



# Quarterly Report on the New York ISO Electricity Markets Second Quarter of 2022

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# Market Highlights



## Market Highlights: Executive Summary


- NYISO energy markets performed competitively in the second quarter of 2022.
- All-in prices ranged from \$34 in the North Zone to \$113 per MWh in Long Island, up 57 to 85 percent from 2021-Q2 in individual regions. (slide [8](#))
  - ✓ Energy prices rose 115 to 131 percent across the system primarily because of higher gas prices (up 152 to 174 percent). (slide [22](#))
  - ✓ Other contributing factors include:
    - Increased congestion across the Central-East interface from planned transmission outages that reduced the transfer capability by more than 1 GW in April and May.
    - High levels of congestion from Upstate New York to Long Island because one (out of two) 345 kV circuits were forced out for most of the quarter.
    - Higher emissions costs from rising RGGI prices and CSAPR Group 3 NO<sub>x</sub> emissions allowance prices. (slide [23](#))
  - ✓ Capacity costs fell by 28 to 55 percent as a result of lower IRM and peak load forecast. (slide [18](#))
- The increased levels of planned outages from transmission upgrade projects led to high levels of day-ahead congestion revenue shortfall uplift (\$175 million), especially related to the Central East interface (\$162 million). (slide [57](#))





## Market Highlights: Executive Summary

- Although NYISO has reduced OOM dispatch for 69kV congestion on Long Island, other OOM actions increased significantly in 2022-Q2 from previous years.
  - ✓ OOM actions to secure facilities in the West Zone occurred on 50 days, and supplemental commitment for local reserve needs occurred in the Capital Zone on 12 days and Long Island on 12 days. (slides [13](#), [60](#))
  - ✓ Commitment of steam turbines in NYC for NOx bubble constraints could have been avoided on 31 days if ARR-37 allowed NYISO to consider whether the GTs in a particular NOx bubble were truly necessary for reliability. (slide [17](#))
- Price convergence between NYISO and neighboring areas was relatively poor as the average price in PJM exceeded NYISO's by nearly \$6/MWh and the average price in NYISO exceeded ISO-NE's by more than \$4/MWh. (slide [48](#))
  - ✓ Inefficient utilization of the ISO-NE interface results from price forecast errors and OOM transaction cuts after CTS transactions are scheduled. (slides [48-49](#))
    - Price forecast error rose this year as the contribution from load forecast error also rose. Load forecast adjustments are often made in RTC when operators anticipate the load forecasts in future intervals is off. (slides [12](#), [50-51](#))
  - ✓ Under-utilization of the PJM interface is exacerbated by large fees charged to exports from NYISO to PJM. (see 2021 SOM Recommendation #2015-9)

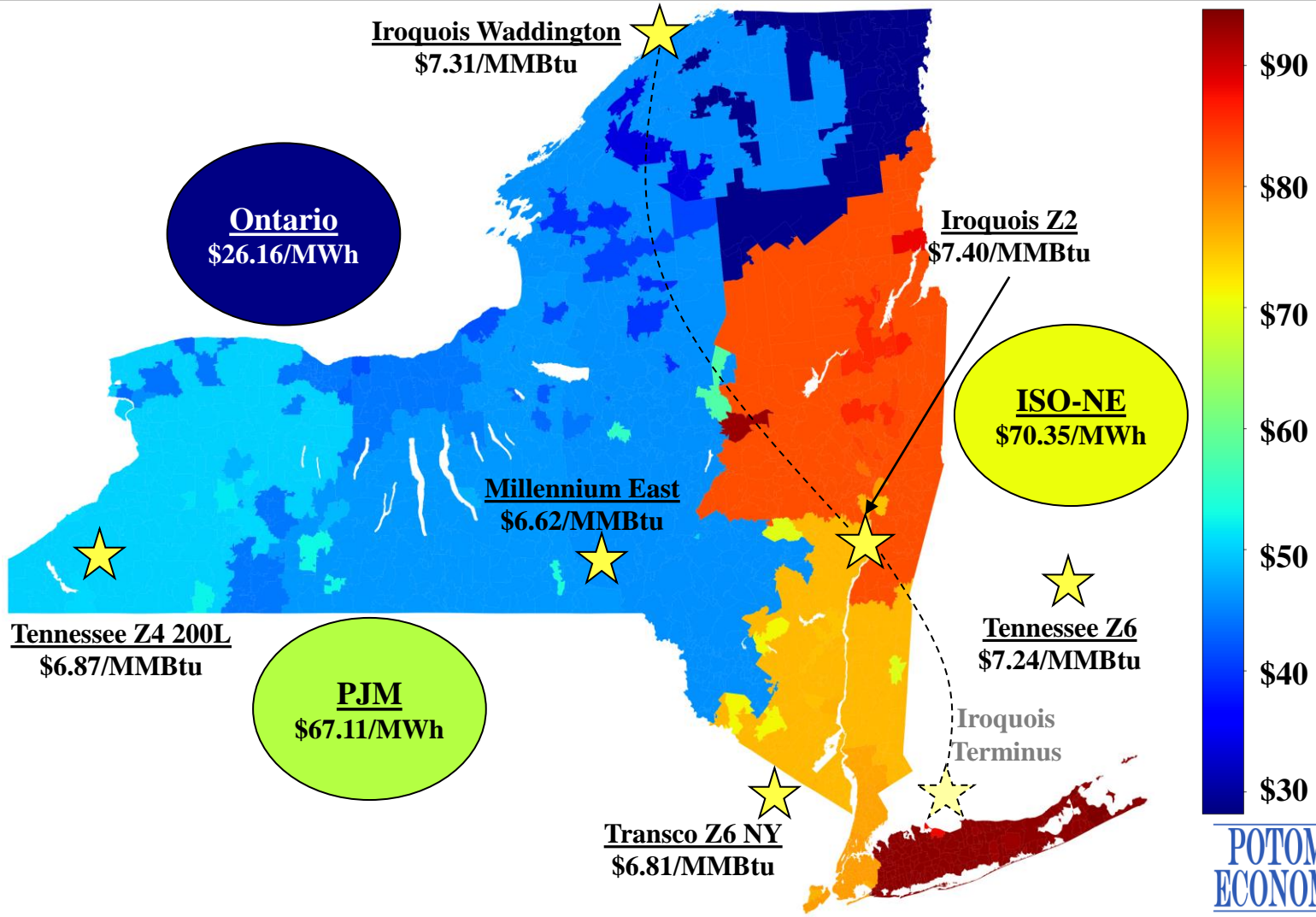


## Market Highlights: Executive Summary

- Duct burner operations of CCs continued to present challenges both for generator bidding and operator scheduling of resources. (slides [15](#) & [64](#)) On average:
  - ✓ More than 250 MW of duct burner capacity was offered as capable of providing services (including 10-minute reserves, regulation, and following 5-minute instructions) but physically unable to respond within the required timeframes.
  - ✓ More than 150 MW of CC capacity (including both duct burner and baseload ranges) was unavailable for energy and/or reserves because of no offer, inflexible bidding, and being disqualified from providing reserves.
  - ✓ In addition, understated ramping capability of some CCs contributed to transient high congestion in some local areas.
- The NYISO has increased efforts to audit GTs that provide 10 and 30-minute non-synchronous reserves over the past two years. (slide [16](#)) However:
  - ✓ Most audits are conducted on units that regularly demonstrate fast-start capability in normal market operations.
  - ✓ Some units that performed poorly in audits and in normal market operations remain qualified (despite being scheduled for reserves frequently).
  - ✓ Most rarely-started 30-minute units were also not audited in the last 12 months.



## Market Highlights: System Price Diagram








## Market Highlights: Summary of Energy Market Outcomes

- NYISO energy markets performed competitively in the second quarter of 2022.
  - ✓ The amount of output gap (slide [75](#)) and unoffered economic capacity (slide [76](#)) remained reasonably consistent with competitive market expectations.
- All-in prices ranged from \$34/MWh in the North Zone to \$113/MWh in Long Island, rising 57 to 85 percent from last year across all zones. (slide [20](#))
  - ✓ Energy prices more than doubled from a year ago, up by 115 to 131 percent across the system. (slides [31-32](#))
    - The increases were driven primarily by higher natural gas prices, which rose 152 to 174 percent across the system from a year ago. (slide [22](#))
    - Other contributing factors include:
      - Lengthy major transmission outages, which led to significant congestion across the Central-East interface and further elevated prices in East NY. (slide [55](#))
      - Lower net imports, which fell by 900 MW in the afternoon peak hours. In particular, higher gas prices and reduced Central-East interface capability made it less (more) economic to import from (export to) PJM. (slide [47](#))
      - Higher emission costs (including CO<sub>2</sub>, NO<sub>x</sub>) which rose by 87 to 201 percent for gas-fired CCs, GTs, and STs. (slide [23](#))
  - ✓ However, capacity costs fell in all areas as discussed in slide [18](#).



## Market Highlights: Generation by Fuel and Emission

- Average nuclear generation fell by roughly 290 MW from a year ago, because of the retirement of the last Indian Point nuclear unit at the end of April 2021.
- Average hourly net imports from external control areas also decreased by over 900 MW from 2021 Q2 due primarily to relative economics. (slide [47](#))
- Gas-fired generation rose by roughly 12 percent despite much higher natural gas prices. (slide [24](#))
  - ✓ Gas-fired combined cycles accounted for 97 percent of this increase (720 MW).
    - Output from Capital Zone combined cycle units rose by 500 MW on average due to the high levels of transmission congestion along the Central East interface.
    - Hudson Valley combined cycles also ran more (250 MW) due to the increase localized congestion from Capital to Hudson Valley. (slide [56](#))
    - Although these led to increased emissions from 2021-Q2 (slides [27-30](#)), the emission levels have been at historical low levels. (slide [26](#))
- Steam turbines accounted for 52 percent of NOx emission in New York City in the second quarter of 2022.
  - ✓ Roughly 20 percent of ST NOx emission was from STs that were supplementally committed for local reliability. (slide [29](#))





## Market Highlights: Congestion Patterns, Revenues and Shortfalls

- Day-ahead congestion revenues totaled \$219 million, up 124 percent from the second quarter of 2021. (slide [55](#))
- The Central-East interface accounted for the largest share (\$141 million or 64 percent) of day-ahead congestion revenues this quarter. (slide [56](#))
  - ✓ This congestion value was noticeably higher than seen in the recent second quarters and was driven primarily by lengthy transmission outages.
    - Multiple line outages reduced the interface capability by more than 1,000 MW for most of April and May, contributing to a total of \$162 million of day-ahead congestion shortfalls in the quarter. (slide [57](#))
  - ✓ Higher gas prices coupled with lower nuclear generation in East NY, as a result of Indian Point 3 retirement, also contributed to this congestion. (slide [24](#)).
- Congestion from Capital to Hudson Valley rose from prior quarters, accounting for the second largest share of overall congestion (10% DA, 17% RT) this quarter.
  - ✓ Transmission outages taken to facilitate Public Policy transmission projects were a key driver of higher congestion in this area.
  - ✓ Congestion on the Cricket Valley-Pleasant Valley 345 kV line was prevalent throughout the quarter, especially in real time.



## Market Highlights:

### Congestion Patterns, Revenues and Shortfalls (cont.)

- Loop flows between NY and NE across the line were a key driver in real time.
  - Ramping capability of some CCs was understated in order to manage offers involving their duct burner ranges, contributing to frequent transient high congestion spikes in real time.
- LI accounted for roughly 8 percent of overall congestion this quarter.
  - ✓ Most of this congestion occurred on the 345 kV inter-ties between upstate regions and Long Island.
    - The Y49 345 kV line was OOS during most of the quarter, contributing to a total of \$15 million of day-ahead congestion shortfalls. (slide [57](#))
    - As a result, gas-fired steam turbines and peaking units on Long Island were often on the margin. (slide [25](#))
      - Higher emission costs for gas-fired STs and GTs contributed to higher LBMPs on Long Island. (slide [23](#))
- North zone accounted for another 8 percent of overall congestion.
  - ✓ 92 percent of this congestion occurred on the Moses-Adirondack 230 kV line when the parallel line was OOS during most of the quarter. (slide [57](#))
  - ✓ These outages have been primarily related to the Moses-Adirondack Smart Path Reliability Project.



## Market Highlights: Load Forecast Errors on RTC/RTD Divergence

- RTC schedules non-dispatchable resources with lead times of 15 minutes to one hour (e.g., external transactions and fast-start units).
  - ✓ Inconsistency between RTC and RTD prices is an indicator that some scheduling decisions of RTC may be inefficient.
- We performed a systematic evaluation of factors that led to inconsistent RTC and RTD prices in the second quarter of 2022. (slide [49](#))
  - ✓ Load forecasting errors increased as a contributor to price differences between RTC and RTD, accounting for 23 percent of the overall divergence this quarter.
    - On average, RTC load was higher than RTD load by nearly 100 MW, contributing to higher RTC LBMPs (than RTD LBMPs by an average of \$3/MWh). (slide [50](#))
    - Operator adjustments to the RTC load forecast were a key driver. (slide [51](#))
      - RTC load forecast adjustments have been more frequent in 2022 because of less accurate BTM solar forecasting.
    - Although load forecast adjustments may be justified for many reasons, large changes in adjustment values may contribute to divergences between RTC and RTD prices, inefficient scheduling, and RT price volatility.
    - Therefore, it would be beneficial to evaluate the current procedure for determining load forecast adjustments in RTC for any potential improvements.





## Market Highlights: OOM Actions to Manage Network Reliability

- OOM actions to manage network reliability were frequent in some regions this quarter - West Zone (50 days), Long Island (25 days), and the Capital Zone (19 days). (slide [60](#))
- OOM actions in the West Zone rose this quarter.
  - ✓ Most of these OOM actions occurred during the planned outage of the Dunkirk 115 kV M2 Bus, where one unit was supplementally committed almost every day to satisfy local voltage and thermal needs.
- Supplemental commitments to satisfy the N-1-1 requirements occurred on: (a) 3 days in the North Country load pocket; (b) 12 days in the Capital Zone 115 kV load pocket; and (c) 12 days in the Long Island load pocket.
  - ✓ We have recommended the NYISO model full reserve requirements for Long Island in our 2021 SOM report. It would be beneficial to model full reserve requirements in other applicable local areas as well, such as North Country and Capital Zone.
- OOM actions to manage 69 kV congestion on Long Island occurred on only two days. (slide [61](#))
  - ✓ Four 69kV constraints that were frequently managed by OOM actions in the past have been incorporated in the market software.



## Market Highlights: Reliability Commitments, OOM Dispatch, and BPCG

- BPCG payments totaled \$27 million, up 205 percent from 2021-Q2 and driven primarily by higher natural gas prices.
  - ✓ Higher supplemental commitments (slide [68](#)) and more frequent OOM actions (slide [70](#)) were also key contributors.
- \$16 million (or 59 percent) of BPCG payments accrued in NYC, 89 percent of which were paid to units that were committed for local reliability. (slide [73](#))
  - ✓ NOx emission costs for gas-fired STs rose to an average of \$12/MWh in June (slide [23](#)), contributing to higher uplift. However, only a subset of ST-owners have requested to reflect this cost in reference levels.
- West Upstate accounted for nearly \$4 million of BPCG uplift.
  - ✓ Most of this uplift accrued on units that were supplementally committed for local voltage and thermal needs.
- RT BPCG spiked more than \$1 million on June 11. (slide [72](#))
  - ✓ This large BPCG was driven primarily by uneconomic over-production by some units, which is under review and may result in sanction.
    - Since this event, the amount of flexible generation offered in certain export-limited areas during the morning ramp (i.e., hours 6-9) has increased dramatically.
    - Updates to the RT BPCG eligibility criteria to prevent this scenario (in the future) were approved by stakeholders and effective starting June 29.





## Market Highlights: Performance and Availability of Duct Burners

- Most combined cycle generators in the NYISO footprint offer supplemental output from their duct burners, totaling roughly 800 MW of summer capacity.
  - ✓ This capacity often presents difficulties in real-time due to inconsistencies between the market design and the physical limitations of duct burners.
- Slide [63](#) shows an example of a combined-cycle unit that could not follow dispatch instructions during a Reserve Pickup (RPU) event, due largely to its inability to fire the duct burner within the 10-minute timeframe.
  - ✓ However, this duct burner capacity is considered capable of following 5-minute dispatch signals in the market scheduling and pricing software.
- Slide [64](#) shows duct-firing capacity that was offered but not physically capable of providing a given service in the required timeframe. During afternoon hours, on average: (a) 123 MW was offered but not capable of following 5-minute ramp instructions; (b) 65 MW was scheduled but not capable of providing 10-minute reserves; and (c) 26 MW was scheduled but not capable of providing regulation.
  - ✓ In addition, (a) 54 MW of duct-firing capacity was unavailable because this range was not offered; and (b) 115 MW of 10- and 30-minute reserves were not offered from baseload capacity (i.e., non-duct ranges) due to an inability to perform in audits of the duct burner range.



## Market Highlights: Performance of Non-synchronous Reserve Providers

- The NYISO routinely audits 10- and 30-minute non-synchronous reserve providers to ensure that they are capable of providing the services that they sell.
- We reviewed NYISO audit results and found that in the 12-month period from July 2021 to June 2022: (slides [65](#)-[66](#))
  - ✓ Using performance during reserve pick-ups (RPU) in lieu of regular audits for 10-minute GTs has been more frequent.
    - More than 60 percent of 10-minute GT audits were RPU audits.
    - This has helped reduce out-of-market actions and associated uplift costs.
  - ✓ The number of audit failures rose notably as a result of more frequent RPU audits.
    - There were a total of 47 audit failures, 30 of which were RPU audit failures.
      - 22 percent of RPU audits failed, compared to just 8 percent of regular audit failures.
    - This demonstrates that units that perform well during regular audits may still perform poorly during normal market operations (including reserve pickups and other RTC and RTD economic starts).
      - It would be beneficial to use performance during economic starts in lieu of regular audits for all GTs as RPU audits only apply to 10-minute GTs.
      - It would be appropriate to disqualify poor performers and discount reserve revenues based on performance during normal market operations.



## Market Highlights: Excess NOx-Rule LRR Commitments in NYC

- The NOx rule prevents NYC GTs in two portfolios from generating during the Ozone season unless steam turbines in the same portfolios are also producing such that the portfolio-average NOx emission satisfies the DEC standard.
  - ✓ A steam turbine was LRR-committed solely to satisfy the NOx rule on many days during the Ozone season.
    - This occurred on 31 days in the second quarter of 2022. (slide [71](#))
  - ✓ Our evaluation shows that even if the committed steam turbine and the associated GTs were unavailable, all N-1-1-0 criteria in the associated load pockets could have been satisfied by other resources on each of the 31 days.
    - The supply margin (excluding the committed steam turbine and associated GTs) generally exceeded 450 MW each day. (slide [71](#))
    - This suggests that these NOx-only steam turbine commitments could have been avoided if ARR-37 allowed the NYISO to consider whether the GTs were truly necessary for reliability (before committing the associated steam turbine).
      - The GTs would not be available in real time absent a NOx-only ST commitment.
  - ✓ These avoidable NOx-only commitments reduce market efficiency by depressing LBMPs and generating uplift and excess production costs (including high emission costs with high CSAPR Group 3 NOx allowance prices).
    - However, this will not be an issue after May 1, 2023 when some of the affected generators will no longer be permitted to operate during the ozone season.





## Market Highlights: Capacity Market

- Spot capacity prices fell by 27 to 58 percent from a year ago, averaging from \$2.27/kW-month in ROS to \$4.83/kW-month in LI this quarter. (slides [79-80](#))
- The ROS prices fell by 41 percent from the prior year, driven primarily by a lower ICAP requirement for the 2022/23 Capability Year.
  - ✓ The ICAP requirement fell by roughly 1 GW because:
    - Peak load forecast fell by 566 MW; and
    - The IRM fell from 120.7 to 119.6 percent.
  - ✓ Higher imports also contributed to lower ROS prices.
    - Monthly variations of cleared imports were normally a key driver of monthly variations in spot prices within the same Capability Period.
- The UCAP requirements in NYC and the G-J Locality were either not or just barely binding, leading spot prices in both localities to be comparable to ROS prices.
  - ✓ Although LCRs rose from the prior Capability Year in both localities, their ICAP requirements were still lower because of lower peak load forecasts.
  - ✓ The high volatility in LCR values year-over-year (despite the lack of significant changes in transmission capability) highlights inefficiencies in the IRM and LCR-setting processes which are discussed in our 2021 SOM Report.

