

Summary of 2016 MISO State of the Market Report

Presented to:

MISO Board Markets Committee

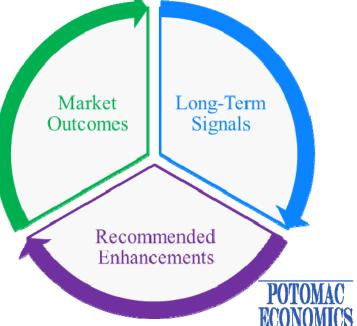
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July 20, 2017



Introduction

- As the Independent Market Monitor (IMM) for the Midcontinent ISO (MISO), we:
 - Evaluate the competitive performance and operation of the MISO markets; and
 - Identify and recommend changes to existing and proposed market rules and operating procedures.
- This presentation summarizes:
 - ✓ Market highlights from 2016;
 - The competitive performance and operational efficiency of the markets;
 - ✓ Long-term economic signals; and
 - ✓ Recommendations.





2016 Market Summary

- The MISO markets performed competitively.
 - ✓ The "price-cost mark-up" was close to zero prices were highly competitive.
 - ✓ The "output gap" measure of potential economic withholding remained low at 0.11 percent of load, and market power mitigation was infrequently applied.
- Fuel prices fell sharply in 2015 and modestly declined in 2016, which contributed to slightly lower energy prices (3 percent) and real-time make-whole payments (1.6 percent).

Day-ahead and real-time markets operated efficiently, with the exception of network congestion issues attributable to:

- ✓ Pseudo-tying MISO generation to PJM;
- ✓ Market-to-market coordination issues; and
- \checkmark Lack of coordination of generation and transmission outages.
- Capacity prices were volatile and did not produce efficient long-term signals.
 - Prices rose significantly in the North for the 2016/2017 planning year, but fell to close to zero market-wide in the 2017/2018 planning year.
 - ✓ Market design problems continue to be a significant concern.





Key Market Developments in 2016

- MISO implemented several market design changes that improved efficiency and competitiveness in 2016:
 - ✓ February 1: The Regional Dispatch Transfer (RDT) constraint replaced the 1,000 MW Subregional Power Balance Constraint, allowing interregional flows of 2,500 MW – 3,000 MW. This produced substantial economic benefits.
 - May 1: Ramp product was implemented that slightly lowered prices and price volatility.
 - July 1: Emergency Pricing was implemented to prevent prices from being understated during emergency events.
 - ✓ September 1: The Real-Time Offer Enhancement (RTOE) was implemented to allow resources to update real-time offers intra-hour.
- In May 2017, MISO implemented ELMP Phase 2 that allows an expanded set of fast-starting peaking resources to set energy prices.



Market Highlights: Load and Price Trends

MISO Prices and Load in 2016 (Slides 8, 9)

- Energy prices and day-ahead congestion fell slightly (2 to 3 percent) in 2016, largely because fuel prices fell slightly in 2016.
 - ✓ Average natural gas prices fell 10 percent in 2016 reaching historic lows in the first half of the year.
 - ✓ Powder river basin coal prices were virtually unchanged from 2015 to 2016.
- Weather was relatively mild and load was modest in most of 2016, weather was more severe and load was higher in the summer months.
 - ✓ MISO's annual peak load of 121 GW was slightly higher than last year, but well below the forecasted peak of 125.9 GW.
- Although the energy markets generally set efficient prices in 2016, we recommend improvements to MISO's price formation through improved shortage pricing and price-setting by peaking resources.



Market Highlights: Load and Price Trends

Transmission Congestion and Regional Transfers (Slide 10)

- While day-ahead congestion fell slightly, the value of real-time congestion rose 4.3 percent to total roughly \$1.4 billion, amongst the highest in the U.S.
- This small increase was comprised of:
 - ✓ No change in congestion throughout the North;
 - ✓ 37 percent *reduction* in congestion on transfers between the North and South subregions; and
 - ✓ 22 percent *increase* in congestion in MISO South, partly due to high and uncoordinated transmission and generation outages.
- Although total congestion increased only slightly, we are concerned that some of the congestion was not efficiently managed related to:
 - ✓ PJM taking dispatch control of MISO resources (affecting \$82 million).
 - ✓ Congestion affected by multiple simultaneous outages (\$224 million).
 - ✓ Potentially conservative transmission ratings (\$155 million).
 - ✓ Market-to-market coordination issues with PJM and SPP (\$238 million).



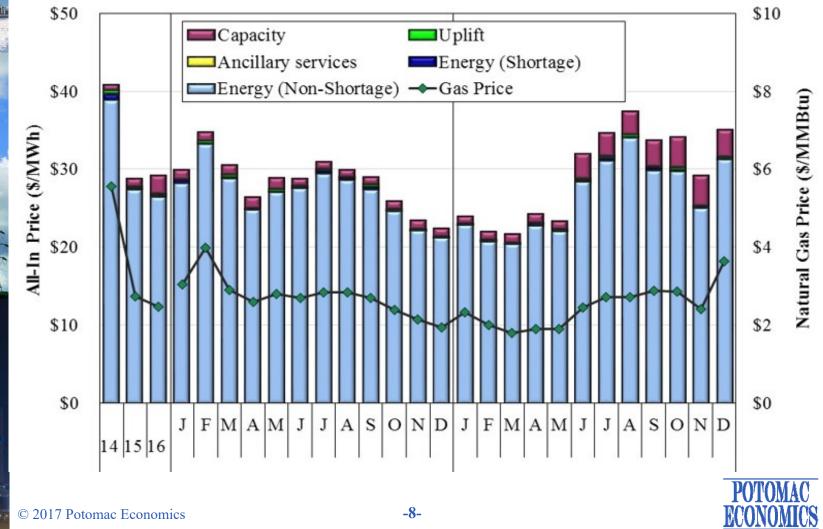
Market Highlights: Long-Term Price Signals

Capacity Margins and Long-Term Economic Signals (Slides 11, 12, 13)

