

## Performance Assessment Interval Billing Approach

Risk Management Committee February 22, 2023



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## Non-Performance Charge Billing

- The current PJM Tariff language specifies that Non-Performance Charges are to be billed in equal installments in the remaining months of the Delivery Year following the determination of the charges.
  - This means Non-Performance Charges from the December 2022 PAI event would be divided in three monthly bills (March, April, May)
  - Given the magnitude of estimated charges for this event, some market participants may have difficulty meeting payment obligations in this timeframe
- PJM reviewed a proposal to extend the billing period to 9 months and provided notice and consultation with the PJM Members and Transmission Owners in accordance with Tariff, section 9.2 and CTOA, section 7.5.1 in soliciting feedback from the RMC, MC & TOA-AC in January
  - Goal is to minimize disruption to the market and maximize the collection of charges



## Amended Billing Timeline – Future Events

Based on feedback received, PJM filed the following amendment with FERC pursuant to section 205 of the FPA on February 2, 2023, in Docket ER23-1038-000:

#### For future PAI events:

Number of billing months remaining in Delivery Year:	6 or More (events in or before September)	Less than 6 (events occurring in October or later)
Billing Timeline:	No change.  Bill charges in equal installments over the remaining months in the Delivery Year.	<ul> <li>PJM may follow the status quo or extend the billing period to up to 9 months with no interest due.</li> <li>Notice to membership is required.</li> <li>Any extension to the billing period would uniformly apply to all market participants.</li> <li>Charges are billed in equal installments over the selected billing period.</li> </ul>



## Amended Billing Timeline – December 2022 Event

#### For the December 2022 PAI events:

A transitional rule was proposed. Members will have two options for payment schedules.

**3 month billing option:** Pay over the remainder of the delivery year consistent with the current tariff. No interest will be applied.

Mar Apr May 1/3<sup>rd</sup> 1/3<sup>rd</sup> 1/3<sup>rd</sup>

**9 month billing option:** Interest would be calculated for the months that go past the current delivery year based on the FERC interest rate at the time of election.

 Mar 1/9th
 Apr 1/9th
 May 1/9th
 Jun 1/9th
 Jul 1/9th
 Aug 1/9th
 Sep 1/9th
 Oct 1/9th
 Nov 1/9th

Interest calculated for last 6 months and then levelized and billed over entire 9 month period



- The proposal helps mitigate risks of member defaults and provide additional opportunities to collect Non-Performance Charges
  - This ultimately decreases the reliability risk that would otherwise arise if resources
    defaulted and could no longer be relied upon as capacity for the remainder of the
    Delivery Year
  - The goal is to increase the pool of bonus payments available for resources that over performed during the event
- In recognition of the reasonable expectation that all bonus payments would have been received by the June monthly bill based on the current tariff, members owed bonus payments will receive the interest payments collected.



# PJM is requiring all members receiving non-performance charges to notify PJM whether they are electing the 3 month or 9 month billing option.

- Elections are contingent on FERC approval of the proposed tariff revisions.
- Elections must be made at the sub-account level (not resource-specific).
- A page is being added to the <u>Billing Line Item Transfer</u> application to facilitate this election.



- The election window will be open from February 22 March 17, 2023.
  - Once submitted, elections can be updated through the end of this period.
  - Elections will become read only beyond March 17.
- Users must have the Billing Line Item Transfer Read/Write role for each sub-account in order to submit these elections.
  - Customer Account Managers can grant this access.

PJM expects all members to proactively submit their elections by March 17. In the event a member does not submit their billing election, PJM will follow up with the member to secure an election. In the event no response is received by March 24, the election will default to the 3 month option.