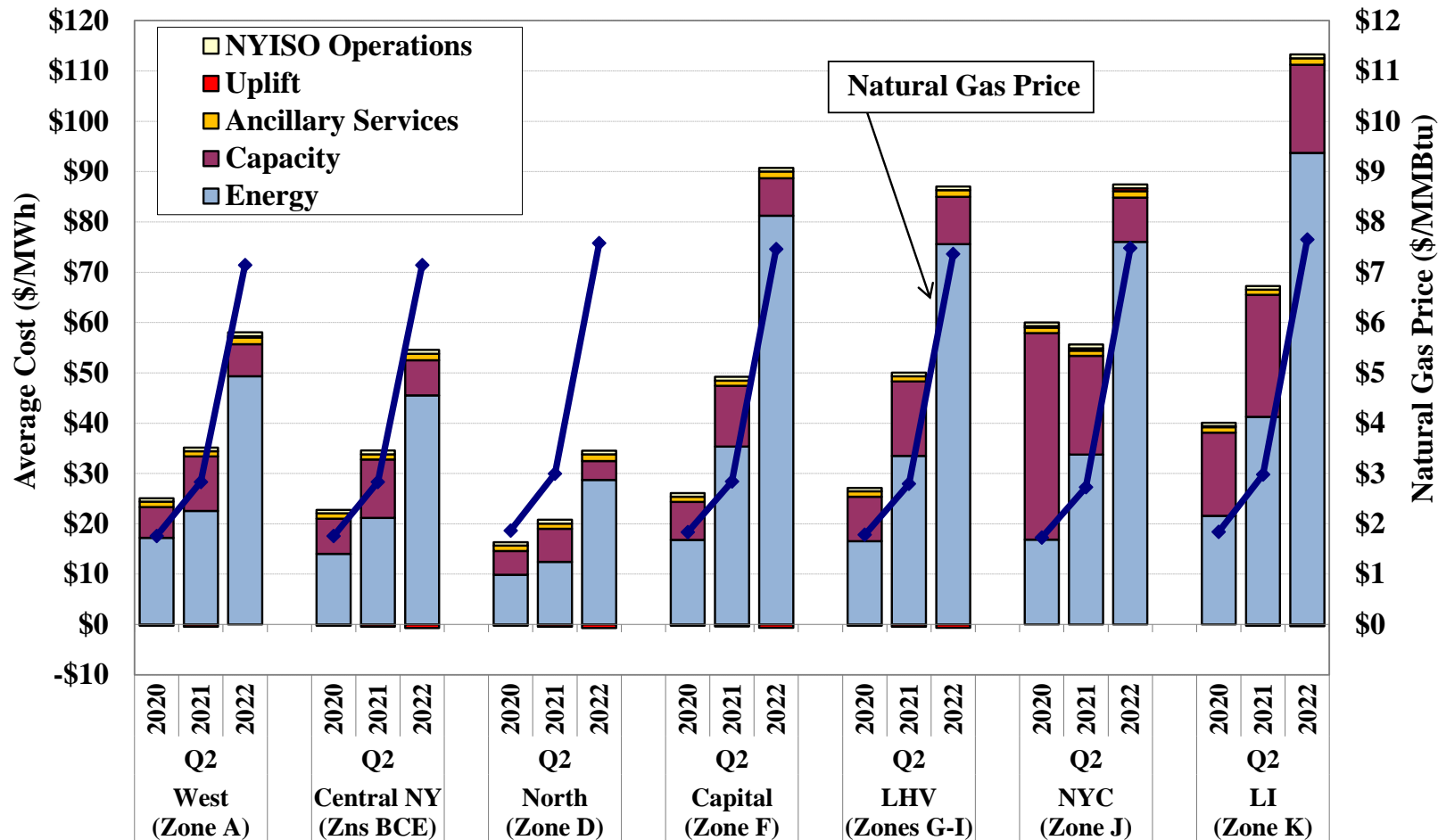


# Charts: Market Outcomes



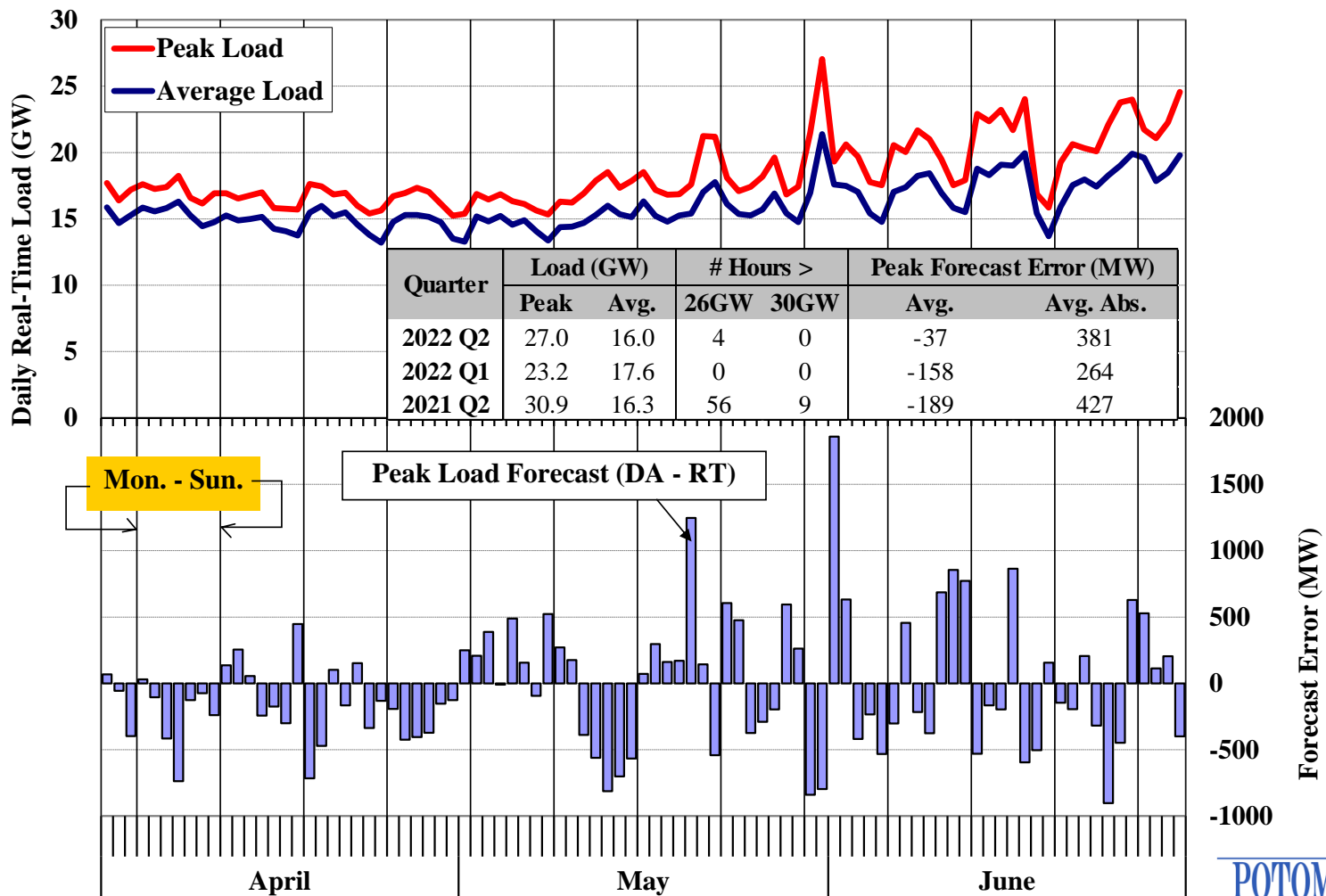


# All-In Prices by Region



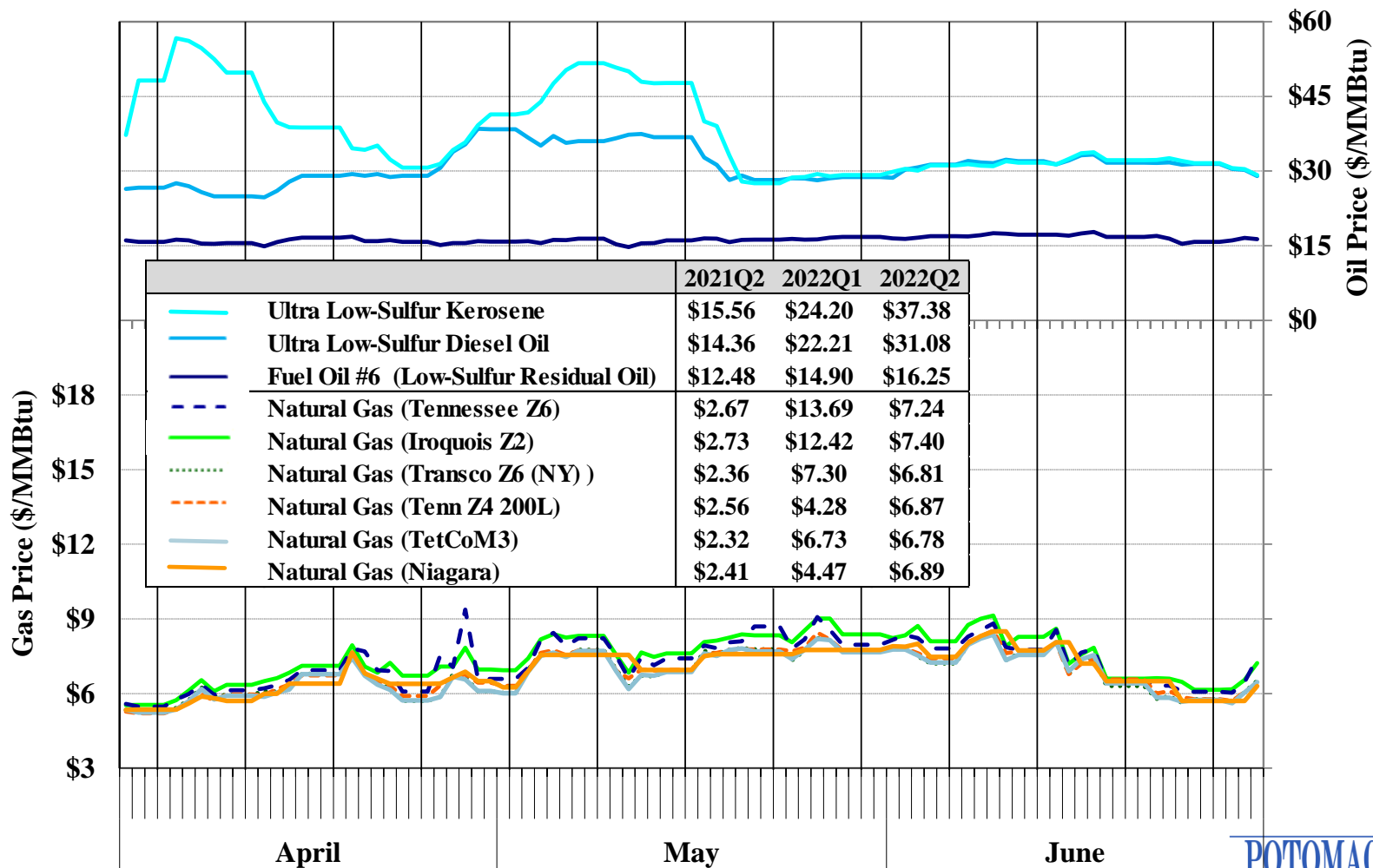


# Load Forecast and Actual Load





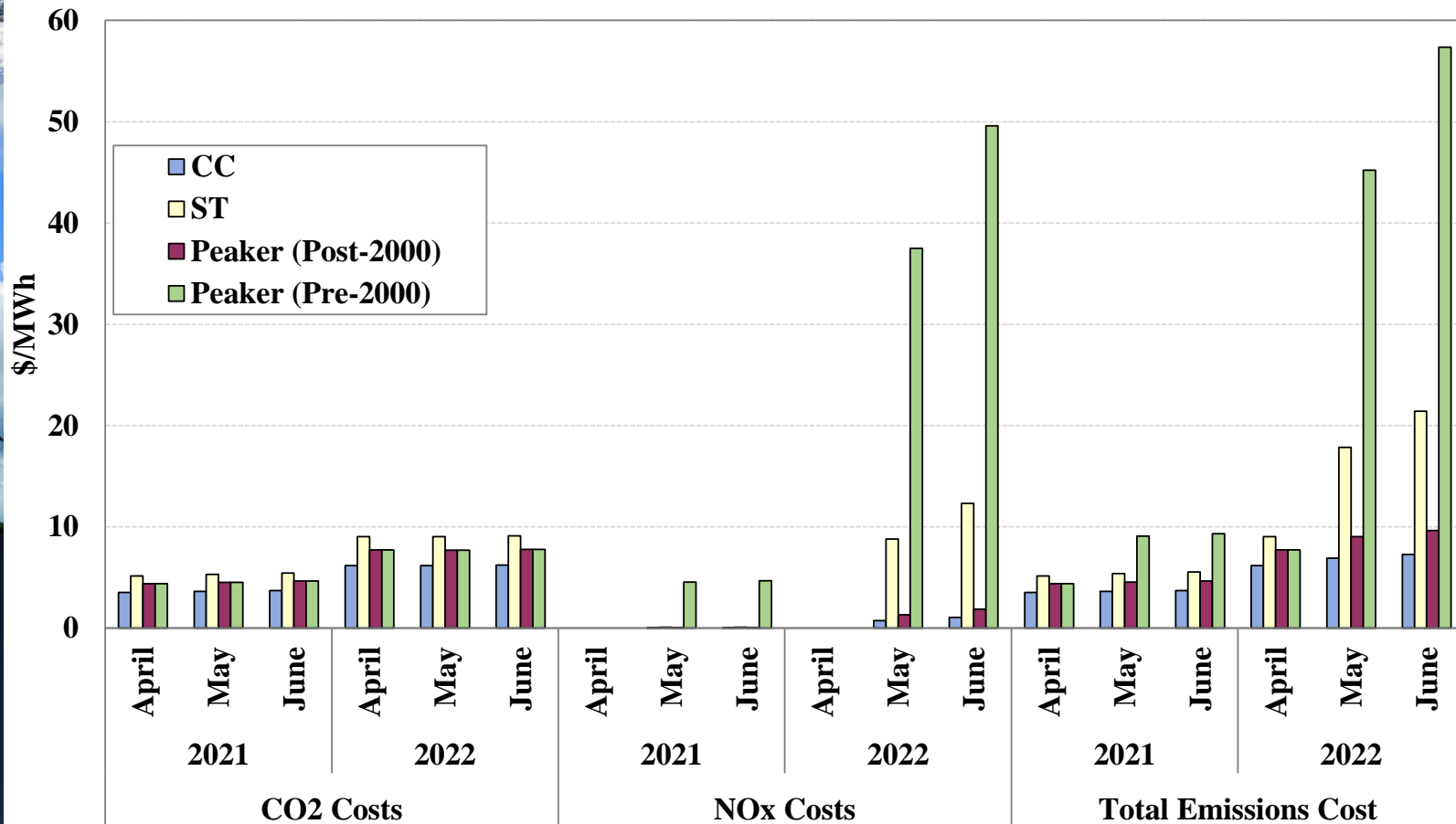
# Natural Gas and Fuel Oil Prices





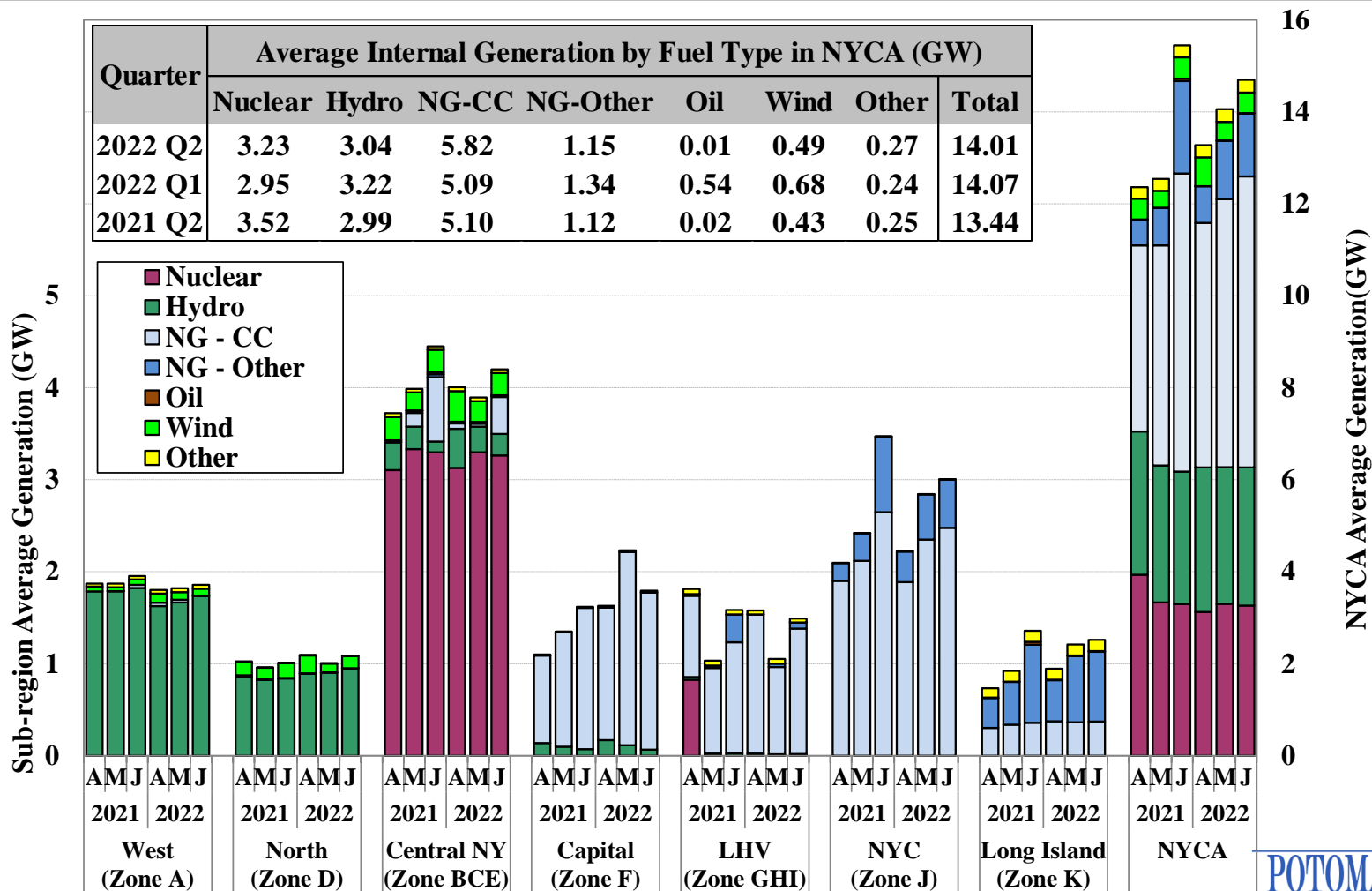
# Emissions Costs by Unit Type

## Natural Gas Fired Resources





# Real-Time Generation Output by Fuel Type





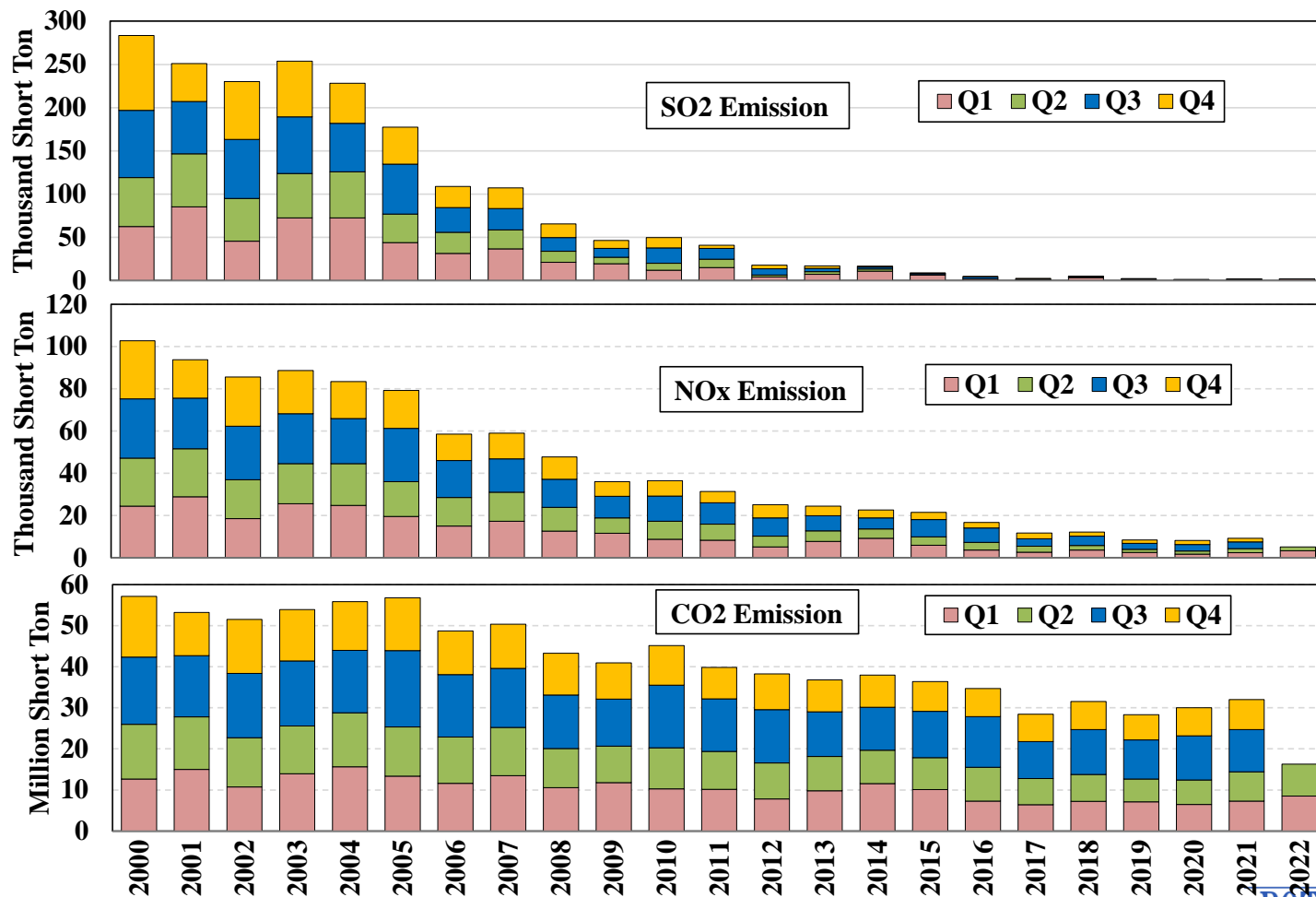
## A vertical collage of three images. The top image shows a large industrial power plant with two prominent red and white striped smokestacks emitting thick white smoke into a clear blue sky. The ground is covered in a layer of snow. The middle image features a tall, dark metal lattice tower for high-voltage power lines, with several power lines stretching across the frame. The background is a bright blue sky with scattered white clouds. The bottom image depicts a modern city skyline at night, with two prominent skyscrapers illuminated with blue and white lights. The buildings have a grid-like facade, and the surrounding area is lit up with city lights.





