ARR/FTR Market Design and Design Components: IMM Proposals

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The Purpose of the ARR/FTR Design

- The purpose of the ARR/FTR design is to return congestion to load. (LEI at 15)
 - Congestion is the surplus payment by load that results from differences in LMP in a transmission constrained system.
 - Congestion is the surplus after generation is paid and virtuals are settled.
 - Congestion is paid by load.
 - Load should get congestion back to in order to get market results similar to pre-LMP market (average cost)

Issues with the ARR/FTR Design

- Load cannot claim all the congestion paid (LEI at 56-64)
- LEI observes several causes for this problem ("leakage"):
 - Limited ability for load to participate as the supply side reduces price discovery
 - ARR holders cannot claim all FTR paths
 - Misalignment of rights relative to network use
 - Cross subsidies among and between ARRs and FTRs

Issues with the ARR/FTR Design

- ARR rights assigned on a historic generation to load path basis do not align with actual network use.
 - Realized and available offset varies widely among customers
- Not all congestion paid by load can be claimed by ARR holders.
 - Self scheduling all allocated ARR rights would have returned less than 62 percent of congestion in the last four planning periods (17/18, 18/19, 19/20, 20/21)
- FTRs are available on paths that do not correspond to physical load service and do not collect congestion.
 - Over 50 percent of FTR MW are generator node to generator node

Fundamental Issue: Poorly Defined Property Rights

- Fundamental issue in any market is the definition of the property rights and who owns the rights.
- Efficient price discovery is not possible unless rights are well defined.
- Fundamental problem with the current ARR/FTR market is poorly defined property rights.
- Congestion belongs to load, load should have the ability to claim all congestion paid.
- Need to define congestion revenue rights so that is possible.

IMM Proposal Corrects Issues Raised

- Clearly define property rights: Congestion Revenue Right (CRR)
- Congestion belongs to load that paid it.
- Return 100 percent of congestion to the load that paid it.
 - Congestion is the surplus is caused by differences in LMP in a transmission constrained system
- Load has the right to sell all or any portion of its congestion revenue rights at prices of its choosing.

IMM Proposal Corrects Issues Raised

- Certainty about return of actual congestion paid
- No hold back of system capability to guarantee FTR funding
- No end of year surplus allocation needed
 - No surplus exists if all congestion revenue rights are allocated

Proposed Design of FTR Market

- If all or a portion of the CRR was sold and load moves from one LSE to another LSE:
 - The auction price (revenue from the sale of the CRR) from any CRR sold moves with the load.
 - The congestion revenue rights of any unsold CRR move with the load.

IMM Proposal Achieves Purpose of the ARR/FTR Design

- The purpose of the ARR/FTR design is to return congestion to load.
 - Returns 100 percent of congestion to load as default state
- The CRR design:
 - Dual property right that provides load with a 100 percent perfect offset to congestion by default
 - Clearly defines property rights
 - Provides basic mechanism for actual price discovery in market for offsets

IMM Proposal Reduces Market Risk

- Reduced risk of default relative to current construct
 - No underfunding
 - No cross subsidies
 - No negative rights
 - Congestion is never negative
 - No flipping of the value of rights
 - Default risk is limited to seller and buyer, not market as a whole
 - In the case of a default, actual congestion returns to the load.

IMM Position on Path Based Hedges

- There is a place for path based hedging instruments in an LMP market.
- The PJM market does not require path based hedges funded and subsidized by load.
- These hedges would be self funded, based on the interaction of prevailing and counterflow bids and offers.
- Network based congestion revenue rights can coexist with path based hedges.

ARR and FTR Total Congestion Offset for ARR Holders: 2011/2012 through 2020/2021 (\$M)

