Problem/Opportunity Statement

REVIEW OF MINIMUM CAPITALIZATION REQUIREMENTS FOR MARKET PARTICIPANTS

PROBLEM / OPPORTUNITY STATEMENT

PJM implemented minimum participation criteria for entities participating in PJM Markets in 2011 and this requirement has remained unchanged since implementation. These requirements are intended to provide controls such that those participating in PJM markets have the financial ability and risk management capabilities for their planned market positions to protect against potential defaults. This problem statement provides an opportunity to review those requirements.

- Higher capitalization provides higher likelihood of capital access which would otherwise require large amounts of collateral to cover outer-tail market events
- Companies with greater assets and lower debt more likely to have access to lender capital
  - Debt to capital ratio is a common lender covenant
- Higher incentive for equity holders who have more “stake in the results ” to provide additional capital to meet collateral calls
  - Equity contributions are frequently made to smaller companies through an investment pool but those funds are typically not committed capital
- The inherent financial strength of a participant, as demonstrated by its capitalization of its corporate structure, provides a measure of additional financial wherewithal.
- A review of minimum capitalization requirements may improve the overall counterparty risk in PJM.
- PJM and Market Participants benefit from have financially strong Market Participants transacting in PJM Markets
- PJM has separate minimum capitalization requirements for FTR Participants and non-FTR Market participants.
- PJM Tariff provides for other methods to satisfy the minimum requirements for participation in PJM markets.
- Sufficient market capitalization is a key risk management tool.