# Historical Emissions by Quarter in NYCA

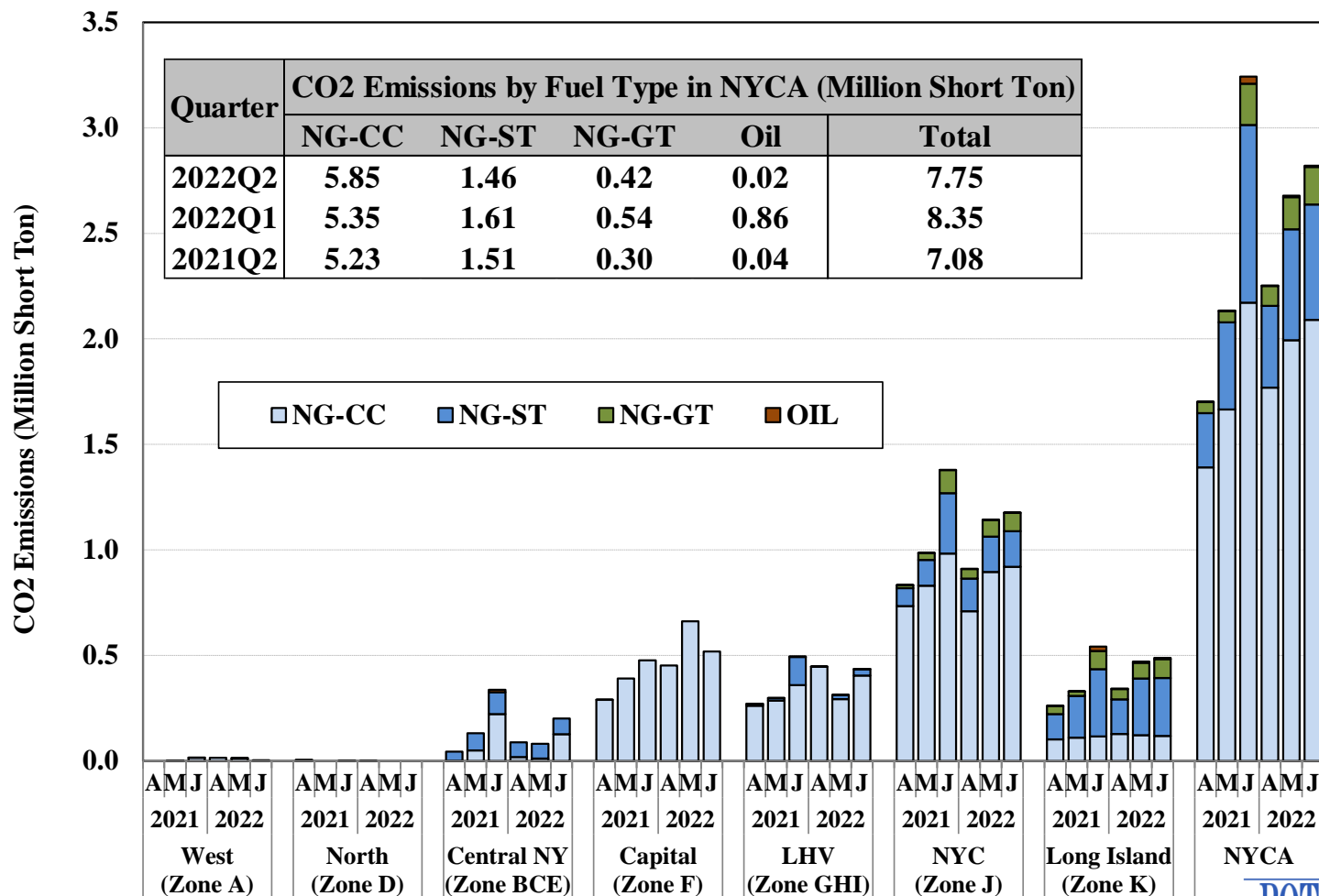
## CO<sub>2</sub>, SO<sub>2</sub>, and NO<sub>x</sub>





