

# **Energy Security Improvements Impact Analysis**

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# Agenda

- Future Cases Preliminary Central Case Results
  - Central Case Overview
  - Net Revenues to Generators
  - Incentives for Energy Inventory
    - Fuel Oil Inventory
    - Forward LNG Contract
  - Production Costs
- Preliminary Scenario Analysis Results



# **Central Case Overview**



- Impacts are measured as the difference between two cases:
  - *Current Market Rules ("CMR") Case*, reflecting current market rules and market responses
  - **ESI Case**, reflecting ESI proposed rules and expected market responses
- Analysis will consider different levels of stressed conditions in a future winter, 2025/26:
  - Frequent Stressed Conditions based on 2013/2014
    - Multiple, shorter periods with fuel system constraints (e.g., multiple, shorter coldsnaps)
  - Extended Stressed Conditions based on 2017/2018
    - One extended period with fuel system constraints (e.g., one extended cold-snap)
  - Infrequent Stressed Conditions
- Results are *preliminary*, but provide reasonable estimates of impacts for the cases evaluated

based on 2016/2017



**ESI** Impacts



# **Central Case**

## **Underlying Assumptions**

- Current fleet (FCA 13 resources, with all approved retirements through FCA 13)
  - Mystic 8 and 9 out
- DOMAC out
  - Repsol in operation, with full supply available on all days to electricity suppliers
  - Under ESI, forward LNG contracts (~610 MW) for capacity not contracted by LDCs to meet design day requirements
- Fuel oil: initial inventory and refilling
  - Under ESI, initial inventory based on Winter Program levels
  - Under CMR, initial inventory based on post-Winter Program levels with daily refill at 25% of ESI rate



## **Central Case**

## **Total Customer Payments**

### **Total Payments by Case (\$ Million)**

		Freq	uent Stress	ed Conditions	Extended Stressed Conditions		Infrequent Stressed Conditio		d Conditions	
	_		Payments (S	SMillion)		Payments (\$	Million)	Payments (\$Million)		(fillion)
Product / Payment		CMR	ESI	Difference	CMR	ESI	<b>Difference</b>	CMR	ESI	Difference
Energy and RT Operating Reserves	6 [A]	\$4,427	\$4,220	-\$207 (-4.7%)	\$3,128	\$2,784	-\$344 (-11.0%)	\$1,821	\$1,816	-\$4 (-0.2%)
DA Energy Option										
DA Option Payment			\$191			\$114			\$63	
EIR			\$23			\$11			\$6	
RER			\$54			\$35			\$18	
GCR10			\$79			\$50			\$26	
GCR30			\$36			\$19			\$12	
RT Option Settlement			-\$180			-\$98			-\$40	
Net DA Ancillary	[B]		\$11			\$16			\$23	
FER Payments	[C]		\$327			\$203			\$112	
Total Payments	[A+B+C]	\$4,427	\$4,558	\$131 (3.0%)	\$3,128	\$3,003	-\$125 (-4.0%)	\$1,821	\$1,951	\$130 (7.2%)



# **Central Case – Net Revenues to Generators**

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## ECONOMIC, FINANCIAL AND STRATEGY CONSULTANTS

# **Net Revenues**

## Impact on Energy Market Net Revenues Reflects Multiple Factors

- The proposed ESI market rules will impact net revenues earned by generators in the New England energy markets
  - Changes to net revenues may impact offers and clearing prices in the Forward Capacity Market; such impacts are not quantified in our analysis
- Estimated impacts vary:
  - Across resource types, depending on each resource's energy and DA energy option offers (relative to other resources), quantity of energy inventory, fuel flexibility, etc.
  - Across cases, depending on market conditions in each case
- Some caution should be exercised in over-interpretation of results as they reflect specific cases and the model may not fully capture all factors affecting plant-level economics



## Impact on Energy Market Net Revenues Reflects Multiple Factors

- Changes in net revenue are quantified within the production cost model, AG-EMM (Energy Market Model), reflecting multiple factors:
  - Changes in payments for energy, including changes in LMPs and FER payments
  - Changes in quantity of energy sold
  - Award and settlement of DA energy options
  - Changes in energy inventory costs



### Average Net Revenues by Resource Type, Winter Season, Frequent Stressed Conditions (\$ per MW)

	Net Revenue (\$/MW)					
	CMR	ESI	Change	Percent Change		
<b>Resource Type:</b>	[A]	[B]	[C] = [B] - [A]	$[\mathbf{D}] = [\mathbf{C}]/[\mathbf{A}]$		
Dual Fuel - CC	\$43,656	\$50,142	\$6,486	14.86%		
Dual Fuel - GT	\$25,290	\$24,772	(\$518)	-2.05%		
Gas Only - CC	\$2,890	\$6,987	\$4,097	141.79%		
Gas Only - GT	\$0	(\$1,399)	(\$1,399)	0.00%		
Gas with LNG under ESI	\$16,453	\$29,646	\$13,193	80.19%		
Oil Only - Steam	\$16,159	\$14,128	(\$2,031)	-12.57%		
Oil Only - Non-steam	\$5,536	\$691	(\$4,845)	-87.52%		
Coal	\$169,927	\$177,387	\$7,460	4.39%		
Biomass/Refuse	\$249,095	\$256,751	\$7,656	3.07%		
Fuel Cell	\$152,600	\$159,270	\$6,670	4.37%		
Hydro	\$99,316	\$102,336	\$3,020	3.04%		
Nuclear	\$277,619	\$286,558	\$8,939	3.22%		
Solar	\$12,851	\$12,161	(\$690)	-5.37%		
Wind	\$95,899	\$94,722	(\$1,177)	-1.23%		
Offshore Wind	\$141,751	\$147,264	\$5,513	3.89%		



### Average Net Revenues by Resource Type, Winter Season, Extended Stressed Conditions (\$ per MW)

	Net Revenue (\$/MW)					
	CMR	ESI	Change	Percent Change		
<b>Resource Type:</b>	<b>[A]</b>	[ <b>B</b> ]	[C] = [B] - [A]	[D] = [C]/[A]		
Dual Fuel - CC	\$29,017	\$26,907	(\$2,110)	-7.27%		
Dual Fuel - GT	\$21,498	\$15,564	(\$5,934)	-27.60%		
Gas Only - CC	\$7,741	\$12,143	\$4,402	56.86%		
Gas Only - GT	\$0	\$340	\$340	0.00%		
Gas with LNG under ESI	\$41,998	\$44,469	\$2,471	5.88%		
Oil Only - Steam	\$21,303	\$6,937	(\$14,366)	-67.44%		
Oil Only - Non-steam	\$12,239	\$1,648	(\$10,590)	-86.53%		
Coal	\$104,382	\$95,168	(\$9,214)	-8.83%		
Biomass/Refuse	\$174,308	\$166,805	(\$7,503)	-4.30%		
Fuel Cell	\$92,946	\$83,599	(\$9,347)	-10.06%		
Hydro	\$73,178	\$72,356	(\$822)	-1.12%		
Nuclear	\$194,168	\$187,800	(\$6,368)	-3.28%		
Solar	\$10,220	\$9,842	(\$378)	-3.70%		
Wind	\$69,117	\$65,528	(\$3,589)	-5.19%		
Offshore Wind	\$106,256	\$99,185	(\$7,071)	-6.65%		



