

# ORDC Simulation Results: Version 2

The Independent Market Monitor for PJM May 10, 2019

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# Introduction

PJM's March 29<sup>th</sup> Price Formation Filing includes simulation results estimating the impact of PJM's proposal. The Market Monitor replicated PJM's simulations using identical software and the same input data as PJM. Replication allows the Market Monitor to verify the results, understand the modelling assumptions, analyze the results in greater detail, and perform alternative simulation scenarios.

The Market Monitor also performed simulations using alternative specifications of the Operating Reserve Demand Curve (ORDC) to demonstrate how market results may change under different proposals.

PJM used PowerGEM's PROBE Perfect Dispatch Model (PROBE Ver 2.85\_1-M) to run its simulations. PROBE Ver 2.85\_1-M contained an error that caused the synchronized reserve shadow price (used to determine the price of synchronized reserves) to be greater than the prices indicated by the ORDC curves. The result of the error is that the simulation results overstate the prices and the overall costs of reserves. This issue was identified and corrected in PROBE Ver 2.85\_1-P and later versions. The Market Monitor used PROBE Ver 2.85 1-R, which incorporated the fix, to produce its own simulation results. PROBE Ver 2.85\_1-R produces synchronized reserve shadow prices that are consistent with the ORDC curves.

The PowerGEM PROBE Perfect Dispatch software is designed to optimize resource commitment and dispatch to the find the lowest production cost solution for energy and reserve requirements, subject to resource and network constraints in a given 24 hours period. One of the inputs to this optimization is the set of resources types that can have their commitment and dispatch changed relative to an initial assumed start state. In the typical perfect dispatch case only diesel and combustion turbine resources can have commitment changes, while other resource types are limited to redispatch, unless otherwise specified. The larger the set of resource types than can have their commitment and dispatch optimized, the more optimal the solution in terms of minimizing production cost given energy and reserve requirements. The PROBE software will change the commitment and dispatch of a given resource set to minimize the cost of any significant changes in market conditions within the 24 hour period. This same flexibility in system dispatch and commitment is generally not available in actual operations. This means that the simulations will tend to have fewer periods of high prices and that the high prices will tend to be lower than in an actual real-time market day with the same load conditions. The simulated market results will underestimate the real world costs of meeting the energy and reserve requirements in the simulation cases.

# **PJM Simulations**

PJM performed three simulations: Cases A, B, and C.

Case A includes no changes in the dispatch and pricing process from PJM's standard Perfect Dispatch simulation software.<sup>1</sup> PJM currently uses the Perfect Dispatch software to benchmark its actual real-time market performance against a simulated outcome that economically optimizes resource dispatch and fast start resource commitment.<sup>2</sup> Case A represents this optimal dispatch and commitment and does not represent the actual status quo. Thus, comparisons using Case A as the benchmark will underestimate the real world costs of meeting the energy and reserve requirements in the simulation cases. PJM also modifies the Case A results by incorporating the payment of a single clearing price to all synchronized reserves.

Case B uses a change in the Perfect Dispatch software settings to extend the economic evaluation of resource commitments to steam units, typically committed prior to the operating day by the Day-Ahead Energy Market, the Day-Ahead Reliability Assessment, or manually by reliability processes. Case B presents a significant departure from reality by allowing the software to decommit resources required by PJM for reliability. Day-ahead reliability commitments accounted for an average of 1,100 MW of generation per hour in 2018.

Case C introduces PJM's proposed ORDC to Case B. PJM argues that the relevant comparison to assess the impact of the ORDC proposal is the comparison of Case B to Case C. Because Case B modifies actual PJM operating conditions, it is not an accurate base case. The Market Monitor also compares Case A to Case C and creates a Case A ORDC that implements the ORDC in the Case A model. If it is the case, and PJM implies that it is, that the ORDC would replace manual operator commitments with market commitments, the relevant comparison is Case A to Case C, because Case A contains the steam unit commitments made by operators.<sup>3</sup> Case B removes all uneconomic operator commitments.

The Market Monitor disagrees with PJM's conclusion that a 30 minute time horizon is appropriate for the 10 minute reserve products. Case C 15 minute presents a case where the ORDC is shifted inward using a 15 minute forecast time horizon for the synchronized and primary reserve demand curves.

Table 1 shows the summary results for the five simulation cases.

<sup>&</sup>lt;sup>1</sup> The Perfect Dispatch software is PowerGEM's PROBE Perfect Dispatch Model.

<sup>&</sup>lt;sup>2</sup> *See* PJM Perfect Dispatch Fact Sheet, <<u>https://www.pjm.com/-/media/about-pjm/newsroom/</u> <u>fact-sheets/perfect-dispatch-fact-sheet.ashx?la=en></u>, last accessed April 19, 2019.

<sup>&</sup>lt;sup>3</sup> See March 29<sup>th</sup> Filing, Pilong Testimony.

## Table 1 Comparison of simulation cases

	Case A	Case B	Case C	Case A ORDC	Case C 15
Load Weighted LMP (\$/MWh)	\$35.80	\$37.30	\$37.76	\$36.91	\$37.61
Generator Weighted LMP (\$/MWh)	\$33.29	\$34.72	\$35.18	\$34.39	\$35.03
Generator Energy Revenue (\$ millions)	\$26,796.6	\$27,943.2	\$28,312.6	\$27,679.3	\$28,191.9
Weighted Synchronized Reserve MCP (\$/MWh)	\$1.99	\$2.58	\$6.33	\$6.05	\$4.66
Weighted Non-Synchronized Reserve MCP (\$/MWh)	\$1.03	\$1.25	\$3.21	\$3.08	\$2.34
Weighted Secondary Reserve MCP (\$/MWh)	NA	NA	\$0.0004	\$0.0004	\$0.0015
Hourly Average Cleared Synchronized Reserve (MW/hour)	1,817.8	1,818.2	3,167.3	3,189.6	2,866.6
Hourly Average Cleared Non-Synchronized Reserve (MW/hour)	634.6	634.2	677.6	678.1	677.3
Hourly Average Cleared Secondary Reserve (MW/hour)	NA	NA	1,944.0	1,928.2	2,195.2
Hourly Average Cleared Total Reserve (MW/hour)	2,452.4	2,452.4	5,789.0	5,795.9	5,739.0
Total Cleared Synchronized Reserve (millions MWh)	15.5	15.5	27.0	27.2	24.4
Total Cleared Non-Synchronized Reserve (millions MWh)	5.4	5.4	5.8	5.8	5.8
Total Cleared Secondary Reserve (millions MWh)	NA	NA	16.6	16.4	18.7
Reserve Revenue (\$ millions)	\$36.4	\$46.7	\$189.3	\$182.1	\$127.3
Uplift (\$ millions)	\$109.9	\$30.4	\$27.5	\$93.0	\$28.0
Bid Production Cost (\$ millions)	\$13,229.6	\$13,121.2	\$13,152.0	\$13,256.8	\$13,135.8
Total Energy and Reserve Market Revenues (\$ millions)	\$26,833.0	\$27,989.9	\$28,501.9	\$27,861.5	\$28,319.2

The Market Monitor provides the detailed hourly and daily simulation results on its website.

# Case B to Case C

PJM argues that the relevant comparison to assess the impact of the ORDC proposal is the comparison of Case B to Case C. Because Case B modifies actual PJM operating conditions, it is not an accurate base case. The comparison of Case B to Case C understates the impact of PJM's proposed changes on the actual market outcomes. The Market Monitor includes this comparison in order to highlight some of the detailed impacts of the comparison that PJM did not include in their filing. PJM presents the changes from Case B to Case C for the calendar year 2018 as the impact of implementing its proposed ORDC. In addition to the summary metrics provide in PJM's filing, the Market Monitor provides additional detailed metrics for each case.

Table 2 provides monthly load weighted average energy prices. The increase in LMP due to the ORDC is much greater in January, primarily resulting from higher base prices during the first week of January.

	Load Weig	hted LMP (\$/MW	h)
	Case B	Case C	Difference
Jan	\$73.87	\$75.01	\$1.14
Feb	\$27.58	\$28.00	\$0.42
Mar	\$30.64	\$30.97	\$0.34
Apr	\$34.10	\$34.73	\$0.63
Мау	\$31.96	\$32.33	\$0.37
Jun	\$30.13	\$30.48	\$0.35
Jul	\$34.53	\$34.85	\$0.31
Aug	\$36.02	\$36.22	\$0.20
Sep	\$35.59	\$35.72	\$0.13
Oct	\$33.90	\$34.52	\$0.63
Nov	\$37.45	\$38.05	\$0.60
Dec	\$33.23	\$33.66	\$0.43
Total	\$37.30	\$37.76	\$0.46

Table 2 PJM load-weighted average LMP: 2018, Case B to Case C

The LMP increases vary geographically. Table 3 shows the differences in annual average hub LMPs and Table 4 shows zonal load-weighted average LMP increases.

Table 3 Average h	ub LMP: 2018,	Case B to Case C
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	Av	erage LMP	(\$/Mwh)
	Case B	Case C	Difference
AEP GEN HUB	\$32.20	\$32.68	\$0.48
AEP-DAYTON HUB	\$33.52	\$34.02	\$0.49
ATSI GEN HUB	\$34.40	\$34.87	\$0.47
CHICAGO GEN HUB	\$28.68	\$29.07	\$0.39
CHICAGO HUB	\$29.29	\$29.68	\$0.38
DOMINION HUB	\$37.25	\$37.73	\$0.48
EASTERN HUB	\$37.34	\$37.64	\$0.30
N ILLINOIS HUB	\$29.09	\$29.47	\$0.38
NEW JERSEY HUB	\$35.14	\$35.55	\$0.40
OHIO HUB	\$33.28	\$33.78	\$0.50
WEST INT HUB	\$35.30	\$35.75	\$0.46
WESTERN HUB	\$35.51	\$36.01	\$0.50

	Load Weighted LMP (\$/Mwh)						
	Case B	Case C	Difference				
AECO	\$37.81	\$38.30	\$0.49				
AEP	\$36.65	\$37.17	\$0.51				
AP	\$38.12	\$38.62	\$0.50				
ATSI	\$37.24	\$37.71	\$0.48				
BGE	\$42.13	\$42.63	\$0.50				
COMED	\$30.74	\$31.15	\$0.41				
CPP	\$35.67	\$36.21	\$0.55				
DAY	\$36.44	\$36.97	\$0.53				
DEOK	\$36.12	\$36.61	\$0.49				
DOM	\$41.06	\$41.56	\$0.50				
DPL	\$41.46	\$41.72	\$0.26				
DUQ	\$36.95	\$37.42	\$0.47				
EKPC	\$35.75	\$36.28	\$0.53				
JCPL	\$37.81	\$38.22	\$0.41				
METED	\$38.14	\$38.55	\$0.42				
PECO	\$37.55	\$37.98	\$0.43				
PENELEC	\$36.94	\$37.46	\$0.52				
PEPCO	\$40.86	\$41.35	\$0.50				
PPL	\$37.40	\$37.77	\$0.38				
PSEG	\$37.34	\$37.72	\$0.38				

Table 4 PJM load-weighted average LMP by zone: 2018, Case B to Case C

Average generator weighted average LMP increases differ from load-weighted average LMP increases. Table 5 shows the generation-weighted average LMP at generation pricing nodes by zone. Typically, load LMP exceeds generator LMP due to congestion and losses, which is the case for most zones in both Cases B and C. However, generator LMPs increase more than load LMPs from Case B to Case C for nine of 19 zones.

