

# FTR Credit Requirements Mark-to-Auction (MTA)

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Credit

Markets & Reliability Committee

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- Market value decline can be an indicator of increasing FTR risk
  - Currently, there is no provision which provides for a collateral call when an FTR portfolio is deteriorating in value
- Mark-to-Auction measures FTR market value changes
  - Difference between purchase price and most recent market price
- The Credit Subcommittee is proposing a new a Mark-to-Auction component for FTR credit requirements
  - Package G1 received 93% support at the MIC
  - Package G1 received 82% support in the CS Poll

- Proposed new FTR Credit Requirement would incorporate a third component
  1. Path-specific component – including:
    - Cleared price minus adjusted historical reference value (includes adjustments for RTEP upgrades)
    - Undiversified adder (if any)
  2. 10¢ Per-MWh minimum
  3. Mark to Auction - **NEW**
    - Cleared FTR portfolio marked against most recent auction prices

- Additive approach to incorporate with Existing Credit Requirements
  - Add positive MTA credit requirement to current requirement
    - Negative MTA is ignored; MTA cannot reduce current requirement
- Intra-Auction collateral calls
  - Implemented the same as the undiversified collateral calls work today
- Freeze Remedy when Market Participant does not cure an MTA collateral call
  - All credit-screened market activity (i.e. virtuals, imports/exports, RPM), except for FTR Sells, will be frozen
- Participant declared in default after second consecutive auction with unsatisfied MTA Collateral Call
  - “Consecutive auctions” must include some overlapping periods
  - Four rounds of a single Annual Auction count as a single auction for default declaration purposes

- §IV.C. of Attachment Q
  - Incorporation of Mark to Auction provisions are in §IV.C.2, §IV.C.3, §IV.C.9, and PART I, SECTION I – DEFINITIONS
  - Updates to §IV.C.8 and former §IV.C.9 were made as a result of the expiration of the Transition Plans for the implementation of the RTEP Upgrades and the per-MWh minimum. These Transition Plans were to expire at the time of the updates to the historical values, which coincides with the implementation of the Mark to Auction provisions.

- Stakeholder Timeline

– Credit Subcommittee	Poll Poll Results	October 23-30, 2018 October 31, 2018
– Market Implementation Committee	First Read Endorsement	November 7, 2018 December 12, 2018
– Markets and Reliability Committee	First Read Endorsement	December 6, 2018 December 20, 2018
– Members Committee	Endorsement	January 24, 2019
– FERC Filing		January 31, 2019

- Target Effective Date

Early April 2019

# Appendix A

## Other Packages and Analysis

Package	Application	Threshold	Support	Do Not Support	Abstain	% Support
A - “Higher of”	Monthly	None	22	149	6	13%
D1 - “Higher of”	Portfolio	None	27	146	4	16%
D1' - “Higher of”	Portfolio	\$100k	19	142	16	12%
G1 - Additive      *PJM Proposal*	Portfolio	None	132	29	16	82%
G2 - Additive	Portfolio	\$100k	51	116	10	31%
G3 - Additive; Bids removed if insufficient collateral	Portfolio	N/A	New			
H - Higher of Existing and (MTA plus MTA Adder)	Portfolio	None	51	111	15	31%
H' - Higher of Existing and (MTA plus MTA Adder)	Portfolio	\$100k	35	127	15	22%
I - Higher of Package G1 and Package H	Portfolio	None	71	97	9	42%
I' - Higher of Package G2 and Package H'	Portfolio	\$100k	29	138	10	17%

All packages except G3 propose intra-auction collateral calls

\*Grayed out Packages (A, D1, D1') were withdrawn by the proposing party

- Four main design components were considered
  - Two components are the same for all remaining packages
    - Portfolio application of MTA
    - Freeze on transactions for failure to post collateral one time
      - Default after second time
  - Two components differ among the packages
    - Method of application on existing requirements
    - Intra-auction threshold for collateral calls

- Portfolio application of Mark-to-Auction
  - The MTA is calculated on a monthly basis using the most recent auction clearing prices
  - Then it is calculated for the whole portfolio, summed across all months
  - ARR credits available to offset MTA credit requirements

