Smoothing the RPM Supply Curve

MIC

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Current Method (IMM)

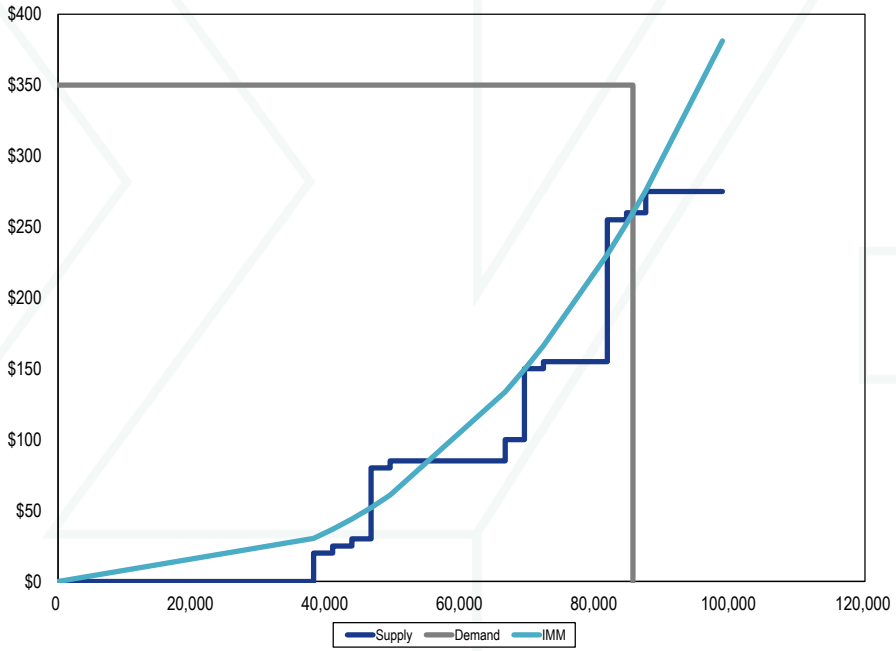
- **The current smoothing method uses the better fit between two functional forms:**

$$y = Ax^B \qquad y = Ae^{Bx}$$

- **Each function is constrained only by forcing the curve through a point of intersection with the demand curve equal to the clearing price.**

Current Method: Example

- **Note: Data is for example purposes and is not actual auction supply.**



Alternative Proposed by Exelon: Polynomial Form

- **One proposed alternative is to use a polynomial equation of the form:**

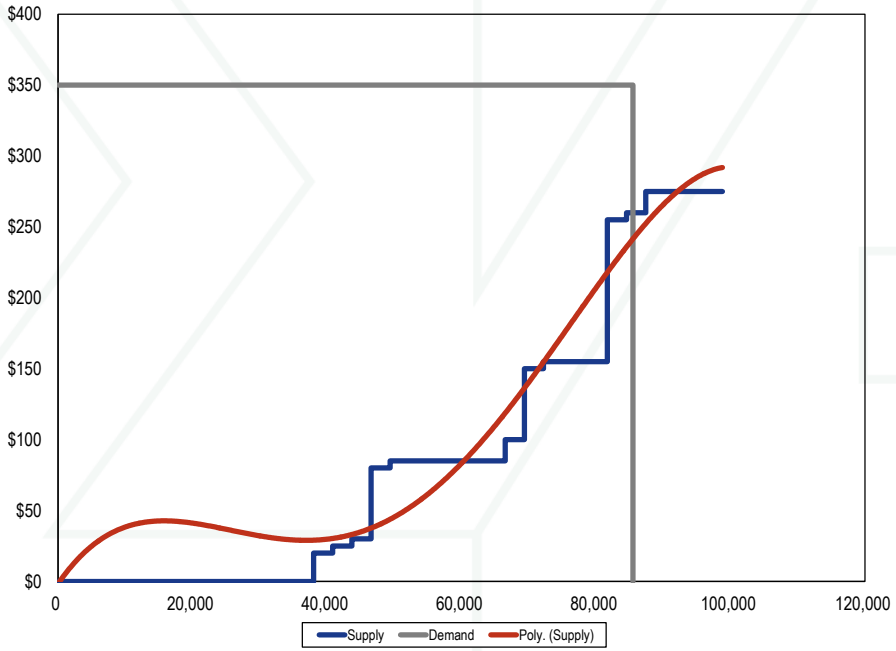
$$y = a_0 + a_1x + a_2x^2 + a_3x^3 + a_4x^4 + \cdots$$