	Generation Weighted LMP (\$/MWh)					
	Case B	Case C	Difference			
AECO	\$37.18	\$37.55	\$0.38			
AEP	\$33.41	\$33.91	\$0.50			
AP	\$35.26	\$35.75	\$0.49			
ATSI	\$35.95	\$36.45	\$0.49			
BGE	\$41.81	\$42.30	\$0.49			
COMED	\$28.99	\$29.36	\$0.37			
DAY	\$38.76	\$39.46	\$0.70			
DEOK	\$33.44	\$33.94	\$0.50			
DOM	\$40.34	\$40.85	\$0.50			
DPL	\$44.92	\$45.12	\$0.20			
DUQ	\$35.68	\$36.14	\$0.45			
EKPC	\$36.29	\$36.87	\$0.58			
JCPL	\$33.85	\$34.24	\$0.39			
METED	\$34.06	\$34.45	\$0.39			
OVEC	\$31.31	\$31.80	\$0.49			
PECO	\$34.78	\$35.18	\$0.40			
PENELEC	\$34.75	\$35.37	\$0.62			
PEPCO	\$43.84	\$44.50	\$0.66			
PPL	\$35.42	\$35.81	\$0.39			
PSEG	\$34.80	\$35.21	\$0.42			

Table 5 PJM generation-weighted average LMP by zone: 2018, Case B to Case C

Table 6 shows the increases in monthly MW weighted average reserve clearing prices for synchronized and primary reserves. Average prices for secondary reserves are zero. Reserve prices more than double annually, increasing in all months and by the largest amounts in the winter months.

	Reserv	e Weighted	Average Market Cl	earing Prices	(\$/MW)	
	Case B		Case C	2	Differen	ice
	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve
Jan	\$6.03	\$1.43	\$15.80	\$6.66	\$9.77	\$5.23
Feb	\$2.36	\$0.31	\$6.65	\$2.57	\$4.30	\$2.26
Mar	\$3.85	\$1.94	\$6.71	\$3.04	\$2.85	\$1.10
Apr	\$4.96	\$2.47	\$7.90	\$3.87	\$2.94	\$1.40
May	\$3.20	\$1.09	\$5.82	\$2.82	\$2.62	\$1.72
Jun	\$1.29	\$1.06	\$3.74	\$2.30	\$2.45	\$1.24
Jul	\$1.45	\$1.08	\$4.11	\$2.25	\$2.65	\$1.17
Aug	\$0.81	\$0.45	\$3.59	\$1.89	\$2.78	\$1.44
Sep	\$1.74	\$1.47	\$4.23	\$2.82	\$2.49	\$1.35
Oct	\$2.38	\$1.94	\$6.04	\$3.83	\$3.66	\$1.89
Nov	\$1.93	\$1.29	\$5.92	\$3.13	\$3.99	\$1.84
Dec	\$0.95	\$0.59	\$5.46	\$2.89	\$4.50	\$2.30
Annual	\$2.58	\$1.25	\$6.33	\$3.21	\$3.75	\$1.95

Table 6 Monthly PJM reserve market prices: 2018, Case B to Case C

Table 7 shows the monthly increases in the quantity of reserves. The increase in synchronized reserves ranges from 51.0 percent in April to 92.9 percent in February. The increases in primary reserves range from 0.7 percent in October to 19.5 percent in February.

	Cleared Reserve MWh										
	Case	В	Case	С	Differe	ence	Percent Difference				
	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary			
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve			
Jan	1,333,092.8	460,168.2	2,418,397.5	546,578.3	1,085,304.7	86,410.1	81.4%	18.8%			
Feb	1,104,579.4	424,887.5	2,130,543.1	507,781.1	1,025,963.7	82,893.6	92.9%	19.5%			
Mar	1,320,246.7	480,453.2	2,040,335.0	508,224.3	720,088.4	27,771.1	54.5%	5.8%			
Apr	1,242,142.7	444,263.6	1,875,125.5	478,559.4	632,982.8	34,295.9	51.0%	7.7%			
May	1,224,596.4	450,672.8	1,926,473.6	487,224.9	701,877.2	36,552.1	57.3%	8.1%			
Jun	1,260,166.9	415,391.3	2,259,288.5	423,859.6	999,121.6	8,468.4	79.3%	2.0%			
Jul	1,311,952.1	484,208.9	2,367,598.0	507,157.2	1,055,645.9	22,948.3	80.5%	4.7%			
Aug	1,298,609.1	481,900.0	2,377,283.8	512,919.8	1,078,674.7	31,019.7	83.1%	6.4%			
Sep	1,307,381.3	372,220.2	2,329,466.3	378,763.9	1,022,085.0	6,543.7	78.2%	1.8%			
Oct	1,462,476.9	435,479.7	2,450,038.5	438,649.3	987,561.6	3,169.7	67.5%	0.7%			
Nov	1,310,593.5	471,232.5	2,278,685.6	489,567.6	968,092.0	18,335.2	73.9%	3.9%			
Dec	1,315,281.3	482,772.0	2,532,455.1	494,226.7	1,217,173.9	11,454.7	92.5%	2.4%			
Total	15,491,118.8	5,403,649.7	26,985,690.1	5,773,512.0	11,494,571.3	369,862.3	74.2%	6.8%			

Table 7 Monthly PJM reserve market clearing: 2018, Case B to Case C

Increases in energy prices, reserve prices, and reserve clearing MW create higher revenues for suppliers. Table 8 provides the monthly generator revenue comparison for Case B to Case C. The total generator revenue increase from Case B to Case C is \$511.9 million. Energy revenues increase by \$369.4 million, accounting for 72.1 percent of the increase. Synchronized reserve revenues increase by \$130.8 million, accounting for 25.6 percent of increased revenues.

	Revenue (\$)											
				Case C			Difference					
	Generation	SR	PR	OR	Generation	SR	PR	OR	Generation	SR	PR	OR
Jan	\$5,081,623,092.5	\$8,041,039.6	\$657,447.2	\$0.0	\$5,179,435,042.5	\$38,219,472.1	\$3,640,986.1	\$6,807.5	\$97,811,950.0	\$30,178,432.6	\$2,983,538.9	\$6,807.5
Feb	\$1,519,472,468.7	\$2,603,153.7	\$132,698.2	\$0.0	\$1,543,724,380.7	\$14,175,045.2	\$1,307,337.2	\$0.0	\$24,251,912.0	\$11,571,891.5	\$1,174,639.1	\$0.0
Mar	\$1,859,115,556.6	\$5,089,052.2	\$933,042.7	\$0.0	\$1,880,105,031.9	\$13,687,271.3	\$1,546,359.5	\$0.0	\$20,989,475.3	\$8,598,219.1	\$613,316.8	\$0.0
Apr	\$1,826,358,822.0	\$6,159,167.4	\$1,098,624.4	\$0.0	\$1,859,479,992.5	\$14,809,220.0	\$1,853,779.5	\$0.0	\$33,121,170.5	\$8,650,052.6	\$755,155.2	\$0.0
May	\$1,775,298,936.7	\$3,915,318.4	\$492,517.1	\$0.0	\$1,796,050,045.9	\$11,202,492.5	\$1,372,517.0	\$0.0	\$20,751,109.2	\$7,287,174.1	\$879,999.9	\$0.0
Jun	\$1,935,187,664.6	\$1,628,149.4	\$439,857.2	\$0.0	\$1,958,510,650.6	\$8,451,910.9	\$976,354.2	\$0.0	\$23,322,986.0	\$6,823,761.5	\$536,496.9	\$0.0
Jul	\$2,580,228,898.0	\$1,907,918.9	\$521,565.1	\$0.0	\$2,604,621,249.7	\$9,728,911.1	\$1,140,853.8	\$0.0	\$24,392,351.7	\$7,820,992.2	\$619,288.7	\$0.0
Aug	\$2,750,194,638.6	\$1,050,710.0	\$214,835.1	\$0.0	\$2,768,400,772.2	\$8,531,431.0	\$967,552.5	\$0.0	\$18,206,133.6	\$7,480,720.9	\$752,717.3	\$0.0
Sep	\$2,222,742,250.0	\$2,271,640.2	\$546,674.0	\$0.0	\$2,234,089,436.4	\$9,855,606.3	\$1,067,524.7	\$0.0	\$11,347,186.4	\$7,583,966.2	\$520,850.7	\$0.0
Oct	\$2,024,751,056.9	\$3,481,601.1	\$845,140.1	\$0.0	\$2,062,113,922.3	\$14,807,457.1	\$1,680,044.1	\$0.0	\$37,362,865.4	\$11,325,855.9	\$834,904.0	\$0.0
Nov	\$2,273,655,880.6	\$2,530,961.9	\$608,868.5	\$0.0	\$2,305,248,950.4	\$13,485,785.4	\$1,531,255.5	\$0.0	\$31,593,069.8	\$10,954,823.6	\$922,387.0	\$0.0
Dec	\$2,094,561,286.0	\$1,254,060.2	\$283,817.4	\$0.0	\$2,120,810,211.0	\$13,815,461.4	\$1,427,978.3	\$0.0	\$26,248,925.0	\$12,561,401.2	\$1,144,160.8	\$0.0
Total	\$27,943,190,551.2	\$39,932,773.1	\$6,775,087.1	\$0.0	\$28,312,589,686.1	\$170,770,064.5	\$18,512,542.5	\$6,807.5	\$369,399,134.9	\$130,837,291.4	\$11,737,455.4	\$6,807.5

Table 9 shows generator revenues by technology type. Table 10 shows generator revenues per installed capacity (ICAP) MW by technology type. Consistent with their, roughly equal, high shares of energy output in PJM, steam, nuclear, and combined cycle gas units receive the greatest benefits from the ORDC.<sup>4</sup>

Revenues increase most for coal steam units. This result is expected. Coal steam units have high capacity factors due to their moderate marginal costs and inflexibility in starting and shutting down, so steam units receive a large share of the benefit of higher energy prices. Coal units' energy revenues increase by \$120.4 million, reserve revenues increase by \$23.2 million and total revenues increase by \$143.6 million.

Nuclear units also have high capacity factors due to their low marginal cost and inflexibility. Nuclear units' energy revenues increase by \$110.1 million but nuclear units do not provide reserves.

Combined cycle units have high capacity factors, but not as high as nuclear and steam units. Combined cycle units' energy revenues increase by \$75.0 million, reserve revenues increase by \$72.6 million, and total revenues increase by \$147.6 million. Combined cycle units greater flexibility leads to the largest increase in reserve revenues by technology type.

<sup>&</sup>lt;sup>4</sup> See Monitoring Analytics, LLC, 2018 State of the Market Report for PJM, Vol. 2, Section 3: Energy Market, Table 3-9.

					Revenue (\$)				
		Case B			Case C			Difference	
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR
Battery	\$148,766.5	\$0.9	\$0.0	\$151,937.2	\$533.1	\$55.4	\$3,170.7	\$532.2	\$55.4
CC	\$7,759,725,631.2	\$22,947,672.0	\$563.7	\$7,834,745,587.7	\$95,559,023.1	\$4,333.1	\$75,019,956.5	\$72,611,351.1	\$3,769.4
CT Natural Gas	\$888,699,914.9	\$5,773,510.7	\$2,003,092.8	\$926,170,750.9	\$26,927,506.5	\$6,407,041.0	\$37,470,836.0	\$21,153,995.8	\$4,403,948.2
CT Oil	\$46,324,308.3	\$1,690,138.3	\$4,474,516.6	\$46,963,248.8	\$5,005,884.6	\$11,325,661.7	\$638,940.5	\$3,315,746.3	\$6,851,145.1
CT Other	\$5,899,724.1	\$11,965.6	\$23,344.2	\$5,975,629.3	\$41,186.5	\$60,698.1	\$75,905.2	\$29,220.9	\$37,353.9
Fuel Cell	\$7,469,775.2	\$0.0	\$0.0	\$7,556,319.5	\$0.0	\$0.0	\$86,544.3	\$0.0	\$0.0
Hydro	\$484,669,838.3	\$2,887,448.2	\$104,804.6	\$489,809,456.5	\$9,556,905.8	\$265,559.0	\$5,139,618.2	\$6,669,457.6	\$160,754.4
Nuclear	\$9,049,991,523.7	\$0.0	\$0.0	\$9,160,068,376.6	\$0.0	\$0.0	\$110,076,852.9	\$0.0	\$0.0
RICE Natural Gas	\$14,189,947.6	\$96,194.4	\$0.0	\$14,478,100.4	\$461,374.5	\$0.0	\$288,152.7	\$365,180.1	\$0.0
RICE OII	\$1,457,402.1	\$2,056.5	\$104,177.5	\$1,401,120.9	\$7,445.1	\$264,985.1	(\$56,281.2)	\$5,388.6	\$160,807.6
RICE Other	\$53,295,887.4	\$505,299.9	\$57,816.4	\$53,795,291.6	\$1,397,551.4	\$141,371.5	\$499,404.1	\$892,251.5	\$83,555.1
Solar	\$66,827,029.5	\$0.0	\$0.0	\$67,156,170.0	\$0.0	\$0.0	\$329,140.5	\$0.0	\$0.0
Steam Coal	\$8,410,313,995.3	\$5,163,185.9	\$6,771.2	\$8,530,672,556.5	\$28,365,453.2	\$42,837.5	\$120,358,561.3	\$23,202,267.4	\$36,066.3
Steam Natural Gas	\$271,573,014.0	\$587,459.2	\$0.0	\$278,003,548.3	\$2,641,350.2	\$0.0	\$6,430,534.3	\$2,053,890.9	\$0.0
Steam Oil	\$40,052,929.0	\$40,336.8	\$0.0	\$40,905,504.0	\$187,324.2	\$0.0	\$852,575.1	\$146,987.5	\$0.0
Steam Other	\$230,868,650.2	\$226,751.1	\$0.0	\$233,449,453.0	\$616,857.5	\$0.0	\$2,580,802.8	\$390,106.4	\$0.0
Wind	\$611,688,031.0	\$0.0	\$0.0	\$621,289,059.6	\$0.0	\$0.0	\$9,601,028.6	\$0.0	\$0.0
Total	\$27,943,196,368.3	\$39,932,019.4	\$6,775,087.1	\$28,312,592,110.7	\$170,768,395.8	\$18,512,542.5	\$369,395,742.4	\$130,836,376.4	\$11,737,455.4