### Average Net Revenues by Resource Type, Winter Season, Infrequent Stressed Conditions (\$ per MW)

	Net Revenue (\$/MW)						
	CMR	ESI	Change	Percent Change			
<b>Resource Type:</b>	<b>[A]</b>	[ <b>B</b> ]	[C] = [B] - [A]	[D] = [C]/[A]			
Dual Fuel - CC	\$7,760	\$11,599	\$3,839	49.47%			
Dual Fuel - GT	\$6,406	\$7,322	\$916	14.30%			
Gas Only - CC	\$8,178	\$11,715	\$3,537	43.25%			
Gas Only - GT	\$0	\$875	\$875	0.00%			
Gas with LNG under ESI	\$29,946	\$15,336	(\$14,610)	-48.79%			
Oil Only - Steam	\$379	(\$3,130)	(\$3,508)	-926.70%			
Oil Only - Non-steam	\$3	(\$63)	(\$66)	-2,548.73%			
Coal	\$35,978	\$40,656	\$4,678	13.00%			
Biomass/Refuse	\$103,237	\$109,615	\$6,378	6.18%			
Fuel Cell	\$29,247	\$32,965	\$3,718	12.71%			
Hydro	\$40,564	\$44,455	\$3,891	9.59%			
Nuclear	\$118,043	\$125,144	\$7,101	6.02%			
Solar	\$7,996	\$7,978	(\$17)	-0.22%			
Wind	\$39,673	\$40,186	\$512	1.29%			
Offshore Wind	\$61,725	\$65,494	\$3,769	6.11%			



### **Frequent Stressed Conditions Case**

### Average Net Revenues, Selected Resources, Winter Season, Frequent Stressed Conditions

		Gas Resources with LNG Contracts in ESI (\$/MW)	Oil Only Steam Resources (\$/MW)	Oil Only Non-steam Resources (\$/MW)	Dual Fuel Gas CC Resources (\$/MW)	Dual Fuel Gas GT Resources (\$/MW)
CMR						
Settlement Revenues	[A]	\$181,139	\$86,462	\$24,586	\$144,096	\$93,997
Production Costs	[B]	\$164,686	\$70,304	\$19,050	\$100,440	\$68,707
Net Revenues	[C] = [A] - [B]	\$16,453	\$16,159	\$5,536	\$43,656	\$25,290
ESI						
Settlement Revenues	[D]	\$200,363	\$85,768	\$14,373	\$153,766	\$91,484
Production Costs	[E]	\$149,046	\$69,536	\$13,567	\$103,549	\$66,535
Incremental Oil Holding Costs	[F]		\$2,104	\$115	\$75	\$177
LNG Contract Costs	[G]	\$21,671				
Net Revenues	[H] = [D] - ([E]+[F]+[G])	\$29,646	\$14,128	\$691	\$50,142	\$24,772
Incremental ESI Net Revenues	[H] - [C]	\$13,193	(\$2,031)	(\$4,845)	\$6,486	(\$518)



## Many Factors Account for Impact Differences Across Resource Types

- Results on prior slides show that net revenue impacts vary across resources
- Many factors drive these differences, some of which may not capture long-run, expected impact; thus, caution should be taken in over-interpretation of results; *for example*:
  - Changes in net EAS revenues
    - Less efficient units (e.g., some oil-fired units) tend to be disproportionately impacted by the reduction in LMPs during high priced hours; FER payments may not offset the reduction in LMPs in these hours; these results reflect the particular assumptions made regarding incremental fuel inventory, which tends to lower LMPs, all else equal
  - DA energy option net payments
    - Net payments may be sensitive to calculation of risk-premiums for particular resource types
    - Peaking resources with Claim10 and Claim30 capability can earn higher DA energy option revenues, because fewer resources are eligible for these products, which causes prices to be higher (particularly in tight market conditions)
  - Frequency of operation
    - Current analysis may not fully capture real-time price volatility; thus, expected net revenues may be understated for peaking units



### Net Revenue Impacts Vary Across Resource Types

- In many cases, estimated impacts are modest
  - For example, in the Frequent Stressed Conditions case, oil-only non-steam units earn \$4,845 per MW less under ESI, which translates to \$0.40 per kWmonth across a 12-month period
- However, as we will see, incentives to individual resources under ESI encourage incremental fuel procurement



# **Central Case – Incentives for Energy Inventory**



# **ESI Incentives for Energy Inventory**

Analysis of Incentives for Resources to Invest in Energy Inventory

- Among many objectives, the proposed ESI market rules are intended to improve generator incentives to secure energy inventory
- Our analysis compares the cost and benefits to individual resources that take steps to improve fuel security
  - We evaluate (1) inventory decisions by oil-fired resources and (2) forward LNG contracts by gas-only resources
  - Benefits reflect the direct incentives (revenues) created by ESI through FER payments and DA energy options
  - Costs reflect the costs of increases in energy inventory, such as contractual costs and holding costs



## **ESI Incentives for Energy Inventory**

Analysis of Incentives for Resources to Invest in Energy Inventory

- Analysis considers two types of questions
- First, does ESI provide incremental incentives for more secure energy inventory compared to current market rules?
  - We find that ESI does create greater incentives for resources to procure incremental fuel as compared to current market rules
- Second, does ESI incent incremental action (i.e., additional fuel oil and forward LNG contracts) beyond energy inventories assumed under CMR?
  - We find that ESI does incent incremental actions, with certain exceptions
  - These exceptions reflect circumstances when incremental energy may provide relatively little benefit in terms of increased energy security or assumed level of incremental energy is too large to earn positive net returns



# **ESI Incentives for Energy Inventory**

Direct Mechanisms by Which ESI Incents Action to Secure Energy Inventory

- Incremental energy inventory can earn additional FER payments by allowing resources to supplying additional energy
  - Incremental energy inventory may allow a resource to supply energy when it otherwise would not by relaxing a physical constraint on available energy inventory (e.g., incremental fuel oil inventory) or relaxing an economic constraint if energy inventory has lower opportunity costs (e.g., a forward LNG contract)
  - To the extent that incremental energy inventory allows a resource to supply incremental DA energy, the resource will earn incremental FER payments
- Incremental energy inventory lowers financial risk when offering DA energy options
  - Increases likelihood that DA energy options are awarded
  - Lowers cost (financial risk) when taking a DA energy option award
  - The incremental net revenues from lower financial risk are partially captured by the model



# Central Case – Incentives for Energy Inventory: Fuel Oil



## Incremental Fuel Oil Incentives Relative to Current Market Rules Direct Mechanisms by Which ESI Incents Action to Secure Energy Inventory