					Revenue				Pre 201 (Without B		2017/201 Baland		Post 201 (With Ba and Su	lancing	Effective (Offset
DI .	400		5 41 1	Balancing +		Surplus Revenue	Surplus	Post			Current		New			
Planning		-	-		Total	Pre 2017/2018	Revenue	2017/2018		Percent			Revenue		Cumulative	
Period	Credits	FTR Credits	Congestion	Congestion	Congestion	Rules	2017/2018 Rules	Rules	Offset	Offset	Received	Offset	Received	Offset	Revenue	Offset
2011/2012	\$512.2	\$310.0	\$1,025.4	(\$275.7)	\$749.7	(\$50.6)	\$35.6	\$113.9	\$771.6	102.9%	\$582.1	77.6%	\$660.4	88.1%	\$771.6	102.9%
2012/2013	\$349.5	\$268.4	\$904.7	(\$379.9)	\$524.8	(\$94.0)	\$18.4	\$62.1	\$523.9	99.8%	\$256.4	48.9%	\$300.1	57.2%	\$523.9	99.8%
2013/2014	\$337.7	\$626.6	\$2,231.3	(\$360.6)	\$1,870.6	(\$139.4)	(\$49.0)	(\$49.0)	\$824.8	44.1%	\$554.6	29.7%	\$554.6	29.7%	\$824.8	44.1%
2014/2015	\$482.4	\$348.1	\$1,625.9	(\$268.3)	\$1,357.6	\$36.7	\$111.2	\$400.6	\$867.2	63.9%	\$673.4	49.6%	\$962.8	70.9%	\$867.2	63.9%
2015/2016	\$635.3	\$209.2	\$1,098.7	(\$147.6)	\$951.1	\$9.2	\$42.1	\$188.9	\$853.7	89.8%	\$739.0	77.7%	\$885.9	93.1%	\$853.7	89.8%
2016/2017	\$640.0	\$149.9	\$885.7	(\$104.8)	\$780.8	\$15.1	\$36.5	\$179.0	\$805.0	103.1%	\$721.6	92.4%	\$864.0	110.7%	\$805.0	103.1%
2017/2018	\$427.3	\$212.3	\$1,322.1	(\$129.5)	\$1,192.6	\$52.3	\$80.4	\$370.7	\$692.0	58.0%	\$590.6	49.5%	\$880.9	73.9%	\$590.6	49.5%
2018/2019	\$529.1	\$130.1	\$832.7	(\$152.6)	\$680.0	(\$5.8)	\$16.2	\$112.2	\$653.34	96.1%	\$522.7	76.9%	\$618.8	91.0%	\$618.8	91.0%
2019/2020	\$542.0	\$91.9	\$612.1	(\$169.4)	\$442.7	(\$1.6)	\$21.6	\$157.8	\$632.3	142.8%	\$486.1	109.8%	\$622.2	140.6%	\$622.2	140.6%
2020/2021	\$373.9	\$179.3	\$899.6	(\$256.2)	\$643.4	(\$43.1)	(\$0.0)	(\$0.0)	\$510.14	79.3%	\$297.1	46.2%	\$297.1	46.2%	\$297.1	46.2%
Total	\$4,829.4	\$2,525.8	\$11,438.0	(\$2,244.7)	\$9,193.4	(\$221.2)	\$312.9	\$1,536.1	\$7,134.1	77.6%	\$5,423.6	59.0%	\$6,646.8	72.3%	\$6,774.9	73.7%

Zonal ARR and FTR Total Congestion Offset for ARR Holders: 2020/2021 Planning Period(\$M)