#### Table 9 Generator revenues by technology type: 2018, Case B to Case C

## Table 10 Generator revenues per ICAP MW by technology: 2018, Case B to Case C

	Revenue (\$/MW)									
		Case B		Case C			Difference			
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR	
Battery	\$3,719.16	\$0.02	\$0.00	\$3,798.43	\$13.33	\$1.38	\$79.27	\$13.31	\$1.38	
CC	\$161,695.31	\$478.18	\$0.01	\$163,258.56	\$1,991.24	\$0.09	\$1,563.25	\$1,513.06	\$0.08	
CT Natural Gas	\$35,493.90	\$230.59	\$80.00	\$36,990.46	\$1,075.46	\$255.89	\$1,496.55	\$844.87	\$175.89	
CT Oil	\$11,688.61	\$426.46	\$1,129.02	\$11,849.83	\$1,263.09	\$2,857.71	\$161.22	\$836.63	\$1,728.69	
CT Other	\$132,876.67	\$269.50	\$525.77	\$134,586.24	\$927.62	\$1,367.07	\$1,709.58	\$658.13	\$841.30	
Fuel Cell	\$248,992.51	\$0.00	\$0.00	\$251,877.32	\$0.00	\$0.00	\$2,884.81	\$0.00	\$0.00	
Hydro	\$60,032.93	\$357.65	\$12.98	\$60,669.54	\$1,183.75	\$32.89	\$636.61	\$826.10	\$19.91	
Nuclear	\$259,519.54	\$0.00	\$0.00	\$262,676.13	\$0.00	\$0.00	\$3,156.59	\$0.00	\$0.00	
RICE Natural Gas	\$117,856.71	\$798.96	\$0.00	\$120,250.00	\$3,832.01	\$0.00	\$2,393.30	\$3,033.06	\$0.00	
RICE OII	\$6,344.81	\$8. <b>9</b> 5	\$453.54	\$6,099.79	\$32.41	\$1,153.61	(\$245.02)	\$23.46	\$700.08	
RICE Other	\$147,642.22	\$1,399.80	\$160.17	\$149,025.68	\$3,871.55	\$391.63	\$1,383.47	\$2,471.75	\$231.47	
Solar	\$48,151.96	\$0.00	\$0.00	\$48,389.13	\$0.00	\$0.00	\$237.16	\$0.00	\$0.00	
Steam Coal	\$130,644.23	\$80.20	\$0.11	\$132,513.86	\$440.62	\$0.67	\$1,869.63	\$360.42	\$0.56	
Steam Natural Gas	\$27,083.90	\$58.59	\$0.00	\$27,725.22	\$263.42	\$0.00	\$641.32	\$204.83	\$0.00	
Steam Oil	\$17,459.86	\$17.58	\$0.00	\$17,831.52	\$81.66	\$0.00	\$371.65	\$64.07	\$0.00	
Steam Other	\$194,252.12	\$190.79	\$0.00	\$196,423.60	\$519.02	\$0.00	\$2,171.48	\$328.23	\$0.00	
Wind	\$67,824.41	\$0.00	\$0.00	\$68,888.98	\$0.00	\$0.00	\$1,064.57	\$0.00	\$0.00	
Total	\$133,665.02	\$191.01	\$32.41	\$135,432.01	\$816.86	\$88.55	\$1,766.99	\$625.85	\$56.15	

To estimate the increase in carbon dioxide emissions due to the ORDC, the emissions rate for each technology, as calculated by the EIA, is multiplied by a generic heat rate for the technology and the simulated MWh of energy.<sup>5</sup> Table 11 provides the estimated increase in CO<sub>2</sub> emissions in short tons.

<sup>&</sup>lt;sup>5</sup> Carbon Dioxide Emissions Coefficients, Energy Information Administration, <<u>https://www.eia.gov/environment/emissions/co2\_vol\_mass.php</u>>, accessed May 9, 2019.

	CO2 Rate (Ibs/MMBtu)	Heat Rate (MMBtu/MWh)	CO2 Rate (tons/MWh)	CO2 Case B (tons)	CO2 Case C (tons)	CO2 Difference (tons)
Battery						
CC	117.00	7.5	0.44	99,811,925	99,450,170	(361,755)
CT Natural Gas	117.00	11.0	0.64	11,023,488	11,471,605	448,117
CT Oil	161.30	13.0	1.05	246,259	246,871	613
CT Other	117.00	11.0	0.64	106,222	106,192	(30)
Fuel Cell						
Hydro						
Nuclear						
RICE Natural Gas	117.00	11.0	0.64	205,511	209,061	3,550
RICE OII	161.30	13.0	1.05	9,586	9,543	(43)
RICE Other	117.00	11.0	0.64	947,615	947,067	(548)
Solar						
Steam Coal	210.20	11.0	1.16	271,043,498	271,055,453	11,955
Steam Natural Gas	117.00	11.0	0.64	3,309,329	3,366,226	56,897
Steam Oil	161.30	11.0	0.89	287,795	288,764	969
Steam Other	117.00	11.0	0.64	4,074,738	4,074,302	(436)
Wind						
Total				386,991,227	387,150,952	159,725

## Table 11 Estimated emissions increase: 2018, Case B to Case C

## Case A to Case C

The comparison of Case A to Case C provides a better estimate of the results of PJM's proposed ORDC compared to the status quo, although the status quo is adjusted to incorporate optimal resource dispatch and fast start resource commitment. A comparison of Case A to Case C shows a higher increase in energy prices, because Case A has lower prices than Case B. Case A prices are lower because more generation is online in Case A, reflecting actual market operations. Case C and Case B allow the software to decommit uneconomic steam units, which are online for reliability or constraints at PJM's instruction.

If it is the case, and PJM implies that it is, that the ORDC would replace manual operator commitments with market commitments, the relevant comparison is Case A to Case C, because Case A contains the steam unit commitments made by operators. Case B removes all uneconomic operator commitments.

Table 12 provides monthly load weighted average energy prices. The increases in LMP due to the ORDC are higher when comparing Case A to Case C, rather than Case B to Case C.

	Load Weig	hted LMP (\$/Mw	ו)
	Case A	Case C	Difference
Jan	\$68.39	\$75.01	\$6.62
Feb	\$25.67	\$28.00	\$2.33
Mar	\$28.82	\$30.97	\$2.16
Apr	\$33.19	\$34.73	\$1.54
Мау	\$30.80	\$32.33	\$1.53
Jun	\$28.75	\$30.48	\$1.72
Jul	\$33.64	\$34.85	\$1.21
Aug	\$35.42	\$36.22	\$0.80
Sep	\$34.73	\$35.72	\$0.99
Oct	\$32.92	\$34.52	\$1.60
Nov	\$36.87	\$38.05	\$1.18
Dec	\$32.37	\$33.66	\$1.29
Total	\$35.80	\$37.76	\$1.96

Table 12 PJM load-weighted average LMP: 2018, Case A to Case C

Table 13 shows the differences in annual average PJM trading hub LMPs.

Table 13	Average h	ub LMP: 2018,	. Case A f	o Case C
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	Aver	age LMP (	\$/MWh)
	Case A	Case C	Difference
AEP GEN HUB	\$31.08	\$32.68	\$1.60
AEP-DAYTON HUB	\$32.43	\$34.02	\$1.59
ATSI GEN HUB	\$33.18	\$34.87	\$1.69
CHICAGO GEN HUB	\$27.39	\$29.07	\$1.67
CHICAGO HUB	\$27.97	\$29.68	\$1.71
DOMINION HUB	\$35.66	\$37.73	\$2.07
EASTERN HUB	\$35.78	\$37.64	\$1.86
N ILLINOIS HUB	\$27.77	\$29.47	\$1.70
NEW JERSEY HUB	\$33.69	\$35.55	\$1.86
OHIO HUB	\$32.21	\$33.78	\$1.57
WEST INT HUB	\$34.01	\$35.75	\$1.74
WESTERN HUB	\$34.10	\$36.01	\$1.91

Table 14 shows the zonal load-weighted average LMP increases.

	Load Weighted	LMP (\$/MWh)	
	Case A	Case C	Difference
AECO	\$36.31	\$38.30	\$1.99
AEP	\$35.36	\$37.17	\$1.80
AP	\$36.59	\$38.62	\$2.03
ATSI	\$35.98	\$37.71	\$1.74
BGE	\$40.04	\$42.63	\$2.59
COMED	\$29.47	\$31.15	\$1.68
CPP	\$34.87	\$36.21	\$1.34
DAY	\$35.17	\$36.97	\$1.79
DEOK	\$34.74	\$36.61	\$1.87
DOM	\$39.25	\$41.56	\$2.31
DPL	\$39.62	\$41.72	\$2.10
DUQ	\$35.67	\$37.42	\$1.75
EKPC	\$34.44	\$36.28	\$1.84
JCPL	\$36.23	\$38.22	\$1.99
METED	\$36.63	\$38.55	\$1.93
PECO	\$35.89	\$37.98	\$2.09
PENELEC	\$35.67	\$37.46	\$1.80
PEPCO	\$38.96	\$41.35	\$2.39
PPL	\$35.73	\$37.77	\$2.04
PSEG	\$35.84	\$37.72	\$1.88

Table 14 PJM load-weighted average LMP by zone: 2018, Case A to Case C

Table 15 shows the increases in energy prices at generation pricing nodes.

	Generation Weighted LMP (\$/MWh)					
	Case A	Case C	Difference			
AECO	\$35.67	\$37.55	\$1.89			
AEP	\$32.25	\$33.91	\$1.65			
AP	\$33.90	\$35.75	\$1.85			
ATSI	\$34.66	\$36.45	\$1.79			
BGE	\$39.54	\$42.30	\$2.77			
COMED	\$27.39	\$29.36	\$1.96			
DAY	\$37.03	\$39.46	\$2.43			
DEOK	\$32.40	\$33.94	\$1.54			
DOM	\$38.59	\$40.85	\$2.26			
DPL	\$41.79	\$45.12	\$3.34			
DUQ	\$34.41	\$36.14	\$1.73			
EKPC	\$34.99	\$36.87	\$1.88			
JCPL	\$32.66	\$34.24	\$1.58			
METED	\$32.61	\$34.45	\$1.85			
OVEC	\$30.59	\$31.80	\$1.21			
PECO	\$33.39	\$35.18	\$1.79			
PENELEC	\$33.60	\$35.37	\$1.77			
PEPCO	\$41.00	\$44.50	\$3.50			
PPL	\$33.79	\$35.81	\$2.02			
PSEG	\$33.55	\$35.21	\$1.66			

Table 15 PJM generation-weighted average LMP by zone: 2018, Case A to Case C

Table 16 shows the increases in reserve prices. Both synchronized reserve and primary reserve prices are more than three times higher in Case C than in Case A.