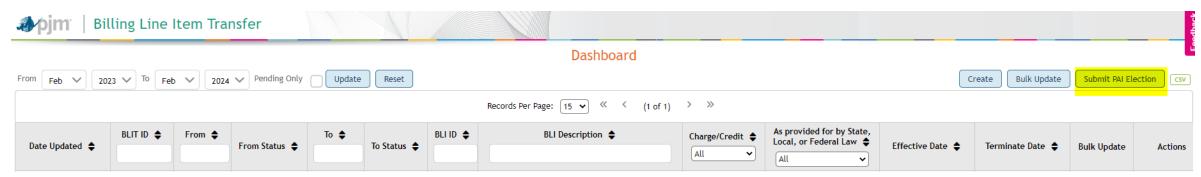


## Accessing the Election Page

#### Navigate to the Billing Line Item Transfer tool page and select "Sign In"



#### From the Dashboard, select the "Submit PAI Election" button





#### **Election Submittal**

My Tools ▼



#### Billing Line Item Transfer

#### PAI Billing Timing Election



For the assessment of Non-Performance Charges stemming from Winter Storm Elliott on December 23 and 24, 2022, please elect whether the charges for this sub-account are to be invoiced over the three monthly bills remaining in the Delivery Year (March 2023 through May 2023) or over nine monthly bills (March 2023 through November 2023), subject to interest. Elections may be made or modified on this screen through March 17, 2023. Failure to make an election will result in all such charges being automatically invoiced over three monthly bills.

ABC's Election:

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(

9 Months (Interest will be applied)

Submit

PAI Election History					
PAI Election (in Months)	User	Timestamp			
	9 PETER10	02/10/2023 09:04:01			
	3 STGUSER44	02/10/2023 08:59:07			

Select the 3 Months or 9 Months option and submit.

Election history will display any changes to elections.



## Single User Multiple Account (SUMA) elections

 Users with SUMA access can make elections for multiple subaccounts using a single user account.

For the assessment of Non-Performance Charges stemming from Winter Storm Elliott on December 23 and 24, 2022, please elect whether the charges for this sub-account are to be invoiced over the three monthly bills remaining in the Delivery Year (March 2023 through May 2023) or over nine monthly bills (March 2023 through November 2023), subject to interest. Elections may be made or modified on this screen through March 17, 2023. Failure to make an election will result in all such charges being automatically invoiced over three monthly bills.





## PAI Charge Cash Flow Example

- This slide is the guide for Example 1 in the corresponding worksheet posted as Item 3B
- In this example, the Estimated PAI is \$1.8 billion
- Repayment of the PAI is split evenly between the 3 month and 9 month option.
- Interest is calculated as follows:
  - Current annual FERC interest rate of 6.31%
  - Interest is calculated beginning in June for the total outstanding
  - Total interest is added to the \$900 million and divided by nine
  - This method results in market participants having even monthly payments
  - PJM has included an interest calculator for market participants in the worksheet

#### This example is for illustrative purposes only



### PAI Charge/Bonus Cash Flow Example 2 – 20% / 10% Holdback

- This slide is the guide for Example 2 in the corresponding worksheet posted as Item 3B
- Example is assuming a 20% holdback in month 1 (March)
- Actual collection in this example is 90% for March; therefore a 10% holdback
- This results in two adjustments:
  - During April, an adjustment for March actual collections would be distributed
  - For April and beyond, the holdback would be reset to 10%
- PJM does not intend to apply a holdback to the interest payments
- PJM will need to monitor the following:
  - Monthly holdback rate
  - Any default by a market participant choosing the 9 month option would result in a claw back of interest

#### This example is for illustrative purposes only



### PAI Charge/Bonus Cash Flow Example 3 – 20% / 30% Holdback

- This slide is the guide for Example 3 in the corresponding worksheet posted as Item 3B
- Example is assuming a 20% holdback in month 1 (March)
- Actual collection in this example is 70% for March; therefore a 30% holdback
- This results in two adjustments:
  - During April, an adjustment for March actual collections would be clawed back
  - For April and beyond, the holdback would be reset to 30%
- Same treatment of interest as in Example 2

This example is for illustrative purposes only



- The proposed holdback percentage will be dependent upon internal credit assessments, outreach and collateralization which is ongoing.
- The holdback percentage for the March 2023 invoice will be reviewed at the March 21<sup>st</sup> RMC meeting.