- The following tables quantify ESI incentives for oil-fired resources to hold incremental energy inventory
  - Tables quantify the direct incentives created by ESI to incent additional fuel inventory – these incentives are new to the market, incremental to incentives under current market rules
- Benefits quantified include:
  - "ESI FER Payments" reflects all FER payments
  - "ESI DA Energy Option Revenue" reflects risk premium component of all DA energy option awards
  - "Change in Holding Costs" reflects difference in holding costs between CMR and ESI case; provided for context regarding the magnitude of costs of incremental fuel
    - Reminder: Fuel inventory levels differ between CMR and ESI
  - "Incremental Net Revenues" sum of (1) FER Payments and (2) DA Energy
     Option Revenue net of (3) Change in Holding Costs



## **Incremental Fuel Oil Incentives Relative to Current Market Rules**

### **Cost Effectiveness of Additional Fuel – Central Case, Frequent Stressed Conditions**

		Change In Holding	ESI FER	ESI DA Energy	Change In Net
Tank Size	Number of	Costs	Payments	<b>Option Revenue</b>	Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$84.60	\$667.82	\$1,046.47	\$1,629.68
1 - 3 Days	53	-\$27.51	\$3,338.42	\$542.23	\$3,853.15
3 - 7 Days	19	-\$95.80	\$9,722.26	\$418.68	\$10,045.15
7+ Days	24	-\$1,744.04	\$7,304.13	\$756.58	\$6,316.67

- Table shows net revenues, with plants grouped by tank size relative to plant capacity
- Compared to CMR, oil-fired resources have positive net incentives to maintain energy inventory
  - For all categories of plants, direct ESI incremental incentives (FER payments and DA energy options) exceed the additional fuel holding costs



## **Incremental Fuel Oil Incentives Relative to Current Market Rules**

### Cost Effectiveness of Additional Fuel – Central Case, Extended Stressed Conditions

		Change In Holding	ESI FER	ESI DA Energy	Change In Net
Tank Size	Number of	Costs	Payments	<b>Option Revenue</b>	Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$47.16	\$314.29	\$478.87	\$746.00
1 - 3 Days	53	-\$81.87	\$1,136.65	\$188.43	\$1,243.21
3 - 7 Days	19	-\$74.99	\$3,168.92	\$164.57	\$3,258.49
7+ Days	24	-\$2,264.14	\$2,583.04	\$172.50	\$491.39

Results are similar for the Extended Stressed Conditions Case



## **Incremental Fuel Oil Incentives Relative to Current Market Rules**

			Central Case,	innequent stress	cu conuntions
Tank Size	Number of	Change In Holding Costs	ESI FER Payments	ESI DA Energy Option Revenue	Change In Net Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$47.16	\$58.39	\$8.63	\$19.87
1 - 3 Days	53	-\$79.45	\$375.06	\$11.23	\$306.84
3 - 7 Days	19	-\$56.81	\$660.67	\$25.92	\$629.79
7+ Days	24	-\$2,760.08	\$369.60	\$3.15	-\$2,387.33

#### Cost Effectiveness of Additional Fuel – Central Case, Infrequent Stressed Conditions

- In the Infrequent Stressed Conditions Case, all plants have increased incentives for energy inventory, except the plants with large tanks
  - For plants with large tanks, the additional holding costs of the assumed level of incremental fuel inventory exceeds the total ESI payments; result reflects specific assumptions about incremental fuel, which may not be optimal given expected plant utilization and other factors



## Incremental Fuel Oil Incentives Relative to Current Market Rules Are Incentives for Energy Inventory Greater than Current Market Rules?

- ESI unambiguously increases incentives for energy inventory
  - For any given level of energy inventory, ESI increases payments for holding energy inventory
    - FER payments
    - DA energy options (risk premium portion)
  - ESI provides incremental revenues in all cases, not only those with stressed conditions



## Incentives for Additional Energy Relative to Assumed Levels Are ESI Incentives Sufficient to Incent Assumed Additional Energy Inventory?

- We analyze whether ESI provides incentives to increase energy inventory in excess of the quantities assumed under CMR
  - In effect, we analyze whether ESI provides incentives to increase energy inventory at the margin
- In cases with ESI in effect, the tables that follow compare:
  - Incremental costs ("Change in Holding Costs") of additional energy inventory, based on end of season fuel oil holding costs
  - Incremental ESI revenues from additional energy inventory, including "Change in FER payments" and "Change in DA Energy Option Revenues") (risk premium portion only)
  - Results reflect comparison of two cases: one case assumes CMR fuel assumptions, while the other assumes ESI fuel assumptions



## Incentives for Additional Energy Relative to Assumed Levels Are ESI Incentives Sufficient to Incent Assumed Additional Energy Inventory?

- Counterfactual tests may understate potential benefits
  - Each test assumes that *all* oil-fired resources have incremental fuel; this test does not reflect the marginal decision faced by each resource, in which the resource increases its energy inventory, but all other resources keep inventories fixed
  - This may reduce revenues for any given resource, as the counterfactual includes energy for all resources, which will tend to "compete" for FER payments and DA energy options



## **ESI Incentives for Fuel Oil Inventory: Incremental Inventory**

		Change In Holding	Change In FER	Change In DA Energy	Change In Net
Tank Size	Number of	Costs	Payments	<b>Option Revenue</b>	Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$69.54	\$167.53	\$182.13	\$280.12
1 - 3 Days	53	-\$39.78	\$869.87	\$52.98	\$883.08
3 - 7 Days	19	-\$122.34	\$250.98	\$82.89	\$211.54
7+ Days	24	-\$1,788.13	\$626.79	\$205.46	-\$955.88

#### **Oil Unit Revenue Impacts – Central Case, Frequent Stressed Conditions**

- At the margin (i.e., given assumed level of energy inventory in CMR), ESI creates positive incentives for incremental inventory relative to holding costs for all units, except those with the largest tanks
- Analysis does not account for changes in market prices (e.g., LMPs) caused by the incremental energy inventory; thus, in equilibrium, more or less energy inventory could be incented than the assumed level
  - Development of a model that solves for the equilibrium level of incremental energy inventory, conditional observable system conditions, is outside of project scope



## **ESI Incentives for Fuel Oil Inventory: Incremental Inventory**

		Change In Holding	Change In FER	Change In DA Energy	Change In Net
Tank Size	Number of	Costs	Payments	<b>Option Revenue</b>	Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$47.16	\$133.14	\$309.90	\$395.88
1 - 3 Days	53	-\$78.45	\$296.63	\$88.40	\$306.58
3 - 7 Days	19	-\$92.03	\$73.97	\$34.61	\$16.54
7+ Days	24	-\$2,170.05	\$127.04	\$92.79	-\$1,950.22