	Re	serve Weighte	d Average Mark	ket Clearing Pri	ces (\$/MW)	
	Case A		Case C	,	Differen	се
	Synchronized	Primary Sy	nchronized	Primary Sy	nchronized	Primary
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve
Jan	\$4.55	\$1.28	\$15.80	\$6.66	\$11.25	\$5.39
Feb	\$1.03	\$0.16	\$6.65	\$2.57	\$5.62	\$2.41
Mar	\$2.42	\$1.17	\$6.71	\$3.04	\$4.29	\$1.87
Apr	\$4.34	\$2.37	\$7.90	\$3.87	\$3.56	\$1.50
May	\$2.82	\$1.07	\$5.82	\$2.82	\$2.99	\$1.75
Jun	\$0.97	\$0.74	\$3.74	\$2.30	\$2.77	\$1.56
Jul	\$1.12	\$0.84	\$4.11	\$2.25	\$2.99	\$1.41
Aug	\$0.73	\$0.43	\$3.59	\$1.89	\$2.86	\$1.46
Sep	\$1.48	\$1.25	\$4.23	\$2.82	\$2.75	\$1.57
Oct	\$2.00	\$1.66	\$6.04	\$3.83	\$4.05	\$2.17
Nov	\$1.68	\$0.98	\$5.92	\$3.13	\$4.24	\$2.15
Dec	\$0.71	\$0.50	\$5.46	\$2.89	\$4.75	\$2.39
Annual	\$1.99	\$1.03	\$6.33	\$3.21	\$4.34	\$2.18

Table 16 Monthly PJM reserve market prices: 2018, Case A to Case C

Table 17 shows monthly reserve market clearing results. Case A and Case B clear similar amounts of reserves, so the difference between Case A and Case C is very similar to the difference between Case B and Case C.

				Cleared Res	serve MWh				
	Case	A	Case	e C	Differe	ence	Percent Difference		
	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	
Jan	1,330,584.2	462,676.8	2,418,397.5	546,578.3	1,087,813.3	83,901.5	81.8%	18.1%	
Feb	1,104,579.5	424,887.5	2,130,543.1	507,781.1	1,025,963.6	82,893.6	92.9%	19.5%	
Mar	1,320,385.9	480,314.2	2,040,335.0	508,224.3	719,949.2	27,910.2	54.5%	5.8%	
Apr	1,242,293.3	444,113.1	1,875,125.5	478,559.4	632,832.2	34,446.3	50.9%	7.8%	
May	1,224,815.1	450,454.2	1,926,473.6	487,224.9	701,658.5	36,770.7	57.3%	8.2%	
Jun	1,259,202.4	416,355.6	2,259,288.5	423,859.6	1,000,086.1	7,504.0	79.4%	1.8%	
Jul	1,311,503.4	484,657.4	2,367,598.0	507,157.2	1,056,094.6	22,499.8	80.5%	4.6%	
Aug	1,298,832.7	481,676.6	2,377,283.8	512,919.8	1,078,451.1	31,243.2	83.0%	6.5%	
Sep	1,307,345.4	372,256.5	2,329,466.3	378,763.9	1,022,120.9	6,507.5	78.2%	1.7%	
Oct	1,462,599.6	435,356.9	2,450,038.5	438,649.3	987,438.9	3,292.4	67.5%	0.8%	
Nov	1,310,571.2	471,254.9	2,278,685.6	489,567.6	968,114.4	18,312.7	73.9%	3.9%	
Dec	1,315,103.5	482,949.9	2,532,455.1	494,226.7	1,217,351.6	11,276.8	92.6%	2.3%	
Total	15,487,815.9	5,406,953.4	26,985,690.1	5,773,512.0	11,497,874.2	366,558.6	74.2%	6.8%	

Table 17 Monthly PJM reserve market clearing: 2018, Case A to Case C

Table 18 provides the monthly generator revenue comparison for Case A and Case C. Total generator revenues increase from Case A to Case C by \$1.7 billion. Increased energy revenues account for 90.8 percent of the increase and increased synchronized reserve payments account for 8.4 percent. The increase in generator revenues is more than \$1 billion higher when comparing Case C to Case A than when comparing Case B to Case C.

Table 18 Monthly PJM generator revenue: 2018, Case A to Case C

							Revenue (\$)					
			Case A			Case C			Difference			
	Generation	SR	PR	OR	Generation	SR	PR	OR	Generation	SR	PR	OR
Jan	\$4,721,942,931.8	\$6,059,690.0	\$590,123.9	\$0.0	\$5,179,435,042.5	\$38,219,472.1	\$3,640,986.1	\$6,807.5	\$457,492,110.7	\$32,159,782.1	\$3,050,862.3	\$6,807.5
Feb	\$1,415,723,162.9	\$1,141,654.3	\$68,865.7	\$0.0	\$1,543,724,380.7	\$14,175,045.2	\$1,307,337.2	\$0.0	\$128,001,217.8	\$13,033,390.9	\$1,238,471.6	\$0.0
Mar	\$1,747,326,457.6	\$3,196,953.8	\$563,993.6	\$0.0	\$1,880,105,031.9	\$13,687,271.3	\$1,546,359.5	\$0.0	\$132,778,574.3	\$10,490,317.6	\$982,365.9	\$0.0
Apr	\$1,772,922,354.2	\$5,387,102.6	\$1,053,933.7	\$0.0	\$1,859,479,992.5	\$14,809,220.0	\$1,853,779.5	\$0.0	\$86,557,638.3	\$9,422,117.5	\$799,845.8	\$0.0
May	\$1,708,618,722.9	\$3,458,761.1	\$482,879.6	\$0.0	\$1,796,050,045.9	\$11,202,492.5	\$1,372,517.0	\$0.0	\$87,431,323.0	\$7,743,731.5	\$889,637.5	\$0.0
Jun	\$1,847,286,164.8	\$1,220,012.8	\$307,677.3	\$0.0	\$1,958,510,650.6	\$8,451,910.9	\$976,354.2	\$0.0	\$111,224,485.8	\$7,231,898.1	\$668,676.9	\$0.0
Jul	\$2,505,939,506.7	\$1,468,835.0	\$405,465.1	\$0.0	\$2,604,621,249.7	\$9,728,911.1	\$1,140,853.8	\$0.0	\$98,681,743.0	\$8,260,076.1	\$735,388.7	\$0.0
Aug	\$2,691,708,750.5	\$944,817.0	\$205,406.4	\$0.0	\$2,768,400,772.2	\$8,531,431.0	\$967,552.5	\$0.0	\$76,692,021.7	\$7,586,614.0	\$762,146.1	\$0.0
Sep	\$2,165,046,703.9	\$1,935,343.8	\$466,280.8	\$0.0	\$2,234,089,436.4	\$9,855,606.3	\$1,067,524.7	\$0.0	\$69,042,732.5	\$7,920,262.5	\$601,243.9	\$0.0
Oct	\$1,960,059,046.6	\$2,923,290.1	\$722,045.5	\$0.0	\$2,062,113,922.3	\$14,807,457.1	\$1,680,044.1	\$0.0	\$102,054,875.7	\$11,884,167.0	\$957,998.7	\$0.0
Nov	\$2,228,604,987.3	\$2,198,883.6	\$461,822.2	\$0.0	\$2,305,248,950.4	\$13,485,785.4	\$1,531,255.5	\$0.0	\$76,643,963.1	\$11,286,901.8	\$1,069,433.3	\$0.0
Dec	\$2,031,396,902.8	\$931,137.4	\$241,804.3	\$0.0	\$2,120,810,211.0	\$13,815,461.4	\$1,427,978.3	\$0.0	\$89,413,308.2	\$12,884,324.0	\$1,186,173.9	\$0.0
Total	\$26,796,575,692.0	\$30,866,481.3	\$5,570,298.0	\$0.0	\$28,312,589,686.1	\$170,770,064.5	\$18,512,542.5	\$6,807.5	\$1,516,013,994.1	\$139,903,583.2	\$12,942,244.5	\$6,807.5

Table 19 shows the increases in revenues by generator technology from Case A to Case C. Table 20 shows the increases in revenues by generator per ICAP MW by generator technology from Case A to Case C. The nuclear units receive the largest increase in revenues because the energy revenues account for a larger share of the revenue increase from Case A to Case C, compared to Case B to Case C.

		Case A			Revenue (\$) Case C			Difference	
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR
Battery	\$144,174.4	\$0.0	\$0.0	\$151,937.2	\$533.1	\$55.4	\$7,762.7	\$533.1	\$55.4
CC	\$7,484,861,343.8	\$17,275,747.1	\$539.5	\$7,834,745,587.7	\$95,559,023.1	\$4,333.1	\$349,884,243.9	\$78,283,276.0	\$3,793.6
CT Natural Gas	\$805,127,285.3	\$4,795,045.9	\$1,616,514.3	\$926,170,750.9	\$26,927,506.5	\$6,407,041.0	\$121,043,465.5	\$22,132,460.6	\$4,790,526.7
CT Oil	\$39,567,721.2	\$1,470,433.3	\$3,708,429.6	\$46,963,248.8	\$5,005,884.6	\$11,325,661.7	\$7,395,527.5	\$3,535,451.3	\$7,617,232.1
CT Other	\$5,669,809.6	\$8,580.7	\$19,434.9	\$5,975,629.3	\$41,186.5	\$60,698.1	\$305,819.7	\$32,605.8	\$41,263.2
Fuel Cell	\$7,146,807.5	\$0.0	\$0.0	\$7,556,319.5	\$0.0	\$0.0	\$409,511.9	\$0.0	\$0.0
Hydro	\$467,552,732.7	\$2,305,817.9	\$87,871.0	\$489,809,456.5	\$9,556,905.8	\$265,559.0	\$22,256,723.8	\$7,251,087.8	\$177,688.0
Nuclear	\$8,624,960,212.6	\$0.0	\$0.0	\$9,160,068,376.6	\$0.0	\$0.0	\$535,108,164.0	\$0.0	\$0.0
RICE Natural Gas	\$13,132,167.2	\$65,537.6	\$0.0	\$14,478,100.4	\$461,374.5	\$0.0	\$1,345,933.1	\$395,837.0	\$0.0
RICE Oil	\$1,301,349.6	\$1,957.5	\$87,485.9	\$1,401,120.9	\$7,445.1	\$264,985.1	\$99,771.4	\$5,487.6	\$177,499.1
RICE Other	\$51,181,770.3	\$378,016.8	\$46,956.6	\$53,795,291.6	\$1,397,551.4	\$141,371.5	\$2,613,521.2	\$1,019,534.6	\$94,414.9
Solar	\$63,794,993.7	\$0.0	\$0.0	\$67,156,170.0	\$0.0	\$0.0	\$3,361,176.3	\$0.0	\$0.0
Steam Coal	\$8,107,721,991.6	\$3,817,694.2	\$2,868.2	\$8,530,672,556.5	\$28,365,453.2	\$42,837.5	\$422,950,564.9	\$24,547,759.1	\$39,969.3
Steam Natural Gas	\$282,552,561.3	\$537,800.2	\$197.9	\$278,003,548.3	\$2,641,350.2	\$0.0	(\$4,549,013.0)	\$2,103,550.0	(\$197.9)
Steam Oil	\$38,694,864.0	\$44,166.4	\$0.0	\$40,905,504.0	\$187,324.2	\$0.0	\$2,210,640.0	\$143,157.8	\$0.0
Steam Other	\$221,652,709.9	\$165,093.6	\$0.0	\$233,449,453.0	\$616,857.5	\$0.0	\$11,796,743.2	\$451,764.0	\$0.0
Wind	\$581,516,370.5	\$0.0	\$0.0	\$621,289,059.6	\$0.0	\$0.0	\$39,772,689.1	\$0.0	\$0.0
Total	\$26,796,578,865.2	\$30,865,891.2	\$5,570,298.0	\$28,312,592,110.7	\$170,768,395.8	\$18,512,542.5	\$1,516,013,245.4	\$139,902,504.6	\$12,942,244.5

Table 19 Generator revenues by technology type: 2018, Case A to Case C

Table 20 Generator revenues per ICAP MW by technology type: 2018, Case A to Case	
C	