		Adjusted	Balancing+	Surplus		Day Ahead	Balancing		Total	
Zone	ARR Credits	•	M2M Charge		Total Offset	•		M2M Payments		Offset
ACEC	\$4.4	\$0.0	(\$2.7)	(\$0.1)	\$1.7	\$8.2	(\$2.3)	(\$0.5)	\$5.5	31.2%
AEP	\$40.2	\$36.4	(\$38.1)	(\$2.4)	\$38.4	\$149.0	(\$32.2)	(\$5.9)		34.6%
APS	\$32.9	\$14.9	(\$14.8)	(\$1.4)	\$33.0	\$60.0	(\$12.5)	(\$2.3)	\$45.2	73.0%
ATSI	\$20.4	\$0.2	(\$19.5)	(\$0.6)	\$1.1	\$70.1	(\$16.4)	(\$3.0)	\$50.6	2.1%
BGE	\$58.4	\$3.6	(\$9.1)	(\$1.7)	\$52.8	\$34.0	(\$7.7)	(\$1.4)	\$24.8	212.7%
COMED	\$36.4	\$11.5	(\$28.5)	(\$1.2)	\$19.4	\$106.8	(\$24.2)	(\$4.4)	\$78.3	24.7%
DAY	\$5.9	\$0.8	(\$5.3)	(\$0.2)	\$1.5	\$16.3	(\$4.5)	(\$0.8)	\$11.0	13.4%
DUKE	\$24.2	\$4.9	(\$8.4)	(\$0.8)	\$20.8	\$25.8	(\$7.1)	(\$1.2)	\$17.4	119.5%
DUQ	\$5.6	\$0.2	(\$4.0)	(\$0.2)	\$1.8	\$10.4	(\$3.4)	(\$0.9)	\$6.2	29.6%
DOM	\$7.7	\$85.7	(\$37.9)	(\$1.9)	\$55.5	\$121.5	(\$32.9)	(\$0.6)	\$87.9	63.1%
DPL	\$28.6	\$8.1	(\$6.7)	(\$0.9)	\$30.1	\$46.9	(\$5.8)	(\$4.9)	\$36.2	83.2%
EKPC	\$3.0	\$0.0	(\$4.2)	(\$0.1)	(\$1.1)	\$12.6	(\$3.6)	(\$0.6)	\$8.4	(13.0%)
EXT	\$0.5	\$0.0	(\$13.8)	(\$0.0)	(\$13.3)	\$24.8	(\$13.8)	\$0.0	\$11.0	(120.7%)
JCPLC	\$6.0	\$0.0	(\$6.1)	(\$0.2)	(\$0.0)	\$19.0	(\$5.0)	(\$1.1)	\$12.9	(0.2%)
MEC	\$3.5	\$0.7	(\$5.3)	(\$0.1)	(\$1.1)	\$21.7	(\$4.6)	(\$0.7)	\$16.5	(6.9%)
OVEC	\$0.0	\$0.0	(\$0.3)	\$0.0	(\$0.3)	\$1.2	(\$0.3)	\$0.0	\$0.9	(28.8%)
PECO	\$15.0	\$0.2	(\$10.9)	(\$0.4)	\$4.2	\$35.8	(\$9.1)	(\$1.8)	\$24.9	17.0%
PE	\$6.1	\$4.9	(\$6.5)	(\$0.3)	\$4.5	\$22.9	(\$5.7)	(\$0.8)	\$16.4	27.3%
PEPCO	\$25.9	\$3.8	(\$8.3)	(\$0.8)	\$21.4	\$28.8	(\$6.9)	(\$1.3)	\$20.5	104.5%
PPL	\$24.3	\$3.4	(\$11.5)	(\$0.7)	\$16.1	\$42.3	(\$9.6)	(\$1.9)	\$30.8	52.4%
PSEG	\$24.7	\$0.0	(\$13.9)	(\$0.7)	\$10.8	\$38.9	(\$11.9)	(\$2.0)	\$25.0	43.2%
REC	\$0.2	\$0.0	(\$0.6)	(\$0.0)	(\$0.4)	\$2.6	(\$0.5)	(\$0.1)	\$2.1	(17.0%)
Total	\$373.9	\$179.3	(\$256.2)	(\$14.5)	\$297.0	\$899.6	(\$219.9)	_ (\$36.3)	\$643.4	46.2%

ARR Allocation MW Share: 2020/2021

	Stage 1	Α	Stage 1B		Stage	2	Total	
	Out of Zone	In Zone						
AECO	28.7%	35.6%	2.7%	26.1%	1.6%	5.4%	33.0%	67.0%
AEP	7.9%	65.8%	0.9%	23.2%	0.0%	2.2%	8.8%	91.2%
APS	8.6%	51.8%	0.8%	35.8%	0.2%	3.0%	9.5%	90.5%
ATSI	26.3%	58.5%	2.6%	9.9%	1.1%	1.6%	30.1%	69.9%
BGE	23.8%	28.6%	0.0%	27.1%	0.1%	20.4%	23.9%	76.1%
ComEd	0.0%	71.7%	0.0%	14.5%	0.0%	13.8%	0.0%	100.0%
DAY	79.7%	2.4%	5.3%	0.3%	1.5%	10.7%	86.6%	13.4%
DEOK	42.2%	31.0%	0.1%	14.9%	0.1%	11.7%	42.5%	57.5%
DLCO	73.3%	0.3%	6.5%	2.1%	8.3%	9.5%	88.1%	11.9%
Dominion	0.7%	63.8%	0.0%	34.1%	0.0%	1.4%	0.7%	99.3%
DPL	22.9%	52.5%	2.3%	12.2%	3.0%	7.2%	28.2%	71.8%
EKPC	21.0%	46.4%	0.1%	0.0%	32.0%	0.4%	53.2%	46.8%
EXT	69.7%	0.0%	30.1%	0.0%	0.2%	0.0%	100.0%	0.0%
JCPL	0.9%	56.8%	0.1%	0.9%	32.3%	9.0%	33.3%	66.7%
Met-Ed	23.2%	65.7%	0.1%	3.5%	0.4%	7.1%	23.7%	76.3%
PECO	11.1%	44.1%	2.9%	29.6%	2.1%	10.2%	16.1%	83.9%
PENELEC	15.2%	61.8%	0.0%	13.6%	1.1%	8.3%	16.3%	83.7%
Pepco	19.1%	30.2%	0.0%	1.6%	4.2%	44.9%	23.3%	76.7%
PPL	0.0%	77.5%	0.0%	8.9%	0.0%	13.6%	0.1%	99.9%
PSEG	27.8%	49.3%	3.3%	11.2%	3.7%	4.7%	34.8%	65.2%
RECO	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%
Total	13.6%	54.9%	1.1%	20.0%	2.3%	8.1%	16.9%	83.1%