#### **Oil Unit Revenue Impacts – Central Case, Extended Stressed Conditions**

Results similar to Frequent Stressed Conditions Case



## **ESI Incentives for Fuel Oil Inventory: Incremental Inventory**

		Change In Holding	Change In FER	Change In DA Energy	Change In Net
Tank Size	Number of	Costs	Payments	<b>Option Revenue</b>	Revenue
(Days of Fuel)	Plants	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)	(\$ / MW Capacity)
0 - 1 Day	28	-\$47.16	\$6.12	\$0.10	-\$8.80
1 - 3 Days	53	-\$79.45	\$31.10	\$0.03	-\$38.93
3 - 7 Days	19	-\$56.81	-\$1.07	\$0.47	-\$20.13
7+ Days	24	-\$2,760.08	-\$8.25	\$0.04	-\$1,942.14

#### **Oil Unit Revenue Impacts – Central Case, Infrequent Stressed Conditions**



# **ESI Incentives for Incremental Fuel Oil Inventory**

Incentives for Resources with Small to Medium Tank Sizes

- For resources with small to medium tank sizes (relative to plant size):
  - Incentives for energy inventory are increased by ESI relative to current market rules
  - At the margin, resources earn positive returns to holding additional fuel when market conditions are constrained
    - Incremental revenues are negative when market conditions are less constrained (such as the Infrequent Stressed Conditions case), but smaller in magnitude than gains
  - Analysis does not undertake any optimization of fuel procurement strategy that might lower (holding) costs during less constrained winters and raise returns during more constrained winters
  - In sum, results demonstrate that there are positive incentives to holding incremental fuel inventory under ESI



# **ESI Incentives for Incremental Fuel Oil Inventory**

### Incentives for Resources with Large Tank Sizes

- For resources with large tank sizes (relative to plant size)
  - Incentives for energy inventory are increased by ESI relative to current market rules
  - But, at the margin, resources with large tanks on average do not earn positive returns for holding additional incremental energy inventory, given assumed additional quantities of inventory
    - Does not suggest that some level of refueling would not earn positive returns, but that assumed level of refueling is too high for positive returns
    - More sophisticated (or lower magnitude) refueling logic might provide positive returns to increased energy inventory
    - There are declining marginal benefits to incremental inventory in terms of improved energy security
  - In sum, results demonstrate that there are positive incentives to holding incremental fuel inventory under ESI, but that marginal benefits may be lower for units with larger tanks (compared to units with smaller tanks)



# Central Case – Incentives for Energy Inventory: Forward LNG Contract



## **Forward LNG Contract**

### **Economics of Forward LNG Contract**

- Forward LNG Contract
  - Bi-lateral contract between LNG terminal and market participant no liquid market with price discovery
  - Willingness to reach agreement depends on the benefits and costs to each party
- Prior analysis (Chapter 2B)<sup>1</sup> identified multiple components affecting these benefits and costs:
  - LNG terminal costs (e.g., operational cost recovery)
  - Generator costs (e.g., credit, financial risk)
  - Market value of stored fuel (given anticipated price volatility)
  - Incremental ISO-NE revenues (e.g., given illiquidity in intraday NG market)

<sup>1</sup> https://www.iso-ne.com/staticassets/documents/2019/01/a2\_analysis\_group\_calculation\_of\_rate\_interim\_compensation\_treatment.pdf



## **Forward LNG Contract**

## Analysis of forward LNG Contract

- Our analysis is based on a specific forward contract, with 10 calls and strike price = \$10 per MMBtu
  - Same contract assumed in Chapter 2B analysis
  - In practice, generators and terminals may enter into different contract structures, some of which may provide greater net benefits under ESI
- Analysis of ESI benefits for CC units reflects only FER payments
  - Model currently does not award GRC10 and GRC30 to individual CC units for their ramp capability; thus, our analysis may understate ESI revenues



## **ESI Incentives for Forward LNG Contract**

		FER Price	FER MWh	FER Payments (\$)	FER Payments
Severity	FER Hours	[A]	[B]	$[\mathbf{A}] = [\mathbf{B}]^*[\mathbf{C}]$	(\$/MW)
Frequent Stressed Conditions	240	\$12.48	146,311	\$1,825,941	\$2,962
Extended Stressed Conditions	240	\$8.88	146,311	\$1,299,421	\$2,108
Infrequent Stressed Conditions	0	NA	0	\$0	\$0

#### **Incremental ESI Revenues from FER Payments**

- In Frequent and Stressed Conditions cases, all call options are exercised price exceeds assumed (static) trigger threshold for exercising call options (\$16 per MMBtu)
  - This trigger threshold is greater than the commodity price to avoid exercising calls when gains are small
- In Infrequent Stressed Conditions case, options are not exercised due to low NG prices
  - With more complex decision-making regarding when to exercise call options, contract would likely earn positive FER payments in some hours



# Incremental Incentives Relative to Current Market Rules

### **Economics of Forward LNG Contract**

- Our analysis shows that ESI will provide incremental incentives for gas-only plants to enter into a forward LNG contract relative to the incentives under current market rules
  - Incentives reflect both FER payments and DA energy option awards
  - FER payments increase the value of holding energy inventory by over \$2,000 per MW in two of three cases
- The AG model captures some, but not all, of the potential gains to resources from incremental fuel inventory
  - Gains in the Infrequent Stressed Conditions Case could be higher with more sophisticated algorithms to exercise call options
  - Analysis captures gains from reduction in financial risk when NG price exceeds LNG price, but not when prices are low (NG price less than LNG price)
  - Analysis does not capture more general benefits of operational performance available to a contract holder, given illiquidity of intraday NG markets



### Incentives for Additional Energy Relative to Assumed Levels Costs (and Benefits) of Forward LNG Contract

- Under current market rules, there may be a gap between prices a generator and LNG terminal are willing to accept for a forward LNG contract
- Incremental ESI revenues may close whatever gap there is between an LNG terminal and generator to reaching agreement
  - Actual values will vary across plants and companies (given portfolio effects, risk preferences, etc.)
- Extent to which ESI incentivizes additional forward LNG contracting depends on the size of the gap between generator willingness to pay and LNG terminal willingness to sell
  - This gap is largely unobservable; our analysis aims to quantity the gap, recognizing heterogeneity in value of forward LNG contract among market participants



## Incentives for Additional Energy Relative to Assumed Levels Costs (and Benefits) of Forward LNG Contract

- Prior analysis found, for the assumed forward contract:
  - LNG terminal and generator costs are approximately \$4,626 per MW
  - Incremental ISO-NE revenues are approximately \$1,921 per MW
    - These incremental revenues are not fully accounted for given the nature of our production cost analysis
    - Our estimates reflect expected costs across multiple scenarios, and thus are not directly comparable to the case-specific results
  - Based on this analysis, gap in revenues is: \$2,705 per MW
- Value of stored fuel will vary with market conditions
  - Forward LNG contract price terms (reservation prices) will vary with the NG market equilibrium, with prices increasing under tighter market conditions
  - ESI may shift the market equilibrium relative to CMR, but compensating changes in key elements of the underlying forward LNG contract would be expected