# Emissions by Region by Fuel Type

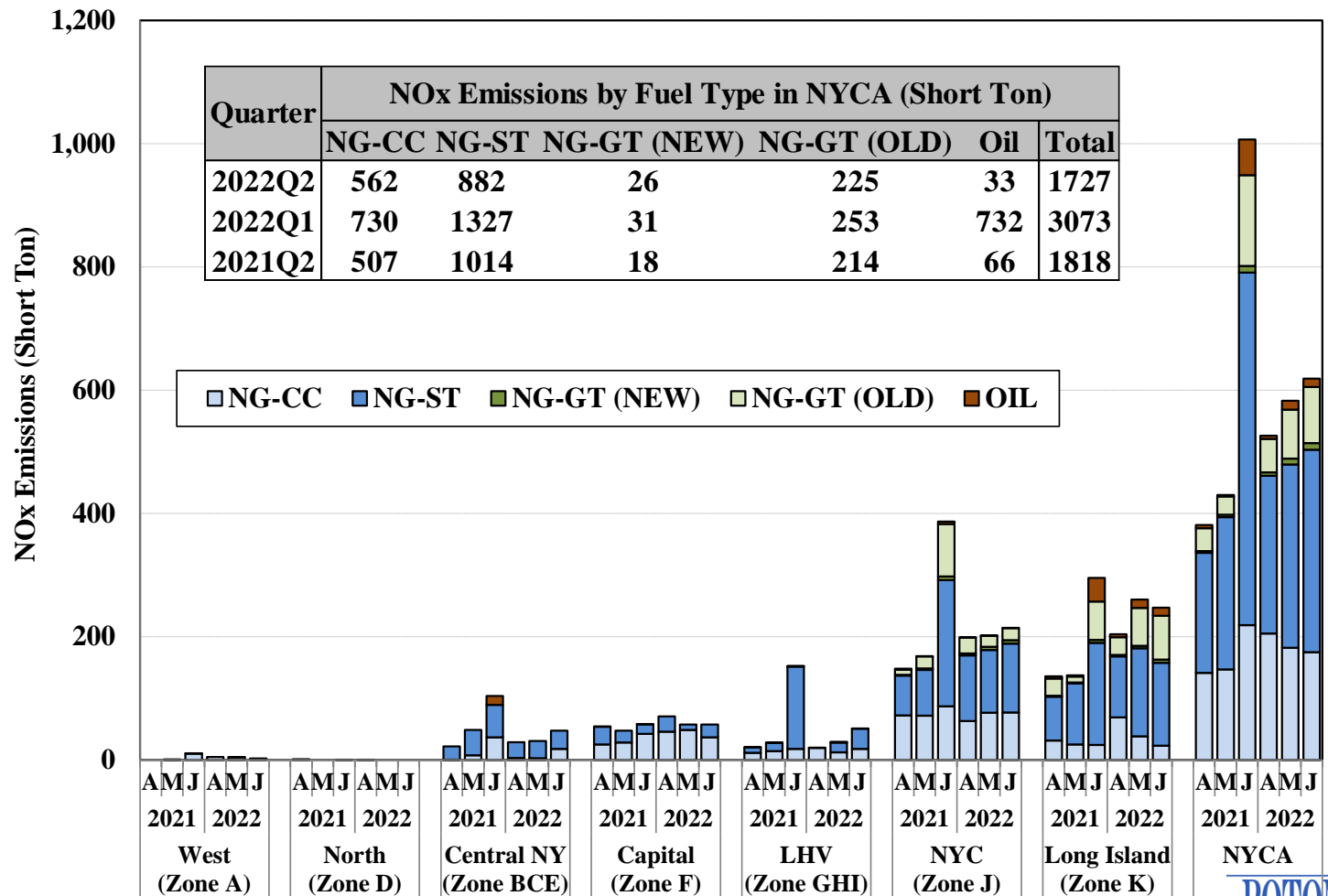
## CO<sub>2</sub> Emissions





# Emissions by Region by Fuel Type

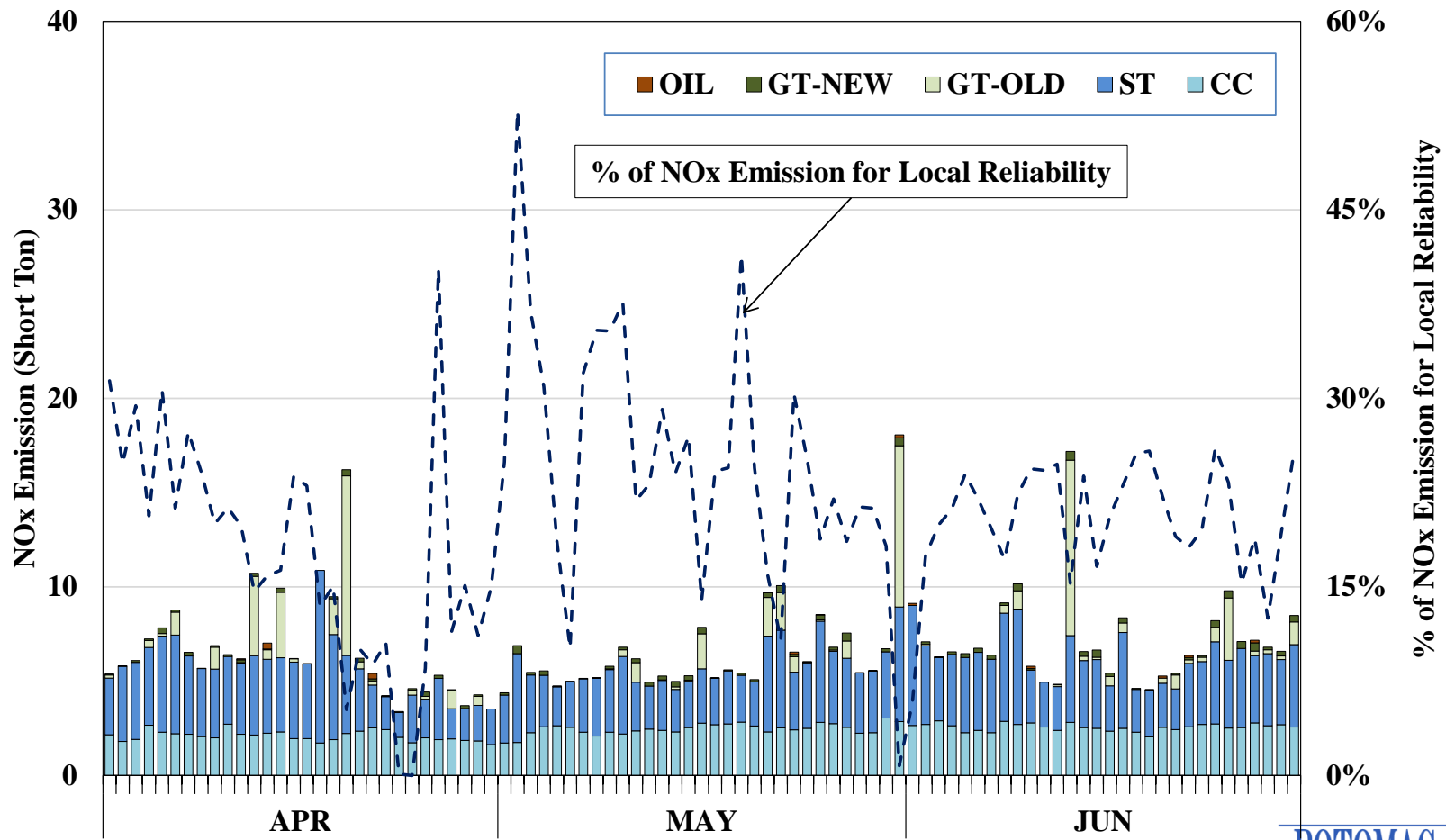
## NO<sub>x</sub> Emissions





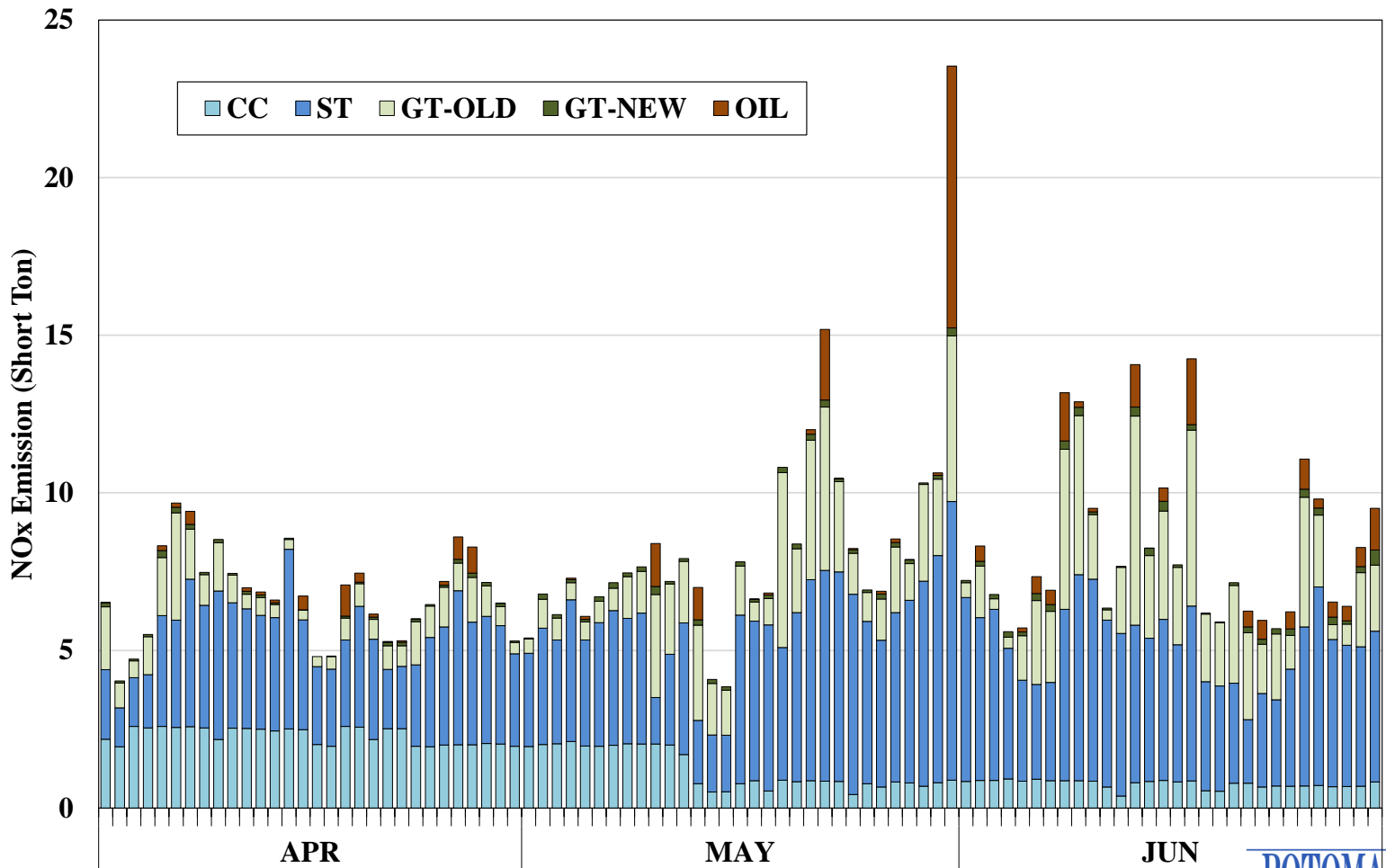


# Daily NO<sub>x</sub> Emissions in NYC



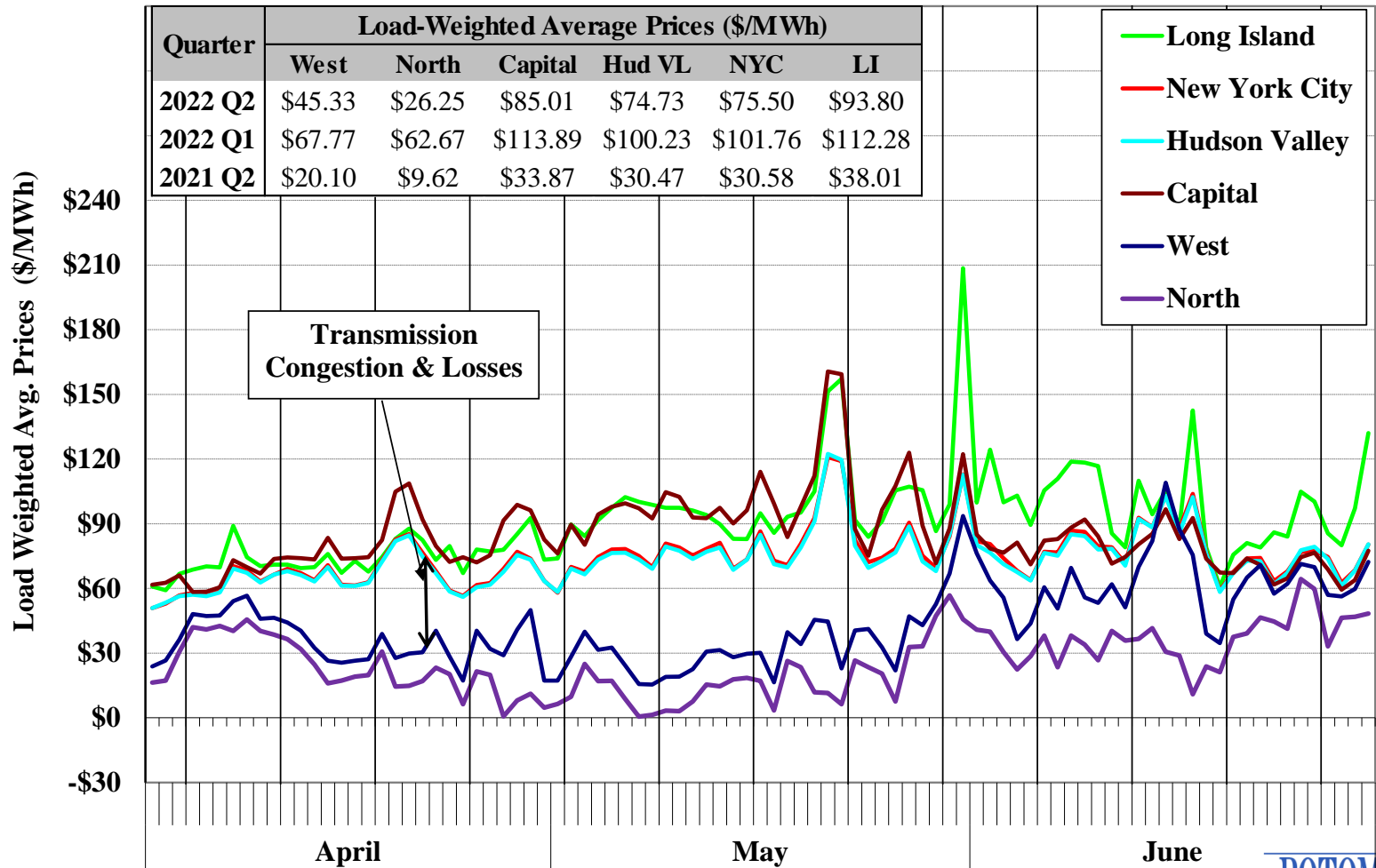


# Daily NO<sub>x</sub> Emissions in Long Island





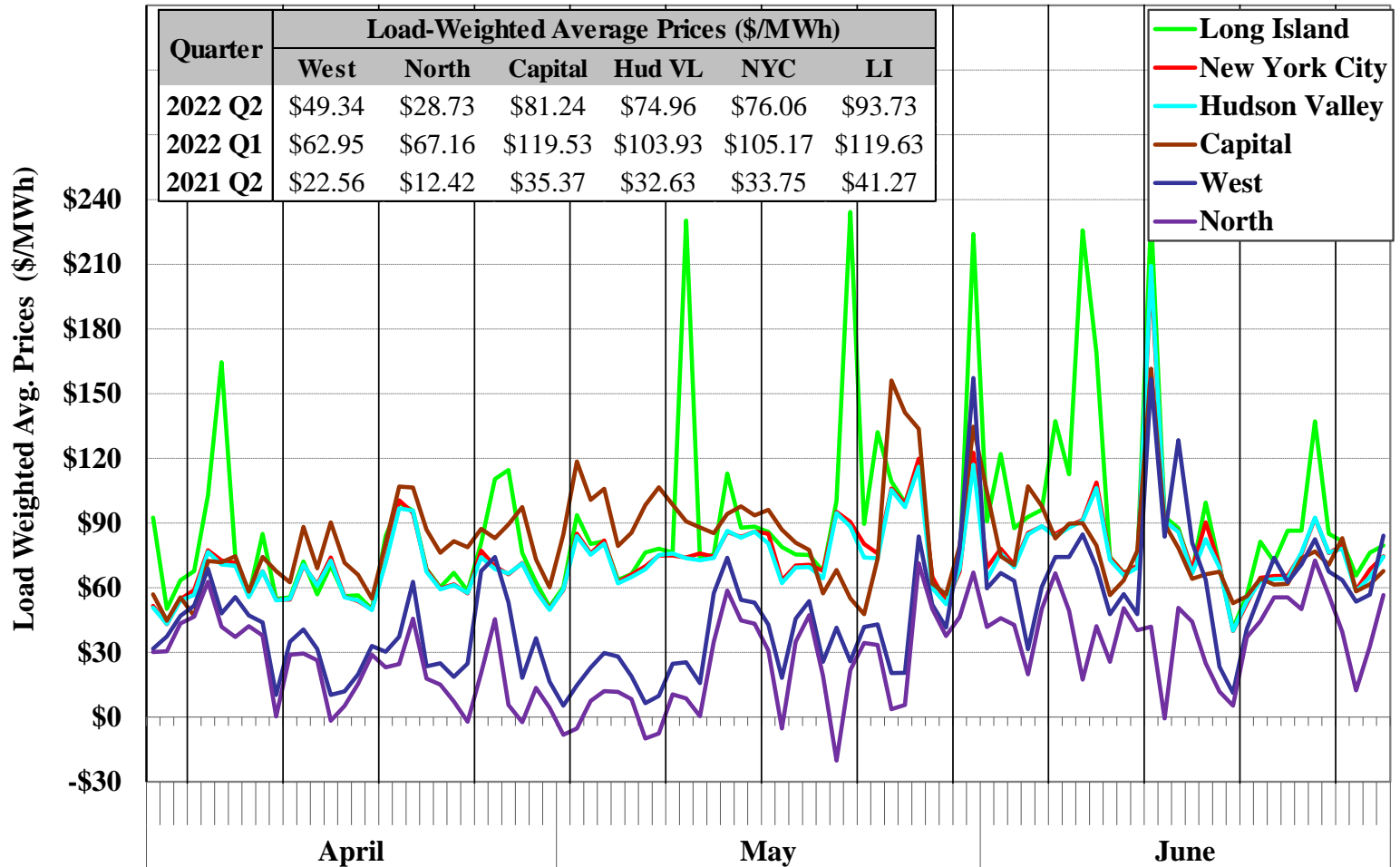
# Day-Ahead Electricity Prices by Zone





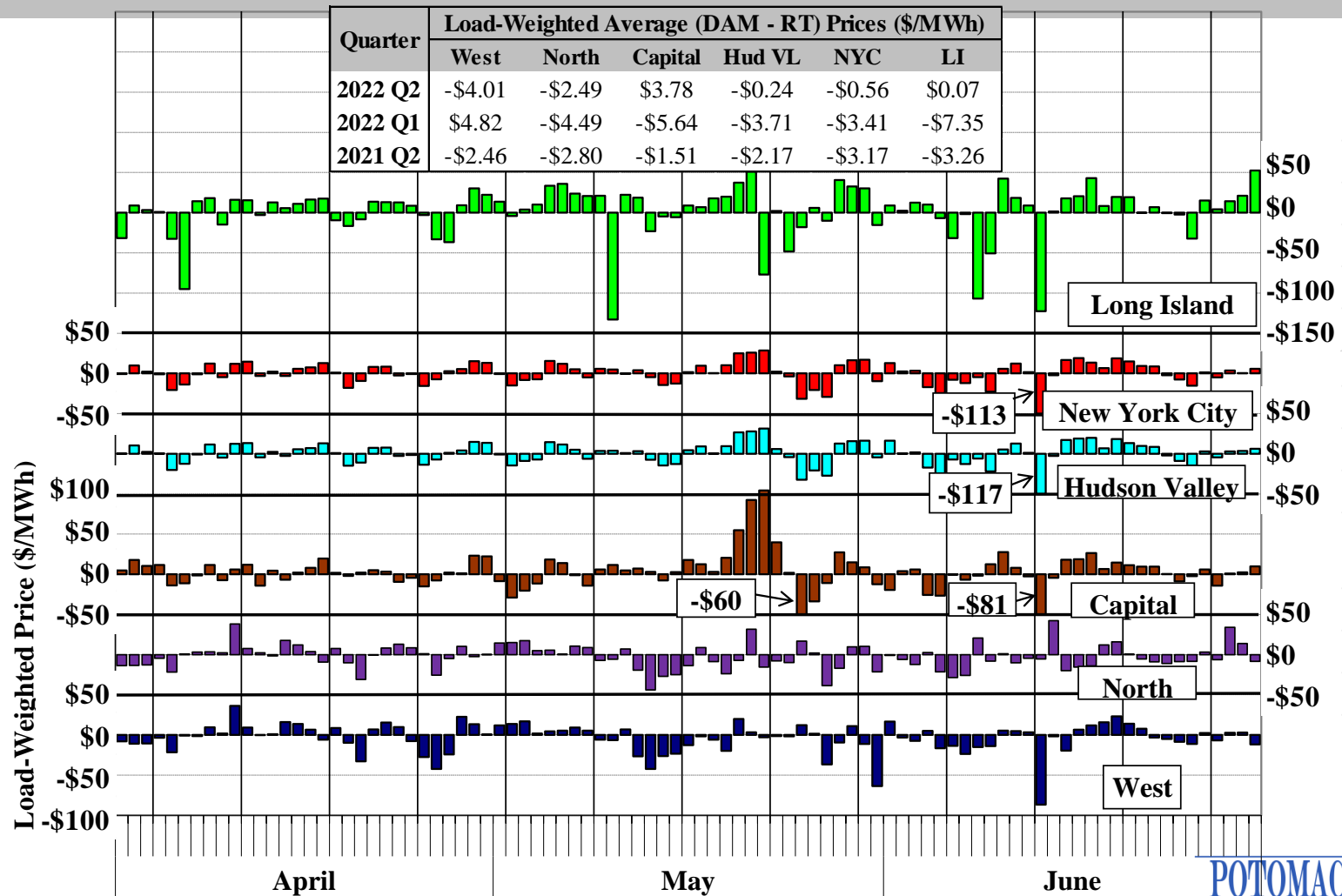


# Real-Time Electricity Prices by Zone





# Convergence Between Day-Ahead and Real-Time Prices



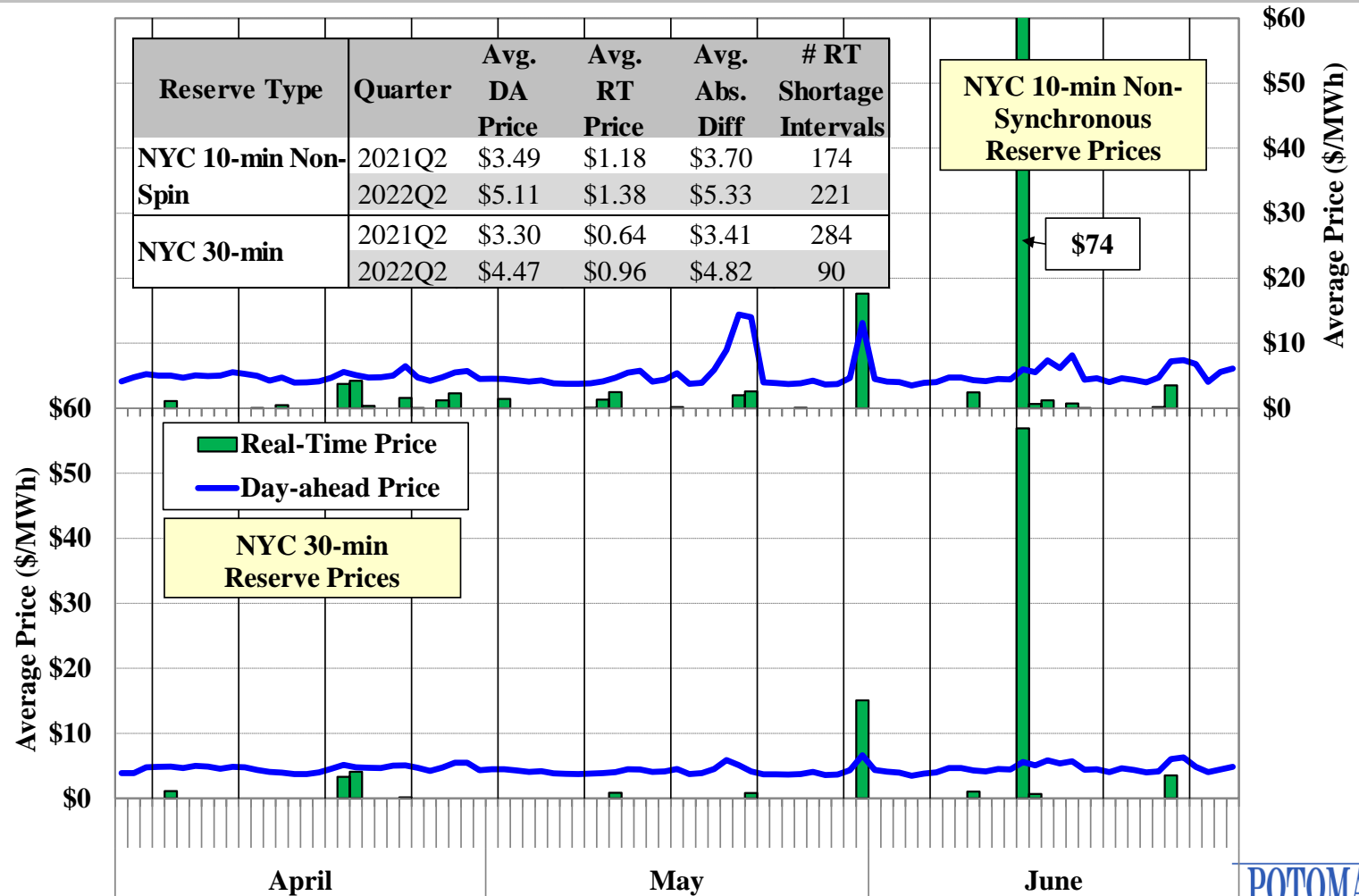


# Charts: Ancillary Services Market



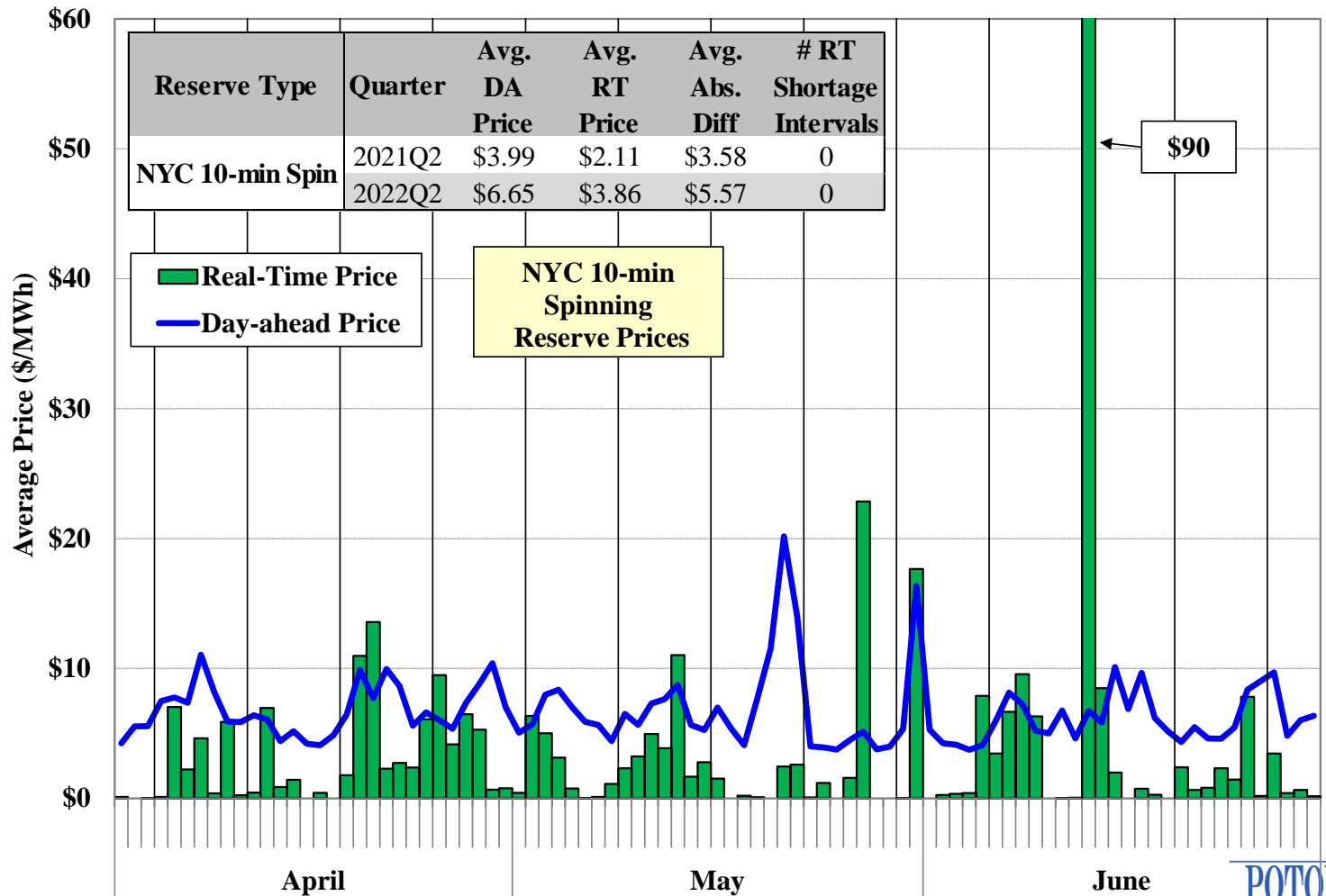


# Day-Ahead and Real-Time Ancillary Services Prices NYC 10-Minute Non-Spinning and 30-Minute Reserves

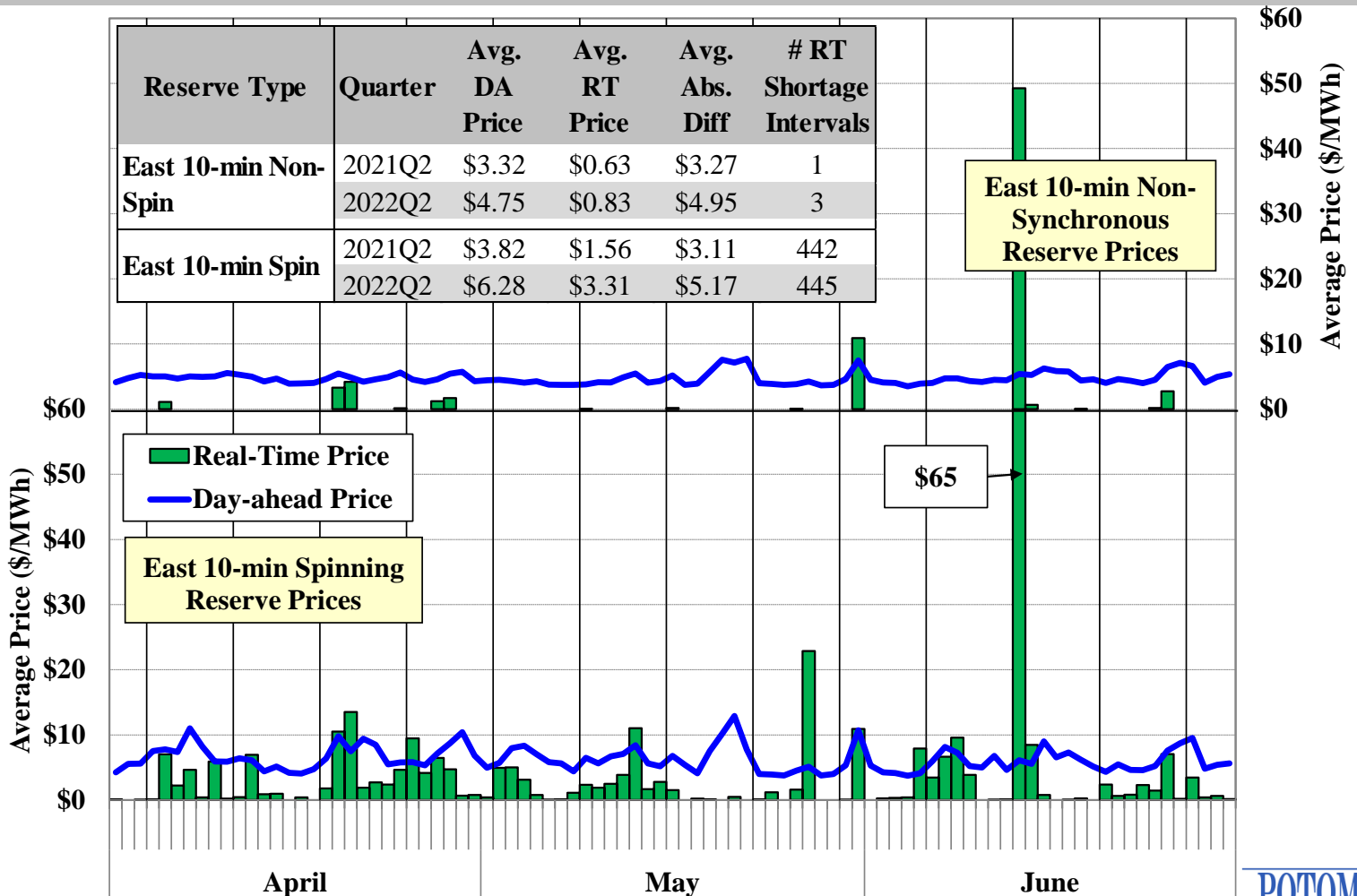


# Day-Ahead and Real-Time Ancillary Services Prices

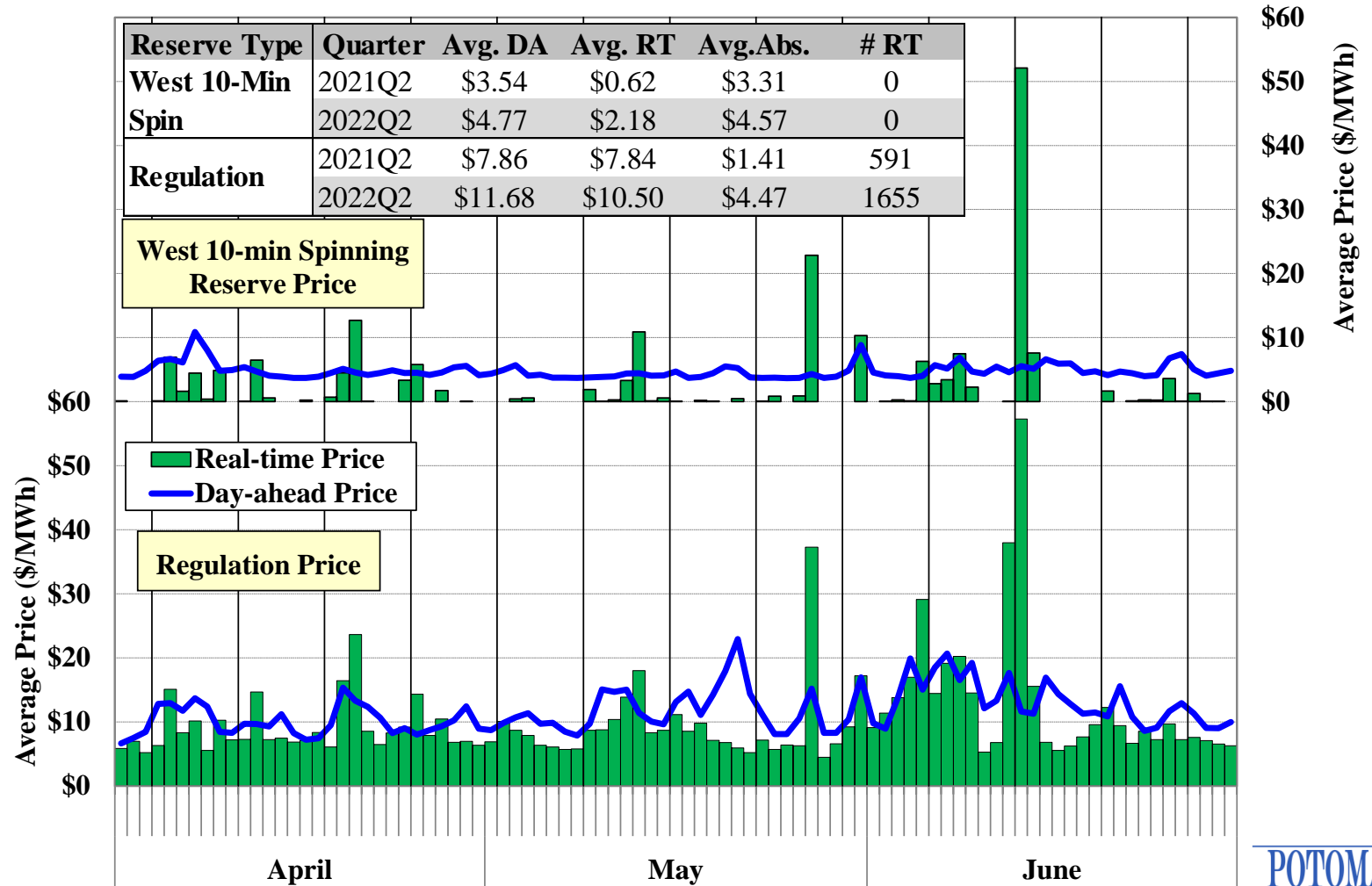
## NYC 10-Minute Spinning Reserves



# Day-Ahead and Real-Time Ancillary Services Prices Eastern 10-Minute Spinning and Non-Spinning Reserves



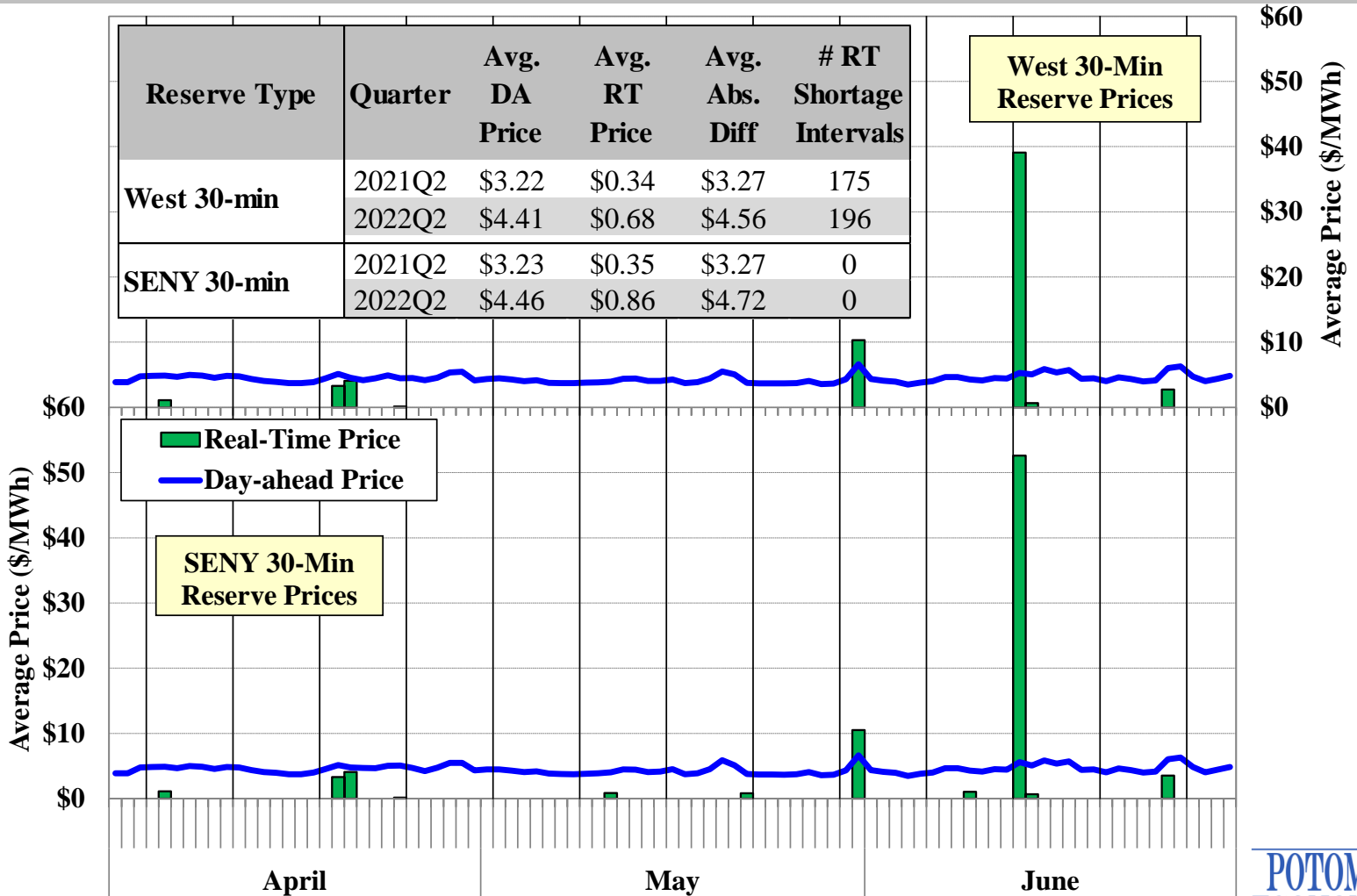
# Day-Ahead and Real-Time Ancillary Services Prices Western 10-Minute Spinning Reserves and Regulation





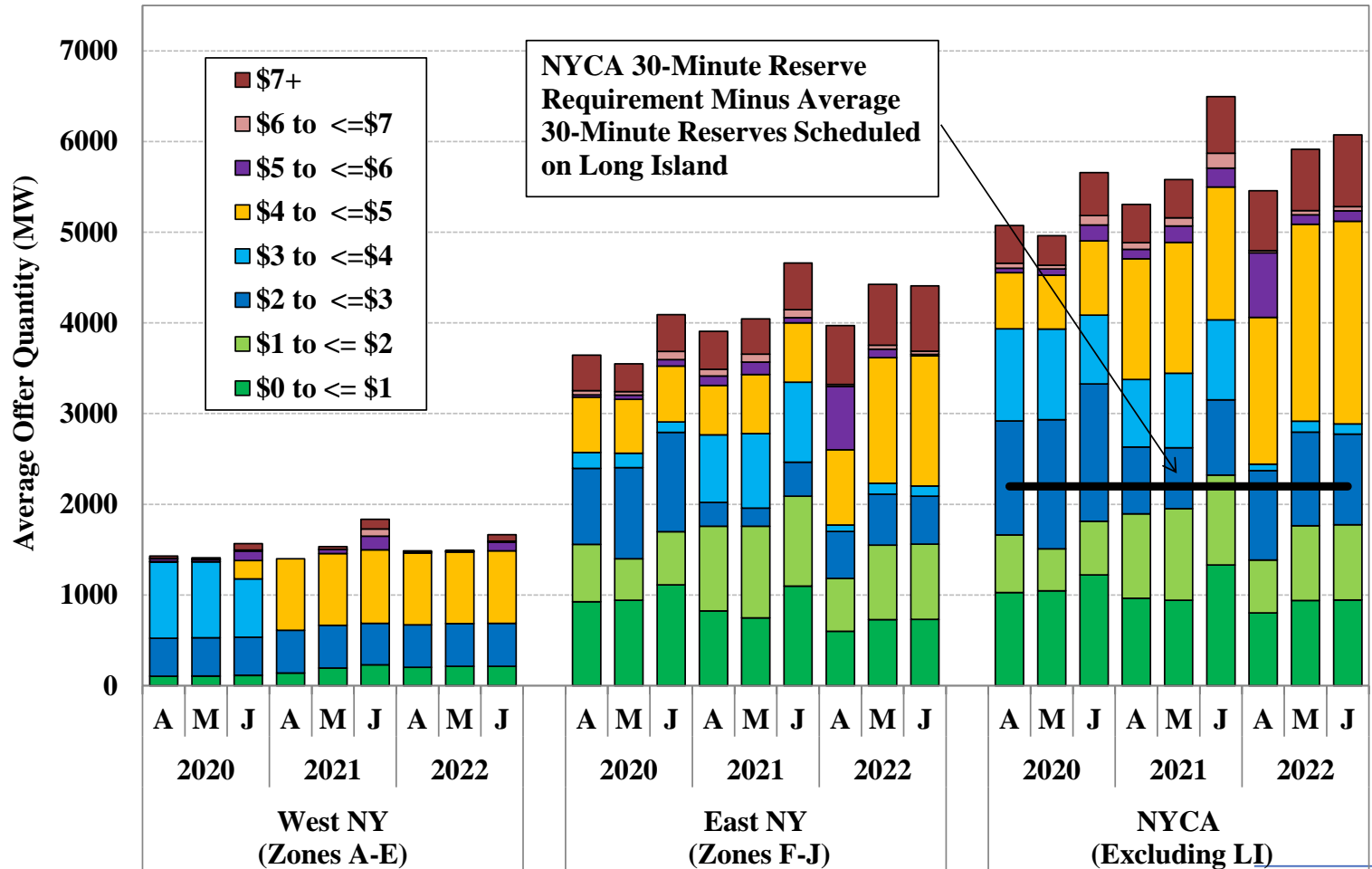
# Day-Ahead and Real-Time Ancillary Services Prices

