

Education For FTR Enhancement Problem Statement/Issue Charge

Gwen Kelly, Sr. Director, Credit Risk & Surveillance Risk Management Committee July 23, 2024



Membership Process Selection

- 1. New applicants are required to complete a Market Participant application
- 2. Applicant identifies markets in which they intend to participate
- 3. If FTR Market is selected, applicant is required to select how and the intent of participation.

How	Intent
FTR Auction	Hedge transactions in energy market of physical energy or ancillary services in actual flow of energy
ARR Participant	Mitigate commercial risk
Other (if applicable, Applicant to describe)	Other (Applicant to describe)



Credit Requirements for FTR Market Participants

Credit Requirements

- Audited financial statements required to perform credit evaluation
- Minimum Capitalization
- Market Eligibility

 (as established through
 Officer Certification
 Form)

\$1 Million Tangible Net Worth or \$10 Million Tangible Assets

Appropriate person as defined under the Commodity Exchange Act section 4(c)(3); \$1 Million in net worth or \$5 Million in total assets

Eligible contract participant as defined under the Commodity Exchange Act section 1a(18); \$1 Million net worth or \$10 Million in assets

A business entity or person who is in the business of (1) generating, transmitting, or distributing electric energy, or (2) providing electric energy services that are necessary to support the reliable operations of the transmission system



Credit Requirements for FTR Market Participants

Credit Policy	
 Unsecured Credit Allowance (UCA) 	No unsecured credit can be utilized for FTRs (effective June 2020)
 Acceptable forms of Collateral 	Limited to Cash and Letters of Credit
FTR Credit Requirement	
 Based upon HSIM (Historical Simulation Initial Margin) Not affected by Market Participant's External/Internal credit score 	



FTR Credit Requirement Components

Initial Margin (IM) Auction Revenue Rights Credits (ARR)

Mark-to-Auction (MTA)

10¢ per-MWh Minimum Realized Gains and / or Losses

Total Requirement = Max { Max (IM – ARR – MTA, Ten Cent per MWh Minimum) – Realized Gains and / or Losses, 0}

- 1. IM = FTR Obligation IM + FTR Options IM
 - a) Confidence interval changed from 97% to 99% on December 12, 2023
 - b) FTR Obligation IM is the sum of
 - i. Straight sum of IMs from long-term positions
 - ii. 20% * straight sum of monthly IMs from Balance Of Planning Period (BOPP). Monthly IMs are adjusted for available ARR credit.
 - iii. 80% * root sum of squares of monthly IMs from BOPP. Monthly IMs are adjusted for available ARR credit.
 - c) FTR Options IM = FTR cost adjusted FTR historical values
- 2. ARR Credit
- 3. MTA
- 4. 10¢ per MWh Minimum
- 5. Realized Gains and / or Losses

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(ARR)

Mark-to-Auction (MTA)

10¢ per-MWh Minimum Realized Gains and / or Losses

Total Requirement = Max { Max (IM – ARR – MTA, Ten Cent per MWh Minimum) – Realized Gains and / or Losses, 0}

- 1. IM = FTR Obligation IM + FTR Options IM
- 2. ARR Credit
 - a) Prorated ARR Credit is subtracted for each month in BOPP
 - b) Remaining unused ARR credit is applied to reduce negative MTA
- 3. MTA = (most recently cleared auction price the original transaction price) * transacted quantity
 - a) summed over all months
 - b) If negative, unused ARR credit can be used to offset: min (MTA + unused ARR,0)
- 4. 10ϕ per MWh Minimum = 10ϕ * portfolio net buy cleared positions
- 5. Realized Gains and / or Losses is the settled FTR value that has not been paid out.



Definition of Realized Gain and Losses

- Any realized gains and/or losses resulting from the settlement of FTR
 Obligations that have not been paid out will be subtracted from the FTR
 Credit Requirement. A realized gain will decrease the FTR Credit
 Requirement (but not below \$0.00), whereas a realized loss will
 increase the FTR Credit Requirement.
- RGL are deducted from invoice not paid and unbilled obligation, therefore not available to offset FTR Obligations.

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Considerations for Possible Use of Billed Not Paid and Unbilled Obligations (Net Seller) as a Form of Collateral

Deduct the amount of RPM Seller Credit being utilized to satisfy RPM Market Credit Requirement to mitigate double counting use of revenue.
Current practice does not permit billed not paid and unbilled obligations to be utilized for market activity (less RGL).
 Would require changes to governing documents and applicable systems (i.e., settlements, eCredit, etc.)
Treatment of Revenues being utilized as cash collateral when funds not yet collected
Possible limitation on PJM retention of post petition revenues in the event of bankruptcy

Cash provided by a Participant as Collateral are required held in a depository account by PJM. How does the proposed treatment of revenues reconcile with this requirement?

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