## **Regulation Market Issues**

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### **Current Design**

- Incorrectly defined marginal benefit factor function (MBF/MRTS)
  - Current MBF does not maintain defined RegA/RegD proportions
- Incorrectly applying the MBF/MRTS in the optimization
  - Incorrectly calculating effective MW contribution of RegD
- The current optimization engine does not provide the optimal mix of resources when considering resources with dual offers.



#### **Current Design**

- MBF/MRTS not consistently used in pricing and settlement
- Assumes MBF/MRTS in price but not settlement
- Mileage ratio instead of MBF/MRTS
  - The mileage ratio used in settlement does not provide a measure of relative work provided and results in the incorrect payment of RegD.
  - Price spikes and "infinite" mileage ratio issues.





- LOC used in clearing and in setting price is not correctly determined
  - LOC based on lower of energy or price offer, rather than actual operative energy offer, causes LOC to be incorrect.
  - Actual energy offer should be used to determine LOC.
  - LOC based on desired amount of MW output at LMP relative to regulation set point can exceed the physical limitations of the unit's ability to ramp.



- Clearing price used in settlements should reflect the within hour actual performance score of the marginal resource, not the historic score.
  - Current construct results in clearing price <> marginal resource offer



- The performance score should reflect the ability to productively follow the signal.
  - The performance score should penalize the inability to provide full cleared capability MW.
  - The performance score should penalize regulation midhour dropouts.



- Purchasing too much RegD in many hours
  - Negatively affecting the provision of regulation and reliability
  - Procuring too little RegA
  - Incorrect compensation
  - Incorrect market incentives

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#### **Microeconomics: Isoquant and MRTS**



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#### 60 MW A- area @6 MW D = 18 MW A





#### **MBF vs MRTS**



#### **Incorrect Amount/Proportion of RegD Cleared**

RegD	RegD MW		Effective	Residual A (700 MW	
Percent of	(Performance		MW from	Target - Effective MW	RegD/
700 MW	Adjusted)	MBF	RegD MW	from RegD)	(RegA+RegD)
5%	40	2.54	108.75	691.25	5%
10%	80	2.18	203.00	597.00	12%
15%	120	1.81	282.75	517.25	19%
20%	160	1.45	348.00	452.00	26%
25%	200	1.09	398.75	401.25	33%
30%	240	0.73	435.00	365.00	40%
35%	280	0.36	456.75	343.25	45%
40%	320	0.00	464.00	336.00	49%



# Example of pre and post December 14, 2015, total effective MW calculations for RegD MW offered at \$0.00 or as self supply



# Illustration of correct method for calculating effective MW



### Clearing phase BF/effective MW reduction, real time BF/effective MW inflation, and exclusion of available RegD resources



#### Maximum, minimum, and average PJM calculated MBF by month



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#### Effect of PJM's current dual offer clearing method on the average MBF in each hour of the day



#### **MBF vs Mileage Rate**



### Average monthly price paid per effective MW of RegD and RegA under mileage and MBF based settlement

RegD Settlement Payments									
	Marginal Rate of Technical								
		Mileage Based	Substitution Based	ubstitution Based		Percent RegD			
		RegD	RegD	RegA	Overpayment	Total RegD			
Year	Month	(\$/Effective MW)	(\$/Effective MW)	(\$/Effective MW)	(\$/Effective MW)	Overpayment (\$)			
2021	Jan	\$30.47	\$11.43	\$11.43	166.6%	\$558,397			
	Feb	\$88.91	\$19.90	\$19.90	346.7%	\$1,310,279			
	Mar	\$61.03	\$17.93	\$17.93	240.4%	\$1,277,850			
	Apr	\$65.99	\$16.73	\$16.73	294.3%	\$1,492,094			
	Мау	\$39.55	\$16.42	\$16.42	140.9%	\$1,081,445			
	Jun	\$26.57	\$18.40	\$18.40	44.4%	\$457,543			
	Jul	\$27.36	\$19.34	\$19.34	41.5%	\$513,073			
	Aug	\$38.23	\$31.77	\$31.77	20.4%	\$288,112			
	Sep	\$35.63	\$28.59	\$28.59	24.6%	\$410,694			
	Oct	\$51.13	\$38.91	\$38.91	31.4%	\$688,515			
	Nov	\$63.20	\$52.92	\$52.92	19.4%	\$377,458			
	Dec	\$33.94	\$26.85	\$26.85	26.4%	\$399,675			
	Yearly	\$46.48	\$24.93	\$24.93	86.4%	\$8,855,253			
2022	Jan	\$62.73	\$68.59	\$68.59	(8.5%)	(\$1,580,376)			
	Feb	\$29.38	\$31.51	\$31.51	(6.8%)	(\$516,687)			
	Mar	\$31.86	\$25.56	\$25.56	24.7%	\$281,052			
	Yearly	\$41.73	\$42.24	\$42.24	(1.2%)	(\$1,816,012)			

# LOC distribution in each five minute interval with a RegD marginal unit and an LOC greater than zero



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