- The packages differ in regard to Intra-Auction Collateral Calls
  - Intra-auction collateral call component
    - The intra-auction collateral calls will be implemented the same as the undiversified collateral calls work today
  - Intra-auction collateral call component with a \$100k threshold
    - Threshold applied intra-auction only, collateral calls issued post-auction for any shortfall
  - No Intra-auction collateral call (New package G3)
    - If a Market Participant does not have sufficient collateral posted to cover an increase to the requirement based on the preliminary auction clearing prices, then all bids are removed and the case is rerun with those bides removed

- When a Market Participant does not cure an MTA collateral call:
  - All credit-screened market activity (i.e. virtuals, imports/exports, RPM), except for FTR Sells, will be frozen
  - Participant declared in default after second consecutive auction
    - “Consecutive auctions” must include some overlapping periods
      - e.g. two LTFTR auctions, two BOPP auctions, annual plus one LTFTR auction, annual plus one BOPP auction
      - LTFTR and BOPP auctions do not overlap
    - Four rounds of a single Annual Auction count as a single “auction clearing” for default declaration purposes

- Proposed options for applying MTA<sup>1</sup> to current requirement<sup>2</sup>:
  - Additive (G1/G2/G3)
    - Add positive MTA credit requirement to current requirement (Negative MTA is ignored; MTA cannot reduce current requirement)
  - “Higher of” (H/H’)
    - Use the higher of the current requirement and the MTA + “MTA Adder”, where the “MTA Adder” is:
      - 20% of MTA for FTRs awarded in BOPP or Annual
      - 50% MTA loss for LTFTRs (reduces to 20% when they become current-year)
  - Combination of both “Higher of” and Additive (I/I’)

<sup>1</sup> For this discussion, adding and comparing MTA refer to values that have moved against the participant

<sup>2</sup> Current requirement is higher of path-specific and per-MWh minimum requirements



# Mark to Auction Proposals

	Package G1	Package G2	Package G3	Package H	Package H'	Package I	Package I'
Integration with existing requirements	Additive			Higher of Existing and MTA plus MTA Adder: <ul style="list-style-type: none"> <li>• 20% of MTA for FTRs awarded in BOPP or Annual</li> <li>• 50% MTA loss for Long-Term FTRs<sup>2</sup></li> </ul>		Higher of Current plus MTA and MTA plus MTA Adder: <ul style="list-style-type: none"> <li>• 20% of MTA for FTRs awarded in BOPP or Annual</li> <li>• 50% MTA loss for Long-Term FTRs<sup>2</sup></li> </ul>	
Intra-Auction or Post-Auction	Intra-Auction	Intra-Auction with \$100k Threshold <sup>1</sup>	No Intra-Auction collateral call – bids with insufficient collateral are removed	Intra-Auction	Intra-Auction with \$100k Threshold <sup>1</sup>	Intra-Auction	Intra-Auction with \$100k Threshold <sup>1</sup>
Increase of Requirements for Members – excluding GreenHat (as of JUL 2018 Auction)	\$33M (3.5%)			\$3M (0.3%)		\$33M (3.5%)	
Percentage of Accounts Impacted	25%			4%		25%	
Total GreenHat Requirement (Including \$90M volumetric requirement)	\$207M			\$162M		\$207M	
Support in Credit Subcommittee Poll	82%	31%	N/A – New Proposal	31%	22%	42%	17%

<sup>1</sup>Threshold only to be applied Intra-Auction, collateral calls for an amount under the threshold will be issued Post-Auction

<sup>2</sup>LT adder would be for LT FTRs until they become the annual auction period

## Package G1/G2/G3

- 75% of accounts would have no net increase
- Remaining 25% would have a total increase of ~\$33M