				Rev	enue (\$/MW	)			
		Case A			Case C			Difference	
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR
Battery	\$3,604.36	\$0.00	\$0.00	\$3,798.43	\$13.33	\$1.38	\$194.07	\$13.33	\$1.38
CC	\$155,967.75	\$359.99	\$0.01	\$163,258.56	\$1,991.24	\$0.09	\$7,290.80	\$1,631.25	\$0.08
CT Natural Gas	\$32,156.09	\$191.51	\$64.56	\$36,990.46	\$1,075.46	\$255.89	\$4,834.37	\$883.95	\$191.33
CT Oil	\$9,983.78	\$371.02	\$935.72	\$11,849.83	\$1,263.09	\$2,857.71	\$1,866.05	\$892.07	\$1,921.99
CT Other	\$127,698.41	\$193.26	\$437.72	\$134,586.24	\$927.62	\$1,367.07	\$6,887.83	\$734.36	\$929.35
Fuel Cell	\$238,226.92	\$0.00	\$0.00	\$251,877.32	\$0.00	\$0.00	\$13,650.40	\$0.00	\$0.00
Hydro	\$57,912.74	\$285.61	\$10.88	\$60,669.54	\$1,183.75	\$32.89	\$2,756.80	\$898.15	\$22.01
Nuclear	\$247,331.25	\$0.00	\$0.00	\$262,676.13	\$0.00	\$0.00	\$15,344.88	\$0.00	\$0.00
RICE Natural Gas	\$109,071.16	\$544.33	\$0.00	\$120,250.00	\$3,832.01	\$0.00	\$11,178.85	\$3,287.68	\$0.00
RICE Oil	\$5,665.43	\$8.52	\$380.87	\$6,099.79	\$32.41	\$1,153.61	\$434.36	\$23.89	\$772.74
RICE Other	\$141,785.61	\$1,047.20	\$130.08	\$149,025.68	\$3,871.55	\$391.63	\$7,240.07	\$2,824.35	\$261.55
Solar	\$45,967.24	\$0.00	\$0.00	\$48,389.13	\$0.00	\$0.00	\$2,421.88	\$0.00	\$0.00
Steam Coal	\$125,943.83	\$59.30	\$0.04	\$132,513.86	\$440.62	\$0.67	\$6,570.03	\$381.32	\$0.62
Steam Natural Gas	\$28,178.89	\$53.63	\$0.02	\$27,725.22	\$263.42	\$0.00	(\$453.67)	\$209.79	(\$0.02)
Steam Oil	\$16,867.86	\$19.25	\$0.00	\$17,831.52	\$81.66	\$0.00	\$963.66	\$62.41	\$0.00
Steam Other	\$186,497.86	\$138.91	\$0.00	\$196,423.60	\$519.02	\$0.00	\$9,925.74	\$380.11	\$0.00
Wind	\$64,478.96	\$0.00	\$0.00	\$68,888.98	\$0.00	\$0.00	\$4,410.02	\$0.00	\$0.00
Total	\$128,180.23	\$147.65	\$26.65	\$135,432.01	\$816.86	\$88.55	\$7,251.78	\$669.22	\$61.91

To estimate the increase in carbon dioxide emissions due to the ORDC, the emissions rate for each technology, as calculated by the EIA, is multiplied by a generic heat rate for the technology and the simulated MWh of energy.<sup>6</sup> Table 21 provides the estimated increase in CO<sub>2</sub> emissions in short tons. For Case A to Case C, the total MWh used to serve load decreases, so the total emissions also fall.

<sup>&</sup>lt;sup>6</sup> Carbon Dioxide Emissions Coefficients, Energy Information Administration, <<u>https://www.eia.gov/environment/emissions/co2\_vol\_mass.php</u>>, accessed May 9, 2019.

	CO2 Rate (Ibs/MMBtu)	Heat Rate (MMBtu/MWh)	CO2 Rate (tons/MWh)	CO2 Case A (tons)	CO2 Case C (tons)	CO2 Difference (tons)
Battery						
CC	117.00	7.5	0.44	99,921,281	99,450,170	(471,111)
CT Natural Gas	117.00	11.0	0.64	10,126,406	11,471,605	1,345,199
CT Oil	161.30	13.0	1.05	228,427	246,871	18,444
CT Other	117.00	11.0	0.64	106,225	106,192	(32)
Fuel Cell						
Hydro						
Nuclear						
RICE Natural Gas	117.00	11.0	0.64	191,070	209,061	17,991
RICE OII	161.30	13.0	1.05	9,573	9,543	(31)
RICE Other	117.00	11.0	0.64	947,109	947,067	(41)
Solar						
Steam Coal	210.20	11.0	1.16	271,630,534	271,055,453	(575,081)
Steam Natural Gas	117.00	11.0	0.64	3,809,895	3,366,226	(443,669)
Steam Oil	161.30	11.0	0.89	296,370	288,764	(7,606)
Steam Other	117.00	11.0	0.64	4,089,342	4,074,302	(15,039)
Wind						
Total				387,266,889	387,150,952	(115,936)

## Table 21 Estimated emissions change: 2018, Case A to Case C

## Case A to Case A ORDC

The Market Monitor also compares Case A to Case A ORDC. The Case A ORDC adds PJM's ORDC directly to the Case A model rather than to the Case B model.

Table 22 shows that the LMP increase between Case A and Case A ORDC is \$1.12 per MWh. This is lower than the \$1.96 per MWh LMP increase between Case A and Case C, and greater than the \$0.46 per MWh increase between Case B and Case C.

	Load W	eighted LMP (\$/MW	/h)
	Case A	Case A ORDC	Difference
Jan	\$68.39	\$70.74	\$2.34
Feb	\$25.67	\$27.26	\$1.59
Mar	\$28.82	\$29.58	\$0.76
Apr	\$33.19	\$34.18	\$0.99
Мау	\$30.80	\$31.45	\$0.65
Jun	\$28.75	\$29.31	\$0.56
Jul	\$33.64	\$34.07	\$0.43
Aug	\$35.42	\$36.01	\$0.59
Sep	\$34.73	\$35.46	\$0.73
Oct	\$32.92	\$34.16	\$1.25
Nov	\$36.87	\$38.27	\$1.40
Dec	\$32.37	\$34.49	\$2.12
Total	\$35.80	\$36.91	\$1.12

Table 22 PJM load-weighted average LMP: 2018, Case A to Case A ORDC

Table 23 provides average energy prices for the PJM hubs for Case A and Case A with the PJM proposed ORDC.

	Average LMP (\$/MWh)						
	Case A	Case A ORDC	Difference				
AEP GEN HUB	\$31.08	\$32.11	\$1.03				
AEP-DAYTON HUB	\$32.43	\$33.47	\$1.04				
ATSI GEN HUB	\$33.18	\$34.28	\$1.10				
CHICAGO GEN HUB	\$27.39	\$28.30	\$0.91				
CHICAGO HUB	\$27.97	\$28.89	\$0.92				
DOMINION HUB	\$35.66	\$36.68	\$1.02				
EASTERN HUB	\$35.78	\$36.98	\$1.19				
N ILLINOIS HUB	\$27.77	\$28.68	\$0.92				
NEW JERSEY HUB	\$33.69	\$34.86	\$1.17				
OHIO HUB	\$32.21	\$33.25	\$1.04				
WEST INT HUB	\$34.01	\$35.06	\$1.04				
WESTERN HUB	\$34.10	\$35.18	\$1.07				

Table 23 Average hub LMP: 2018, Case A to Case A ORDC

Table 24 and Table 25 provide the increases in load and generation-weighted average energy prices by zone when PJM's proposed ORDC is applied to Case A.

	Load Weighted LMP (\$/MWh)					
	Case A	Case A1	Difference			
AECO	\$36.31	\$37.53	\$1.22			
AEP	\$35.36	\$36.45	\$1.09			
AP	\$36.59	\$37.74	\$1.15			
ATSI	\$35.98	\$37.13	\$1.15			
BGE	\$40.04	\$41.11	\$1.07			
COMED	\$29.47	\$30.41	\$0.94			
CPP	\$34.87	\$36.46	\$1.58			
DAY	\$35.17	\$36.32	\$1.14			
DEOK	\$34.74	\$35.86	\$1.12			
DOM	\$39.25	\$40.34	\$1.09			
DPL	\$39.62	\$40.88	\$1.26			
DUQ	\$35.67	\$36.80	\$1.12			
EKPC	\$34.44	\$35.55	\$1.11			
JCPL	\$36.23	\$37.45	\$1.22			
METED	\$36.63	\$37.83	\$1.21			
PECO	\$35.89	\$37.13	\$1.23			
PENELEC	\$35.67	\$36.88	\$1.21			
PEPCO	\$38.96	\$40.03	\$1.07			
PPL	\$35.73	\$36.96	\$1.22			
PSEG	\$35.84	\$37.02	\$1.18			

Table 24 PJM load-weighted average LMP by zone: 2018, Case A to Case A ORDC

	Generation Weighted LMP (\$/MWh)					
	Case A	Case A ORDC	Difference			
AECO	\$35.67	\$36.83	\$1.16			
AEP	\$32.25	\$33.31	\$1.05			
AP	\$33.90	\$34.99	\$1.09			
ATSI	\$34.66	\$35.85	\$1.19			
BGE	\$39.54	\$40.56	\$1.03			
COMED	\$27.39	\$28.32	\$0.93			
DAY	\$37.03	\$38.45	\$1.42			
DEOK	\$32.40	\$33.48	\$1.08			
DOM	\$38.59	\$39.67	\$1.08			
DPL	\$41.79	\$43.17	\$1.39			
DUQ	\$34.41	\$35.51	\$1.11			
EKPC	\$34.99	\$36.17	\$1.18			
JCPL	\$32.66	\$33.75	\$1.10			
METED	\$32.61	\$33.78	\$1.17			
OVEC	\$30.59	\$32.65	\$2.06			
PECO	\$33.39	\$34.62	\$1.23			
PENELEC	\$33.60	\$34.86	\$1.26			
PEPCO	\$41.00	\$42.11	\$1.12			
PPL	\$33.79	\$34.98	\$1.20			
PSEG	\$33.55	\$34.72	\$1.16			

Table 25 PJM generation-weighted average LMP by zone: 2018, Case A to Case A ORDC

Table 26 shows the increases in reserve prices when the PJM proposed ORDC is applied to Case A.

	Reserve Weighted Average Market Clearing Prices (\$/MW)								
	Case A		Case A O	RDC	Difference				
	Synchronized	Primary Sy	nchronized	Primary Sy	nchronized	Primary			
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve			
Jan	\$4.55	\$1.28	\$14.44	\$6.11	\$9.88	\$4.84			
Feb	\$1.03	\$0.16	\$6.49	\$2.53	\$5.46	\$2.37			
Mar	\$2.42	\$1.17	\$5.56	\$2.47	\$3.14	\$1.30			
Apr	\$4.34	\$2.37	\$7.55	\$3.71	\$3.22	\$1.34			
May	\$2.82	\$1.07	\$5.60	\$2.70	\$2.78	\$1.63			
Jun	\$0.97	\$0.74	\$3.20	\$2.00	\$2.23	\$1.26			
Jul	\$1.12	\$0.84	\$3.72	\$2.06	\$2.60	\$1.22			
Aug	\$0.73	\$0.43	\$3.47	\$1.85	\$2.75	\$1.42			
Sep	\$1.48	\$1.25	\$4.21	\$2.82	\$2.73	\$1.56			
Oct	\$2.00	\$1.66	\$5.97	\$3.78	\$3.97	\$2.12			
Nov	\$1.68	\$0.98	\$5.92	\$3.17	\$4.24	\$2.19			
Dec	\$0.71	\$0.50	\$6.26	\$3.37	\$5.55	\$2.87			
Annual	\$1.99	\$1.03	\$6.05	\$3.08	\$4.05	\$2.05			

Table 26 Monthly PJM reserve market prices: 2018, Case A to Case A ORDC

Table 27 shows the monthly reserve clearing levels when the PJM proposed ORDC is applied to Case A.