- While the 2017 summer capacity margin fell to 18.9 percent, sufficient capacity exits to meet the 15.8 percent capacity margin requirement.
- Well-designed markets produce sufficient net revenues to support investment when existing resources are not sufficient to meet the system's needs.
- Net revenues for new resources rose in most areas, but long-term price signals remained well below those needed to incent investment.
 - \checkmark This result is partly due to the prevailing capacity surplus in MISO.
 - But capacity market design continues to undermine long-term signals and will likely cause them remain insufficient when the surplus dissipates.
- Capacity cleared at \$1.50 per MW-day in the 2017/2018 auction for the entire MISO footprint this is essentially zero.
 - This is not an efficient price under current capacity levels and will motivate poor retirement and export decisions by MISO's competitive suppliers.
 - ✓ MISO attempted to address this in 2016 with an unsound proposal that was not accepted by FERC, but we encourage MISO to pursue efficient alternatives.



All-In Price

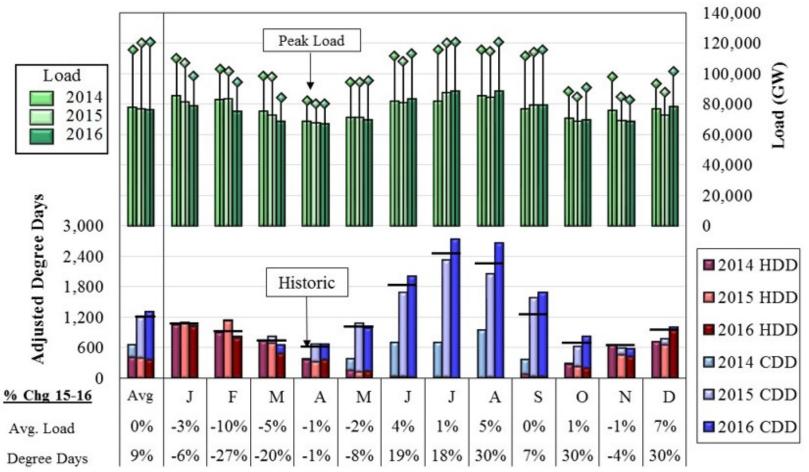


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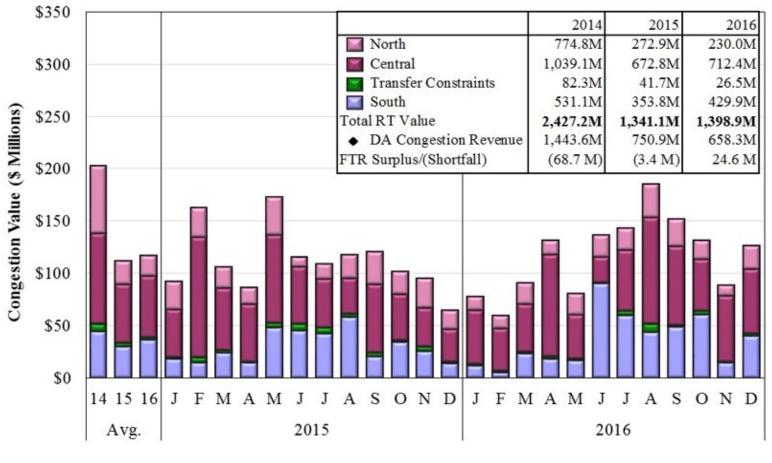


Weather and Load in 2015





Real-Time Value of Congestion in MISO





Capacity Margins in Summer 2017

| | | Alternative IMM Scenarios | | | |
|-------------------------------------|-----------|---------------------------|------------------------|---------------|--|
| | | | High Temperature Cases | | |
| | Base Case | Realistic DR* | Full DR | Realistic DR* | |
| Load | | | | | |
| Base Case | 125,020 | 125,020 | 125,020 | 125,020 | |
| High Load Increase | - | - | 7,211 | 7,211 | |
| Total Load (MW) | 125,020 | 125,020 | 132,231 | 132,231 | |
| Generation | | | | | |
| Internal Generation | 140,850 | 140,850 | 140,850 | 140,850 | |
| BTM Generation | 4,009 | 4,009 | 4,009 | 4,009 | |
| Hi Temp Derates** | - | - | (4,900) | (4,900) | |
| Adjustment due to Transfer Limit*** | (2,157) | (2,157) | - | - | |
| Total Generation (MW) | 142,701 | 142,701 | 139,958 | 139,958 | |
| Imports and Demand Response | | | | | |
| Demand Response**** | 6,112 | 4,890 | 6,112 | 4,890 | |
| Capacity Imports**** | 3,483 | 3,483 | 3,483 | 3,483 | |
| Capacity Exports | (3,636) | (3,636) | (3,636) | (3,636) | |
| Margin (MW) | 23,640 | 22,417 | 13,686 | 12,464 | |
| Margin (%) | 18.9% | 17.9% | 10.9% | 10.0% | |

* Assumes 80% response to account for uncertainties in availability and performance.

** Derates are highly variable; this value is based on four of the hottest days since the start of the MISO markets.

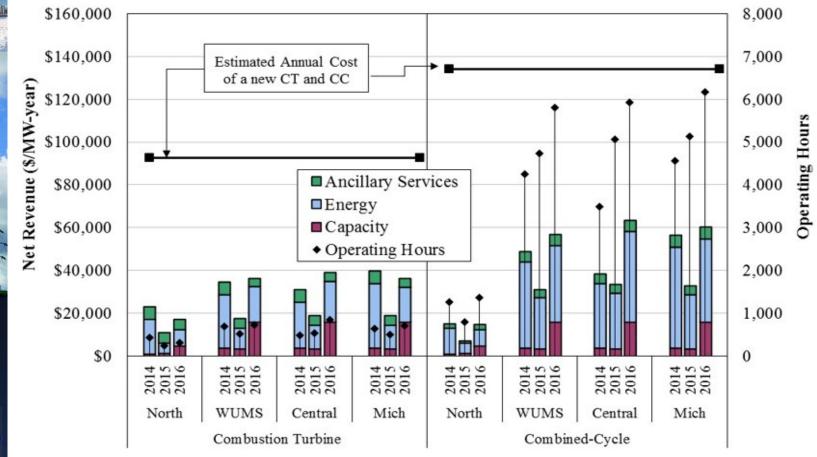
*** Accounts for resources that may not be accessible because of the transfer constraint; assumes a transfer limit of 2,000 MW (includes probabalistic derates from the full 2,500 MW).