## Incentives for Additional Energy Relative to Assumed Levels Net Effect of ESI on Forward LNG Contract Incentives

- ESI introduces incremental incentives for energy inventory
  - Chapter 2B estimate of gap (\$2,705 per MW) aimed to ensure program participation; in practice, gap may be lower for some resources
- Incremental ESI revenues fully exceeds gap with Frequent Stressed Conditions (\$2,962 per MW) and most of the gap with Extended Stressed Conditions (\$2,108 per MW)
- These results suggest that ESI would provide meaningful incentives to help close any gap between generators and LNG terminals to signing LNG contract



## **Central Case – Production Costs**



### **Production Costs**

### Model Production Costs and Fuel Holding Costs Quantified

- We quantity two aspects of production costs.
- First, we quantity the marginal costs of meeting energy market requirements, including load, operating reserves and DA energy options
  - Marginal costs include fuel and variable operations and maintenance (O&M) costs
  - Marginal costs are quantified within the production cost model, AG-EMM (Energy Market Model)
- Second, we quantity the incremental holding costs between cases
  - Holding costs reflect the opportunity cost of holding fuel in storage
  - Fuel oil holding costs reflect financial opportunity costs, price risk and liquidity constraints
  - LNG holding costs reflect financial opportunity costs and operational storage costs
- Other factors not quantified by the analysis are being assesses qualitatively



### **Production Costs**

#### Production Costs, with and without ESI, Central Cases All Oil-Fired Resources Store Incremental Fuel

		Fotal Mod luction Co (\$ Million	sts <sup>[1]</sup>	Incremental Energy Inventory Costs <sup>[2]</sup> (\$ Million)	Change in Total Production Costs	
Scenario Name/Acronym	CMR	ESI	Change	ESI	(\$ Million)	
Frequent Stressed Conditions	\$1,550.9	\$1,513.5	(\$37.3)	\$9.1	(\$28.3)	
Extended Stressed Conditions	\$995.6	\$972.8	(\$22.9)	\$11.8	(\$11.1)	
Infrequent Stressed Conditions	\$677.6	\$677.0	(\$0.6)	\$15.8	\$15.2	

Notes:

[1] Production Costs only do not include opportunity costs.

[2] Incremental energy inventory costs include LNG and oil holding costs for incremental fuel at the end of winter.

- Assumes energy inventory costs for all resources
- Production costs lower in 2 of 3 cases despite increased DA energy market requirements



### **Production Costs**

#### Production Costs, with and without ESI, Central Cases Large Oil-Fired Resources Do Not Store Incremental Fuel

		Fotal Mode luction Co (\$ Million	sts <sup>[1]</sup>	Incremental Energy Inventory Costs <sup>[2]</sup> (\$ Million)	Change in Total Production Costs
Scenario Name/Acronym	CMR	ESI	Change	ESI	(\$ Million)
Frequent Stressed Conditions	\$1,550.9	\$1,513.5	(\$37.3)	\$1.1	(\$36.2)
Extended Stressed Conditions	\$995.6	\$972.8	(\$22.9)	\$1.0	(\$21.8)
Infrequent Stressed Conditions	\$677.6	\$677.0	(\$0.6)	\$2.3	\$1.7

Notes:

[1] Production Costs only do not include opportunity costs.

[2] Incremental energy inventory costs include LNG and oil holding costs for incremental fuel at the end of winter.

- Assumes energy inventory costs for all resources except resources with large fuel tanks (12 largest resources in terms of tank size, measured by days of fuel)
  - Assume these resources to not store fuel (or store less fuel) given incentives analysis
  - Likely does not meaningfully affect production costs
- Production costs lower in 2 of 3 cases, but limited losses in Infrequent Constraints Case suggests that with more refined refueling assumptions, gains would be larger



## **Preliminary Scenario Analysis Results**



### **Scenarios Presented**

Scenario Name	Scenario Description
Central Case	"Central Case" Current Market Rules (CMR) and Energy Security Improvements (ESI) assumptions, updated but largely as
	presented at July 30 Markets Committee Meeting.
	- RER Requirement updated to 1,200 MW; Refinement of Risk Premium methodology.
ESI Products - RER Plus	"Central Case", plus an additional 50% hourly RER requirement (1,800 MW total).
ESI Products - No EIR/RER	"Central Case", without EIR or RER products.
Supply Shocks	Unexpected real-time outages, experienced during coldest portion of historic base winter.
Shock HQ 1 Day	Shock of 1,364 MW is modeled in real-time market, but not expected in day-ahead market.
	- High Severity: Based on January 3, 2014 (average temp 11.64 °F);
	- Medium Severity: Based on January 1, 2018 (average temp 2.72 °F);
	- Low Severity: Based on December 16, 2016 (average temp 4.77 °F).
Shock HQ 5 Days	Shock of 1,364 MW is modeled Day 1 in real-time market, but not expected in Day 1 day-ahead market. Resource is expected
	out day-ahead in remaining days (Days 2-5).
	- High Severity: Based on January 21-25, 2014 (average temp 12.83 °F);
	- Medium Severity: Based on December 28, 2017 - January 1, 2018 (average temp 5.68 °F);
	- Low Severity: Based on January 6-10, 2017 (average temp 19.07 °F).
High Load	Load is increased by 5%, with no other modeling changes.
DA Load Adjusted for EIR (50%)	Day-ahead cleared load and EIR requirement adjusted such that EIR requirement is zero in 50% of hours. The load adjustment
	is the fixed quantity needed to shift up DA supply such that the EIR requirement is zero in 50% of the hours.
Resource Mix - Oil Retirements	Changes in retirements and replacements to future-year resource mix. For all scenarios:
	- ~1,500 MW at-risk resources and an additional ~1,000 MW of oil resources retired.
Renewable Replacement	3,824 MW nameplate (1,300 MW derated) of new offshore wind added;
	1,200 MW of new hydro imports added.
Gas Replacement	2,500 MW of new natural gas CC resources added, none with dual-fuel capability.
Gas / Dual Fuel Replacement	2,500 MW of new natural gas CC resources added, 50% with dual-fuel capability.
High LNG Supply	Assume additional LNG availability of 0.4 Bcf/day to both ESI and CMR cases (all winter severities). Under ESI, assume an
	incremental 0.4 Bcf/day available for LNG forward contracts, for a total of 0.52 Bcf/day available for forward contracts.
Strike x 1.2	Strike Price increased to 120% of "Central Case" Value



### **Scenarios Presented**

### Set of Scenarios Presented Today

- The scenarios evaluated seeks to be responsive to the set of stakeholder requests we have received to date
- To the extent possible, additional scenarios requested by stakeholders will be evaluated in future analysis
- Assumptions regarding how ESI impacts oil and LNG arrangements remain unchanged in scenario analysis unless explicitly stated otherwise
- Results are preliminary, and we continue to evaluate results to develop more insight into expected ESI impacts



