

Initial Margin Confidence Interval Analysis

Eric Endress
Financial Risk Mitigation Senior
Task Force
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- Backtesting was conducted on the three confidence intervals which are currently under consideration
- The failure rate shows the percentage of instances where the initial margin that was calculated was insufficient to cover the actual market moves that occurred

| Confidence Interval | Failure Rate |
|---------------------|--------------|
| 99% | 0.65% |
| 97% | 0.90% |
| 95% | 1.21% |



Backtesting Continued – 99% Confidence Interval

In case of a failure, what is the loss above the IM?

- The expected shortfall indicates the percentage difference between the IM and the loss above the IM when there was a failure
- Results are for Confidence Interval of 99%:

| IM Range (million USD) | Shortfall (% of IM) | Average Shortfall (\$ in MM) | Max Shortfall (\$ in MM) | Failure Rate (%) | Count of Observations |
|---------------------------|---------------------|------------------------------------|-----------------------------|---------------------|-----------------------|
| 0-1 | 52 | 0.06 | 0.79 | 0.48% | 76 |
| 1-3 | 43 | 0.76 | 2.32 | 0.06% | 10 |
| 3-10 | 13 | 0.63 | 1.48 | 0.06% | 9 |
| 10 and above | 37 | 7.19 | 22.29 | 0.04% | 7 |



Backtesting Continued – 97% Confidence Interval

In case of a failure, what is the loss above the IM?

- The expected shortfall indicates the percentage difference between the IM and the loss above the IM when there was a failure
- Results are for Confidence Interval of 97%:

| IM Range (million USD) | Shortfall (% of IM) | Average Shortfall (\$ in MM) | Max Shortfall (\$ in MM) | Failure Rate (%) | Count of Observations |
|---------------------------|---------------------|------------------------------------|-----------------------------|---------------------|-----------------------|
| 0-1 | 53 | 0.08 | 0.87 | 0.64% | 109 |
| 1-3 | 49 | 0.80 | 2.62 | 0.08% | 13 |
| 3-10 | 18 | 1.07 | 7.37 | 0.12% | 20 |
| 10 and above | 32 | 5.63 | 25.41 | 0.06% | 11 |



Backtesting Continued – 95% Confidence Interval

In case of a failure, what is the loss above the IM?

- The expected shortfall indicates the percentage difference between the IM and the loss above the IM when there was a failure
- Results are for Confidence Interval of 95%:

| IM Range (million USD) | Shortfall (% of IM) | Average Shortfall (\$ in MM) | Max Shortfall (\$ in MM) | Failure Rate (%) | Count of Observations |
|---------------------------|---------------------|------------------------------------|--------------------------|---------------------|-----------------------|
| 0-1 | 54 | 80.0 | 0.89 | 0.81% | 138 |
| 1-3 | 32 | 0.55 | 2.74 | 0.17% | 29 |
| 3-10 | 19 | 1.07 | 8.10 | 0.15% | 26 |
| 10 and above | 37 | 5.98 | 26.71 | 0.08% | 13 |