- **Unless the equation is subject to constraints, it is possible that the best fit line may not intersect the point at which supply equals demand.**

- **Unless the equation is subject to constraints, the best fit polynomial line may be decreasing at points, which is not desirable.**

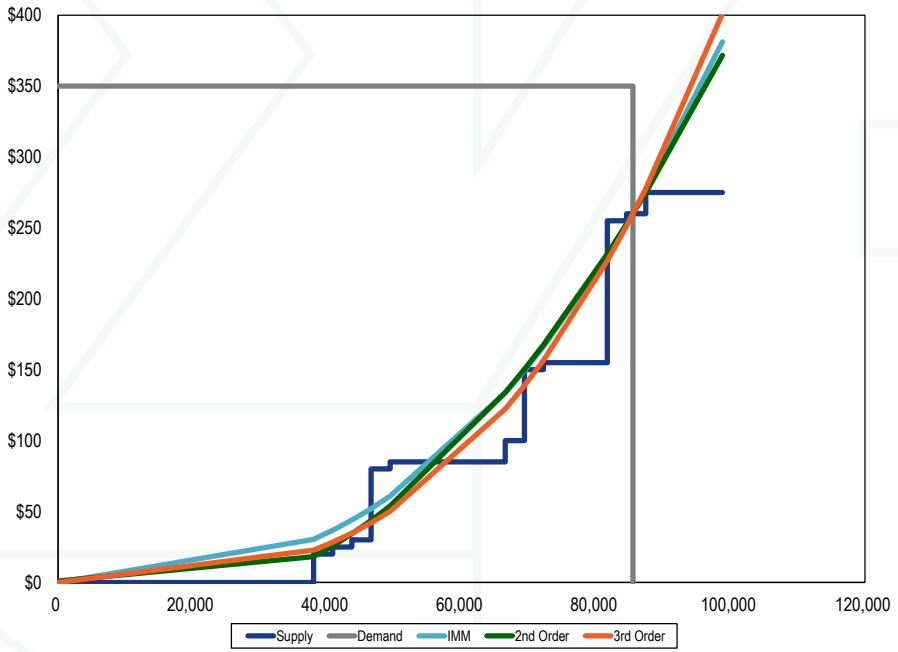
Polynomial Method: Example

- **Example of a supply curve and the best-fit 4th order polynomial equation, with no constraints:**



Polynomial Method: Example

- **Polynomial equations, with constraints:**
  - **Must intersect the point at which supply equals demand**
  - **Must be a non-decreasing function**
- **For comparison, the current method (IMM) is also shown**