**** Cleared amounts for the 2017 / 2018 planning year. © 2017 Potomac Economics



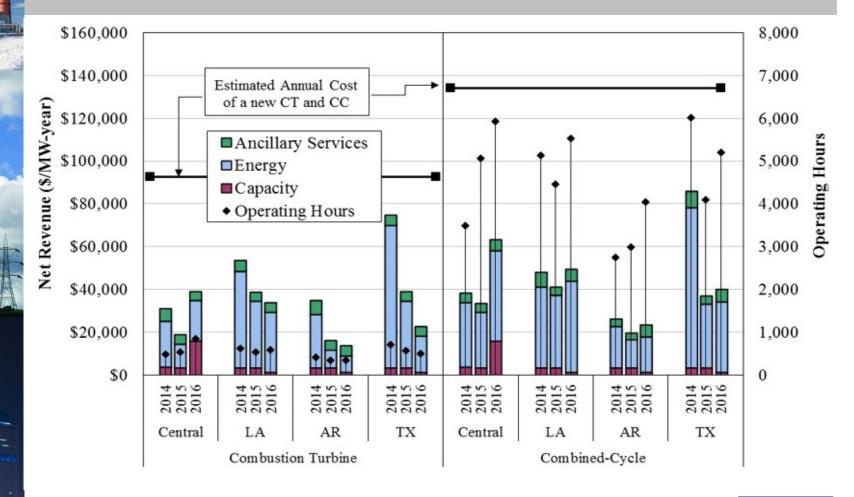


Long-Run Price Signals: Net Revenue Midwest Region





Long-Run Price Signals: Net Revenue South Region







Evaluation of Virtual Trading in MISO

- Some have argued recently that virtual trading may generate costs that are greater than the benefits they provide.
- To evaluate this assertion, we have developed a multi-tiered set of screens to identify virtual trades that improve market efficiency and those that do not.
- A substantial majority of virtual trades improve efficiency (see table below).
 - ✓ Profits of efficiency-enhancing virtual trades exceeded losses by \$65 million, a 15 percent increase over 2015, but the total benefits of virtual transactions are much larger.
 - ✓ Some virtual transactions profit that do not contribute to efficiency (profits on un-modeled constraints or loss factors). These rents totaled \$35 million.

| | Financial Participa | | Physical Participants | | Total | |
|--|-----------------------|----------------|-----------------------|----------------|-----------------------|-------------------|
| | Average Hourly MWh | Share of Class | Average Hourly MWh | Share of Class | Average Hourly MWh | Share of Total |
| Efficiency - Enhancing Virtuals Non - Efficiency - | 6,790 | 58% | 400 | 47% | 7,190 | 57% |
| Enhancing Virtuals | 4,956 | 42% | 456 | 53% | 5,412 | 43% |



IMM Recommendation 2016-6 and 2016-7: *Improve Deviation Thresholds and Settlement Rules for Wind to Improve Forecasting Incentives and Validate Wind Forecasts*

- MISO has one of the best wind dispatch capabilities through its DIR process, but it is highly dependent on accurate wind forecasts.
 - ✓ MISO dispatch uses wind forecasts as the dispatch maximum for wind units, which generally results in dispatch instructions equal to the wind forecast.
 - \checkmark We have identified chronic over-forecasting by certain wind suppliers.
 - ✓ Settlement rules create a strong incentive for DIR wind resources in MISO to over-forecast their output in real-time, due to current market settlement rules.

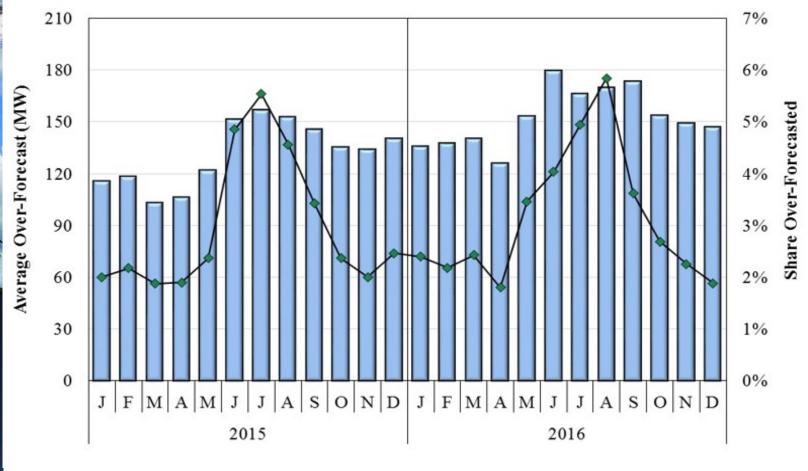
• Principle/Approach:

- Principle: Provide incentives for suppliers to submit accurate forecasts and procedures to address persistent forecasts errors.
- ✓ Approach: Consider a modified excess energy threshold for wind to allow resources more latitude to exceed their dispatch when no congestion exists and other changes to balance the EXE/DFE settlements that wind units face.
- ✓ Approach: Develop procedures to validate market participant forecasts and utilize alternative forecasts when participants' forecasts are inaccurate.
- Benefits: Better utilization of transmission and lower production costs.





