Paris, France

Resource Adequacy in Competitive Wholesale Markets: The U.S. Experience

Jeffery S. Dennis
Director, Division of Policy Development
U.S. Federal Energy Regulatory Commission
15 January 2015

Obligatory Disclaimer

Any views expressed in this presentation are my own, and do not necessarily represent the views the Federal Energy Regulatory Commission or the United States Government.

U.S. Electricity Regulation: Who is Responsible for What?

Federal Regulation (FERC)

- Wholesale sales of capacity and energy for resale in interstate commerce
- ☐ Transmission of electricity in interstate commerce
- □ (Very) Limited transmission siting authority
- Permitting of hydro plants
 - Otherwise, no generation planning or facility siting control
- Reliability of transmission grid

State Regulation (PUCs)

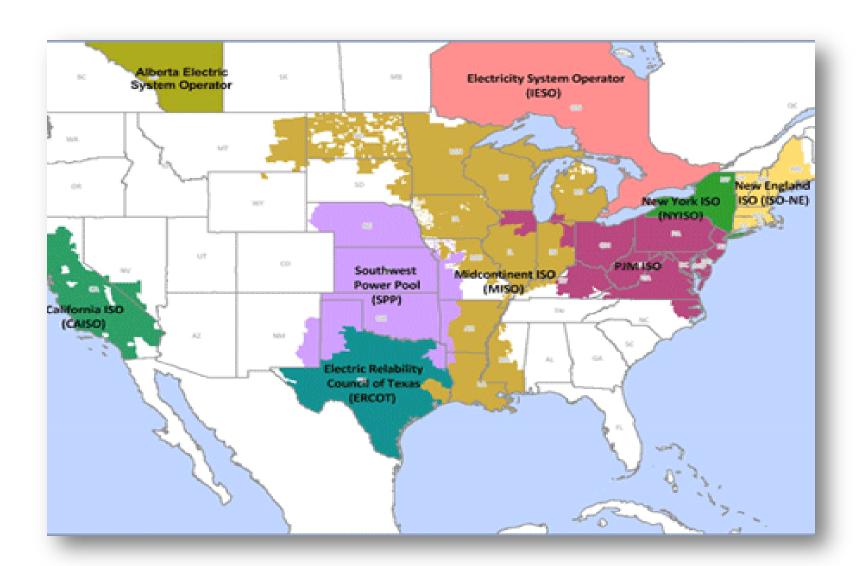
- Retail sales to end users
- □ Low-voltage distribution
- □ Siting of power plants and transmission lines
 - Resource planning; *i.e.* the generation types (coal, natural gas, renewable) used by a utility to serve customers

Historic Industry Structure

- Vertically-integrated monopolies with "bundled" cost-based rates
- Individual utilities plan and build generation, transmission and distribution to meet own load growth
- Some power pooling and wholesale sales between entities, but resource sharing not prevalent early on
- Almost no resources owned by non-utilities

Evolution to Competitive Markets

- Federal and state policy changes encourage greater electricity competition and development of "merchant" (non-utility) generation
 - Many states required utilities to unbundle and divest assets
- Regional Transmission Organizations and Independent System Operators (RTOs/ISOs) created
 - Organized wholesale energy markets with price caps
 - Originally required member utilities to provide sufficient capacity or pay a deficiency charge; operated voluntary balancing markets for capacity



U.S. Resource Adequacy Constructs

- RTO/ISO-run centralized capacity markets
 with a single market clearing price
 - ISO New England, New York ISO, PJM Interconnection
- □ State regulators set requirements for utilities;
 RTO operates residual market(s)
 - California ISO, Midcontinent Independent System Operator
- Non-RTO/ISO regions: state regulated integrated resource planning

Why Centralized Capacity Markets?

- □ Resolve "missing money" problem and provide opportunity for fixed cost recovery
 - Energy market mitigation limits revenue opportunity
- □ Give RTO/ISO an administrative tool to assure resource adequacy/reliability needs are met with least cost mix of resources
- Establish transparent market signals for future investment

Challenge: Interaction with State and Local Policy Goals

- States concerned that market power mitigation conflicts with renewable energy goals
 - Offer floors ("Minimum Offer Price Rule") prevent certain resources from bidding below cost to assure clearing; ensures out-of-market subsidies do not distort market outcomes
 - May prevent higher-cost renewables from clearing market and satisfying RA requirements
- RTOs/ISOs have taken a variety of approaches to addressing this potential conflict
 - Exemptions
 - Defining who is subject to offer floors
 - Resource-specific offer floors and unit-specific review

Challenge: Are we getting the "right" capacity resources?

- □ Originally procured a single product MWs
 - No consideration of resource type; little consideration of transmission deliverability or location
- Evolved to include locational features to account for transmission limits and send location-specific price signals
- □ Today's challenges: resource performance, fuel assurance, and resource characteristics
 - Poor performance of capacity resources, especially during tight system conditions
 - Risks of interruptible fuel supplies
 - Need for specific resource characteristics (e.g., fast ramping)
- All RA constructs face these challenges to some degree

Interregional Resource Adequacy

- Little resource planning across RTO/ISO regions or utility systems in non-RTO/ISO regions
- Each capacity construct has rules to allow external resources to participate
- □ Goal is to balance greater competition/economic efficiency against potential reliability impacts
- Considerations include:
 - Transmission availability and potential for curtailment by neighboring systems
 - Operator visibility and ability to dispatch
 - Impact of redispatch scenarios on deliverability
 - Application of market rules applied to internal resources (must-offer, etc.)

Thanks!

Questions?

Jeff Dennis (202) 502-6532 jeff.dennis@ferc.gov