## Western and SENY 30-Minute Reserves





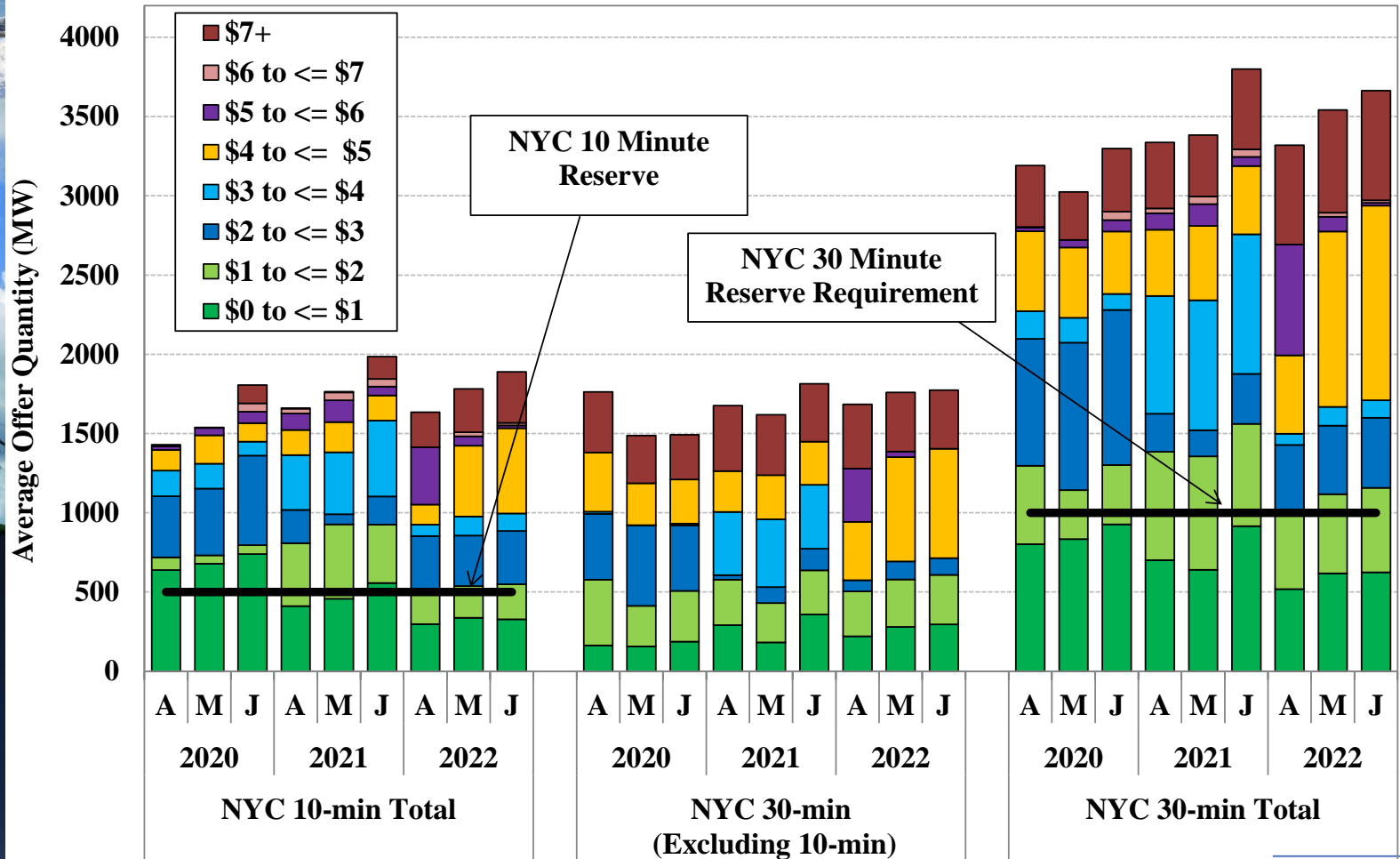
# Day-Ahead NYCA 30-Minute Reserve Offers Committed and Available Offline Quick-Start Resources





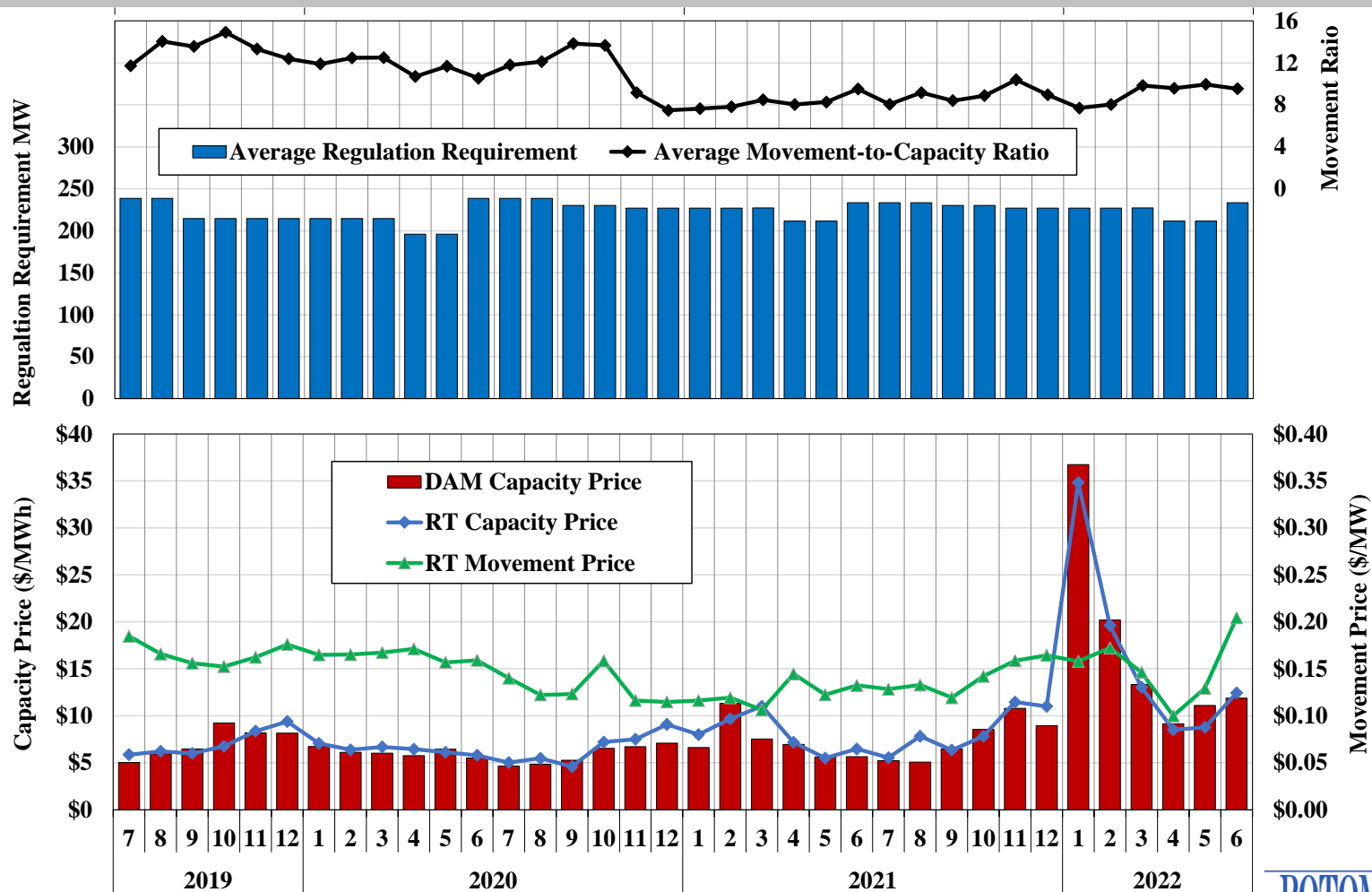
# Day-Ahead NYC Reserve Offers

## Committed and Available Offline Quick-Start Resources





# Regulation Requirements, Prices, and Movement-to-Capacity Ratio by Month



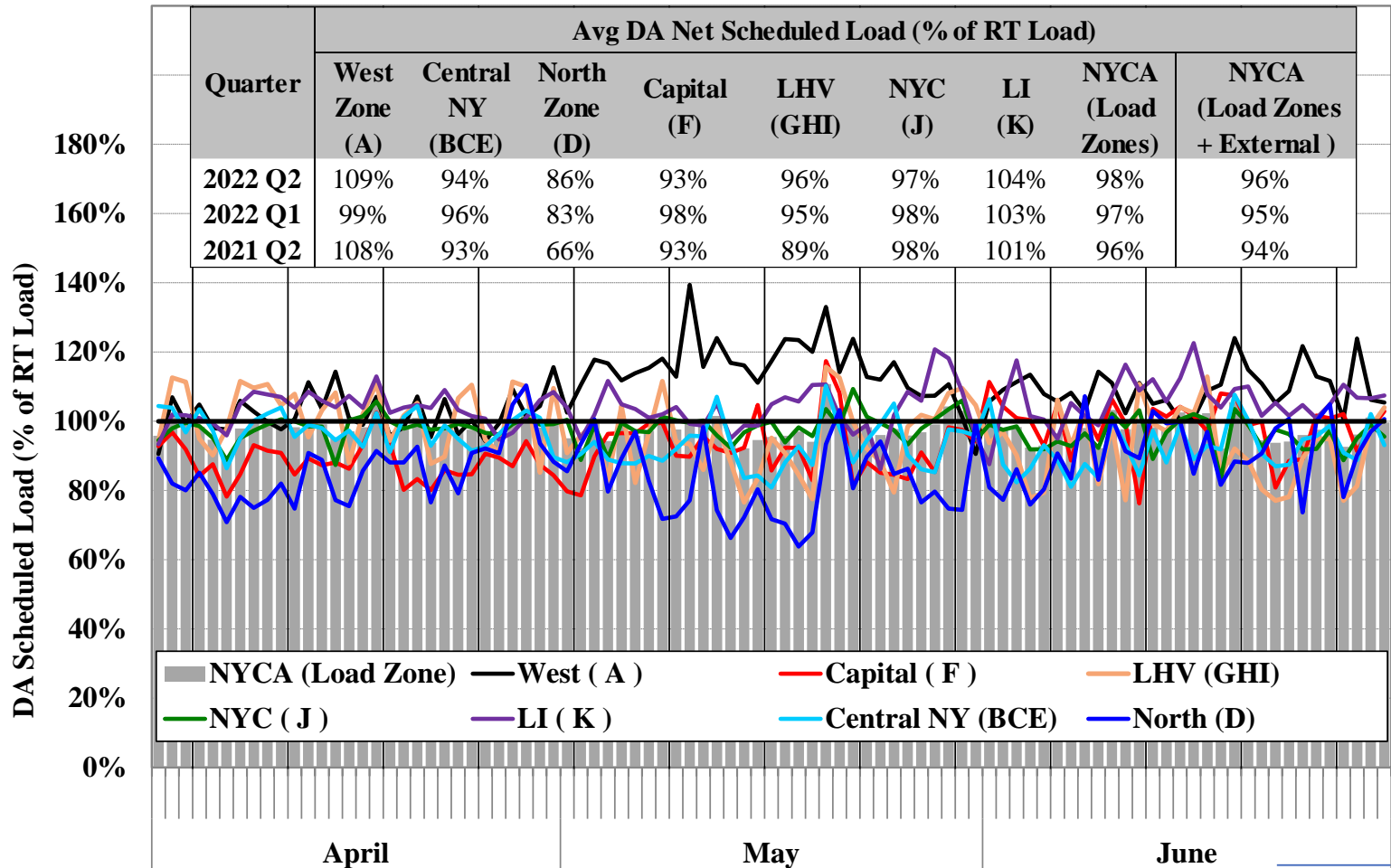




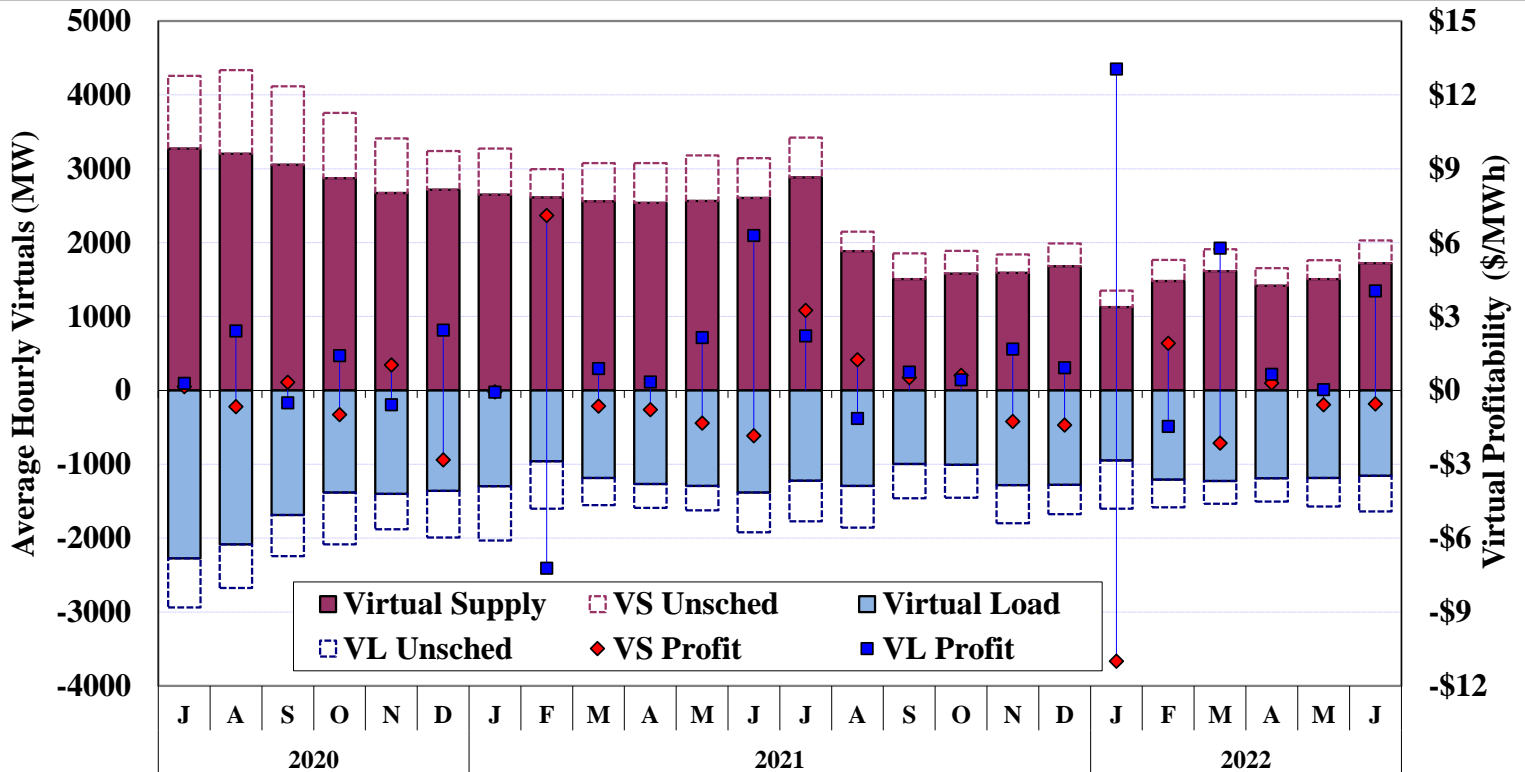
# Charts: Energy Market Scheduling



# Day-ahead Scheduled Load and Actual Load Daily Peak Load Hour



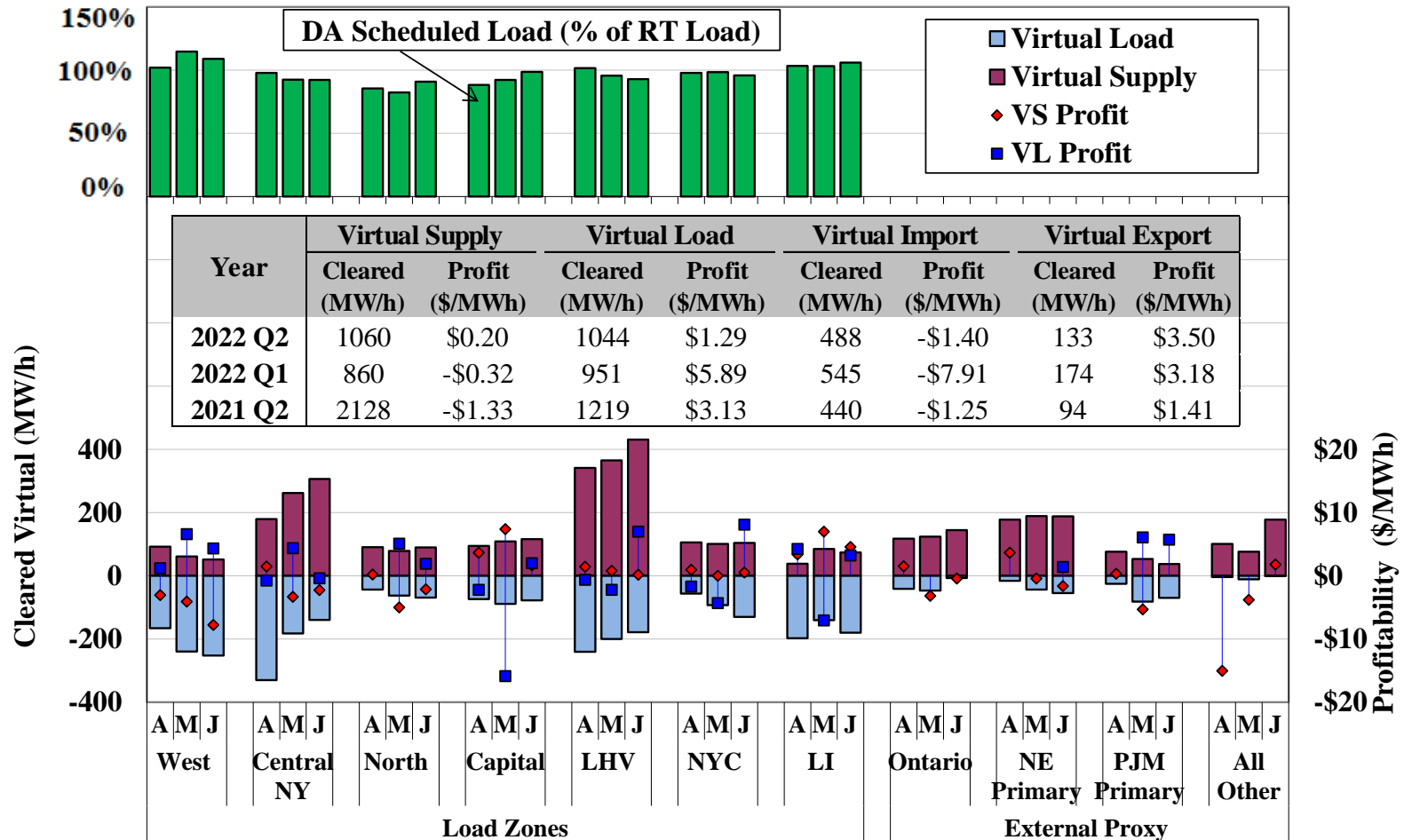
# Virtual Trading Activity by Month



Profit > 50% of Avg. Zone Price	MW	416	377	196	235	619	375	320	658	514	549	378	325	413	158	158	96	182	195	225	307	217	291	324	183
	%	8%	7%	4%	6%	15%	9%	8%	18%	14%	14%	10%	8%	10%	5%	6%	4%	6%	7%	11%	11%	8%	11%	12%	6%
Loss > 50% of Avg. Zone Price	MW	377	304	198	312	528	440	283	388	491	688	498	271	234	174	140	88	197	215	208	278	226	306	304	180
	%	7%	6%	4%	7%	13%	11%	7%	11%	13%	18%	13%	7%	6%	5%	6%	3%	7%	7%	10%	10%	8%	12%	11%	6%



# Virtual Trading Activity by Location



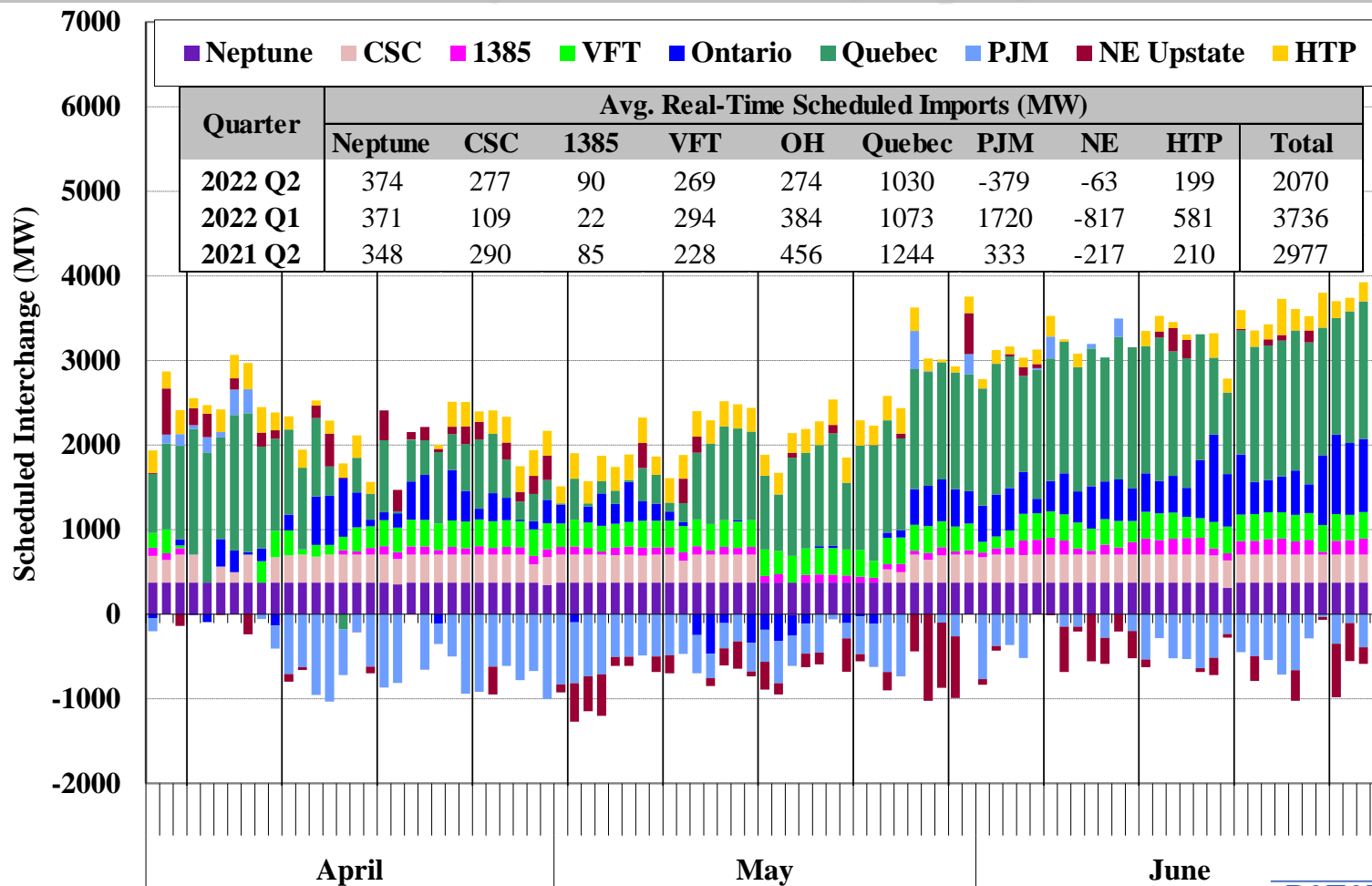
Notes: 1. Virtual profit is not shown for a category if the average scheduled quantity is less than 50 MW.

2. For chart description, see slide [89](#).





# Net Imports Scheduled in Real Time Across External Interfaces Daily Peak Hours (1-9pm)



Notes: Two Quebec interfaces are combined into one.