ARR Allocation Revenue Share: 2020/2021

	Stage 1A		Stage 1	В	Stage :	2	Tota	ıl
	Out of Zone	In Zone	Out of Zone	In Zone	Out of Zone	In Zone	ot of Zone	In Zone
ACEC	44.3%	18.2%	6.4%	27.7%	0.5%	2.9%	51.2%	48.8%
AEP	10.4%	68.4%	0.8%	17.9%	0.0%	2.4%	11.2%	88.8%
APS	15.0%	61.0%	1.1%	22.3%	0.0%	0.6%	16.1%	83.9%
ATSI	94.0%	2.3%	0.3%	1.3%	2.4%	-0.3%	96.7%	3.3%
BGE	79.0%	12.8%	0.5%	4.7%	1.9%	1.1%	81.3%	18.7%
COMED	0.0%	92.1%	0.0%	3.5%	0.0%	4.4%	0.0%	100.0%
DAY	88.3%	0.2%	2.0%	0.1%	9.4%	0.0%	99.7%	0.3%
DOM	0.8%	75.5%	0.0%	23.2%	0.0%	0.5%	0.8%	99.2%
DPL	35.3%	52.5%	1.5%	8.3%	0.4%	2.0%	37.2%	62.8%
DUKE	75.5%	16.4%	0.0%	4.1%	0.4%	3.4%	76.0%	24.0%
DUQ	80.6%	0.0%	6.9%	-0.1%	5.7%	7.0%	93.1%	6.9%
EKPC	79.0%	11.9%	0.2%	0.0%	8.9%	0.0%	88.1%	11.9%
EXT	50.0%	0.0%	49.6%	0.0%	0.4%	0.0%	100.0%	0.0%
JCPLC	-0.1%	7.6%	0.1%	0.6%	84.7%	7.2%	84.7%	15.3%
MEC	39.7%	58.9%	1.3%	0.5%	0.1%	-0.4%	41.0%	59.0%
PE	38.2%	53.5%	0.1%	6.2%	0.0%	2.1%	38.3%	61.7%
PECO	1.9%	75.1%	5.0%	16.1%	0.2%	1.7%	7.1%	92.9%
PEPCO	88.1%	7.7%	1.3%	0.3%	0.2%	2.4%	89.6%	10.4%
PPL	0.0%	88.5%	0.0%	10.3%	0.1%	1.1%	0.0%	100.0%
PSEG	34.6%	46.8%	2.6%	2.7%	7.7%	5.7%	44.9%	55.1%
REC	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%
Total	32.7%	52.0%	0.9%	11.1%	1.4%	1.9%	35.0%	65.0%

Offset Available to Load if All ARRs Self Scheduled: 2018/2019 through 2020/2021 Planning Periods