Wind Over-Forecasting in 2016

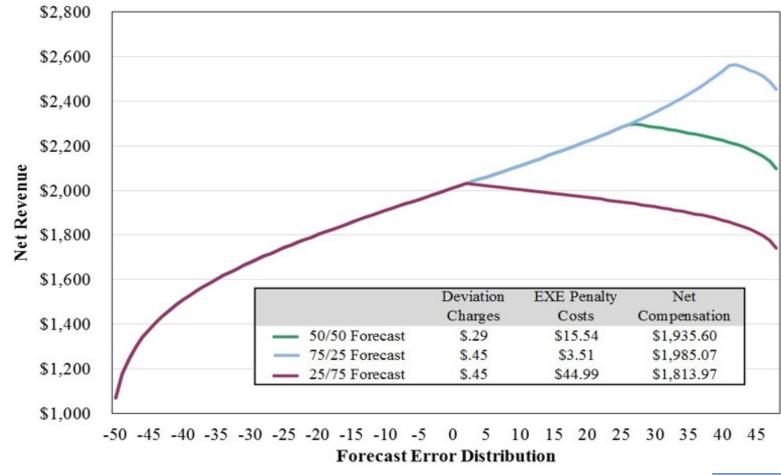


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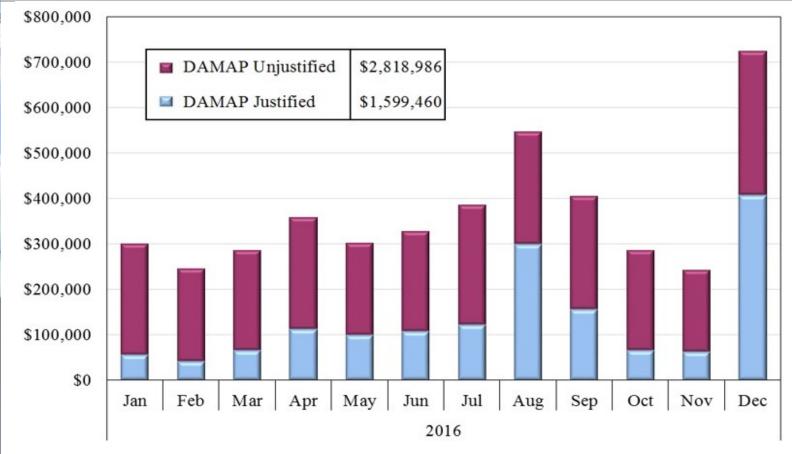
Expected Settlement Value of Forecast Alternatives for Wind







DAMAP Compensation to Wind Resources



Note: "Unjustified" DAMAP is paid to wind units dispatched at their ECOMAX, which was not intended and is due to an error in the Tariff.

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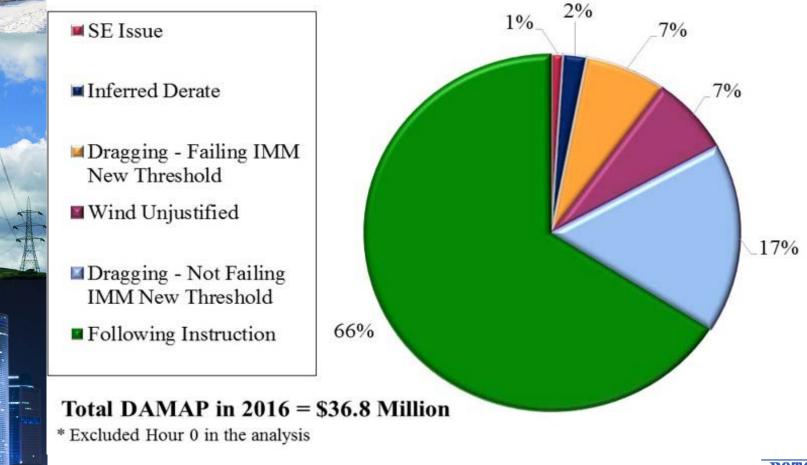


IMM Recommendation 2016-5: Reform DAMAP and RTORSGP Rules to Improve Performance Incentives and Reduce Gaming Opportunities

- Our evaluation of DAMAP and RTORSGP reveals that significant amounts were paid to resources not performing well:
 - ✓ Of nearly \$37 million paid to generating resources in 2016, only two-thirds of the payments were paid to units following MISO's dispatch instructions.
 - ✓ The remaining third reduces the costs to generators of performing poorly.
 - Almost \$3 million was paid to wind resources for forecast errors because of a flaw in MISO's tariff that should be corrected as soon as practicable.
- Principle/Approach:
 - ✓ Principle: Reward good performers and penalize poor performers.
 - ✓ Approach: Incorporate a performance metric in the calculation of makewhole payments that would reduce the payment by the amount that corresponds to resources' dispatch deviations.
- Benefits:
 - ✓ Align incentives with good resource performance, and improving reliability.
 - ✓ Lower inefficient make-whole payment costs.



DAMAP Payments





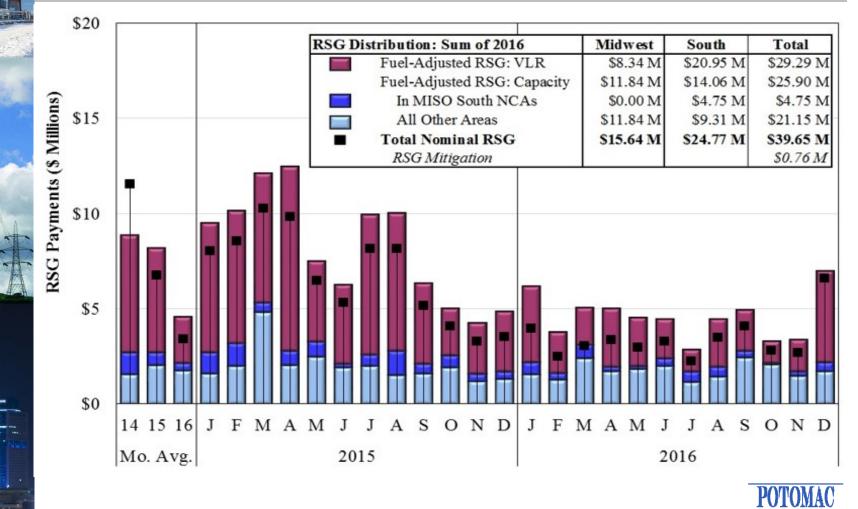
IMM Recommendation 2016-4 and 2014-2: *Establish Regional Reserve Requirements and a 30-Minute Local Reserve Product to Reflect the VLR and Subregional Capacity Needs*