# Efficiency of Intra-Hour Scheduling Under CTS

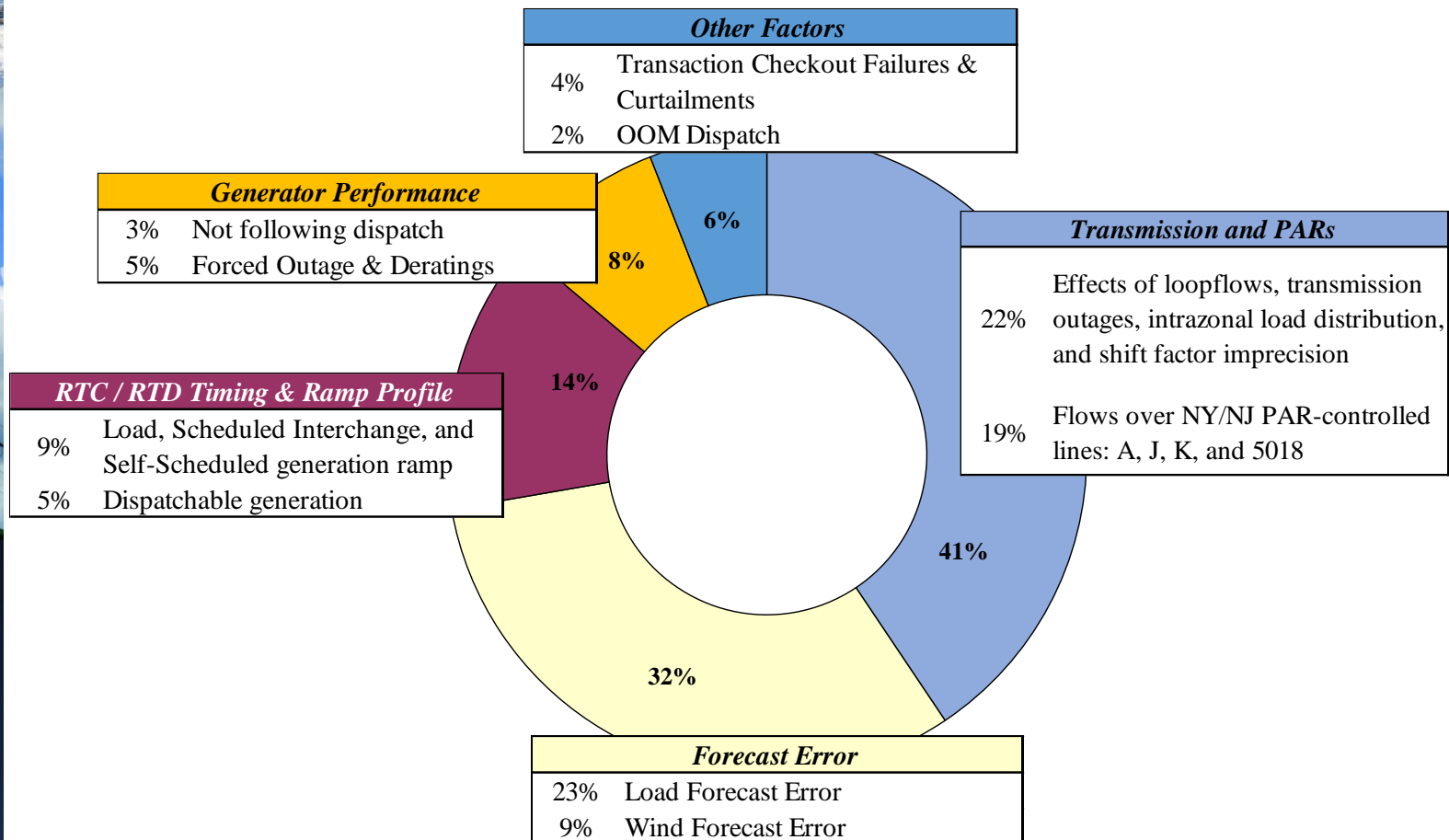
## Primary PJM and NE Interfaces

			Average/Total During Intervals w/ Adjustment							
			CTS - NY/NE				CTS - NY/PJM			
			Both Forecast Errors <= \$20	Any Forecast Error > \$20	Total		Both Forecast Errors <= \$20	Any Forecast Error > \$20	Total	
% of All Intervals w/ Adjustment			73%	19%	92%		41%	17%	58%	
Average Flow Adjustment ( MW )	Net Imports		16	17	16		-2	-17	-7	
	Gross		103	138	110		68	88	74	
Production Cost Savings (\$ Million)	Projected at Scheduling Time		\$2.2	\$1.5	\$3.7		\$0.5	\$1.4	\$1.9	
	Net Over-Projection by:	NY	-\$0.2	-\$0.8	-\$1.0		-\$0.1	-\$0.5	-\$0.6	
		NE or PJM	\$0.0	\$0.0	\$0.1		-\$0.1	-\$0.9	-\$1.0	
	Other Unrealized Savings		-\$0.1	-\$0.2	-\$0.3		\$0.0	-\$0.1	-\$0.1	
	Actual Savings		\$2.0	\$0.5	\$2.5		\$0.3	-\$0.1	\$0.2	
Interface Prices (\$/MWh)	NY	Actual	\$65.51	\$94.35	\$71.36	\$71.78	\$53.12	\$78.76	\$60.66	\$57.82
		Forecast	\$67.45	\$96.17	\$73.27	\$74.09	\$55.19	\$85.90	\$64.23	\$60.21
	NE or PJM	Actual	\$62.93	\$88.88	\$68.19	\$67.64	\$56.93	\$88.16	\$66.12	\$63.55
		Forecast	\$62.36	\$86.57	\$67.27	\$66.70	\$59.90	\$101.42	\$72.11	\$69.10
Price Forecast Errors (\$/MWh)	NY	Fcst. - Act.	\$1.94	\$1.82	\$1.92	\$2.31	\$2.07	\$7.14	\$3.56	\$2.39
		Abs. Val.	\$4.97	\$44.90	\$13.07	\$13.25	\$4.90	\$28.33	\$11.79	\$9.73
	NE or PJM	Fcst. - Act.	-\$0.57	-\$2.31	-\$0.92	-\$0.95	\$2.97	\$13.26	\$6.00	\$5.55
		Abs. Val.	\$4.16	\$26.25	\$8.64	\$8.56	\$6.33	\$48.50	\$18.74	\$16.72

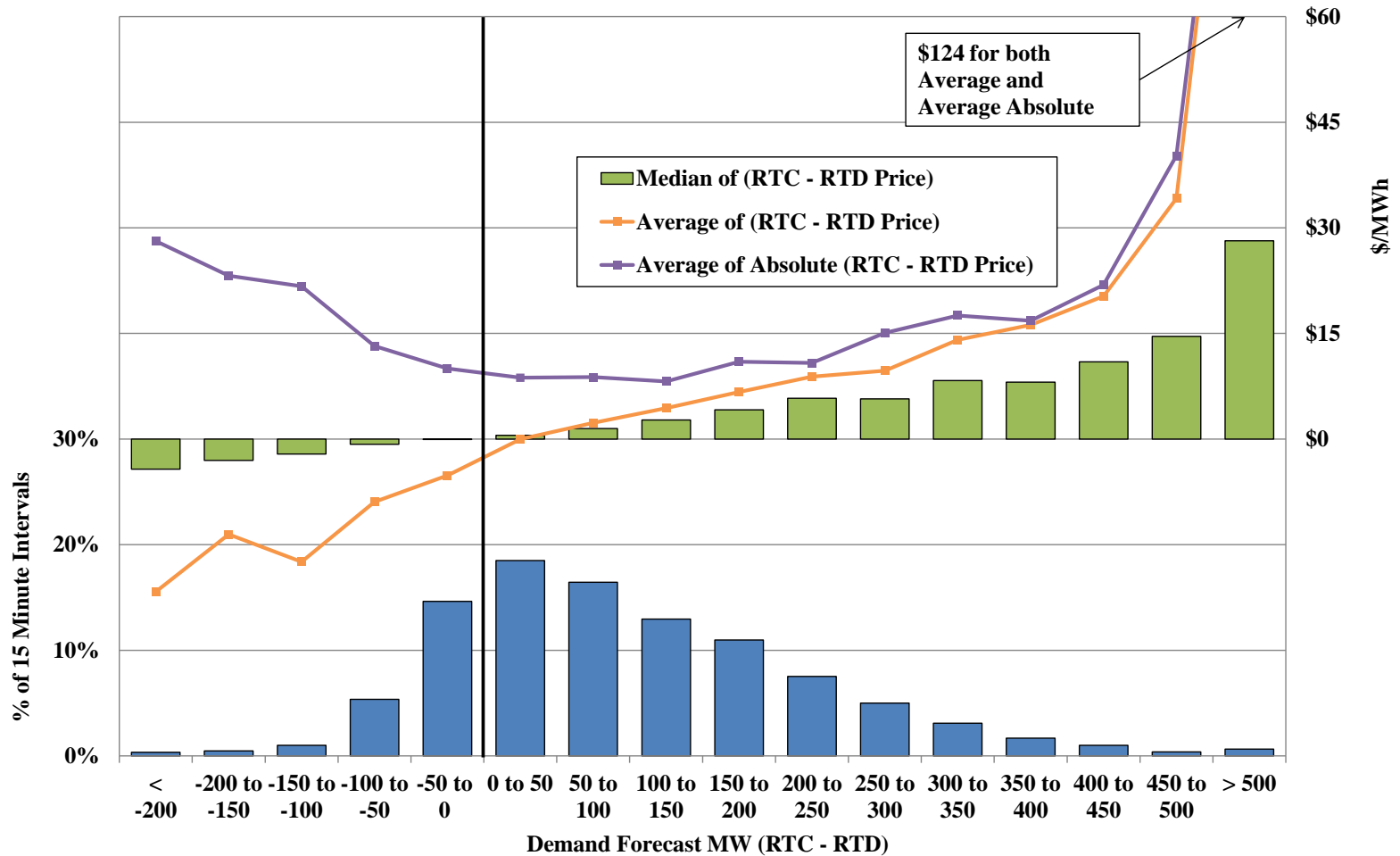
For Adjustment Intervals Only

For All Intervals

# Detrimental Factors to RTC and RTD Price Divergence

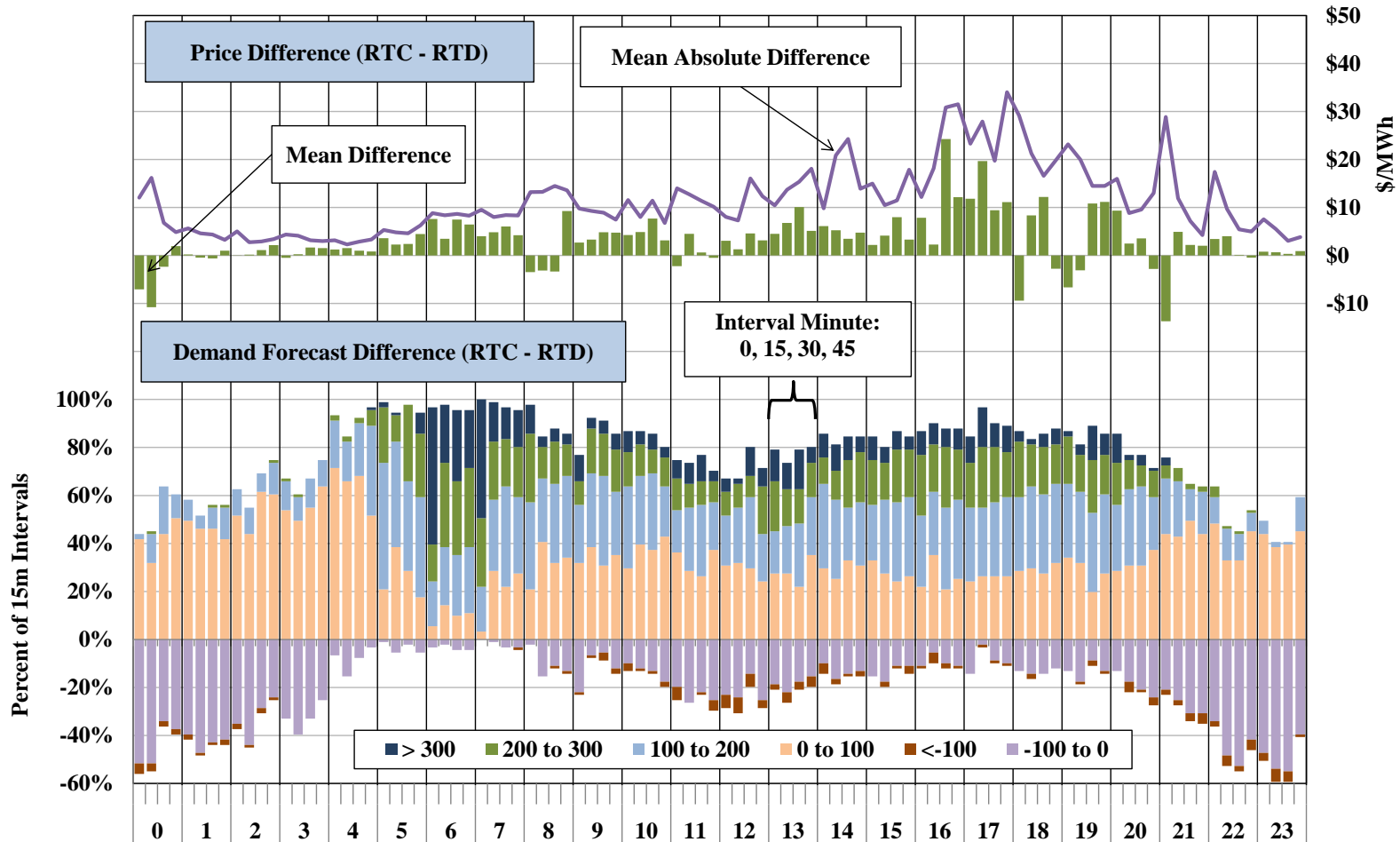


# RTC and RTD Price Difference vs Demand Forecast Difference





# RTC and RTD Price Difference vs Demand Forecast Difference by Time of Day



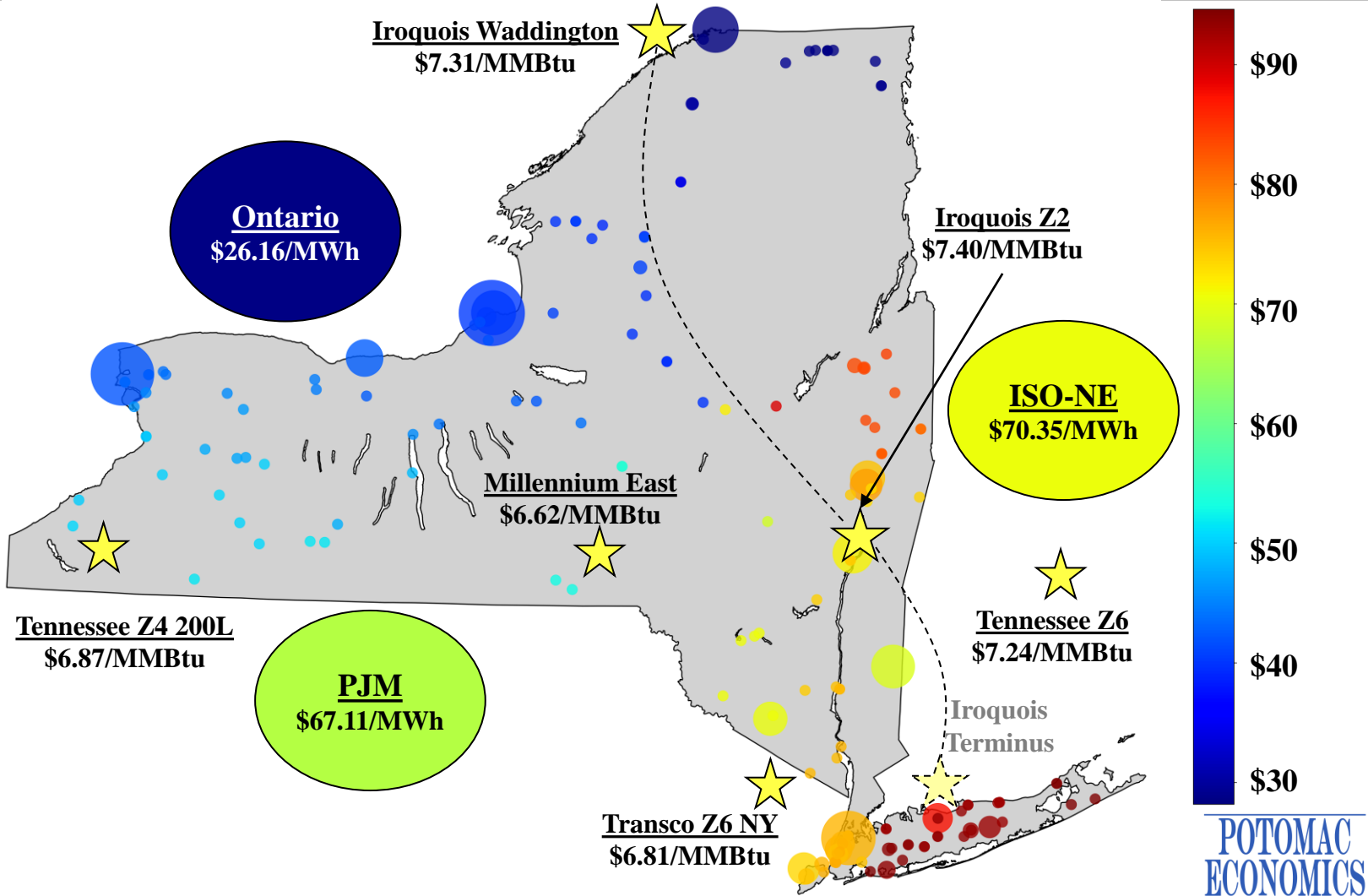


# Charts: Transmission Congestion Revenues and Shortfalls



# System Congestion

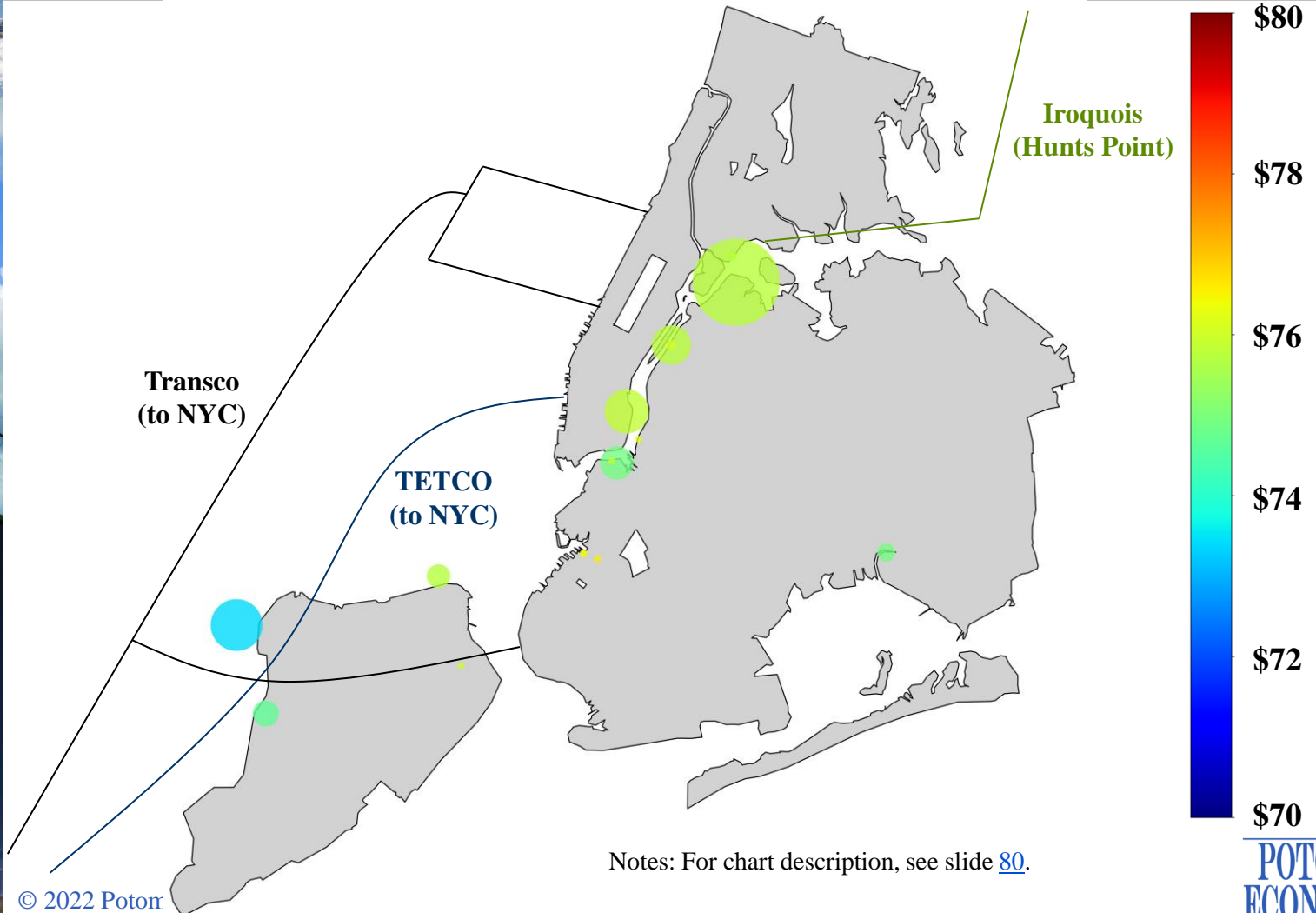
## Real-Time Price Map at Generator Nodes





# System Congestion

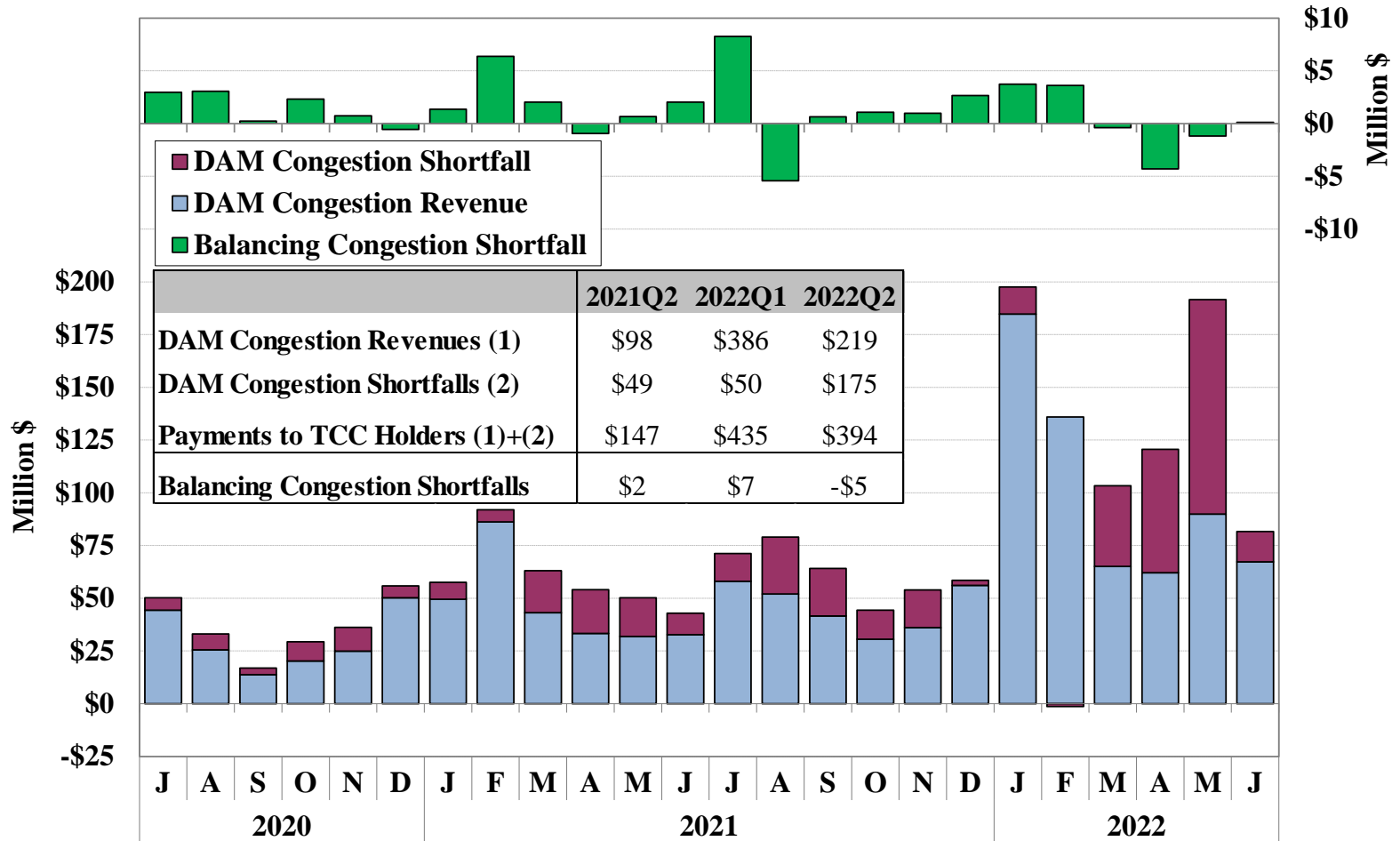
## NYC Real-Time Price Map at Generator Nodes