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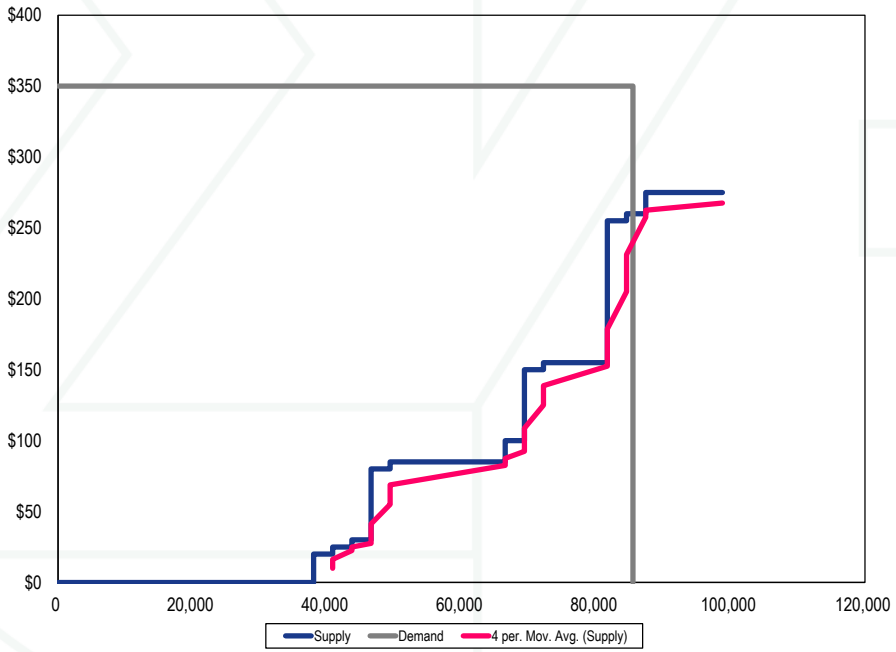
Alternative Proposed by Exelon: Moving Average

- **A moving average is unlikely to pass through the point at which supply equals demand because supply is an increasing function.**



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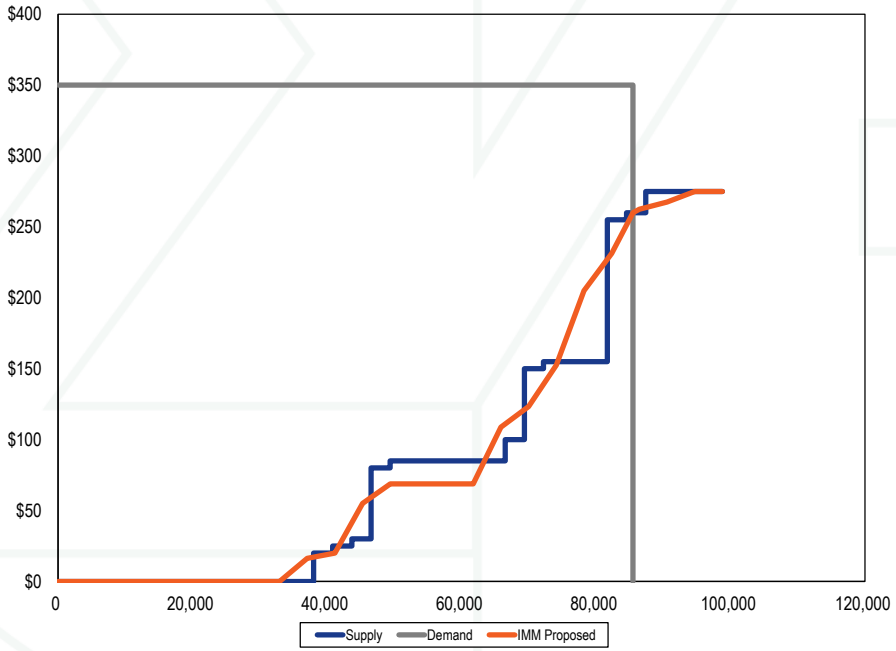
IMM Proposed Alternative

- **Divide the supply curve into distinct segments of equal MW;**
- **Plot the average price within each segment;**
- **Force the adjusted line through the clearing point.**