- MISO incurs high RSG costs in some areas to satisfy subregional capacity or VLR needs beyond first contingencies which are operating reserve needs.
 - ✓ The VLR needs exist because some areas do not have resources that can start within 30 minutes to restore the lost supply after a contingency.
 - MISO makes a substantial number of resource commitments and often incurs RSG to satisfy subregional capacity needs when the RDT may bind.
- Principle/Approach:
 - ✓ Principle: Align market products with reliability needs.
 - ✓ Approach: Create a local 30-minute reserve product and establish procurement requirements for the VLR areas and the subregions.
- Benefits:
 - Lower costs by allowing the markets to satisfy MISO's reliability needs and reducing out-of-market actions by MISO operators.
 - ✓ Expand the supply available to meet the VLR requirements.
 - Provide market signals to build fast-starting units that can satisfy the VLR needs at a much lower cost (they can satisfy the requirements while offline).
 - ✓ Allow MISO to accurately price subregional shortages (N and S).





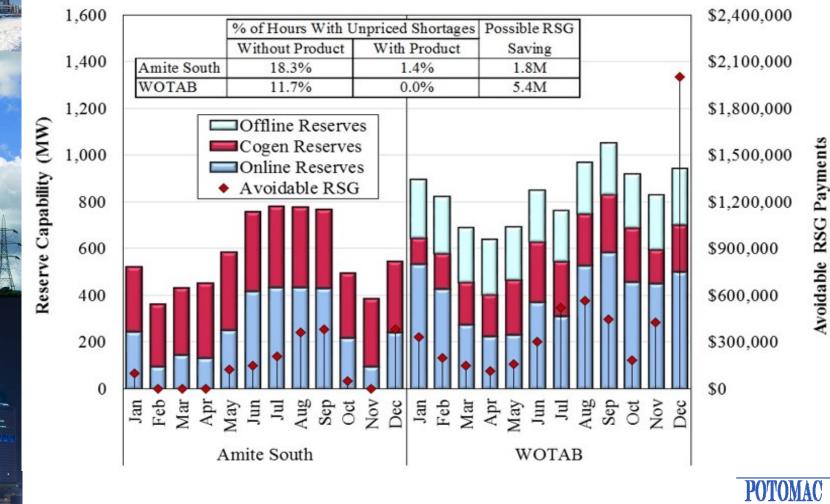
Day-Ahead RSG Payments 2015-2016



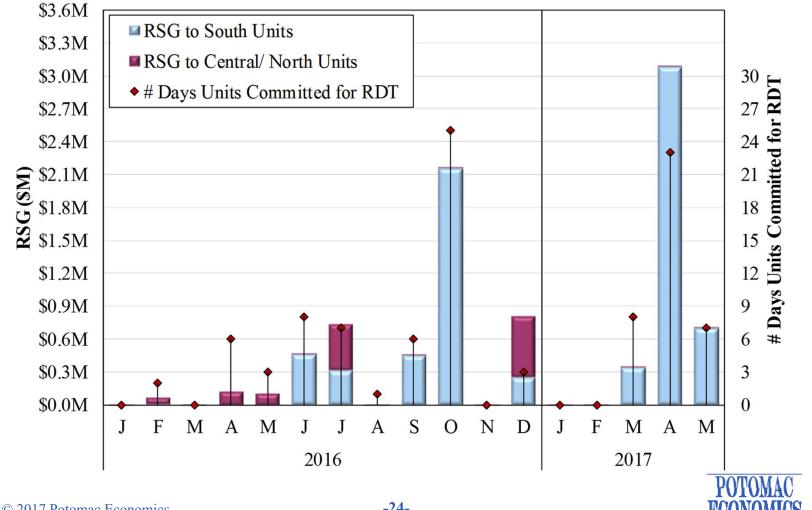
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30 Minute Reserve Capability in MISO South Load Pockets



RDT – Associated RSG June 2016 – April 2017



IMM Recommendation 2016-2: *Improve Procedures for M2M Activation and Coordination, including Identifying, Testing, and Transferring Control*

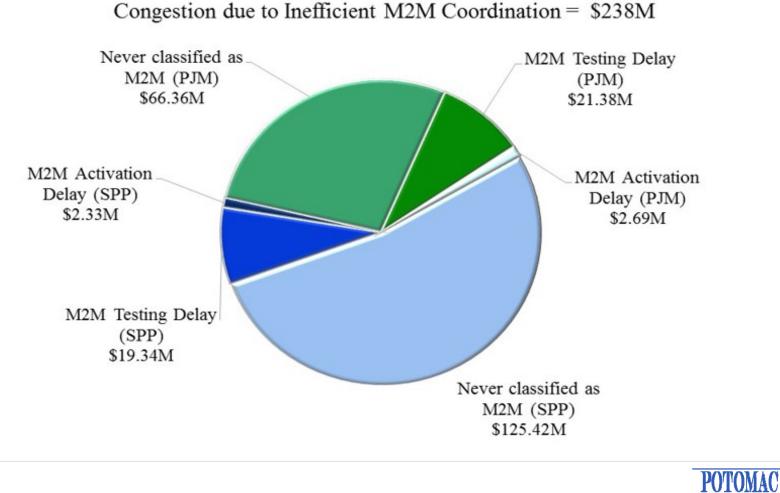
- Procedural issues have caused coordinated congestion management between MISO and its neighbors to not be fully efficient.
 - ✓ In 2016, more than \$238 million of congestion could have been more efficiently managed through better M2M coordination procedures.
 - In Spring 2017, more than \$66 million of congestion accumulated on two coordinated MISO constraints that are dominated by PJM.
- Principle/Approach:
 - ✓ Principle: Least-cost resources should be dispatched to manage constraints.
 - Approach: Improve automation and logging of testing and activation of M2M constraints.
 - Approach: Develop criteria with JOA partners to transfer monitoring of M2M constraints to the RTO with the most dispatch relief.
 - ✓ Approach: Develop a JOA with TVA to coordinate congestion management.
- Benefits: Substantially reduce inefficient congestion and associated production costs.