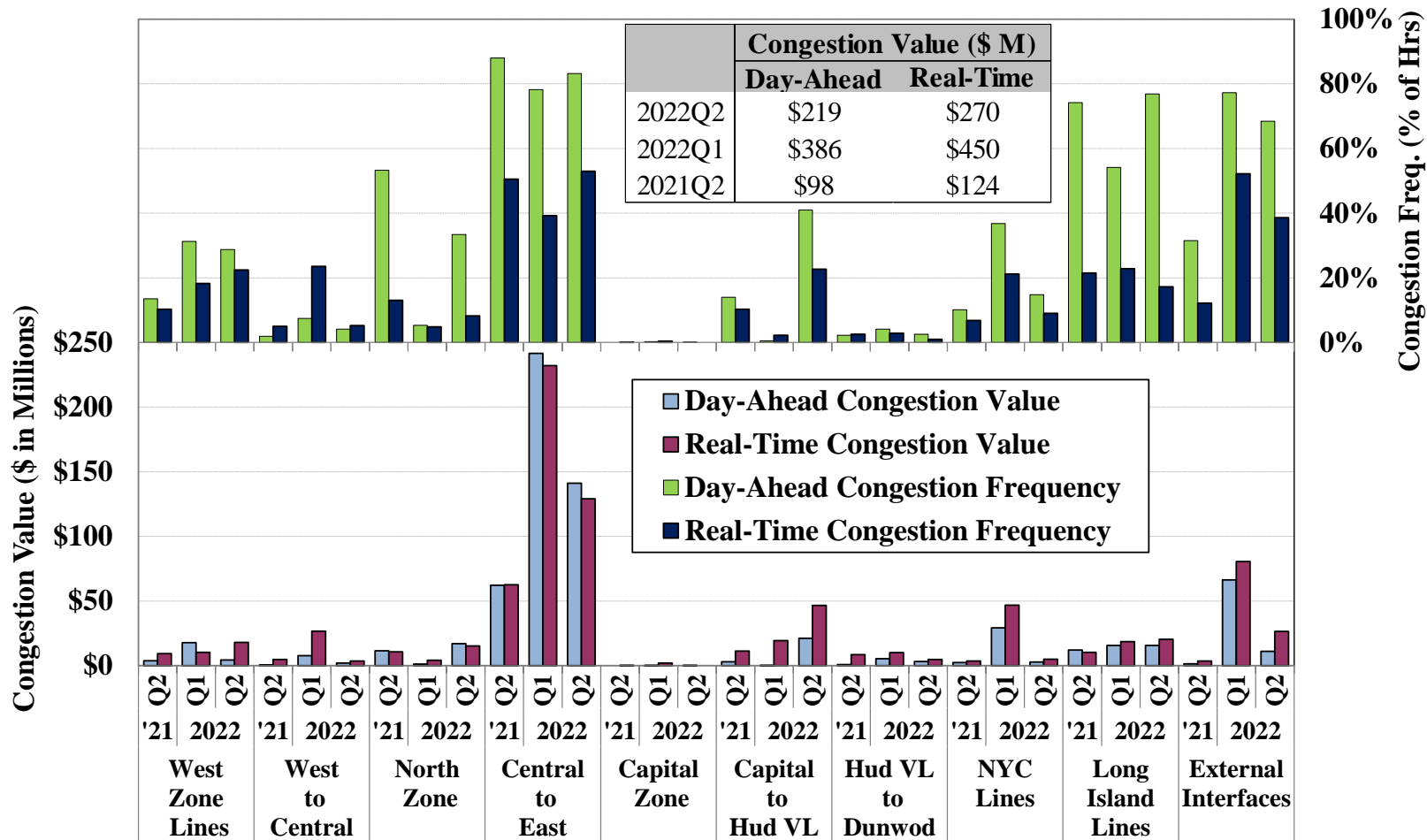
# Congestion Revenues and Shortfalls by Month



Notes: For chart description, see slides [94](#) and [95](#).

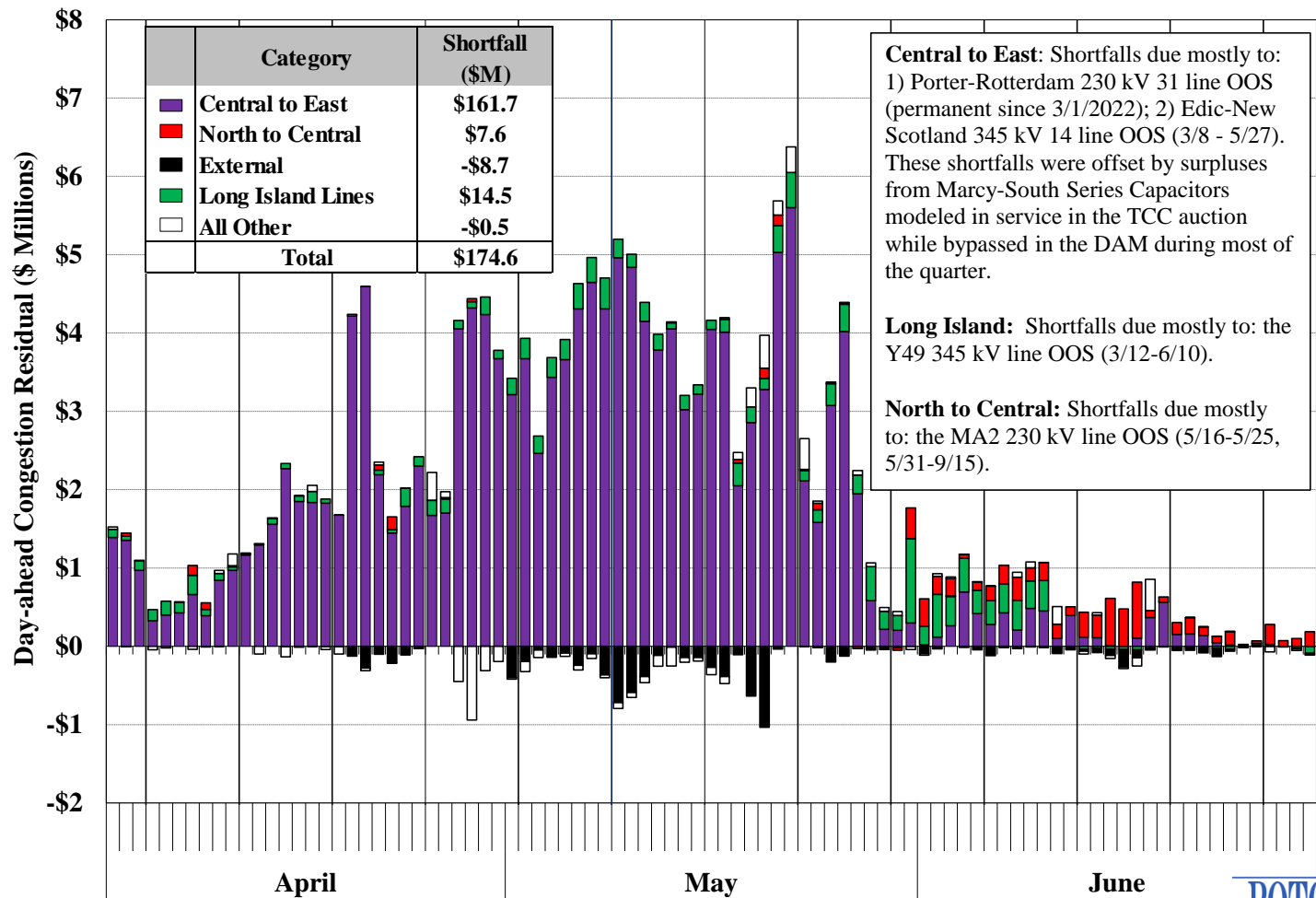


# Day-Ahead and Real-Time Congestion Value by Transmission Path



Notes: For chart description, see slides [94](#), [95](#), and [96](#).

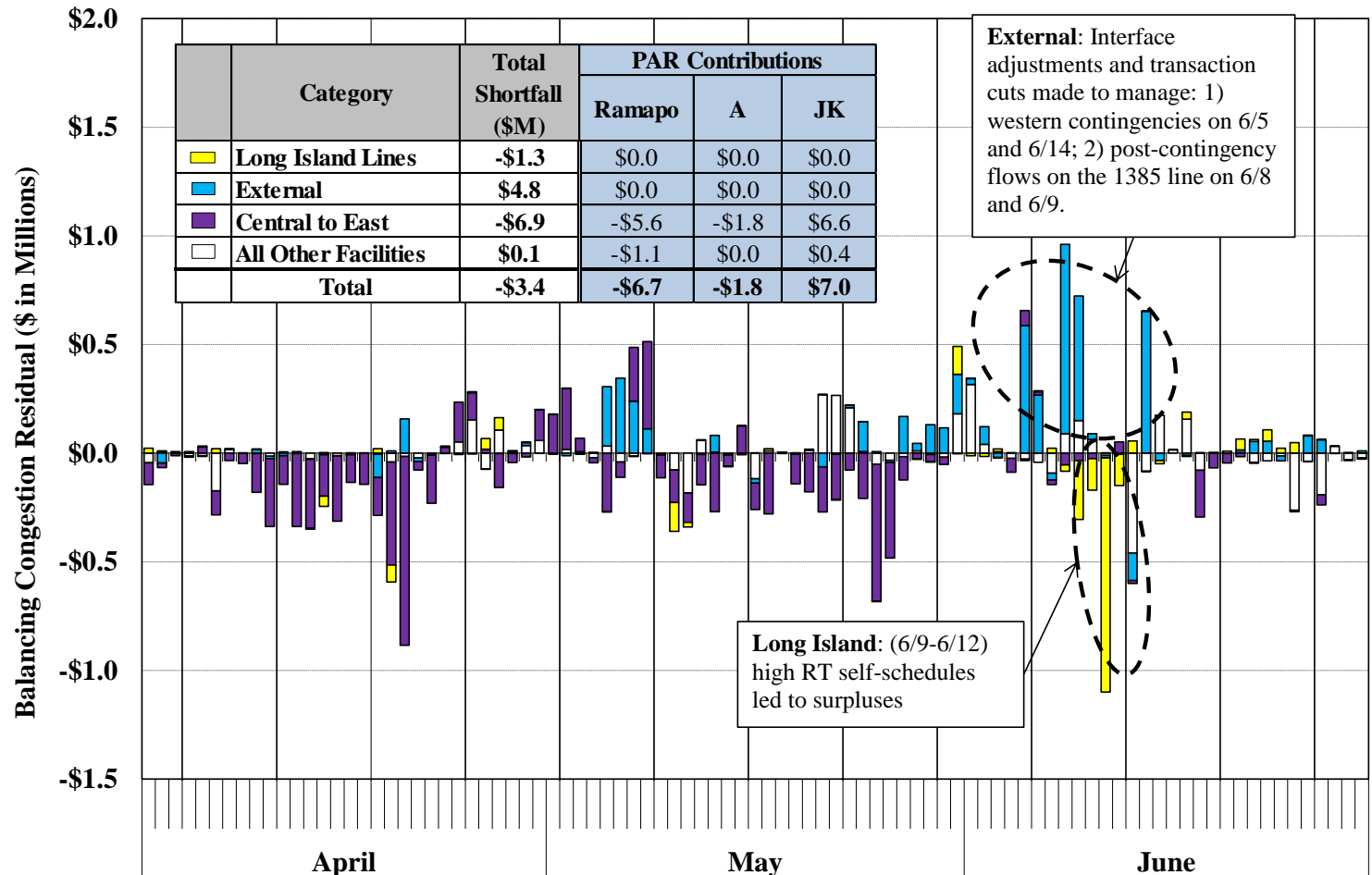
# Day-Ahead Congestion Revenue Shortfalls by Transmission Facility



Notes: For chart description, see slides [94](#), [95](#), and [96](#).



# Balancing Congestion Shortfalls by Transmission Facility

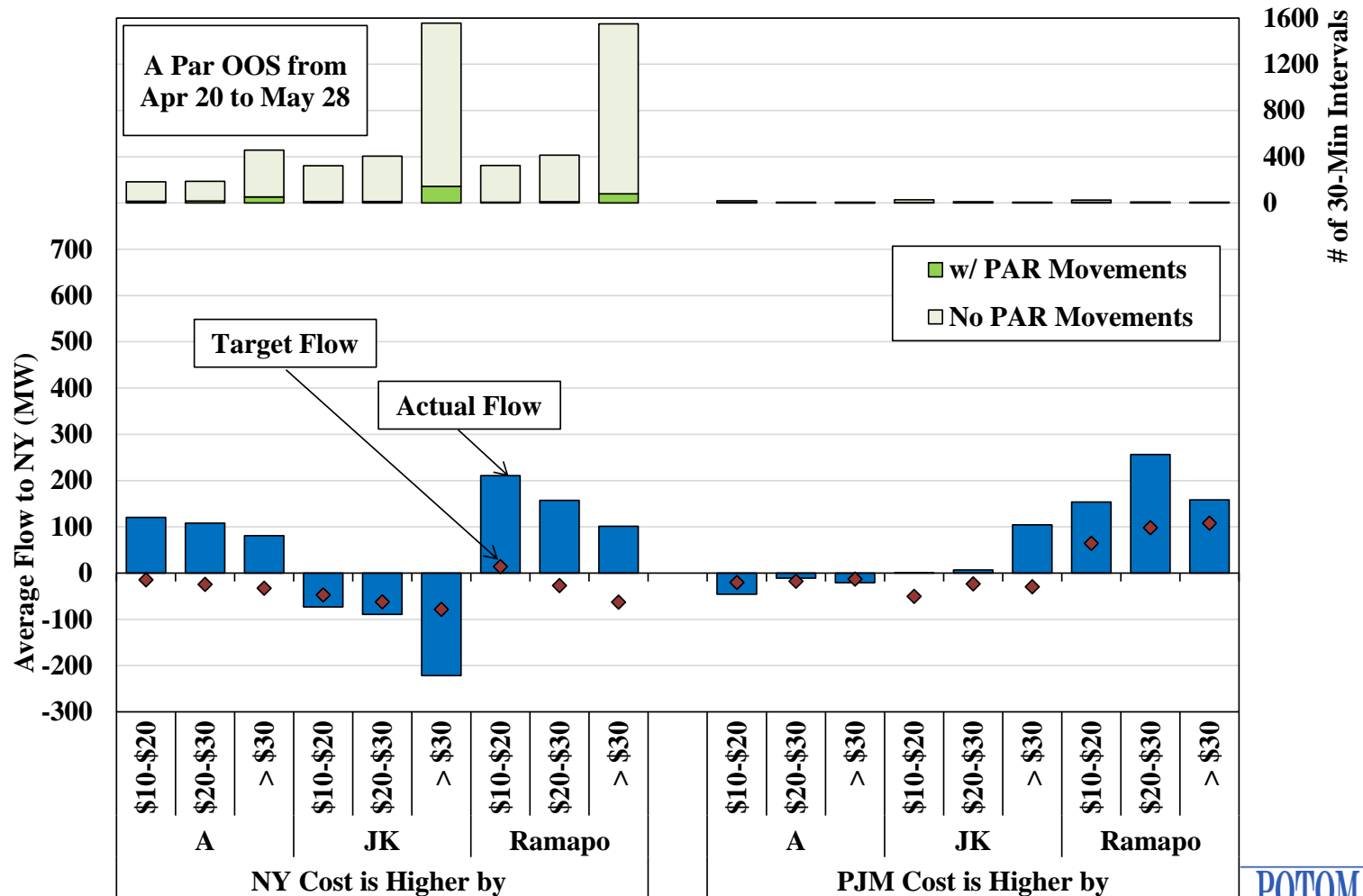


Notes: 1. The BMCR estimated above may differ from actual BMCR because the figure is partly based on real-time schedules rather than metered values. 2. For chart description, see slides [94](#), [95](#), and [96](#).  
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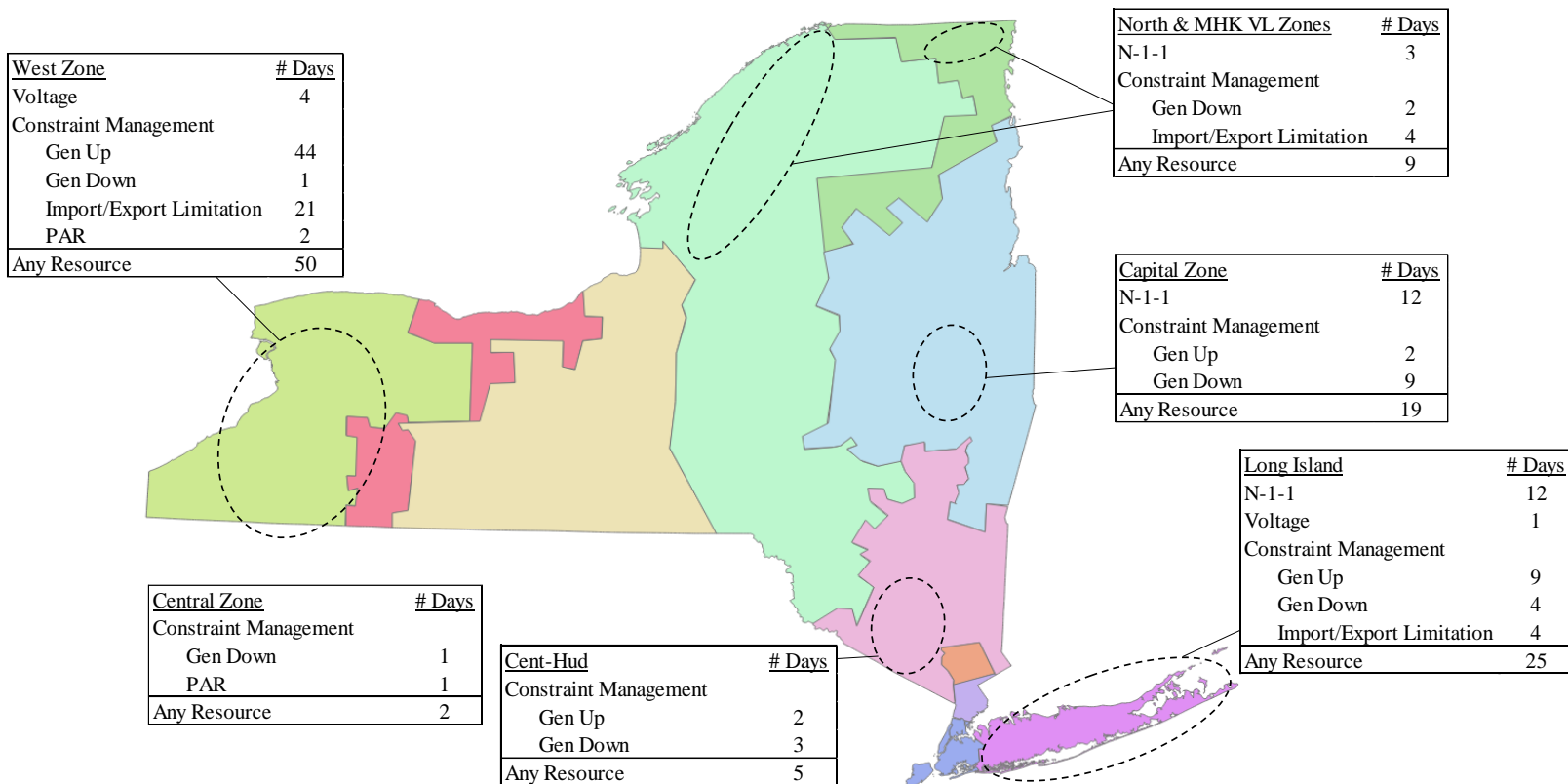