### **Scenarios - Summary Results**

### **Frequent Stressed Conditions**

#### Summary of Modeled ESI Impacts by Scenario

	]	Prices (\$/MWh	)	Customer Payment (\$ Million)			
	Change in DA		A 11000 00	Change in Energy and Ancillary Services	Energy	Change in Total	
	Change in DA LMP	Average FER	Average Option Price		Options (DA Cost net of RT	Customer	
Scenario Name/Acronym	(ESI - CMR)	Price	(GCR, RER)	(ESI - CMR)	Settlement)	Payments	
Frequent Stressed Conditions - Central Case							
Central Case	(\$6.31)	\$10.38	\$22.10	\$119	\$11	\$131	
Frequent Stressed Conditions - August Scenarios							
ESI Products - RER Plus	(\$6.15)	\$10.46	\$22.05	\$127	\$13	\$140	
ESI Products - No EIR/RER	(\$7.21)	NA	\$22.28	(\$235)	\$9	(\$227)	
Shock HQ 1 Day	(\$6.44)	\$10.39	\$22.10	\$115	\$11	\$126	
Shock HQ 5 Days	(\$30.32)	\$10.42	\$22.39	(\$633)	\$13	(\$619)	
High Load	(\$10.83)	\$10.46	\$22.34	(\$33)	\$13	(\$20)	
DA Load Adjusted for EIR (50%)	(\$4.86)	\$10.70	\$21.99	\$160	\$10	\$170	
Oil Retirements; Renewable Replacement	(\$2.39)	\$9.95	\$21.27	\$233	\$3	\$236	
Oil Retirements; Gas Replacement	(\$10.74)	\$10.42	\$22.92	(\$41)	\$17	(\$24)	
Oil Retirements; Gas / Dual Fuel Replacement	(\$15.35)	\$10.41	\$22.61	(\$175)	\$15	(\$161)	
High LNG Supply	(\$6.30)	\$10.31	\$22.08	\$113	\$11	\$123	
Frequent Stressed Conditions - September Scenarios							
Strike x 1.2	(\$6.86)	\$6.03	\$12.88	(\$35)	\$4	(\$30)	



### **Scenarios - Summary Results**

### **Extended Stressed Conditions**

Summary of Modeled ESI Impacts by Scenario

	]	Prices (\$/MWh	)	Customer Payment (\$ Million)			
				Change in			
				Energy and			
				Ancillary	Energy	Change in	
	Change in DA		Average	Services	Options (DA	Total	
	LMP	Average FER	Option Price	(+ FER in ESI)	Cost net of RT	Customer	
Scenario Name/Acronym	(ESI - CMR)	Price	(GCR, RER)	(ESI - CMR)	Settlement)	Payments	
Extended Stressed Conditions - Central Case							
Central Case	(\$10.80)	\$6.48	\$13.29	(\$141)	\$16	(\$125)	
<b>Extended Stressed Conditions - August Scenarios</b>							
ESI Products - RER Plus	(\$10.75)	\$6.50	\$13.36	(\$139)	\$19	(\$120)	
ESI Products - No EIR/RER	(\$11.34)	NA	\$12.95	(\$361)	\$8	(\$353)	
Shock HQ 1 Day	(\$13.21)	\$6.49	\$13.31	(\$219)	\$16	(\$203)	
Shock HQ 5 Days	(\$13.21)	\$6.49	\$13.31	(\$219)	\$16	(\$203)	
High Load	(\$27.44)	\$6.51	\$13.56	(\$690)	\$18	(\$672)	
DA Load Adjusted for EIR (50%)	(\$8.52)	\$5.90	\$13.24	(\$89)	\$15	(\$74)	
Oil Retirements; Renewable Replacement	(\$2.23)	\$6.11	\$12.67	\$120	\$10	\$130	
Oil Retirements; Gas Replacement	(\$85.83)	\$6.48	\$13.79	(\$2,445)	\$19	(\$2,426)	
Oil Retirements; Gas / Dual Fuel Replacement	(\$58.54)	\$6.47	\$13.61	(\$1,634)	\$18	(\$1,617)	
High LNG Supply	(\$8.75)	\$6.28	\$13.01	(\$82)	\$13	(\$69)	
Extended Stressed Conditions - September Scenarios							
Strike x 1.2	(\$10.94)	\$3.70	\$7.69	(\$233)	\$8	(\$225)	



### **Scenarios - Summary Results**

### **Infrequent Stressed Conditions**

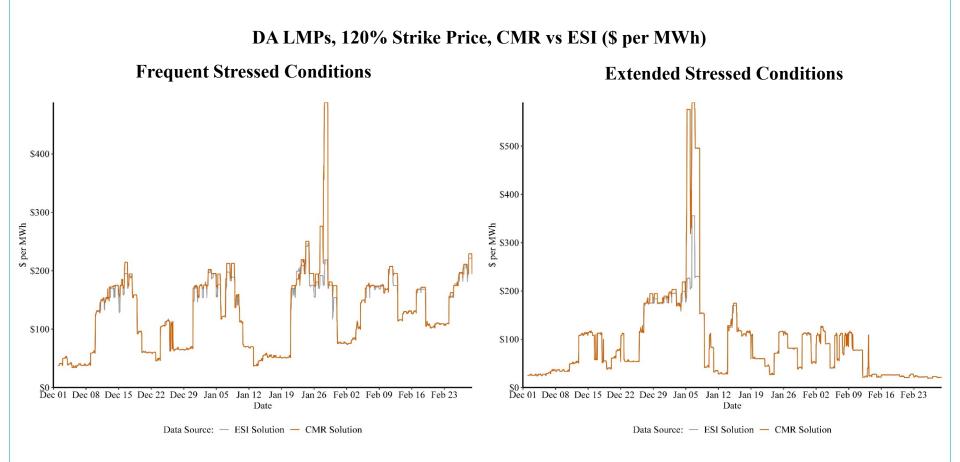
#### Summary of Modeled ESI Impacts by Scenario