Congestion Due to Inefficient Market-to-Market Coordination



Potential for Congestion Coordination with TVA

| Status | Total Congestion Value (\$ Millions) | Re-dispatch Savings (\$ Millions) | |
|--|---|--------------------------------------|--|
| MISO Constraints when TVA Generators had significant impact | \$169.6 M | \$16.9 M | |
| TVA (TLR) Constraints when MISO Generators had significant impact | \$21.1 M | \$4.9 M | |
| Total | \$190.7 M | \$21.8 M | |

IMM Recommendation 2016-1:

Improve Shortage Pricing by Adopting an Improved Contingency Reserve Demand Curve that Reflects that Expected VOLL

- Well-designed markets will produce efficient shortage pricing, which is based on properly-valued Reserve Demand Curves (RDC).
 - ✓ The marginal reliability value of reserves at any shortage level is equal to the expected value of the load that may not be served:

Value of Lost Load (VOLL) * Probability of Losing Load

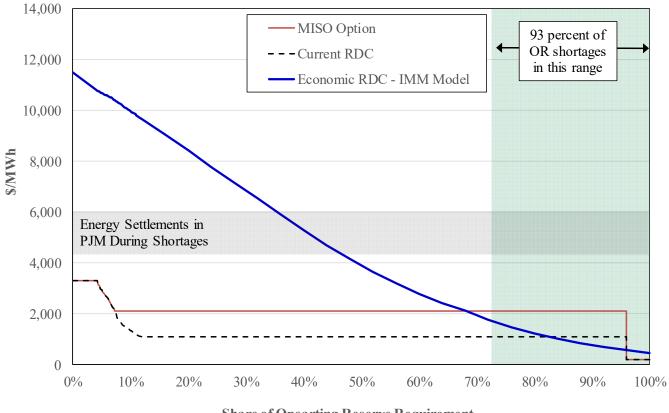
 MISO's current RDC results in overstated shortage prices for small shortages and understated shortage prices for larger shortages.

Principle/Approach:

- Principle: Energy and reserve prices should reflect the marginal reliability value of resources at any given level of shortage.
- ✓ Approach: Increase the VOLL to better reflect the value of serving the highest value loads.
- ✓ Approach: Develop RDCs whose slope is based on the probability of losing load at any particular level of reserves.
- Benefits: Efficient shortage prices will facilitate more efficient short-term decisions (commitment, import/export, etc.) and longer-term decisions (forward contracting, investment, etc.).



IMM Proposed Operating Reserve Demand Curve



Share of Opearting Reserve Requirement



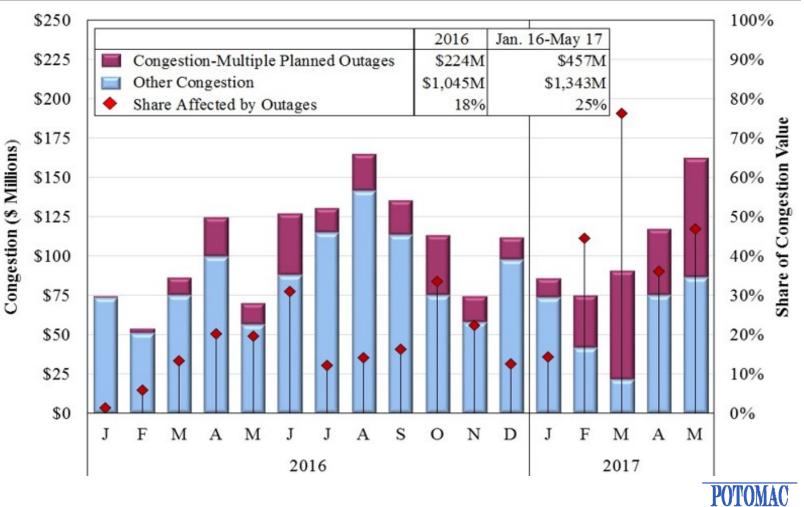
IMM Recommendation 2016-3: Enhanced Transmission and Generation Planned Outage Approval Authority

- MISO is responsible for approving the schedules of planned transmission and generation outages, but does not coordinate outage schedules to lower costs.
 - ✓ Approval process considers only reliability concerns associated with requested outages, not the potential economic costs.
 - ✓ One quarter of all real-time congestion (\$457 million) was attributable to concurrent generation outages from January 2016 to May 2017.
- Principle/Approach:
 - Principle: Outage scheduling and coordination should incorporate economic considerations to minimize unnecessary and inefficient congestion costs.
 - ✓ Approach: Expand outage approval/coordination authority to address economic congestion that does not raise clear reliability concerns.
- Benefits:
 - ✓ Outage-related congestion will be reduced during peak outage season.
 - Fewer instances of capacity-related emergency events during the shoulder months.