	Cleared Reserve MWh								
	Case	A	Case A	ORDC	Differe	ence	Percent Difference		
	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	
Jan	1,330,584.2	462,676.8	2,445,062.7	548,353.4	1,114,478.5	85,676.6	83.8%	18.5%	
Feb	1,104,579.5	424,887.5	2,138,010.4	507,611.7	1,033,430.9	82,724.1	93.6%	19.5%	
Mar	1,320,385.9	480,314.2	2,096,359.6	508,626.9	775,973.7	28,312.8	58.8%	5.9%	
Apr	1,242,293.3	444,113.1	1,886,322.7	478,023.9	644,029.4	33,910.8	51.8%	7.6%	
May	1,224,815.1	450,454.2	1,938,602.6	487,486.4	713,787.5	37,032.3	58.3%	8.2%	
Jun	1,259,202.4	416,355.6	2,286,218.0	424,304.8	1,027,015.6	7,949.2	81.6%	1.9%	
Jul	1,311,503.4	484,657.4	2,387,740.2	508,090.9	1,076,236.8	23,433.5	82.1%	4.8%	
Aug	1,298,832.7	481,676.6	2,387,116.6	512,981.3	1,088,283.9	31,304.7	83.8%	6.5%	
Sep	1,307,345.4	372,256.5	2,335,838.7	379,079.1	1,028,493.3	6,822.7	78.7%	1.8%	
Oct	1,462,599.6	435,356.9	2,456,927.0	439,048.7	994,327.4	3,691.8	68.0%	0.8%	
Nov	1,310,571.2	471,254.9	2,291,506.6	489,321.5	980,935.4	18,066.6	74.8%	3.8%	
Dec	1,315,103.5	482,949.9	2,525,861.3	494,245.9	1,210,757.8	11,296.0	92.1%	2.3%	
Total	15,487,815.9	5,406,953.4	27,175,566.0	5,777,174.3	11,687,750.1	370,221.0	75.5%	6.8%	

Table 27 Monthly PJM reserve market clearing: 2018, Case A to Case A ORDC

Table 28 shows the increases in generator revenue when PJM's proposed ORDC is applied to Case A.

Table 28 Monthly PJM generator revenue: 2018, Case A to Case A ORDC

	Revenue (\$)											
			Case A			Case A ORDC				Difference		
	Generation	SR	PR	OR	Generation	SR	PR	OR	Generation	SR	PR	OR
Jan	\$4,721,942,931.8	\$6,059,690.0	\$590,123.9	\$0.0	\$4,903,702,907.4	\$35,303,787.8	\$3,352,958.5	\$6,853.3	\$181,759,975.6	\$29,244,097.9	\$2,762,834.6	\$6,853.3
Feb	\$1,415,723,162.9	\$1,141,654.3	\$68,865.7	\$0.0	\$1,505,390,913.7	\$13,879,148.9	\$1,284,741.5	\$0.0	\$89,667,750.8	\$12,737,494.6	\$1,215,875.8	\$0.0
Mar	\$1,747,326,457.6	\$3,196,953.8	\$563,993.6	\$0.0	\$1,793,996,326.8	\$11,661,958.2	\$1,257,380.7	\$0.0	\$46,669,869.2	\$8,465,004.5	\$693,387.1	\$0.0
Apr	\$1,772,922,354.2	\$5,387,102.6	\$1,053,933.7	\$0.0	\$1,827,296,170.8	\$14,247,039.3	\$1,775,546.7	\$0.0	\$54,373,816.6	\$8,859,936.7	\$721,613.0	\$0.0
May	\$1,708,618,722.9	\$3,458,761.1	\$482,879.6	\$0.0	\$1,747,120,599.4	\$10,865,845.1	\$1,316,140.9	\$0.0	\$38,501,876.5	\$7,407,084.1	\$833,261.4	\$0.0
Jun	\$1,847,286,164.8	\$1,220,012.8	\$307,677.3	\$0.0	\$1,884,384,743.0	\$7,316,486.5	\$848,315.9	\$0.0	\$37,098,578.2	\$6,096,473.7	\$540,638.6	\$0.0
Jul	\$2,505,939,506.7	\$1,468,835.0	\$405,465.1	\$0.0	\$2,539,745,703.8	\$8,890,634.9	\$1,044,746.0	\$0.0	\$33,806,197.1	\$7,421,800.0	\$639,280.9	\$0.0
Aug	\$2,691,708,750.5	\$944,817.0	\$205,406.4	\$0.0	\$2,738,981,078.8	\$8,294,350.9	\$948,480.0	\$0.0	\$47,272,328.3	\$7,349,534.0	\$743,073.6	\$0.0
Sep	\$2,165,046,703.9	\$1,935,343.8	\$466,280.8	\$0.0	\$2,217,133,432.6	\$9,834,664.3	\$1,067,937.8	\$0.0	\$52,086,728.7	\$7,899,320.5	\$601,657.1	\$0.0
Oct	\$1,960,059,046.6	\$2,923,290.1	\$722,045.5	\$0.0	\$2,037,984,679.1	\$14,665,751.7	\$1,660,008.2	\$0.0	\$77,925,632.5	\$11,742,461.7	\$937,962.8	\$0.0
Nov	\$2,228,604,987.3	\$2,198,883.6	\$461,822.2	\$0.0	\$2,317,394,164.9	\$13,568,427.3	\$1,549,689.7	\$0.0	\$88,789,177.6	\$11,369,543.7	\$1,087,867.5	\$0.0
Dec	\$2,031,396,902.8	\$931,137.4	\$241,804.3	\$0.0	\$2,166,214,528.6	\$15,817,395.2	\$1,667,131.7	\$0.0	\$134,817,625.8	\$14,886,257.9	\$1,425,327.4	\$0.0
Total	\$26,796,575,692.0	\$30,866,481.3	\$5,570,298.0	\$0.0	\$27,679,345,248.9	\$164,345,490.4	\$17,773,077.7	\$6,853.3	\$882,769,556.9	\$133,479,009.0	\$12,202,779.7	\$6,853.3

Table 29 and Table 30 show the generator revenues by technology type, both total and per ICAP MW, comparing Case A to Case A with the PJM proposed ORDC.

Table 29 Generator revenues by technology type: 2018, Case A to Case A ORDC

		Case A			Revenue (\$) Case A1			Difference	
	Generation		PR	Generation	SR	PR	Generation		PR
Battery	\$144,174.4	\$0.0	\$0.0	\$155,536.6	\$277.1	\$55.4	\$11,362.2	\$277.1	\$55.4
CC	\$7,484,861,343.8	\$17,275,747.1	\$539.5	\$7,680,684,082.1	\$90,320,363.5	\$5,000.2	\$195,822,738.3	\$73,044,616.4	\$4,460.7
CT Natural Gas	\$805,127,285.3	\$4,795,045.9	\$1,616,514.3	\$869,483,702.5	\$26,359,623.3	\$6,093,503.0	\$64,356,417.2	\$21,564,577.4	\$4,476,988.7
CT Oil	\$39,567,721.2	\$1,470,433.3	\$3,708,429.6	\$40,491,904.3	\$5,023,324.6	\$10,939,062.3	\$924,183.1	\$3,552,891.3	\$7,230,632.7
CT Other	\$5,669,809.6	\$8,580.7	\$19,434.9	\$5,845,941.0	\$41,415.9	\$56,705.1	\$176,131.5	\$32,835.2	\$37,270.2
Fuel Cell	\$7,146,807.5	\$0.0	\$0.0	\$7,403,493.9	\$0.0	\$0.0	\$256,686.3	\$0.0	\$0.0
Hydro	\$467,552,732.7	\$2,305,817.9	\$87,871.0	\$486,117,032.0	\$9,186,724.4	\$250,957.8	\$18,564,299.3	\$6,880,906.5	\$163,086.9
Nuclear	\$8,624,960,212.6	\$0.0	\$0.0	\$8,916,012,522.1	\$0.0	\$0.0	\$291,052,309.6	\$0.0	\$0.0
RICE Natural Gas	\$13,132,167.2	\$65,537.6	\$0.0	\$14,252,185.1	\$477,897.2	\$0.0	\$1,120,017.9	\$412,359.7	\$0.0
RICE OII	\$1,301,349.6	\$1,957.5	\$87,485.9	\$1,320,746.6	\$8,381.2	\$248,170.9	\$19,397.0	\$6,423.7	\$160,685.0
RICE Other	\$51,181,770.3	\$378,016.8	\$46,956.6	\$52,643,347.3	\$1,341,552.8	\$135,816.5	\$1,461,577.0	\$963,536.0	\$88,859.9
Solar	\$63,794,993.7	\$0.0	\$0.0	\$65,510,189.5	\$0.0	\$0.0	\$1,715,195.8	\$0.0	\$0.0
Steam Coal	\$8,107,721,991.6	\$3,817,694.2	\$2,868.2	\$8,378,605,491.7	\$28,082,751.7	\$43,579.2	\$270,883,500.1	\$24,265,057.5	\$40,710.9
Steam Natural Gas	\$282,552,561.3	\$537,800.2	\$197.9	\$289,145,179.8	\$2,736,022.3	\$227.2	\$6,592,618.5	\$2,198,222.1	\$29.3
Steam Oil	\$38,694,864.0	\$44,166.4	\$0.0	\$39,328,394.9	\$185,138.6	\$0.0	\$633,530.8	\$140,972.2	\$0.0
Steam Other	\$221,652,709.9	\$165,093.6	\$0.0	\$228,374,231.0	\$580,406.5	\$0.0	\$6,721,521.1	\$415,312.9	\$0.0
Wind	\$581,516,370.5	\$0.0	\$0.0	\$603,972,118.5	\$0.0	\$0.0	\$22,455,748.0	\$0.0	\$0.0
Total	\$26,796,578,865.2	\$30,865,891.2	\$5,570,298.0	\$27,679,346,098.9	\$164,343,879.0	\$17,773,077.7	\$882,767,233.7	\$133,477,987.8	\$12,202,779.7

	Revenue (\$/MW-year)								
		Case A			Case C			Difference	
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR
Battery	\$3,604.36	\$0.00	\$0.00	\$3,798.43	\$13.33	\$1.38	\$194.07	\$13.33	\$1.38
CC	\$155,967.75	\$359.99	\$0.01	\$163,258.56	\$1,991.24	\$0.09	\$7,290.80	\$1,631.25	\$0.08
CT Natural Gas	\$32,156.09	\$191.51	\$64.56	\$36,990.46	\$1,075.46	\$255.89	\$4,834.37	\$883.95	\$191.33
CT Oil	\$9,983.78	\$371.02	\$935.72	\$11,849.83	\$1,263.09	\$2,857.71	\$1,866.05	\$892.07	\$1,921.99
CT Other	\$127,698.41	\$193.26	\$437.72	\$134,586.24	\$927.62	\$1,367.07	\$6,887.83	\$734.36	\$929.35
Fuel Cell	\$238,226.92	\$0.00	\$0.00	\$251,877.32	\$0.00	\$0.00	\$13,650.40	\$0.00	\$0.00
Hydro	\$57,912.74	\$285.61	\$10.88	\$60,669.54	\$1,183.75	\$32.89	\$2,756.80	\$898.15	\$22.01
Nuclear	\$247,331.25	\$0.00	\$0.00	\$262,676.13	\$0.00	\$0.00	\$15,344.88	\$0.00	\$0.00
RICE Natural Gas	\$109,071.16	\$544.33	\$0.00	\$120,250.00	\$3,832.01	\$0.00	\$11,178.85	\$3,287.68	\$0.00
RICE OII	\$5,665.43	\$8.52	\$380.87	\$6,099.79	\$32.41	\$1,153.61	\$434.36	\$23.89	\$772.74
RICE Other	\$141,785.61	\$1,047.20	\$130.08	\$149,025.68	\$3,871.55	\$391.63	\$7,240.07	\$2,824.35	\$261.55
Solar	\$45,967.24	\$0.00	\$0.00	\$48,389.13	\$0.00	\$0.00	\$2,421.88	\$0.00	\$0.00
Steam Coal	\$125,943.83	\$59.30	\$0.04	\$132,513.86	\$440.62	\$0.67	\$6,570.03	\$381.32	\$0.62
Steam Natural Gas	\$28,178.89	\$53.63	\$0.02	\$27,725.22	\$263.42	\$0.00	(\$453.67)	\$209.79	(\$0.02)
Steam Oil	\$16,867.86	\$19.25	\$0.00	\$17,831.52	\$81.66	\$0.00	\$963.66	\$62.41	\$0.00
Steam Other	\$186,497.86	\$138.91	\$0.00	\$196,423.60	\$519.02	\$0.00	\$9,925.74	\$380.11	\$0.00
Wind	\$64,478.96	\$0.00	\$0.00	\$68,888.98	\$0.00	\$0.00	\$4,410.02	\$0.00	\$0.00
Total	\$128,180.23	\$147.65	\$26.65	\$135,432.01	\$816.86	\$88.55	\$7,251.78	\$669.22	\$61.91

Table 30 Generator revenue per ICAP MW by technology type: 2018, Case A to Case A ORDC

To estimate the increase in carbon dioxide emissions due to the ORDC, the emissions rate for each technology, as calculated by the EIA, is multiplied by a generic heat rate for the technology and the simulated MWh of energy.<sup>7</sup> Table 31 provides the estimated increase in CO<sub>2</sub> emissions in short tons.