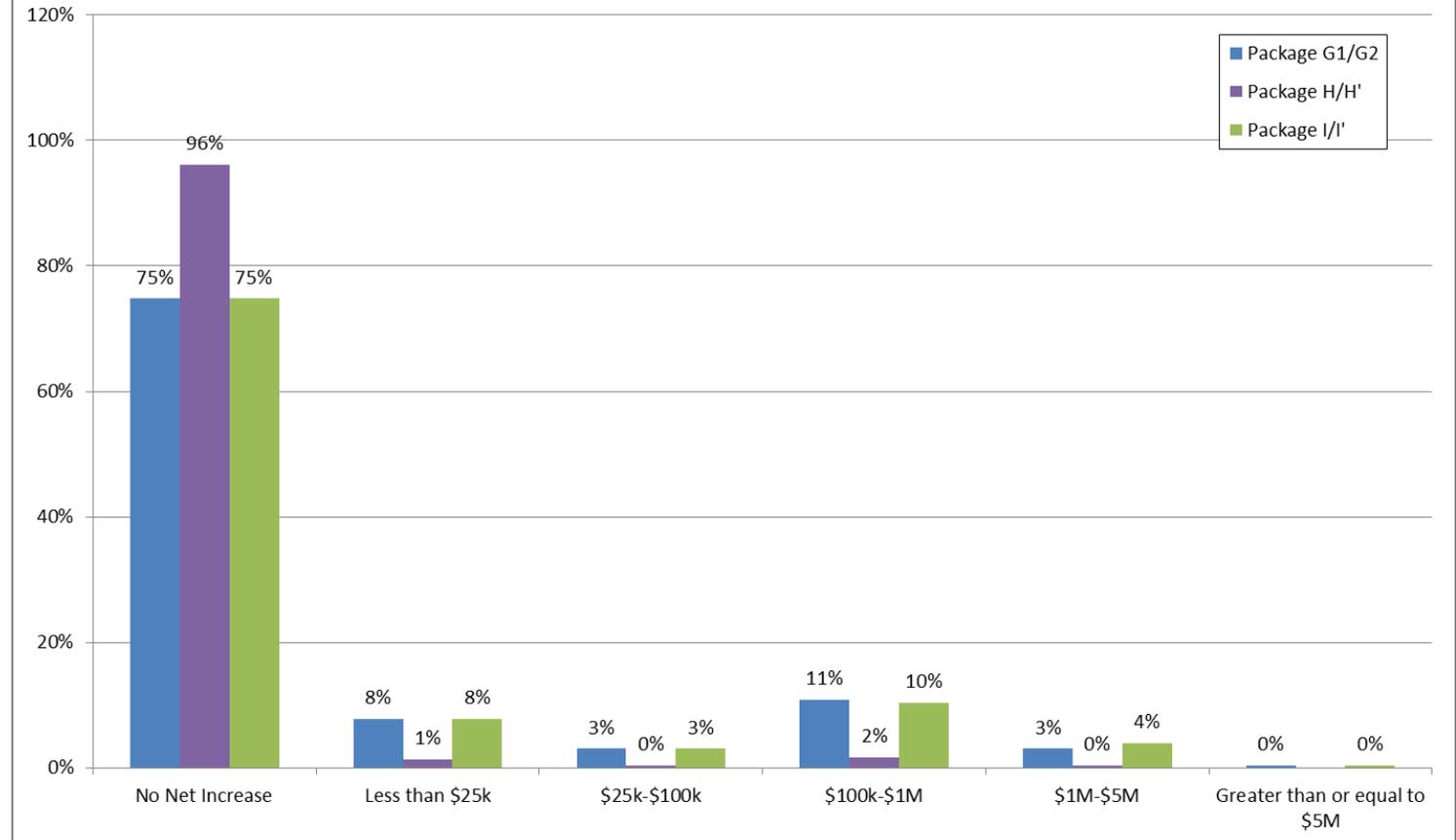
## Package H/H'

- 96% of accounts would have no net increase
- Remaining 4% would have a total increase of ~\$3M

## Package I/I'

- 75% of accounts would have no net increase
- Remaining 25% would have a total increase of ~\$33M

**Percentage of Accounts Impacted with Implementation of Mark-to-Auction**  
**As of JUL 2018 Auction Clearing**  
 (Excluding GreenHat Accounts)



- Increased credit requirements from marking an existing portfolio to new auction clearing prices can cause credit requirement increases and associated collateral calls during auction clearing
  - Just like the current “undiversified adder” collateral calls
  - Package G3 would remove positions without a collateral call if the account has insufficient credit allocated
- PJM back-tested the proposed mark-to-auction requirements against seven auctions from 18/19 Annual Round 1 through JUL 2018 to see the possible impact on auction clearing
  - This period incorporated auctions undertaken since FTR Credit Requirements were changed on April 1, 2018