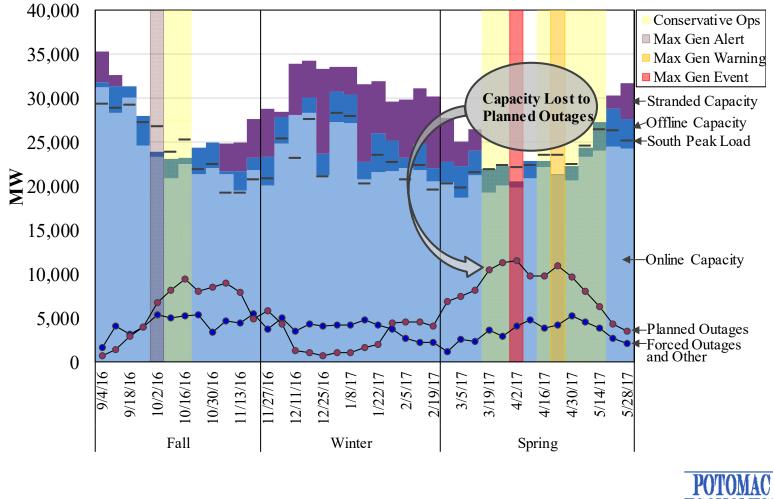
Outage-Related Congestion



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Planned Outages and Associated MISO South Events





IMM Recommendation 2015-1: Expand Eligibility for Online Pricing in ELMP and Disable Offline Price Setting

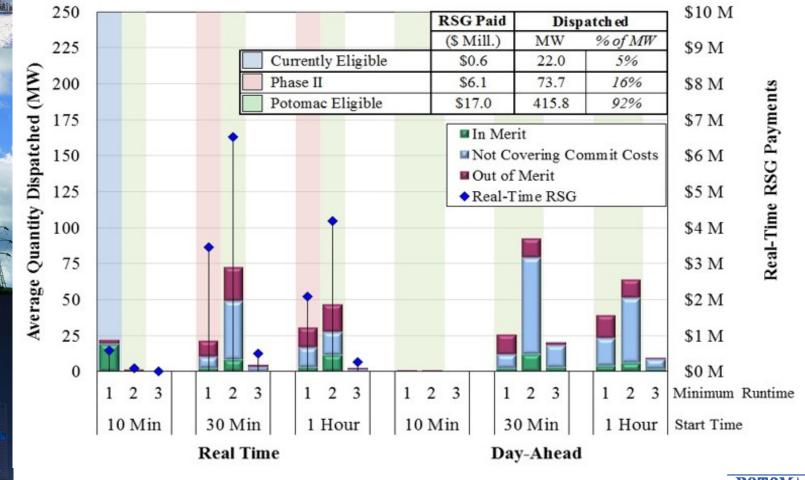
- Allowing fast-start peaking resources to set prices is essential for establishing efficient real-time energy and reserve prices.
- Based on our evaluation of the performance of Phase I the ELMP model:
 - ✓ The price effects of the online resources averaged 9 cents per MWh because a very small share of MISO's peaking resources were eligible under ELMP.
 - ✓ The offline price effects averaged a reduction of 11 cents per MWh, but our assessment indicates that these effects were generally inefficient.
- Principle/Approach:
 - ✓ Principle: Marginal economic sources of supply should set real-time prices.
 - ✓ Approach: Expand the price-setting eligibility for online resources to appropriately include as larger a share of peaking resources.
 - ✓ Approach: Disable the offline price-setting logic in ELMP.
- Benefits:
 - Improved real-time price formation will improve the day-ahead market scheduling and prices, ultimately lower overall production costs.





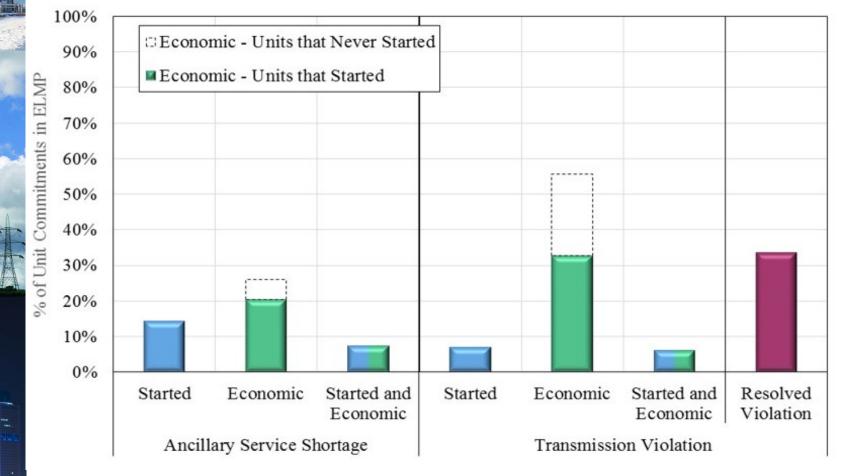


ELMP Online Pricing Eligibility





ELMP Offline Pricing



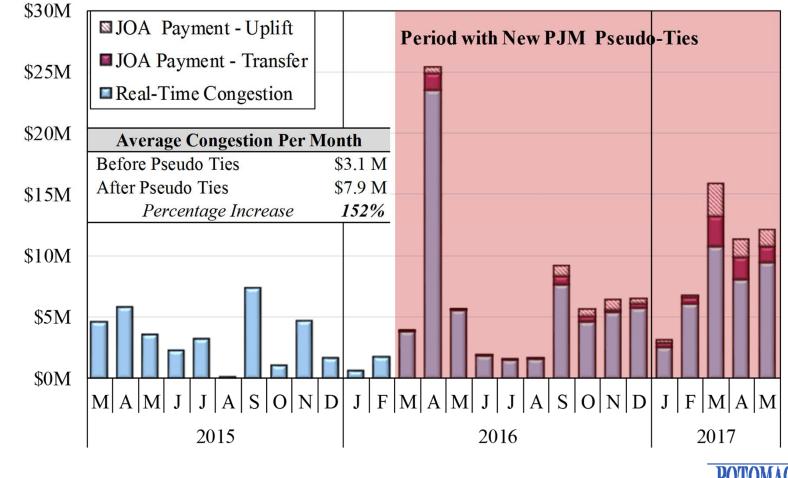


IMM Recommendation 2015-5: *Implement Firm Capacity Delivery Procedures with PJM*

- PJM requires external capacity resources to be pseudo-tied to PJM.
 - \checkmark 12 units have been pseudo-tied to PJM in March and June of 2016.
 - ✓ Transferring dispatch control to PJM reduces the efficiency of the dispatch and impairs reliability because these units affect flows over MISO's network.
 - ✓ The RTOs must rely on market-to-market coordination and >100 new M2M constraints have been defined so far.
- Principle/Approach:
 - Principle: Accommodate capacity exports without undermining the economic real-time dispatch in MISO.
 - ✓ Approach: Replace the PJM pseudo-tie requirement with procedures to guarantee delivery of the capacity that has been exported to PJM.
- Benefits:
 - ✓ PJM receives the full benefits of its capacity imports and avoids market-tomarket congestion costs they will otherwise incur.
 - ✓ MISO will retain the ability to dispatch its system efficiently.