<sup>&</sup>lt;sup>7</sup> Carbon Dioxide Emissions Coefficients, Energy Information Administration, <<u>https://www.eia.gov/environment/emissions/co2\_vol\_mass.php</u>>, accessed May 9, 2019.

	CO2 Rate (Ibs/MMBtu)	Heat Rate (MMBtu/MWh)	CO2 Rate (tons/MWh)	CO2 Case A (tons)	CO2 Case A ORDC (tons)	CO2 Difference (tons)
Battery						
CC	117.00	7.5	0.44	99,921,281	99,218,180	(703,101)
CT Natural Gas	117.00	11.0	0.64	10,126,406	10,842,983	716,577
CT Oil	161.30	13.0	1.05	228,427	230,241	1,814
CT Other	117.00	11.0	0.64	106,225	106,182	(42)
Fuel Cell						
Hydro						
Nuclear						
RICE Natural Gas	117.00	11.0	0.64	191,070	206,866	15,797
RICE OII	161.30	13.0	1.05	9,573	9,550	(23)
RICE Other	117.00	11.0	0.64	947,109	946,662	(447)
Solar						
Steam Coal	210.20	11.0	1.16	271,630,534	272,133,017	502,483
Steam Natural Gas	117.00	11.0	0.64	3,809,895	3,814,332	4,437
Steam Oil	161.30	11.0	0.89	296,370	295,936	(434)
Steam Other	117.00	11.0	0.64	4,089,342	4,088,432	(909)
Wind						
Total				387,266,889	387,803,950	537,061

## Table 31 Estimated emissions increase: 2018, Case A to Case A ORDC

## Case B to Case C 15 minute

When PJM's 30 minute ORDC is replaced with an ORDC based on 15 minute forecast error uncertainty, the price and revenue differences are lower.

Table 32 shows the increase in monthly energy prices between Case B and Case C 15 minute.

	Load Weighted LMP (\$/MWh)						
	Case B	Case C15	Difference				
Jan	\$73.87	\$74.91	\$1.04				
Feb	\$27.58	\$27.88	\$0.30				
Mar	\$30.64	\$30.73	\$0.09				
Apr	\$34.10	\$34.47	\$0.37				
Мау	\$31.96	\$32.13	\$0.17				
Jun	\$30.13	\$30.18	\$0.05				
Jul	\$34.53	\$34.70	\$0.16				
Aug	\$36.02	\$36.15	\$0.13				
Sep	\$35.59	\$35.75	\$0.16				
Oct	\$33.90	\$34.26	\$0.36				
Nov	\$37.45	\$38.02	\$0.57				
Dec	\$33.23	\$33.51	\$0.28				
Total	\$37.30	\$37.61	\$0.31				

Table 32 PJM load-weighted average LMP: 2018, Case B to Case C 15 minute

Table 33 shows the increase in energy prices at PJM hubs. The differences range from \$0.13 per MWh to \$0.35 per MWh, about \$0.15 per MWh less than the differences for Case B to Case C.

	Average LMP (\$/MWh)						
	Case B	Case C15	Difference				
AEP GEN HUB	\$32.20	\$32.52	\$0.32				
AEP-DAYTON HUB	\$33.52	\$33.85	\$0.33				
ATSI GEN HUB	\$34.40	\$34.69	\$0.29				
CHICAGO GEN HUB	\$28.68	\$28.94	\$0.27				
CHICAGO HUB	\$29.29	\$29.56	\$0.27				
DOMINION HUB	\$37.25	\$37.55	\$0.30				
EASTERN HUB	\$37.34	\$37.47	\$0.13				
N ILLINOIS HUB	\$29.09	\$29.35	\$0.27				
NEW JERSEY HUB	\$35.14	\$35.42	\$0.28				
OHIO HUB	\$33.28	\$33.61	\$0.33				
WEST INT HUB	\$35.30	\$35.61	\$0.31				
WESTERN HUB	\$35.51	\$35.86	\$0.35				

## Table 33 Average hub LMP: 2018, Case B to Case C 15 minute

Table 34 and Table 35 show the differences in zonal load and generation-weighted average energy prices.

	Load Weighted LMP (\$/MWh)						
	Case B	Case C15	Difference				
AECO	\$37.81	\$38.17	\$0.36				
AEP	\$36.65	\$36.99	\$0.33				
AP	\$38.12	\$38.47	\$0.35				
ATSI	\$37.24	\$37.55	\$0.31				
BGE	\$42.13	\$42.52	\$0.39				
COMED	\$30.74	\$31.03	\$0.28				
CPP	\$35.67	\$36.07	\$0.40				
DAY	\$36.44	\$36.79	\$0.35				
DEOK	\$36.12	\$36.46	\$0.34				
DOM	\$41.06	\$41.37	\$0.31				
DPL	\$41.46	\$41.59	\$0.13				
DUQ	\$36.95	\$37.25	\$0.30				
EKPC	\$35.75	\$36.10	\$0.35				
JCPL	\$37.81	\$38.11	\$0.29				
METED	\$38.14	\$38.44	\$0.31				
PECO	\$37.55	\$37.85	\$0.30				
PENELEC	\$36.94	\$37.32	\$0.38				
PEPCO	\$40.86	\$41.21	\$0.35				
PPL	\$37.40	\$37.67	\$0.27				
PSEG	\$37.34	\$37.60	\$0.26				

Table 34 PJM load-weighted average LMP by zone: 2018, Case B to Case C 15 minute

	Generation Weighted LMP (\$/MWh)						
	Case B	Case C15	Difference				
AECO	\$37.18	\$37.42	\$0.24				
AEP	\$33.41	\$33.74	\$0.33				
AP	\$35.26	\$35.59	\$0.33				
ATSI	\$35.95	\$36.28	\$0.32				
BGE	\$41.81	\$42.17	\$0.35				
COMED	\$28.99	\$29.26	\$0.27				
DAY	\$38.76	\$39.28	\$0.52				
DEOK	\$33.44	\$33.78	\$0.34				
DOM	\$40.34	\$40.65	\$0.30				
DPL	\$44.92	\$45.15	\$0.23				
DUQ	\$35.68	\$35.97	\$0.29				
EKPC	\$36.29	\$36.67	\$0.38				
JCPL	\$33.85	\$34.07	\$0.23				
METED	\$34.06	\$34.35	\$0.29				
OVEC	\$31.31	\$31.63	\$0.32				
PECO	\$34.78	\$35.05	\$0.27				
PENELEC	\$34.75	\$35.16	\$0.41				
PEPCO	\$43.84	\$44.25	\$0.42				
PPL	\$35.42	\$35.69	\$0.27				
PSEG	\$34.80	\$35.10	\$0.30				

Table 35 PJM generation-weighted average LMP by zone: 2018, Case B to Case C 15 minute

Table 36 shows the change in reserve clearing prices between Case B and Case C 15 minute. Reserve price increases are high, but they do not more than double as in Case B or Case A to Case C.

		serve Weighte	•	ket Clearing Pri	ces (\$/MW)	
	Case B		Case C	15	Differen	се
	Synchronized	Primary Sy	nchronized	Primary Sy	nchronized	Primary
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve
Jan	\$6.03	\$1.43	\$12.45	\$5.25	\$6.41	\$3.82
Feb	\$2.36	\$0.31	\$5.52	\$2.18	\$3.16	\$1.87
Mar	\$3.85	\$1.94	\$4.63	\$1.93	\$0.78	(\$0.01)
Apr	\$4.96	\$2.47	\$5.48	\$2.74	\$0.52	\$0.27
May	\$3.20	\$1.09	\$3.43	\$1.67	\$0.23	\$0.58
Jun	\$1.29	\$1.06	\$2.30	\$1.47	\$1.01	\$0.41
Jul	\$1.45	\$1.08	\$2.77	\$1.55	\$1.32	\$0.47
Aug	\$0.81	\$0.45	\$2.35	\$1.26	\$1.54	\$0.81
Sep	\$1.74	\$1.47	\$3.07	\$2.10	\$1.34	\$0.63
Oct	\$2.38	\$1.94	\$4.51	\$2.84	\$2.12	\$0.90
Nov	\$1.93	\$1.29	\$4.47	\$2.41	\$2.53	\$1.12
Dec	\$0.95	\$0.59	\$4.42	\$2.33	\$3.47	\$1.75
Annual	\$2.58	\$1.25	\$4.66	\$2.34	\$2.08	\$1.09

Table 36 Monthly PJM reserve market prices: 2018, Case B to Case C 15 minute

Table 37 shows that the amount of synchronized reserves cleared with the 15 minute ORDC is much less than the amount cleared with the 30 minute ORDC. The difference in primary reserves changes little.

	Cleared Reserve MWh										
	Case	В	Case (	C 15	Differe	ence	Percent Dif	fference			
	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary	Synchronized	Primary			
	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve			
Jan	1,333,092.8	460,168.2	2,228,540.3	549,776.7	895,447.5	89,608.6	67.2%	19.5%			
Feb	1,104,579.4	424,887.5	1,965,775.9	507,575.8	861,196.4	82,688.2	78.0%	19.5%			
Mar	1,320,246.7	480,453.2	1,797,395.2	507,862.2	477,148.5	27,409.0	36.1%	5.7%			
Apr	1,242,142.7	444,263.6	1,636,792.8	477,526.3	394,650.1	33,262.8	31.8%	7.5%			
May	1,224,596.4	450,672.8	1,705,638.6	486,468.2	481,042.2	35,795.4	39.3%	7.9%			
Jun	1,260,166.9	415,391.3	2,008,779.8	423,307.1	748,612.9	7,915.8	59.4%	1.9%			
Jul	1,311,952.1	484,208.9	2,092,166.6	505,553.7	780,214.6	21,344.8	59.5%	4.4%			
Aug	1,298,609.1	481,900.0	2,097,757.4	510,334.8	799,148.3	28,434.8	61.5%	5.9%			
Sep	1,307,381.3	372,220.2	2,190,349.4	380,285.2	882,968.1	8,065.0	67.5%	2.2%			
Oct	1,462,476.9	435,479.7	2,257,125.9	438,064.3	794,649.0	2,584.6	54.3%	0.6%			
Nov	1,310,593.5	471,232.5	2,088,334.8	488,764.7	777,741.2	17,532.3	59.3%	3.7%			
Dec	1,315,281.3	482,772.0	2,354,808.2	494,782.0	1,039,526.9	12,009.9	79.0%	2.5%			
Total	15,491,118.8	5,403,649.7	24,423,464.6	5,770,300.8	8,932,345.8	366,651.1	57.7%	6.8%			

Table 37 Monthly PJM reserve market clearing: 2018, Case B to Case C 15

Table 38 provides monthly and annual generator revenue by product. Total generator revenues increase by \$329.3 million from Case B to Case C 15 minute.