	]	Prices (\$/MWh	)	Customer Payment (\$ Million)			
	Change in DA LMP	Average FER	-	(		Change in Total Customer	
Scenario Name/Acronym Infrequent Stressed Conditions - Central Case	(ESI - CMR)	Price	(GCR, RER)	(ESI - CMR)	Settlement)	Payments	
Central Case	(\$0.14)	\$3.65	\$7.30	\$108	\$23	\$130	
Infrequent Stressed Conditions - August Scenarios ESI Products - RER Plus	(\$0.13)	\$3.65	\$7.29	\$108	\$26	\$135	
ESI Products - No EIR/RER	(\$0.17)	NA	\$7.34	(\$5)	\$15	\$10	
Shock HQ 1 Day	(\$0.13)	\$3.65	\$7.30	\$108	\$23	\$131	
Shock HQ 5 Days	(\$0.18)	\$3.65	\$7.31	\$106	\$23	\$129	
High Load	(\$0.28)	\$3.66	\$7.32	\$108	\$23	\$131	
DA Load Adjusted for EIR (50%)	(\$0.01)	\$3.22	\$7.29	\$95	\$22	\$117	
Oil Retirements; Renewable Replacement	\$0.04	\$3.63	\$7.24	\$113	\$22	\$135	
Oil Retirements; Gas Replacement	(\$0.26)	\$3.63	\$7.26	\$103	\$23	\$126	
Oil Retirements; Gas / Dual Fuel Replacement	(\$0.11)	\$3.63	\$7.26	\$108	\$23	\$130	
High LNG Supply	\$0.05	\$3.65	\$7.30	\$114	\$23	\$136	
Infrequent Stressed Conditions - September Scenarios							
Strike x 1.2	(\$0.16)	\$1.99	\$4.23	\$56	\$15	\$71	



### **Scenarios - Prices**

### DA LMPs - 120% Strike Price





### **Scenarios – Total Payments**

### 120% Strike Price

		Frec	uent Stres	sed Conditions	Exte	nded Stress	sed Conditions	Infre	quent Stress	ed Conditions
	_		Payments	(\$Million)		Payments (	(\$Million)		Payments (\$	Million)
Product / Payment		CMR	ESI	Difference	CMR	ESI	Difference	CMR	ESI	Difference
Energy and RT Operating Reserves	[A]	\$4,427	\$4,203	-\$224 (-5.1%)	\$3,128	\$2,779	-\$349 (-11.2%)	\$1,821	\$1,816	-\$5 (-0.3%)
DA Energy Option										
DA Option Payment			\$111			\$66			\$36	
EIR			\$13			\$6			\$3	
RER			\$31			\$20			\$11	
GCR10			\$46			\$29			\$15	
GCR30			\$21			\$11			\$7	
RT Option Settlement			-\$107			-\$58			-\$21	
Net DA Ancillary	[B]		\$4			\$8			\$15	
FER Payments	[C]		\$190			\$116			\$61	
Total Payments	[A+B+C]	\$4,427	\$4,397	-\$30 (-0.7%)	\$3,128	\$2,903	-\$225 (-7.2%)	\$1,821	\$1,892	\$71 (3.9%)

#### Total Payments, 120% Strike Price, CMR vs ESI (\$ per MWh)

- The scenario assumes the same level of energy inventory as the Central Case, although the increase in DA energy option strike price could affect the additional levels of energy inventory incented by ESI; estimating such effects is outside the scope of the current analysis
- Such changes in energy inventory could affect economic outcomes, for example, increasing LMPs if there were a reduction in inventoried energy



## **Operational / Reliability Impacts**

### **Impacts Vary Across Scenarios**

- Reliability impacts vary across scenarios in terms of the level of impact, and the impact of ESI (relative to CMR)
  - Impacts are greatest in the Frequent Stressed Conditions Case, although impacts are observed in all cases, including the Infrequent Stressed Conditions Case
- For scenario with higher DA energy option strike price (i.e., "Strike x 1.2"):
  - Our analysis shows limited changes in reliability impacts compared to the Central Case
  - However, our analysis does not quantify the change incentives to secure energy inventory due to the lower risk associated with a DA energy option with a higher strike price
  - Such changes in energy inventory would be expected to affect reliability outcomes, but these are not captured in our analysis



### Multiple Metrics to Capture Different Aspects of Energy Security

#### Change in Reliability Metric with ESI compared to CMR Frequent Stressed Conditions

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Frequent Stressed Conditions - Central Case					
Central Case	0	(43)	(72)	(2,690,653)	31,134
Frequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	(37)	(68)	(2,687,268)	31,134
ESI Products - No EIR/RER	0	(37)	(64)	(2,613,230)	31,134
Shock HQ 1 Day	0	(42)	(64)	(2,675,548)	30,759
Shock HQ 5 Days	0	(58)	(94)	(2,831,887)	31,681
High Load	0	(52)	(69)	(2,712,209)	36,795
DA Load Adjusted for EIR (50%)	0	(42)	(77)	(2,912,293)	28,018
Oil Retirements; Renewable Replacement	0	(4)	(6)	(773,310)	13,666
Oil Retirements; Gas Replacement	0	(42)	(39)	(2,181,279)	17,853
Oil Retirements; Gas / Dual Fuel Replacement	0	(67)	(54)	(3,110,186)	23,938
High LNG Supply	0	(17)	(24)	(5,346,168)	17,294
Frequent Stressed Conditions - September Scenarios					
Strike x 1.2	0	(42)	(72)	(2,749,095)	30,918

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### Multiple Metrics to Capture Different Aspects of Energy Security

#### Change in Reliability Metric with ESI compared to CMR, Extended Stressed Conditions

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Extended Stressed Conditions - Central Case					
Central Case	0	16	14	(827,322)	34,594
Extended Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	15	13	(827,322)	34,594
ESI Products - No EIR/RER	0	16	14	(827,322)	34,594
Shock HQ 1 Day	0	12	9	(790,125)	38,633
Shock HQ 5 Days	0	12	9	(790,125)	38,633
High Load	0	8	(8)	(827,409)	33,796
DA Load Adjusted for EIR (50%)	0	11	8	(844,477)	33,606
Oil Retirements; Renewable Replacement	0	(16)	2	(483,505)	13,741
Oil Retirements; Gas Replacement	0	(4)	(30)	(1,132,786)	19,539
Oil Retirements; Gas / Dual Fuel Replacement	0	5	(23)	(1,000,221)	17,715
High LNG Supply	0	(20)	(8)	(3,279,617)	32,101
Extended Stressed Conditions - September Scenarios					
Strike x 1.2	0	16	13	(827,322)	34,594

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### Multiple Metrics to Capture Different Aspects of Energy Security

#### Change in Reliability Metric with ESI compared to CMR Infrequent Stressed Conditions

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Infrequent Stressed Conditions - Central Case					
Central Case	0	(4)	(4)	0	5,651
Infrequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	(4)	(4)	0	5,651
ESI Products - No EIR/RER	0	(4)	(4)	0	5,651
Shock HQ 1 Day	0	(4)	(4)	0	6,071
Shock HQ 5 Days	0	(10)	(10)	0	7,695
High Load	0	0	0	0	9,905
DA Load Adjusted for EIR (50%)	0	(4)	(4)	0	5,651
Oil Retirements; Renewable Replacement	0	3	3	0	10,083
Oil Retirements; Gas Replacement	0	(4)	(4)	0	6,566
Oil Retirements; Gas / Dual Fuel Replacement	0	0	0	0	6,795
High LNG Supply	0	11	11	0	13,078
Infrequent Stressed Conditions - September Scenarios					
Strike x 1.2	0	(4)	(4)	0	5,651

