PJM will continue billing one retroactive month concurrently with the prompt month until all retroactive months are billed. This rule considers the impact of a participant's net virtual transaction portfolio on all constraints. If a participant's net virtual portfolio impacts a constraint by the greater of 0.1 MW or 10 percent or more of the line limit, and that constraint affects an individual FTR's target allocation by \$0.01, the FTR is subject to FTR forfeiture if the net virtual portfolio increased the value of the FTR. FTR forfeitures do not result from net virtual portfolios that decrease the value of their affiliates' FTRs. The forfeiture amount calculation is the hourly profit of the FTR and an FTR cannot forfeit more than once per hour.