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Performance Assessment Interval Billing Approach



#### Member Hotline

(610) 666 - 8980

(866) 400 - 8980

custsvc@pjm.com



# Appendix



#### Filed Tariff Redlines

#### Tariff, Attachment DD, Section 10A

(j) The Office of the Interconnection shall bill charges and credits for performance during Performance Assessment Intervals within three calendar months after the calendar month that included such Performance Assessment Intervals, provided, for any Non-Performance Charge, the amount shall be divided by the number of months remaining in the Delivery Year for which no invoice has been issued, and the resulting amount shall be invoiced each such remaining month in the Delivery Year. Notwithstanding, or during the first month of the next Delivery Year if three there are less than six months do not remaining in the current Delivery Year for which no invoice has been issued, the Office of the Interconnection may, with prior notice to PJM Members, allocate in equal amounts any Non-Performance Charge in the remaining monthly bills for the current Delivery Year plus up to six monthly bills into the following Delivery Year (but in no event shall the total Non-Performance Charge be divided in more than nine monthly bills). Provided, for any Non-Performance Charges associated with Performance Assessment Intervals from December 23, 2022 and December 24, 2022, a Capacity Market Seller may elect, by providing notice to the Office of Interconnection by March 17, 2023, to divide the total amount of Non-Performance Charges by either (i) the number of remaining monthly bills in the current Delivery Year (i.e., 3 bills) or (ii) the number of remaining monthly bills in the current Delivery Year plus six additional monthly bills into the following Delivery Year (i.e., 9 bills); provided further, however, that for an election under subsection (ii) above, the monthly Non-Performance Charge shall be levelized to include interest for the six month period following the current Delivery Year, such interest amount being determined at the electric interest rate established by the Federal Energy Regulatory Commission at the time of such election. All interest collected in accordance with this provision shall be allocated to the total pool of bonus performance payments and distributed in accordance with Tariff, Attachment DD, section 10A(g).



## What Will I See in MSRS if I Elect the 9 Month Option?

- The Non-Performance Assessment reports in MSRS will show the non-performance charges <u>absent</u> any interest charges.
  - The Non-Performance Monthly Charge column on the Billing Month Summary report will show 1/9<sup>th</sup> of the total charge (absent interest).
- Interest charges can be seen on the billing statement.
  - Under Billing Line Item 1667: Non-Performance Charge
  - Applied as a same month adjustment to this line item. For example, March interest will be assessed as an adjustment to March non-performance charges in the March billing statement.
  - These adjustments will also be visible on the Billing Adjustment Summary report in MSRS.
  - The interest calculator tab of Item 3B can be used to shadow the interest calculation.



## What Will I See in MSRS if I Am a Bonus Recipient?

- The Non-Performance Assessment reports in MSRS will show the bonus credits <u>absent</u> any interest payments.
  - The Total PJM Non-Performance Monthly Charge column on the Billing Month Summary report will show the total charges (absent interest) billed in a given month (reflective of both 3 month and 9 month elections).
- Interest payments can be seen on the billing statement.
  - Under Billing Line Item 2667: Non-Performance Credit
  - Applied as a same month adjustment to this line item. For example, March interest will be paid as an adjustment to March non-performance credits in the March billing statement.
  - These adjustments will also be visible on the Billing Adjustment Summary report in MSRS.



### How Will the Bonus Holdback Be Reported?

- A column will be added to the Non-Performance Assessment Billing Month Summary report to show the amount of bonus dollars withheld for each billing month.
  - Member's Bonus Credit = (Total PJM Non-Performance Monthly Charge Bonus Holdback Adjustment) \* bonus MW ratio share
  - More detail to be shared at March Market Settlements Subcommittee meeting
- If PJM over or under collects compared to the bonus holdback, the difference (positive or negative) will appear as an adjustment to the prior month's bonus credit in the next monthly billing statement.
  - These adjustments will appear separately from the adjustments for interest payments.
  - A new version of the Billing Month Summary that shows the corrected Bonus Holdback Adjustment for that prior month will also be issued.





Month	Bill Issued	Net Payments Due	Net Disbursements Due
March 2023	Fri 4/7/2023	Fri 4/14/2023	Mon 4/17/2023
April 2023	Fri 5/5/2023	Fri 5/12/2023	Mon 5/15/2023
May 2023	Wed 6/7/2023	Fri 6/16/2023	Tue 6/20/2023
June 2023	Mon 7/10/2023	Fri 7/14/2023	Mon 7/17/2023
July 2023	Mon 8/7/2023	Fri 8/11/2023	Mon 8/14/2023
August 2023	Fri 9/8/2023	Fri 9/15/2023	Mon 9/18/2023
September 2023	Fri 10/6/2023	Fri 10/13/2023	Mon 10/16/2023
October 2023	Tues 10/7/2023	Mon 11/13/2023	Tues 11/14/2023
November 2023	Thu 12/7/2023	Fri 12/15/2023	Mon 12/18/2023