18/19 Planning Period			1	19/20 Planning Period			20/21 Planning Period					
		Bal+M2M	Congestion			Bal+M2M	Congesti			Bal+M2M	Congesti	
	SS FTR	Charges	+M2M	Offset	SS FTR	Charges	on+M2M	Offset	SS FTR	Charges	on+M2M	Offset
ACEC	\$11.5	(\$1.9)	\$10.0	96.2%	\$2.6	(\$2.1)	\$3.7	15.6%	\$1.8	(\$2.7)	\$5.5	-16.4%
AEP	\$84.9	(\$24.2)	\$105.4	57.6%	\$62.7	(\$28.2)	\$81.9	42.1%	\$77.3	(\$38.1)	\$110.9	35.3%
APS	\$37.4	(\$9.0)	\$44.7	63.5%	\$31.2	(\$10.4)	\$31.9	65.1%	\$42.0	(\$14.8)	\$45.2	60.3%
ATSI	\$45.3	(\$12.5)	\$52.3	62.8%	\$27.9	(\$13.9)	\$36.8	38.1%	\$30.7	(\$19.5)	\$50.6	22.1%
BGE	\$49.0	(\$6.1)	\$20.0	215.0%	\$53.7	(\$6.7)	\$15.3	308.0%	\$79.7	(\$9.1)	\$24.8	284.2%
COMED	\$51.4	(\$16.7)	\$96.3	36.1%	\$40.6	(\$19.8)	\$65.2	31.9%	\$69.6	(\$28.5)	\$78.3	52.4%
DAY	\$11.2	(\$3.3)	\$12.8	61.8%	\$5.6	(\$3.9)	\$9.7	17.4%	\$8.0	(\$5.3)	\$11.0	24.9%
DUKE	\$50.4	(\$5.3)	\$23.6	191.2%	\$30.5	(\$6.0)	\$14.9	164.2%	\$40.9	(\$8.4)	\$17.4	187.2%
DUQ	\$7.2	(\$2.5)	\$7.7	61.5%	\$8.1	(\$3.2)	\$5.1	95.2%	\$8.9	(\$4.0)	\$6.2	79.7%
DOM	\$55.8	(\$18.4)	\$66.0	56.7%	\$32.8	(\$16.9)	\$59.2	26.9%	\$40.9	(\$37.9)	\$87.9	3.5%
DPL	\$57.7	(\$4.0)	\$59.0	91.0%	\$27.3	(\$8.7)	\$17.4	107.3%	\$56.4	(\$6.7)	\$36.2	137.4%
EKPC	\$0.9	(\$2.3)	\$9.5	-14.5%	\$4.1	(\$2.9)	\$7.4	16.8%	\$6.6	(\$4.2)	\$8.4	29.3%
EXT	\$1.7	(\$4.8)	(\$4.1)	76.7%	\$0.9	(\$2.2)	(\$1.7)	74.3%	\$0.3	(\$13.8)	\$11.0	-122.3%
JCPLC	\$2.6	(\$4.2)	\$20.3	-7.8%	\$2.3	(\$4.6)	\$9.2	-25.5%	\$0.9	(\$6.1)	\$12.9	-40.2%
MEC	\$5.0	(\$3.3)	\$14.6	11.8%	\$0.8	(\$4.2)	\$8.7	-38.5%	\$8.0	(\$5.3)	\$16.5	16.5%
OVEC	NA	NA	NA	NA	NA	\$0.1	\$0.5	NA	NA	(\$0.3)	\$0.9	NA
PECO	\$15.7	(\$7.4)	\$29.9	27.7%	\$16.8	(\$8.2)	\$13.4	63.8%	\$14.0	(\$10.9)	\$24.9	12.4%
PE	\$17.5	(\$4.2)	\$17.5	76.0%	\$11.2	(\$3.8)	\$10.8	69.1%	\$13.5	(\$6.5)	\$16.4	42.8%
PEPCO	\$19.5	(\$5.4)	\$18.2	77.8%	\$23.2	(\$6.1)	\$13.7	124.3%	\$37.3	(\$8.3)	\$20.5	141.7%
PPL	\$4.3	(\$7.7)	\$36.6	-9.1%	\$39.2	(\$8.5)	\$20.5	149.9%	\$43.7	(\$11.5)	\$30.8	104.5%
PSEG	\$35.6	(\$8.8)	\$38.5	69.6%	\$21.3	(\$8.9)	\$18.4	67.2%	\$43.2	(\$13.9)	\$25.0	117.0%
REC	\$0.2	(\$0.9)	\$1.1	-68.7%	\$0.2	(\$0.3)	\$0.6	-22.6%	\$1.0	(\$0.6)	\$2.1	21.0%
Total	\$565.0	(\$152.7)	\$680.0	60.6%	\$443.0	(\$169.4)	\$442.7	61.8%	\$624.8	(\$256.2)	\$643.4	57.3%

FTR Percentage of MW By Source and Sink Node Type: 2019/2020 Annual Auction

			Si	nk Type		
					esidual Metered	
Source Type	Aggregate	Generator	Hub	Interface	Aggregate	Zone
Aggregate	1.8%	5.1%	0.2%	0.0%	0.2%	0.4%
Generator	11.1%	53.7%	4.2%	0.7%	5.3%	8.4%
Hub	0.3%	0.8%	0.5%	0.0%	0.3%	1.3%
Interface	0.1%	0.4%	0.0%	0.0%	0.1%	0.1%
Residual Metered Aggregate	0.1%	0.5%	0.0%	0.0%	0.0%	0.0%
Zone	0.4%	1.4%	0.6%	0.0%	0.5%	1.3%