Effects of Pseudo-Tying MISO's Generators to PJM





Other Key Recommendations: Improvements to the Planning Resource Auction

- MISO's PRA is not providing efficient economic signals to facilitate investment, retirement, and capacity import/export decisions. As a result, margins are falling.
 - This is troubling for the competitive loads and supply that rely on the wholesale markets (no regulatory backstop).
 - The most important recommendation is to implement capacity demand curves that reflect reliability value, at least for competitive load and supply.
 - ✓ MISO's proposal to address this issue was rejected by FERC, but more reasonable and efficient alternatives should be pursued.
- In addition, we've identified some concerns with the current PRA that have prompted the following new recommendations:
 - ✓ 2015-6 and 8: Improve the modeling of transmission constraints and the transfer constraint between subregions in the PRA.
 - ✓ 2015-7: Modify the mitigation measures to address uneconomic retirements.
 - ✓ 2016-9: Disqualify resources not expected to be available during peak conditions.
- Benefits:
 - Ensure efficient locational price separation to reflect true transmission constraints
 - Establish efficient price signals to facilitate long-term decisions to invest, retire, and import/export capacity, which will lower costs for MISO's loads.



List of Recommendations

| | SOM Number | Focus Area | Recommendations | High Benefit | Feasible in ST |
|------|---------------|---------------|---|-----------------|-------------------|
| | Energy Pr | | | | |
| | 2015-1 | 3 | Expand eligibility for online units to set prices in ELMP and suspend offline pricing. | \checkmark | |
| | 2015-2 | 2,3 | Expand utilization of temperature-adjusted and short-term emergency ratings for transmission facilities | \checkmark | |
| 4 | 2014-3 | 2 | Improve external congestion related to TLRs by developing a JOA with TVA. | | |
| # | 2012-5 | 1,2 | Introduce a virtual spread product. | | |
| | 2016-1 | 1,3,7 | Improve shortage pricing by adopting an improved contingency reserve demand curve that reflects the expected value of lost load. | \checkmark | |
| | 2016-2 | 3,4 | Improve procedures for M2M Activation and Coordination including identifying, testing, and transferring control of M2M Flowgates. | \checkmark | |
| Nut- | 2016-3 | 2,7 | Enhanced Transmission and Generation Planned Outage Approval Authority. | | |
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List of Recommendations

| | SOM Number | Focus Area | Recommendations | High Benefit | Feasible in ST | |
|-----|---|---------------|--|-----------------|--------------------|--|
| | Operating Reserves and Guarantee Payments | | | | | |
| | 2014-2 | 1,3,7 | Introduce a 30-Minute reserve product to reflect VLR requirements and other local reliability needs. | \checkmark | | |
| | 2016-4 | 1,3,7 | Establish regional reserve requirements and cost allocation. | | | |
| | 2016-5 | 1,5 | Reform DAMAP and RTORSGP rules to improve performance incentives, and reduce gaming opportunities and unjustified costs. | \checkmark | | |
| | Improve I |)ispatch E | fficiency and Real-Time Market Operations | | | |
| 4 | 2012-12 | 1,5 | Improve thresholds for uninstructed deviations. | \checkmark | \checkmark | |
| A | 2012-16 | 1,3 | Re-order MISO's emergency procedures to utilize demand response efficiently. | | \checkmark | |
| | 2015-4 | 1 | Enhanced tools and procedures to address poor dispatch performance. | | \checkmark | |
| | 2016-6 | 1 | Improve the accuracy of the LAC recommendations. | | \checkmark | |
| | 2016-7 | 1,5 | Improve forecasting incentives for wind resources by modifying deviation thresholds and settlement rules. | | | |
| No. | 2016-8 | 1,7 | Validation of wind suppliers' forecasts and use results to correct dispatch instructions. | | \checkmark | |
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List of Recommendations

| | SOM Number | Focus Area | Recommendations | High Benefit | Feasible in ST | | |
|---|-------------------|---------------|---|------------------------|-------------------|--|--|
| | Resource Adequacy | | | | | | |
| | 2010-14 | 7 | Introduce a sloped demand curve in the RAC to replace the current vertical demand curve. | $\checkmark\checkmark$ | | | |
| | 2013-4 | 7 | Improve alignment of the PRA and the Attachment Y process governing retirement and suspensions. | | \checkmark | | |
| | 2014-5 | 7 | Transition to seasonal capacity market procurements. | | | | |
| + | 2014-6 | 7 | Define local resource zones primarily based on transmission constraints and local reliability requirements. | | | | |
| A | 2015-5 | 7 | Implement Firm Capacity Delivery Procedures with PJM. | $\checkmark\checkmark$ | | | |
| | 2015-6 | 7 | Improve the modeling of transmission constraints in the PRA. | \checkmark | | | |
| | 2015-7 | 7 | Improve the physical withholding mitigation measures for the PRA by addressing uneconomic retirements. | | \checkmark | | |
| | 2015-8 | 7 | Improve the limit on the transfer constraint between MISO South and Midwest in the PRA. | | \checkmark | | |
| | 2016-9 | 7 | Qualification of planning resources. | | \checkmark | | |