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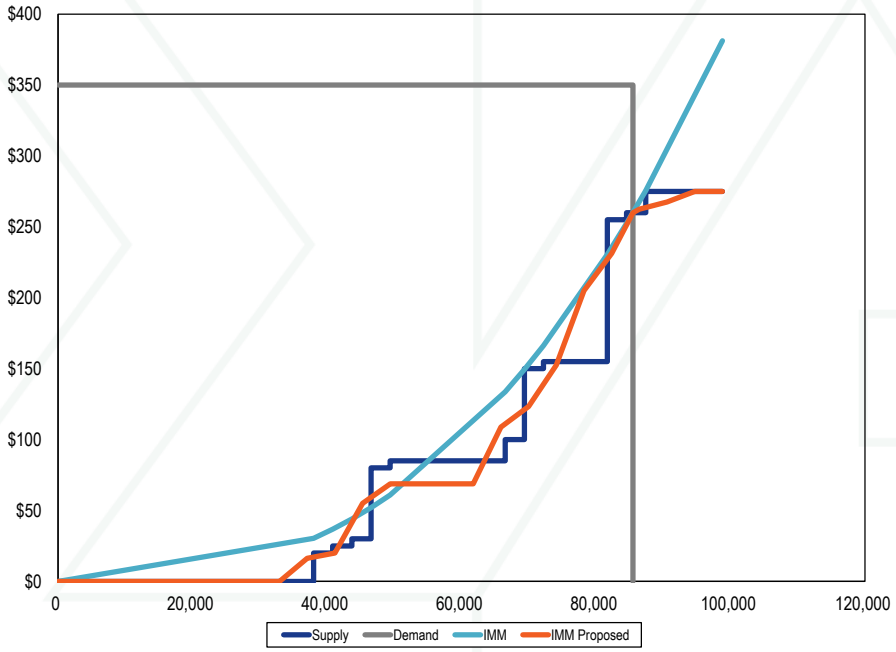
Comparison of Current Method to the IMM Proposed Alternative Method



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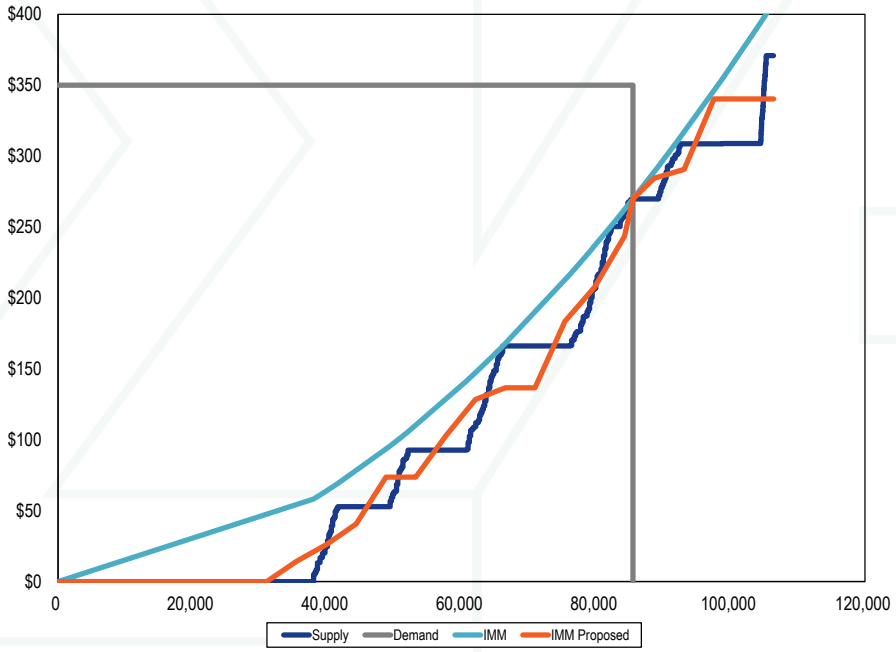
Comparison of Current Method to the IMM Proposed Alternative Method

- **Note that as the magnitude of jumps in supply decreases, the IMM proposed alternative will more closely track the true offer curve.**



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Conclusion

- **Competitors cannot see the supply curve in a competitive market.**
- **There have been no good reasons advanced to provide substantially more detailed supply curve data.**
- **There is a tradeoff between providing more detailed supply curve data and the probability of decreasing competition.**
- **It is appropriate to err on the conservative side when providing supply curve data.**
- **Both the current method and the IMM proposed alternative are appropriately conservative for RTO.**
- **Current method should be retained for smaller LDAs. (No curve for less than four suppliers.)**

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