

## Cross-RTO Survey of Capacity Markets What is Working and What is Not



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## The Brattle Group's Expertise in Capacity Markets

*The Brattle Group* has worked on a number of highly visible engagements in capacity market design for RTOs. Our recent work in these areas includes:

- "Review of PJM's Reliability Pricing Model (RPM)" (June, 2008)
- "Review of the Forward Capacity Market Auction Results and Design Elements" in ISO New England (co-authored with ISO-NE Internal Market Monitoring Unit, June, 2009)
- "Cost-Benefit Analysis of Replacing the NYISO's Existing ICAP Market with a Forward Capacity Market" (June, 2009)
- "A Comparison of PJM's RPM with Alternative Energy and Capacity Market Designs" (October, 2009)
- Assessment of the Midwest ISO's Resource Adequacy Construct (2009, in progress)

## **Capacity Market Design**

	<b>No</b> Resource Adequacy Requirement	Short-Term Resource Adequacy Requirement	Forward Resource Adequacy Requirement	
<b>No</b> RTO Capacity Market	ERCOT AESO Ontario	SPP	CAISO	This presentation focuses on key
<b>"Voluntary"</b> RTO Capacity Market		MISO		market design challenges in mandatory capacity markets <sup>*</sup>
<b>"Mandatory"</b> RTO Capacity Market		NYISO	PJM (RPM) ISO-NE (FCM)	

\*Based on The Brattle Group's work evaluating capacity market designs for PJM, ISO-NE, and NYISO

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## **Forward Capacity Market Structure**

## **Observations**

- Existing forward capacity markets (PJM, ISO-NE) appear to attract sufficient new capacity to meet future needs.
- NYISO (a short-term capacity market) currently has surplus capacity; the incremental benefits of forward procurement would not be available until new capacity is needed.

## Challenges

- Aligning auction timing with capacity development lead-times
- Buyers' risk of over-procurement due to peak load over-forecasting
- Suppliers' risk of deficiency penalties if projects are not completed on time
- Still provides only one-year certainty

## Approaches

- Three-year forward commitment period (PJM, ISO-NE) with provisions for DR and other short leadtime resources
- Hold back some demand until the incremental auctions; some supply (DR and new generation/uprates) is also likely to hold off
- Allow suppliers to relieve themselves of their supply obligation in incremental auctions
- Forward commitment helps price stability; commit to mitigate buyer market power; consider multi-year commitment, but this creates inefficiencies

## **DR Participation in RTO Capacity Markets**

#### **Observations**

- RTO forward capacity markets have attracted a lot of new demand response (PJM, ISO-NE).
- Robust DR growth even at low capacity prices (ISO-NE).
- Penalties and incentives for DR have been uneven some penalties have been asymmetric across resource types.

#### Challenges

- Deficiency risk with DR resources (like *potential* generation, no steel in the ground)
- Performance risk of DR resources ("fatigue")
- Some DR capacity is available only on a shorter-term basis than 3+ year forward commitment

#### Approaches

- Qualification requirements and monitoring of project development milestones; deficiency penalties
- Performance penalties comparable to generation; energy payments provide incentives
- Allow new DR to participate in incremental or reconfiguration auctions (requires increasing liquidity of these auctions)

## **Locational Resource Adequacy**

#### Observations

- All three RTO market designs (PJM, ISO-NE, NYISO) aim to ensure that prices accurately signal where new capacity is needed.
- NYISO has consistent price separation and high prices in constrained NYC zones.
- ISO-NE has not yet price-separated, in PJM price separation varies from year to year.

Challenges			Approaches		
•	Ensuring local price signals	•	Careful definition and explicit modeling of capacity zones (PJM) and local sourcing requirements (ISO-NE, NYISO)		
•	Uncertainty of planned transmission upgrades	•	Count only if certain milestones have been achieved		
•	Market power mitigation in constrained areas	•	See next slide		

## **Market Power Mitigation**

#### **Observations**

- Supplier market power can be high, especially in small, constrained areas.
- Buyer market power is a concern, especially in smaller markets or markets with moderate load growth. Threat is that buyers depress the market price paid to existing resources by contracting for surplus new capacity out of market.
- NYISO: heavy buyer & seller mitigation in constrained areas; PJM: extensive supply offer mitigation; ISO-NE: rely on non-market solutions, light mitigation reflects skepticism about the ability to mitigate accurately.

Challenges	Approaches		
<ul> <li>Supplier market power</li> </ul>		<ul> <li>Allow planned resources to make a forward commitment to compete with existing (PJM, ISO-NE); Sloped demand curves (PJM, NYISO); Mitigate offers</li> </ul>	
<ul> <li>Buyer market power</li> </ul>		<ul> <li>Offer floors (PJM, ISO-NE, NYISO); APR in ISO-NE</li> </ul>	
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# Administrative Capacity Demand Curves and Net CONE

#### Observations

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- Capacity demand curves and Net CONE values are the largest source of contention.
- Sloped capacity demand curves PROS: reduce the incentive to exercise market power and dampen price volatility.
- Sloped capacity demand curves CONS: clearing prices are determined partly by administratively-determined parameters.
- Even if Net CONE were accurate the RA requirement and/or scarcity prices are still administratively-determined.

<ul> <li>Shape of administrative demand curve</li> <li>Ranges from different sloped curves (PJM, NYISO) to vertical (ISO-NE)</li> <li>Administrative determination of CONE</li> <li>Depends on choice of reference technology, cost estimates, financing assumptions, and Energy + A/S offset</li> <li>Adjustments to Net CONE over time</li> <li>Administrative and empirical market-based adjustments</li> </ul>	Challenges		Approaches		
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## What is Working and What is Not (quite yet)

## Working

## **Continuing Challenges**

- Several markets have attracted and retained large amounts of capacity, even at market prices lower than CONE
  - **PJM**: RPM attracted/retained a net of 7,210 MW of capacity sixth auction alone, after a net capacity addition of more than 14,000 MW in the first five auctions
  - **ISO-NE**: FCM attracted 900 MW capacity in the 1<sup>st</sup> auction, and 3,134 MW of new capacity in the 2<sup>nd</sup> auction
- These market have also attracted large amounts of low-cost demand response

- Buyer market power
- Contentious administrative determinations (load forecasting, reliability targets, Net CONE)
- Local reliability; continued reliance on RMRs in some markets
- Treatment of planned transmission
- Tension in accommodating short lead-time resources (mostly DR) and long lead-time projects (baseload generation, transmission)
- Perceptions ("not yet reliable") and transition issues ("rate shock")

## About The Brattle Group

*The Brattle Group* provides consulting and expert testimony in economics, finance, and regulation to corporations, law firms, and governments around the world.

We combine in-depth industry experience, rigorous analyses, and principled techniques to help clients answer complex economic and financial questions in litigation and regulation, develop strategies for changing markets, and make critical business decisions.

- Climate Change Policy and Planning Cost of Capital Demand Forecasting and Weather Normalization Demand Response and Energy Efficiency Electricity Market Modeling Energy Asset Valuation Energy Contract Litigation Environmental Compliance Fuel and Power Procurement Incentive Regulation
- Rate Design, Cost Allocation, and Rate Structure Regulatory Strategy and Litigation Support Renewables Resource Planning Retail Access and Restructuring Risk Management Market-Based Rates Market Design and Competitive Analysis Mergers and Acquisitions Transmission

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