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## Appendix



### **RER Price Upper Bound**

### Maximum single-hour RER price in Central Cases

#### Maximum RER Price, Central Cases (\$ per MWh)

Scenario Name	Maxmimum RER Price
Central Case - Frequent Stressed Conditions	\$69.75
Central Case - Extended Stressed Conditions	\$67.90
Central Case - Infrequent Stressed Conditions	\$41.21



#### **Reliability Metrics, with ESI, Frequent Stressed Conditions Case**

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Frequent Stressed Conditions - Central Case					
Central Case	0	192	217	7,797,048	208,975
Frequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	198	221	7,800,433	208,975
ESI Products - No EIR/RER	0	198	225	7,874,471	208,975
Shock HQ 1 Day	0	210	239	7,906,929	208,738
Shock HQ 5 Days	0	197	231	7,968,763	209,381
High Load	0	290	340	10,894,746	207,071
DA Load Adjusted for EIR (50%)	0	191	209	7,323,898	208,277
Oil Retirements; Renewable Replacement	0	61	67	1,939,247	200,843
Oil Retirements; Gas Replacement	0	302	387	11,933,919	184,565
Oil Retirements; Gas / Dual Fuel Replacement	0	254	330	8,925,308	191,180
High LNG Supply	0	34	49	6,285,779	206,959
Frequent Stressed Conditions - September Scenarios					
Strike x 1.2	0	193	217	7,738,606	208,758



#### Reliability Metrics, with CMR, Frequent Stressed Conditions Case

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Frequent Stressed Conditions - Central Case					
Central Case	0	235	289	10,487,701	177,840
Frequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	235	289	10,487,701	177,840
ESI Products - No EIR/RER	0	235	289	10,487,701	177,840
Shock HQ 1 Day	0	252	303	10,582,477	177,979
Shock HQ 5 Days	0	255	325	10,800,650	177,701
High Load	0	342	409	13,606,955	170,276
DA Load Adjusted for EIR (50%)	0	233	286	10,236,192	180,259
Oil Retirements; Renewable Replacement	0	65	73	2,712,557	187,177
Oil Retirements; Gas Replacement	0	344	426	14,115,198	166,712
Oil Retirements; Gas / Dual Fuel Replacement	0	321	384	12,035,494	167,242
High LNG Supply	0	51	73	11,631,947	189,665
Frequent Stressed Conditions - September Scenarios					
Strike x 1.2	0	235	289	10,487,701	177,840



#### **Reliability Metrics, with ESI, Extended Stressed Conditions Case**

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Extended Stressed Conditions - Central Case					
Central Case	0	485	424	1,681,552	226,665
Extended Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	484	423	1,681,552	226,665
ESI Products - No EIR/RER	0	485	424	1,681,552	226,665
Shock HQ 1 Day	0	477	404	1,732,942	225,164
Shock HQ 5 Days	0	477	404	1,732,942	225,164
High Load	0	553	477	1,982,209	224,621
DA Load Adjusted for EIR (50%)	0	478	421	1,670,860	224,835
Oil Retirements; Renewable Replacement	0	112	122	388,425	209,535
Oil Retirements; Gas Replacement	0	538	450	1,881,246	185,003
Oil Retirements; Gas / Dual Fuel Replacement	0	548	469	1,829,587	190,964
High LNG Supply	0	163	153	999,832	235,040
<b>Extended Stressed Conditions - September Scenarios</b>					
Strike x 1.2	0	485	423	1,681,552	226,665



#### Reliability Metrics, with CMR, Extended Stressed Conditions Case

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
<b>Extended Stressed Conditions - Central Case</b>					
Central Case	0	469	410	2,508,874	192,071
<b>Extended Stressed Conditions - August Scenarios</b>					
ESI Products - RER Plus	0	469	410	2,508,874	192,071
ESI Products - No EIR/RER	0	469	410	2,508,874	192,071
Shock HQ 1 Day	0	465	395	2,523,067	186,531
Shock HQ 5 Days	0	465	395	2,523,067	186,531
High Load	0	545	485	2,809,618	190,825
DA Load Adjusted for EIR (50%)	0	467	413	2,515,336	191,229
Oil Retirements; Renewable Replacement	0	128	120	871,929	195,794
Oil Retirements; Gas Replacement	0	542	480	3,014,031	165,464
Oil Retirements; Gas / Dual Fuel Replacement	0	543	492	2,829,808	173,250
High LNG Supply	0	183	161	4,279,449	202,940
<b>Extended Stressed Conditions - September Scenarios</b>					
Strike x 1.2	0	469	410	2,508,874	192,071



**Reliability Metrics, with ESI, Infrequent Stressed Conditions Case** 

	Operating		Uncovered NG Peakers:	Natural Gas Used in Generation	Daily Available
	Reserve	NG Physically		When NG Economically	•
	Shortages	Binding	Economically Binding	•	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Infrequent Stressed Conditions - Central Case		X			<u>_</u>
Central Case	0	350	350	0	247,147
Infrequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	350	350	0	247,147
ESI Products - No EIR/RER	0	350	350	0	247,147
Shock HQ 1 Day	0	350	350	0	246,622
Shock HQ 5 Days	0	357	357	0	244,897
High Load	0	425	425	0	244,124
DA Load Adjusted for EIR (50%)	0	350	350	0	247,147
Oil Retirements; Renewable Replacement	0	134	134	0	219,275
Oil Retirements; Gas Replacement	0	385	385	0	207,469
Oil Retirements; Gas / Dual Fuel Replacement	0	393	393	0	215,117
High LNG Supply	0	166	166	0	258,149
Infrequent Stressed Conditions - September Scenarios	6				
Strike x 1.2	0	350	350	0	247,147



#### **Reliability Metrics, with CMR, Infrequent Stressed Conditions Case**

			Uncovered NG	Natural Gas	
	Operating		Peakers:	Used in Generation	Daily Available
	Reserve	NG Physically	NG Physically or	When NG Economically	Oil Generation
	Shortages	Binding	Economically Binding	Binding	Minimum
Scenario Name/Acronym	(Hours)	(Hours)	(Hours)	(MMBtu)	(MWh)
Infrequent Stressed Conditions - Central Case					
Central Case	0	354	354	0	241,496
Infrequent Stressed Conditions - August Scenarios					
ESI Products - RER Plus	0	354	354	0	241,496
ESI Products - No EIR/RER	0	354	354	0	241,496
Shock HQ 1 Day	0	354	354	0	240,550
Shock HQ 5 Days	0	367	367	0	237,202
High Load	0	425	425	0	234,220
DA Load Adjusted for EIR (50%)	0	354	354	0	241,496
Oil Retirements; Renewable Replacement	0	131	131	0	209,192
Oil Retirements; Gas Replacement	0	389	389	0	200,903
Oil Retirements; Gas / Dual Fuel Replacement	0	393	393	0	208,322
High LNG Supply	0	155	155	0	245,071
Infrequent Stressed Conditions - September Scenarios					
Strike x 1.2	0	354	354	0	241,496



### Contact

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