Matrix: ARRs

			•		
# -		Design Components ¹	Priority	Status Quo	IMM Proposal
# 1	Track/Theme	Design Components	Priority	Status Quo	IIVIIVI Proposal
				Stage 1 - source points only from	
				designated active historical resources	
				or Qualified Replacement Resources	
				Stage 2 – source points any available	
				generator, interface, hub, zone	Rights to all congestion allocated to the load that
		Availability and Assignment of		Must always sink at load settlement	paid it, based on actual network congestion DA and
1	1. ARRs	Congestion rights to Load		point/aggregate	RT
					Rights to all congestion allocated to the load that
1a.		All			paid it, based on actual network congestion DA and RT
Ta.		Allocation mechanism			KI .
1b.		ARR nomination point availability			Physical load points/export interface
TD.		Congestion Right Election (Claim		Annual, 24H Obligation "Price taker"	Thysical load points/export interface
		or Sell Options)		from average 4 round annual auction	Set reserve prices for the sale of any portion of
2				prices	congestion that will be paid in a given period.
				Auction surplus goes to FTR	
				deficiencies first, residual allocated to	
3		Auction Surplus		ARR holders on ARR weighted basis	NA, All rights are assigned, no unassigned rights
				Congestion surplus goes to FTR	
				deficiencies first, residual allocated to	
4		Congestion Surplus		ARR holders on ARR weighted basis	NA. All rights are assigned, no unassigned rights.
		Cogcc.c Ca.plab		Annual Model with modeled	
				constraints, line limits and outages	
				based on DA snap shot, Monthly	
				updates during planning year.	
				Objective to guarantee target	Actual DA model and RT model of every actual
5		Model details		allocation payouts.	market day
		A		Stage 1A up-to ZBL share on	
6 7		Amount of guaranteed ARRs Incremental ARR product types		historical source and sink paths only. EE, Merchant, RTEP	Full congestion paid in planning year. Eliminate IARR, inconsistent with network use.
,		meremental ARR product types		Model document available here:	Eliminate IARR, Inconsistent with network use.
				https://www.pim.com/-/media/markets-	
		IARR model development and SFT		ops/ftr/pim-iarr-model-development-	
7a.		assumptions and procedures		and-analysis.ashx	Eliminate IARR, inconsistent with network use.



Matrix: FTRs

#	Track/Theme	Design Components ¹	Priority		IMM Proposal
8	2. FTRs	FTR Auction bid limits			NA
9		FTR Option paths and clearing mechanism		Path availability limited by historical pricing and source/sink pnode type. Price calculated for all eligible Option paths.	All rights are options, no negative values possible
10		Invalid FTR Paths		FTR paths that clear with < 0.1% impact on any constraint not cleared. FTRs with a zero clearing price will only be awarded if there is a minimum of one binding constraint in the auction period for which the FTR path sensitivity is non-zero (0.1% threshold).	
11		FTR product & class types		24H, On peak, Off peak (M-F 2300- 0700, Weekend all day). Monthly or Annual product.	Product types for congestion made availble to market would match what was sold by rights holders. Product types can be as flexiable as requested by the market.
				Post, Accept, Confirm.	All bilateral arragements must be on a PJM platform
12		Bilateral transaction functionality		Indemnification from defaults	subject to PJM credit criteria.
13		Source of Congestion dollars allocated to FTRs		DA ahead only, balancing and M2M assigned to load on load ratio basis.	All congestion (DA+Balancing+M2M)
14		Available Rights not allocated or directly claimable by load (FTR Biddable points)		Paths not associated with ARR source and sink pairs (sets)	NA
15		FTR Forfeiture Rule		Flow based, per M-6 section 8.6	NA

Matrix: Transparency

# *	Track/Theme	Design Components ¹	Priority	Status Quo	IMM Proposal
				Base topology, outages, selected interface limits, m2m flow, loop flow, uncompensated flow, contingencies	Actual DA model and RT model of every actual
16	Transparency and Simplicity	Network model posted information		modeled	market day. OASIS.
				Base models posted quarterly; outages, interface limits posted per auction, aggregate and PAR	
17		Network model posting frequency			OASIS
18		Outage modeling		Binary outages, entire model period	Actual by Day
		Bid submission upload capability		Bids can be submitted through FTR center, or browserless via XML.	
19		Implementation date		N/A	

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