**Number of Members who would have an Intra-Auction Collateral Call**

	18/19 AnnRd1	17/18 May & 18/19 AnnRd2	18/19 AnnRd3	18/19 AnnRd4	18/19 June	19/22 LT Rd1	18/19 July	Total
<b>Total</b>	6	8	9	7	9	1	3	43
>1MM			1		2	1		4
500K-1MM	1	2	2	1	1			7
100K - 500K	4	4	1	1	4		2	16
25K-100K	1		2	4	1		1	9
<25K		2	3	1	1			7

**Package  
G1/G2  
and  
Package  
I/I'**

For all seven auctions, there would have been 43 intra-auction collateral calls

37% would have been for less than \$100k

**Package G3 would eliminate intra-auction collateral calls by removing bids automatically if the account had insufficient collateral allocated prior to clearing**

**Number of Members who would have an Intra-Auction Collateral Call**

	18/19 AnnRd1	17/18 May & 18/19 AnnRd2	18/19 AnnRd3	18/19 AnnRd4	18/19 June	19/22 LT Rd1	18/19 July	Total
<b>Total</b>	4	8	5	1	10	2	2	32
>1MM			1		1	1		3
500K-1MM		2			2			4
100K - 500K	3	4	1		4		1	13
25K-100K	1		1		1		1	4
<25K		2	2	1	2	1		8

**Package  
H/H'**

For all seven auctions, there would have been 32 intra-auction collateral calls

38% would have been for less than \$100k

# Appendix B

## Explanations and Examples

- The MTA is initially calculated on a monthly basis for each FTR path as the original purchase price minus the most recent auction clearing price
- The original purchase price is prorated by monthly class hours
- The most recent auction clearing prices are applied
  - Long Term Auction prices are pro-rated on a monthly class hour basis for the applicable year(s)
  - Annual Auction prices are pro-rated on a monthly class hour basis for the applicable year
  - Balance of Planning Period (BOPP) Auction prices are applied monthly if monthly value exists (i.e. JUL); Overlapping periods in an individual auction (i.e. SEP and Q2), subtract the known price of the sub-period from the larger period's price, and prorate the remaining price among the remaining months in that period; Quarterly periods are prorated by monthly class hours
- "Sell" and options logic are implemented the same as the path specific credit requirements are calculated currently
- The MTA Credit is then summed over all months, with negative months netting with positive months

- A 1-MW, 24H, “Buy” Obligation FTR clears at \$50 in the 16/19 Long Term Auction Round 3 for 18/19 Planning Year (i.e. YR3) and the results from the JUL 2018 Auction are as follows:

Period	Clearing Price
JUL	-\$4
AUG	-\$7
SEP	-\$5
Q2-SEP	-\$10
Q3	\$15
Q4	-\$6

The individual monthly MTA credit values for this path would be as follows:

	Equation	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
Period Type		JUL	AUG	SEP	Q2-SEP		Q3			Q4		
Class Hours (A)		744	744	720	744	721	744	744	672	743	720	744
Proration Factor for Original Purchase Price (B)	(A)/8760	744/8760	744/8760	720/8760	744/8760	721/8760	744/8760	744/8760	672/8760	743/8760	720/8760	744/8760
Prorated Original Purchase Price (C)	(B*50)	\$4.25	\$4.25	\$4.11	\$4.25	\$4.12	\$4.25	\$4.25	\$3.84	\$4.24	\$4.11	\$4.25
Proration Factor for Most Recent Auction Clearing Price (D)	(A)/sum of class hours in period type	744/744	744/744	720/720	744/1465	721/1465	744/2160	744/2160	672/2160	743/2207	720/2207	744/2207
Most Recent Auction Clearing Price (E)		-\$4	-\$7	-\$5	-\$10	-\$10	\$15	\$15	\$15	-\$6	-\$6	-\$6
Prorated Most Recent Auction Clearing Price (F)	(D*E)	-\$4.00	-\$7.00	-\$5.00	-\$5.08	-\$4.92	\$5.17	\$5.17	\$4.67	-\$2.02	-\$1.96	-\$2.02
Mark to Auction Credit	(C-F)	\$8.25	\$11.25	\$9.11	\$9.33	\$9.04	-\$0.92	-\$0.92	-\$0.83	\$6.26	\$6.07	\$6.27

- The months with positive MTA credit represent that the most recent mark is moving against the portfolio, and thus has a positive credit requirement
- If this was the only FTR in a portfolio, the portfolio approach would sum all the months for a total of \$62.98 (note: positive values net with negative values).