	Revenue (\$)											
			Case C15					Difference				
	Generation	SR	PR	OR	Generation	SR	PR	OR	Generation	SR	PR	OR
Jan	\$5,081,623,092.5	\$8,041,039.6	\$657,447.2	\$0.0	\$5,164,719,346.6	\$27,737,483.1	\$2,885,555.4	\$13,623.1	\$83,096,254.1	\$19,696,443.5	\$2,228,108.2	\$13,623.1
Feb	\$1,519,472,468.7	\$2,603,153.7	\$132,698.2	\$0.0	\$1,536,564,230.3	\$10,850,811.1	\$1,108,521.8	\$0.0	\$17,091,761.6	\$8,247,657.4	\$975,823.6	\$0.0
Mar	\$1,859,115,556.6	\$5,089,052.2	\$933,042.7	\$0.0	\$1,864,570,295.1	\$8,327,706.0	\$980,355.9	\$0.0	\$5,454,738.5	\$3,238,653.7	\$47,313.2	\$0.0
Apr	\$1,826,358,822.0	\$6,159,167.4	\$1,098,624.4	\$0.0	\$1,846,381,111.9	\$8,969,897.6	\$1,308,754.1	\$14,835.2	\$20,022,289.9	\$2,810,730.2	\$210,129.7	\$14,835.2
May	\$1,775,298,936.7	\$3,915,318.4	\$492,517.1	\$0.0	\$1,784,878,867.9	\$5,846,893.8	\$812,023.9	\$0.0	\$9,579,931.2	\$1,931,575.3	\$319,506.8	\$0.0
Jun	\$1,935,187,664.6	\$1,628,149.4	\$439,857.2	\$0.0	\$1,939,986,706.5	\$4,623,571.9	\$623,395.9	\$0.0	\$4,799,041.9	\$2,995,422.5	\$183,538.7	\$0.0
Jul	\$2,580,228,898.0	\$1,907,918.9	\$521,565.1	\$0.0	\$2,592,662,571.0	\$5,800,174.5	\$783,547.7	\$0.0	\$12,433,673.0	\$3,892,255.6	\$261,982.5	\$0.0
Aug	\$2,750,194,638.6	\$1,050,710.0	\$214,835.1	\$0.0	\$2,761,741,273.6	\$4,927,006.9	\$642,904.1	\$0.0	\$11,546,635.0	\$3,876,296.8	\$428,068.9	\$0.0
Sep	\$2,222,742,250.0	\$2,271,640.2	\$546,674.0	\$0.0	\$2,234,223,570.8	\$6,730,050.8	\$799,958.9	\$0.0	\$11,481,320.8	\$4,458,410.6	\$253,284.9	\$0.0
Oct	\$2,024,751,056.9	\$3,481,601.1	\$845,140.1	\$0.0	\$2,045,976,189.9	\$10,168,382.5	\$1,246,072.1	\$0.0	\$21,225,133.0	\$6,686,781.4	\$400,932.0	\$0.0
Nov	\$2,273,655,880.6	\$2,530,961.9	\$608,868.5	\$0.0	\$2,308,388,830.5	\$9,324,641.1	\$1,176,746.4	\$0.0	\$34,732,949.9	\$6,793,679.3	\$567,877.9	\$0.0
Dec	\$2,094,561,286.0	\$1,254,060.2	\$283,817.4	\$0.0	\$2,111,816,591.9	\$10,414,915.4	\$1,155,014.1	\$0.0	\$17,255,305.9	\$9,160,855.1	\$871,196.6	\$0.0
Total	\$27,943,190,551.2	\$39,932,773.1	\$6,775,087.1	\$0.0	\$28,191,909,586.0	\$113,721,534.5	\$13,522,850.2	\$28,458.3	\$248,719,034.8	\$73,788,761.3	\$6,747,763.1	\$28,458.3

Table 39 shows the change in generator revenues by technology with the 15 minute ORDC. Table 40 shows the change in generator revenues per ICAP MW by technology with the 15 minute ORDC. The distribution of increased revenue across technology types is similar to the 30 minute ORDC, but the magnitudes are smaller.

	Revenue (\$)									
		Case B			Case C1		Difference			
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR	
Battery	\$148,766.5	\$0.9	\$0.0	\$151,503.7	\$305.4	\$37.9	\$2,737.2	\$304.5	\$37.9	
CC	\$7,759,725,631.2	\$22,947,672.0	\$563.7	\$7,816,207,204.6	\$64,143,239.3	\$2,772.2	\$56,481,573.4	\$41,195,567.3	\$2,208.5	
CT Natural Gas	\$888,699,914.9	\$5,773,510.7	\$2,003,092.8	\$907,809,179.2	\$16,306,920.9	\$4,707,542.6	\$19,109,264.3	\$10,533,410.2	\$2,704,449.8	
CT Oil	\$46,324,308.3	\$1,690,138.3	\$4,474,516.6	\$46,794,643.1	\$3,550,917.7	\$8,249,808.3	\$470,334.9	\$1,860,779.4	\$3,775,291.7	
CT Other	\$5,899,724.1	\$11,965.6	\$23,344.2	\$5,949,933.6	\$30,718.5	\$44,295.4	\$50,209.6	\$18,753.0	\$20,951.1	
Fuel Cell	\$7,469,775.2	\$0.0	\$0.0	\$7,527,969.7	\$0.0	\$0.0	\$58,194.5	\$0.0	\$0.0	
Hydro	\$484,669,838.3	\$2,887,448.2	\$104,804.6	\$487,308,991.8	\$6,771,463.1	\$188,746.2	\$2,639,153.5	\$3,884,014.9	\$83,941.6	
Nuclear	\$9,049,991,523.7	\$0.0	\$0.0	\$9,129,040,875.8	\$0.0	\$0.0	\$79,049,352.1	\$0.0	\$0.0	
RICE Natural Gas	\$14,189,947.6	\$96,194.4	\$0.0	\$14,398,092.1	\$277,466.1	\$0.0	\$208,144.5	\$181,271.7	\$0.0	
RICE Oil	\$1,457,402.1	\$2,056.5	\$104,177.5	\$1,454,166.1	\$5,956.4	\$192,180.2	(\$3,236.0)	\$3,899.9	\$88,002.7	
RICE Other	\$53,295,887.4	\$505,299.9	\$57,816.4	\$53,638,706.8	\$999,598.8	\$105,214.4	\$342,819.4	\$494,299.0	\$47,398.0	
Solar	\$66,827,029.5	\$0.0	\$0.0	\$66,845,393.9	\$0.0	\$0.0	\$18,364.4	\$0.0	\$0.0	
Steam Coal	\$8,410,313,995.3	\$5,163,185.9	\$6,771.2	\$8,489,007,895.6	\$19,217,436.0	\$32,253.0	\$78,693,900.3	\$14,054,250.1	\$25,481.8	
Steam Natural Gas	\$271,573,014.0	\$587,459.2	\$0.0	\$274,847,880.8	\$1,847,087.4	\$0.0	\$3,274,866.7	\$1,259,628.2	\$0.0	
Steam Oil	\$40,052,929.0	\$40,336.8	\$0.0	\$40,595,454.0	\$136,886.7	\$0.0	\$542,525.1	\$96,549.9	\$0.0	
Steam Other	\$230,868,650.2	\$226,751.1	\$0.0	\$232,480,068.2	\$432,362.9	\$0.0	\$1,611,418.0	\$205,611.8	\$0.0	
Wind	\$611,688,031.0	\$0.0	\$0.0	\$617,855,871.3	\$0.0	\$0.0	\$6,167,840.3	\$0.0	\$0.0	
Total	\$27,943,196,368.3	\$39,932,019.4	\$6,775,087.1	\$28,191,913,830.5	\$113,720,359.2	\$13,522,850.2	\$248,717,462.2	\$73,788,339.8	\$6,747,763.1	

Table 39 Generator revenues by technology type: 2018, Case B to Case C 15 minute

	Revenue (\$/MW)								
	Case B			Case C1			Difference		
	Generation	SR	PR	Generation	SR	PR	Generation	SR	PR
Battery	\$3,719.16	\$0.02	\$0.00	\$3,787.59	\$7.64	\$0.95	\$68.43	\$7.61	\$0.95
CC	\$161,695.31	\$478.18	\$0.01	\$162,872.26	\$1,336.60	\$0.06	\$1,176.95	\$858.42	\$0.05
CT Natural Gas	\$35,493.90	\$230.59	\$80.00	\$36,257.11	\$651.28	\$188.02	\$763.21	\$420.70	\$108.01
CT Oil	\$11,688.61	\$426.46	\$1,129.02	\$11,807.29	\$895.97	\$2,081.60	\$118.68	\$469.51	\$952.59
CT Other	\$132,876.67	\$269.50	\$525.77	\$134,007.51	\$691.86	\$997.64	\$1,130.85	\$422.36	\$471.87
Fuel Cell	\$248,992.51	\$0.00	\$0.00	\$250,932.32	\$0.00	\$0.00	\$1,939.82	\$0.00	\$0.00
Hydro	\$60,032.93	\$357.65	\$12.98	\$60,359.82	\$838.74	\$23.38	\$326.89	\$481.09	\$10.40
Nuclear	\$259,519.54	\$0.00	\$0.00	\$261,786.38	\$0.00	\$0.00	\$2,266.84	\$0.00	\$0.00
RICE Natural Gas	\$117,856.71	\$798.96	\$0.00	\$119,585.48	\$2,304.54	\$0.00	\$1,728.77	\$1,505.58	\$0.00
RICE Oil	\$6,344.81	\$8.95	\$453.54	\$6,330.72	\$25.93	\$836.66	(\$14.09)	\$16.98	\$383.12
RICE Other	\$147,642.22	\$1,399.80	\$160.17	\$148,591.91	\$2,769.13	\$291.47	\$949.69	\$1,369.33	\$131.30
Solar	\$48,151.96	\$0.00	\$0.00	\$48,165.20	\$0.00	\$0.00	\$13.23	\$0.00	\$0.00
Steam Coal	\$130,644.23	\$80.20	\$0.11	\$131,866.65	\$298.52	\$0.50	\$1,222.42	\$218.32	\$0.40
Steam Natural Gas	\$27,083.90	\$58.59	\$0.00	\$27,410.51	\$184.21	\$0.00	\$326.60	\$125.62	\$0.00
Steam Oil	\$17,459.86	\$17.58	\$0.00	\$17,696.36	\$59.67	\$0.00	\$236.50	\$42.09	\$0.00
Steam Other	\$194,252.12	\$190.79	\$0.00	\$195,607.97	\$363.79	\$0.00	\$1,355.84	\$173.00	\$0.00
Wind	\$67,824.41	\$0.00	\$0.00	\$68,508.31	\$0.00	\$0.00	\$683.89	\$0.00	\$0.00
Total	\$133,665.02	\$191.01	\$32.41	\$134,854.75	\$543.98	\$64.69	\$1,189.73	\$352.96	\$32.28

Table 40 Generator revenues per ICAP MW by technology type: 2018, Case B to Case C 15 minute

To estimate the increase in carbon dioxide emissions due to the ORDC, the emissions rate for each technology, as calculated by the EIA, is multiplied by a generic heat rate for the technology and the simulated MWh of energy.<sup>8</sup> Table 41 provides the estimated increase in CO<sub>2</sub> emissions in short tons.

<sup>&</sup>lt;sup>8</sup> Carbon Dioxide Emissions Coefficients, Energy Information Administration, <<u>https://www.eia.gov/environment/emissions/co2\_vol\_mass.php</u>>, accessed May 9, 2019.

	CO2 Rate	Heat Rate	CO2 Rate	CO2 Case B	CO2 Case C 15	
Battery	(Ibs/MMBtu)	(MMBtu/MWh)	(tons/MWh)	(tons)	(tons)	(tons)
CC	117.00	7.5	0.44	99,811,925	99,674,572	(137,353)
CT Natural Gas	117.00	11.0	0.64	11,023,488	11,229,780	206,291
CT Oil	161.30	13.0	1.05	246,259	245,507	(752)
CT Other	117.00	11.0	0.64	106,222	106,210	(12)
Fuel Cell						. ,
Hydro						
Nuclear						
RICE Natural Gas	117.00	11.0	0.64	205,511	208,057	2,546
RICE OII	161.30	13.0	1.05	9,586	9,603	17
RICE Other	117.00	11.0	0.64	947,615	947,331	(284)
Solar						
Steam Coal	210.20	11.0	1.16	271,043,498	270,982,403	(61,095)
Steam Natural Gas	117.00	11.0	0.64	3,309,329	3,330,236	20,907
Steam Oil	161.30	11.0	0.89	287,795	288,846	1,050
Steam Other	117.00	11.0	0.64	4,074,738	4,073,092	(1,646)
Wind						
Total				386,991,227	387,022,544	31,317

## Table 41 Estimated emissions increase: 2018, Case B to Case C 15 minutes