# Example 1: Application of each of the Packages

Assuming a portfolio consisted of positions for the current planning year (18/19) and one long term (19/20), and the monthly values for the current credit requirement and the MTA credit are as shown in the table to the right:

- Package A would have a credit requirement equal to the sum of column (C) = \$14,125
- Package D1/D1' would have a credit requirement equal to the higher of [(A) and (B)] = \$13,950
- Package G1/G2 would have a credit requirement equal to [(A)+(B)] = \$19,850
- Package H/H' would have a credit requirement equal to higher of [(A) and (B)+0.2\*(D)+0.5\*(E)]= higher of [\$13,950 and \$7,103]=\$13,950
- Package I/I' would be the max of Package G1/G2 and Package H/H' = \$19,850

NOTE: Under all packages, if (B) was negative (i.e. a positive mark) then it would not be used to reduce credit requirements.

	Month	Year	Current Credit Requirement	MTA Credit	Monthly "Higher of"
Annual	JUL	2018	800	-100	800
	AUG	2018	850	300	850
	SEP	2018	700	200	700
	OCT	2018	650	450	650
	NOV	2018	650	500	650
	DEC	2018	675	700	700
	JAN	2019	700	750	750
	FEB	2019	625	700	700
	MAR	2019	725	750	750
	APR	2019	800	775	800
	MAY	2019	850	800	850
	Long Term	JUN	2019	500	100
JUL		2019	650	50	650
AUG		2019	550	25	550
SEP		2019	450	-25	450
OCT		2019	475	-25	475
NOV		2019	450	-50	450
DEC		2019	500	-75	500
JAN		2020	575	-25	575
FEB		2020	400	-50	400
MAR		2020	450	50	450
APR		2020	475	50	475
MAY		2020	450	50	450
Portfolio Total			13,950	5,900	14,125

(A) (B) (C)

## Additional Calculations for Package H/H':

The Annual MTA is the sum of MTA from JUL 2018 through May 2019. It is equal to \$5,825 (D)

The Long Term MTA is the sum of MTA from JUN 2019 through MAY 2020. It is equal to \$75 (E)



# Example 2: Application of each of the Packages

Assuming a portfolio consisted of positions for the current planning year (18/19) and one long term (19/20), and the monthly values for the current credit requirement and the MTA credit are as shown in the table to the right:

- Package A would have a credit requirement equal to the sum of column (C) = \$21,838
- Package D1/D1' would have a credit requirement equal to the higher of [(A) and (B)] = \$14,750
- Package G1/G2 would have a credit requirement equal to [(A)+(B)] = \$28,700
- Package H/H' would have a credit requirement equal to higher of [(A) and (B)+0.2\*(D)+0.5\*(E)] = higher of [\$13,950 and \$17,756] = \$ 17,756
- Package I/I' would be the max of Package G1/G2 and Package H/H' = \$28,700

NOTE: Under all packages, if (B) was negative (i.e. a positive mark) then it would not be used to reduce credit requirements.

	Month	Year	Current Credit Requirement	MTA Credit	Monthly "Higher of"
Annual	JUL	2018	800	(250)	800
	AUG	2018	850	750	850
	SEP	2018	700	500	700
	OCT	2018	650	1,125	1,125
	NOV	2018	650	1,250	1,250
	DEC	2018	675	1,750	1,750
	JAN	2019	700	1,875	1,875
	FEB	2019	625	1,750	1,750
	MAR	2019	725	1,875	1,875
	APR	2019	800	1,938	1,938
Long Term	MAY	2019	850	2,000	2,000
	JUN	2019	500	250	500
	JUL	2019	650	125	650
	AUG	2019	550	63	550
	SEP	2019	450	(63)	450
	OCT	2019	475	(63)	475
	NOV	2019	450	(125)	450
	DEC	2019	500	(187)	500
	JAN	2020	575	(63)	575
	FEB	2020	400	(125)	400
MAR	2020	450	125	450	
APR	2020	475	125	475	
MAY	2020	450	125	450	
Portfolio Total			13,950	14,750	21,838
			(A)	(B)	(C)

## Additional Calculations for Package H/H':

The Annual MTA is the sum of MTA from JUL 2018 through May 2019. It is equal to \$14,563 (D)

The Long Term MTA is the sum of MTA from JUN 2019 through MAY 2020. It is equal to \$187 (E)