# PAR Operation under M2M with PJM 2022 Q2

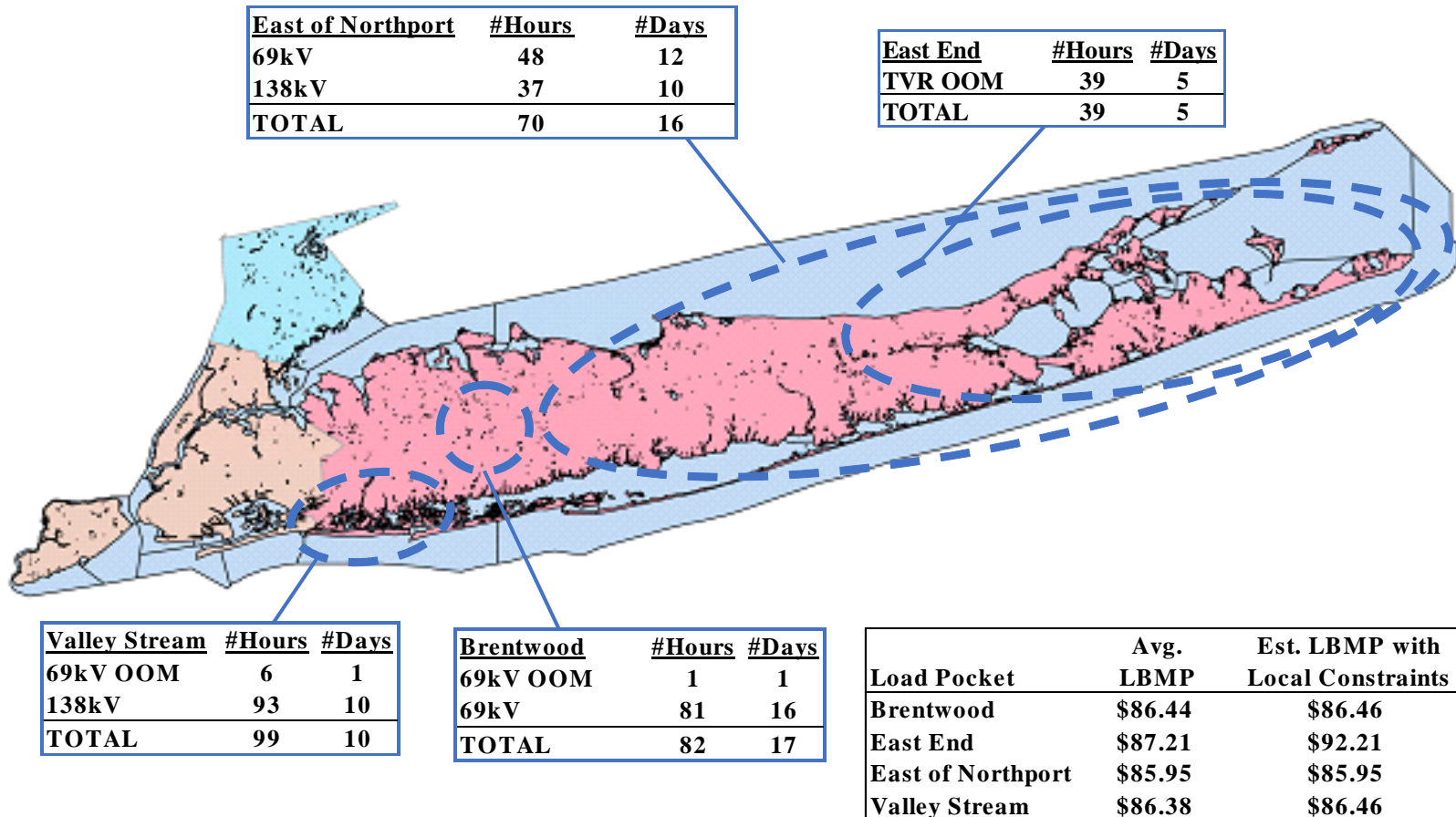


# OOM Actions to Manage Network Reliability



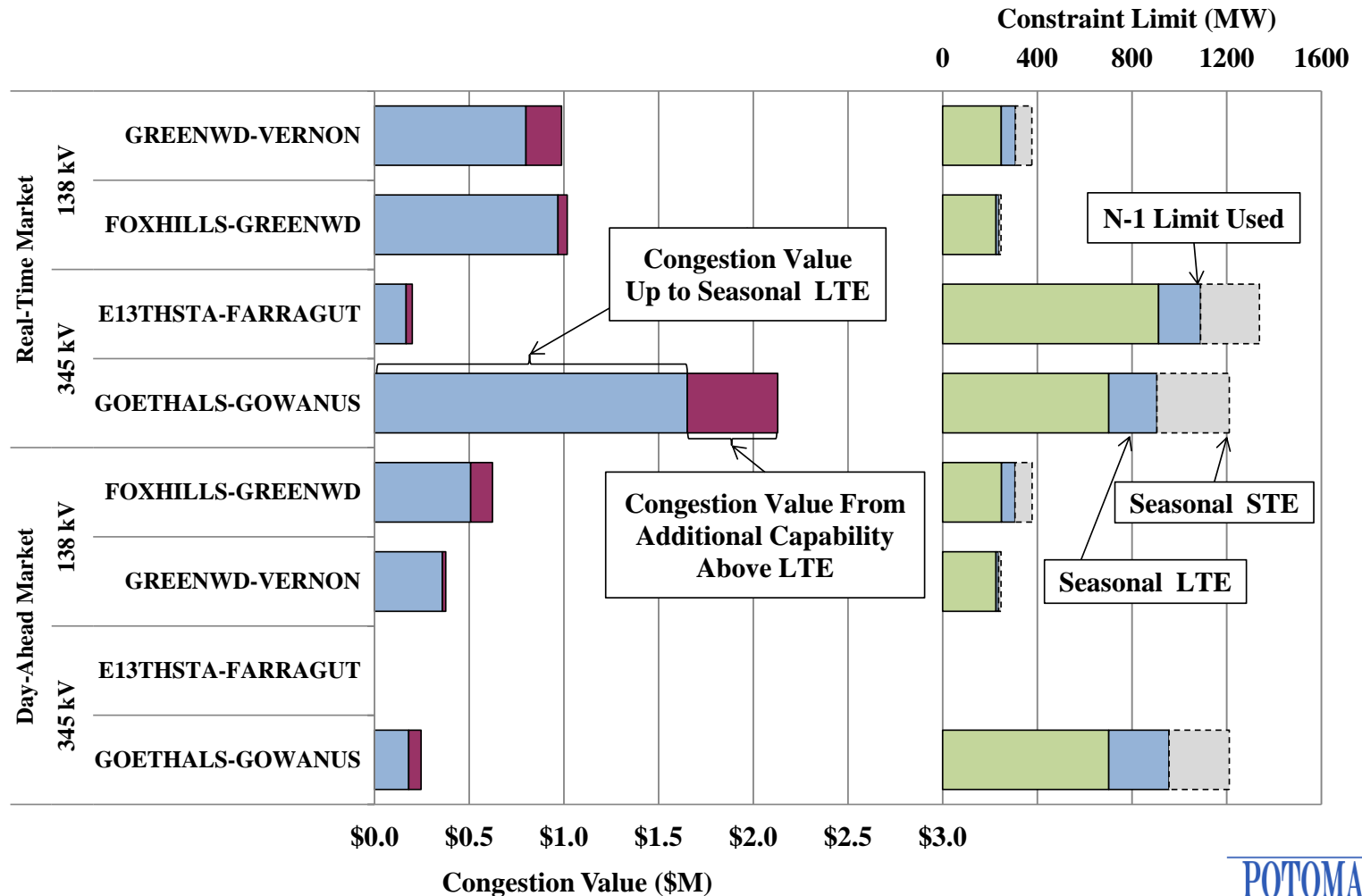
Notes: For chart description, see slides [98-99](#)

# Constraints on the Low Voltage Network: Long Island Load Pockets





# N-1 Constraints in New York City Limits Used vs Seasonal LTE Ratings

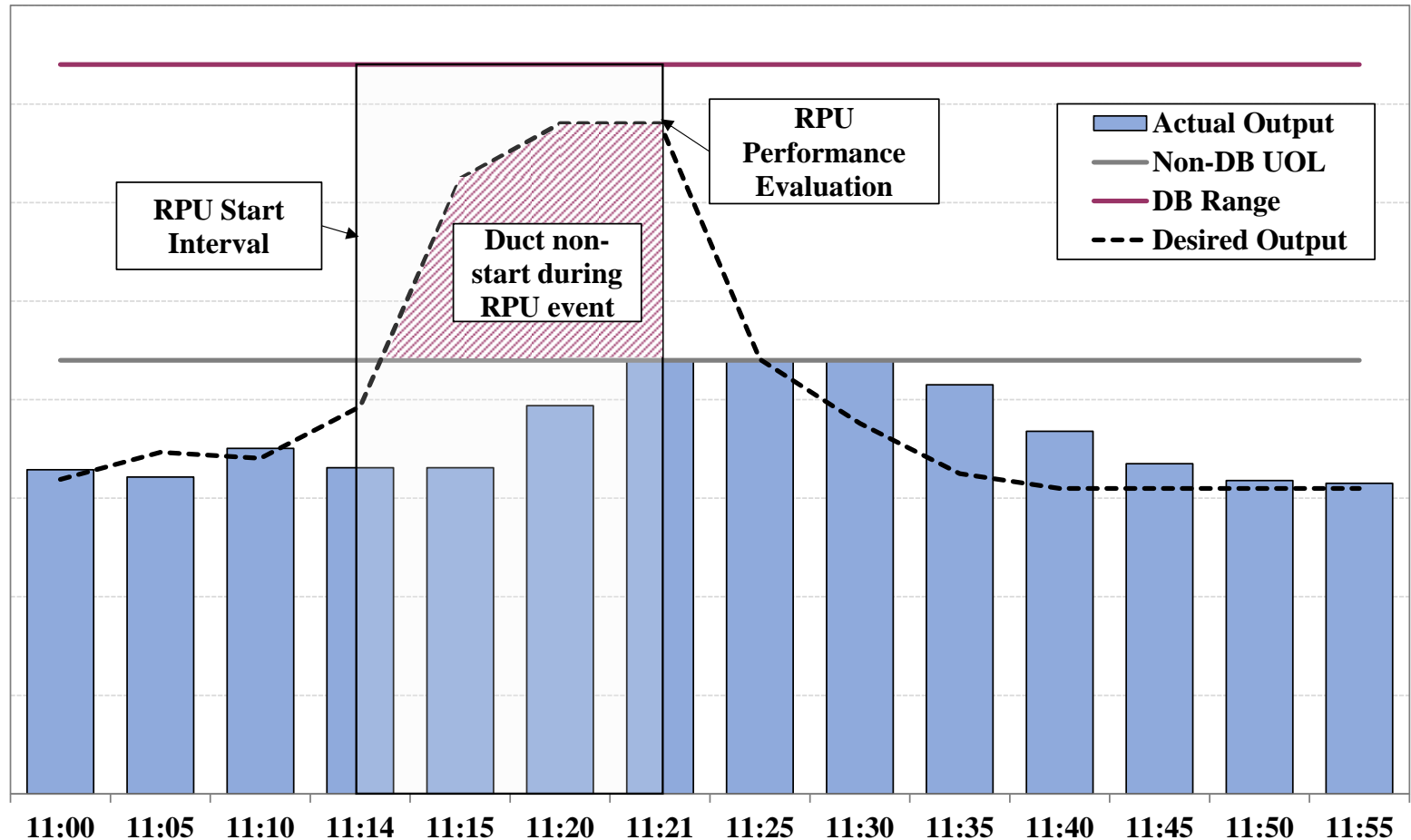






# Duct Burner Real-Time Dispatch Issues

## Example of a Failed RPU



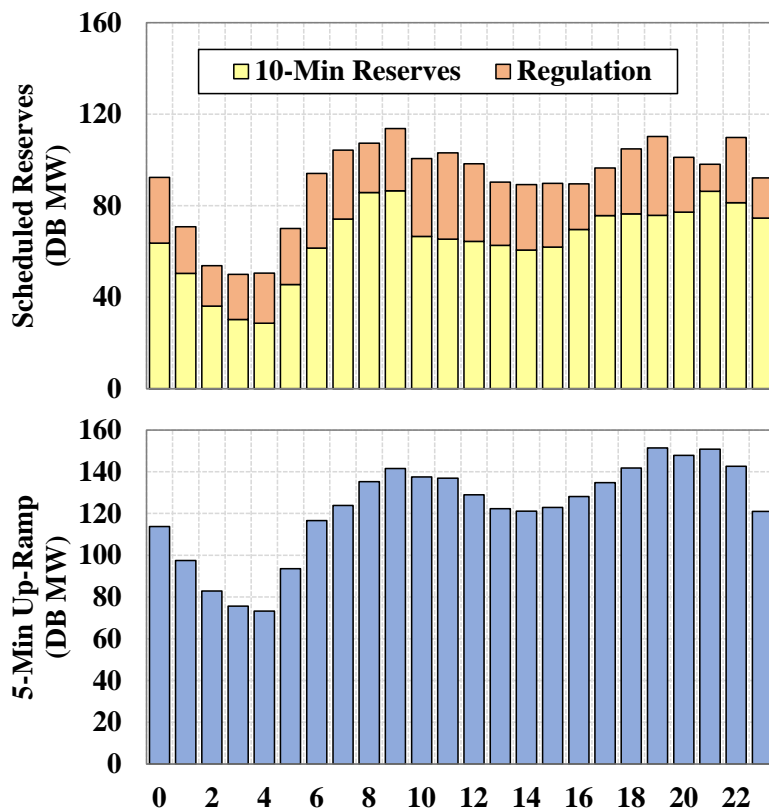
Notes: For chart description, see slide [101](#)



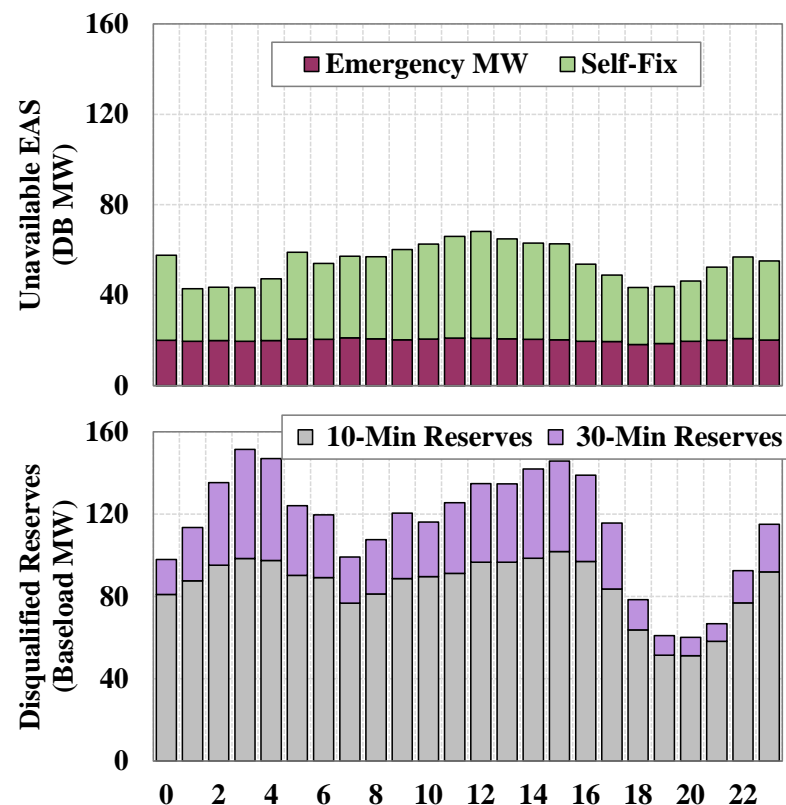
# Duct Burner Schedules and Ramp Expectations

## Evaluation of Duct Availability in Real-Time

**Scheduled or Offered Duct Capacity –  
but Unable to Follow RT Instructions**



**Unoffered Energy and/or Reserves  
(Including Duct and Baseload)**



# 10-Minute Gas Turbine Start-up Performance

## Economic Starts vs. Audits

10 Minute Economic GT Start Performance vs. Audit Results (July 2021 - June 2022)				
Economic GT Starts (RTC, RTD, and RTD-CAM)		GT Audit Results		
Performance Category	No. of Units	No. of Audits	Unique GTs Audited	No. of Audit Failures
Not Evaluated <sup>1</sup>	1	0	0	0
0% - 10%	0	0	0	0
10% - 20%	0	0	0	0
20% - 30%	0	0	0	0
30% - 40%	1	1	1	1
40% - 50%	1	4	1	2
50% - 60%	3	4	2	1
60% - 70%	1	1	1	0
70% - 80%	1	3	1	1
80% - 90%	26	111	26	22
90% - 100%	19	96	19	13
<b>TOTAL</b>	<b>53</b>	<b>220</b>	<b>51</b>	<b>40</b>

Note: 1. Including units that were OOM- or self-started, units that were never started in the time period, and units that were omitted from the analysis due to certain data issues for reliable performance assessment.

# 30-Minute Gas Turbine Start-up Performance

## Economic Starts vs. Audits

### 30 Minute Economic GT Start Performance vs. Audit Results (July 2021 - June 2022)

Economic GT Starts (RTC)		GT Audit Results		
Performance Category	No. of Units	No. of Audits	Unique GTs Audited	No. of Audit Failures
Not Evaluated <sup>1</sup>	15	13	5	3
0% - 10%	4	1	1	0
10% - 20%	0	0	0	0
20% - 30%	0	0	0	0
30% - 40%	0	0	0	0
40% - 50%	1	3	1	1
50% - 60%	1	4	1	1
60% - 70%	1	2	1	0
70% - 80%	8	11	8	0
80% - 90%	29	49	26	2
90% - 100%	33	55	29	0
<b>TOTAL</b>	<b>92</b>	<b>138</b>	<b>72</b>	<b>7</b>

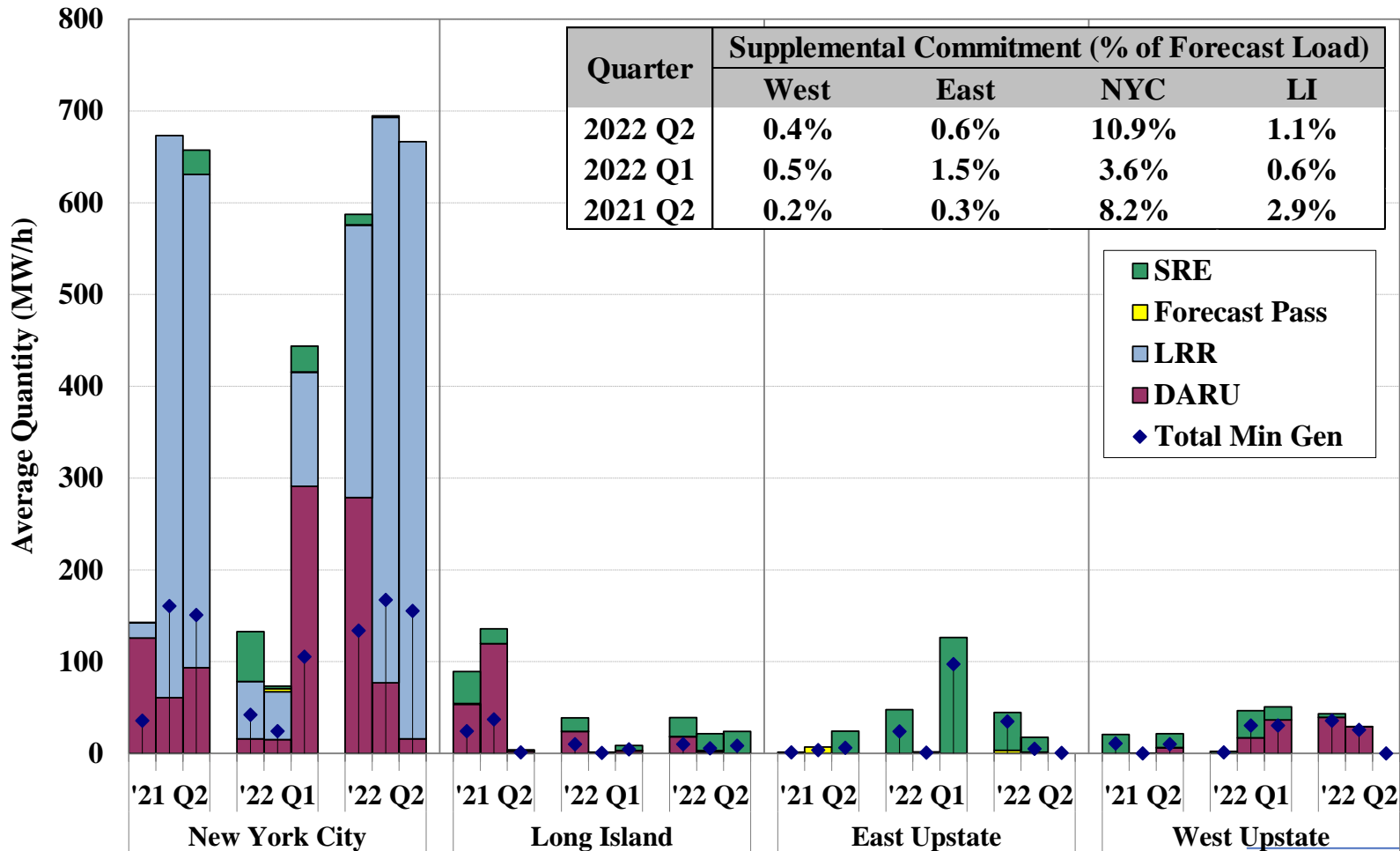
Note: 1. Including units that were OOM- or self-started, units that were never started in the time period, and units that were omitted from the analysis due to certain data issues for reliable performance assessment.





# Charts: Supplemental Commitment, OOM Dispatch, and BPCG Uplift

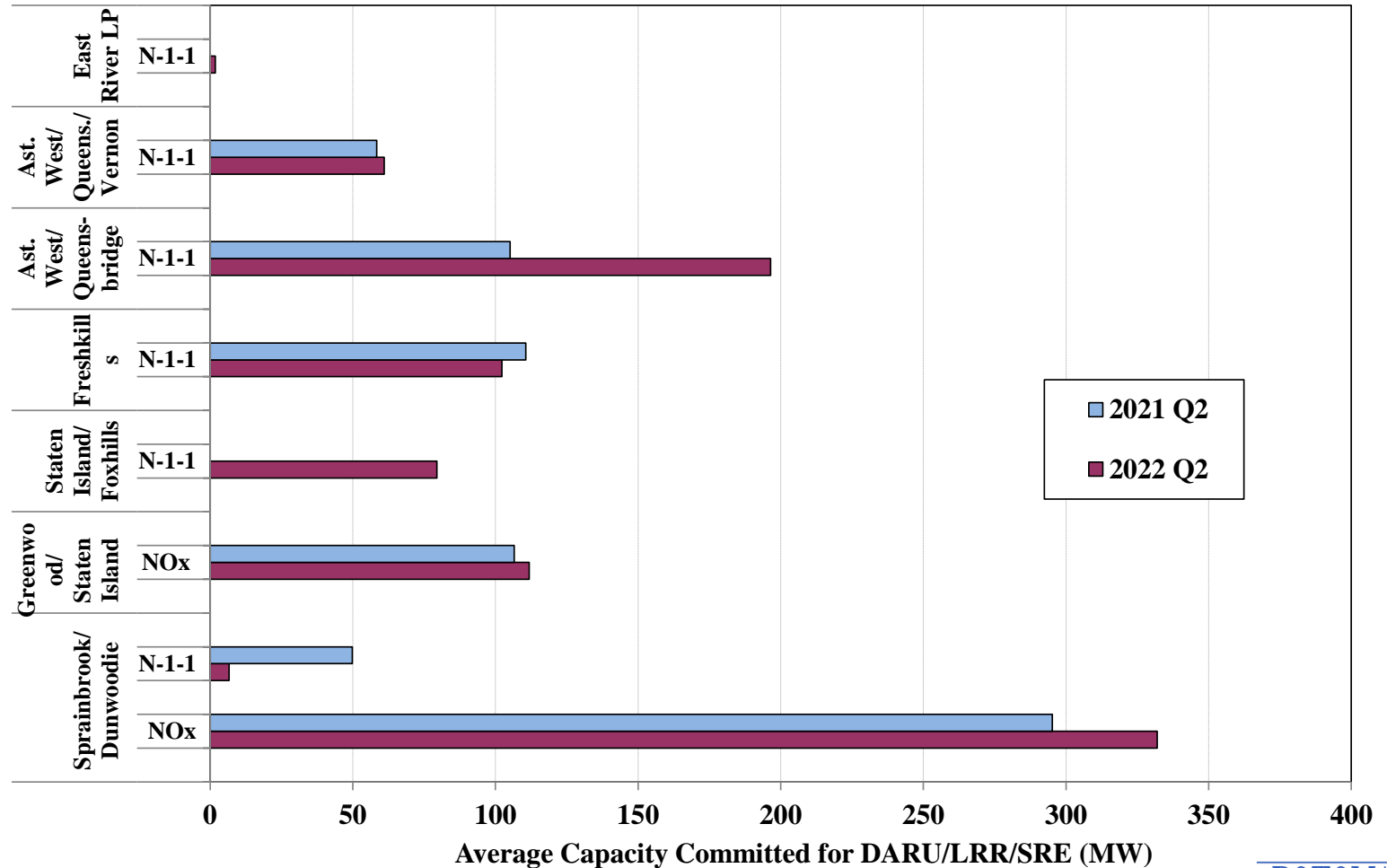
# Supplemental Commitment for Reliability by Category and Region



Notes: For chart description, see slides [103](#) and [104](#).



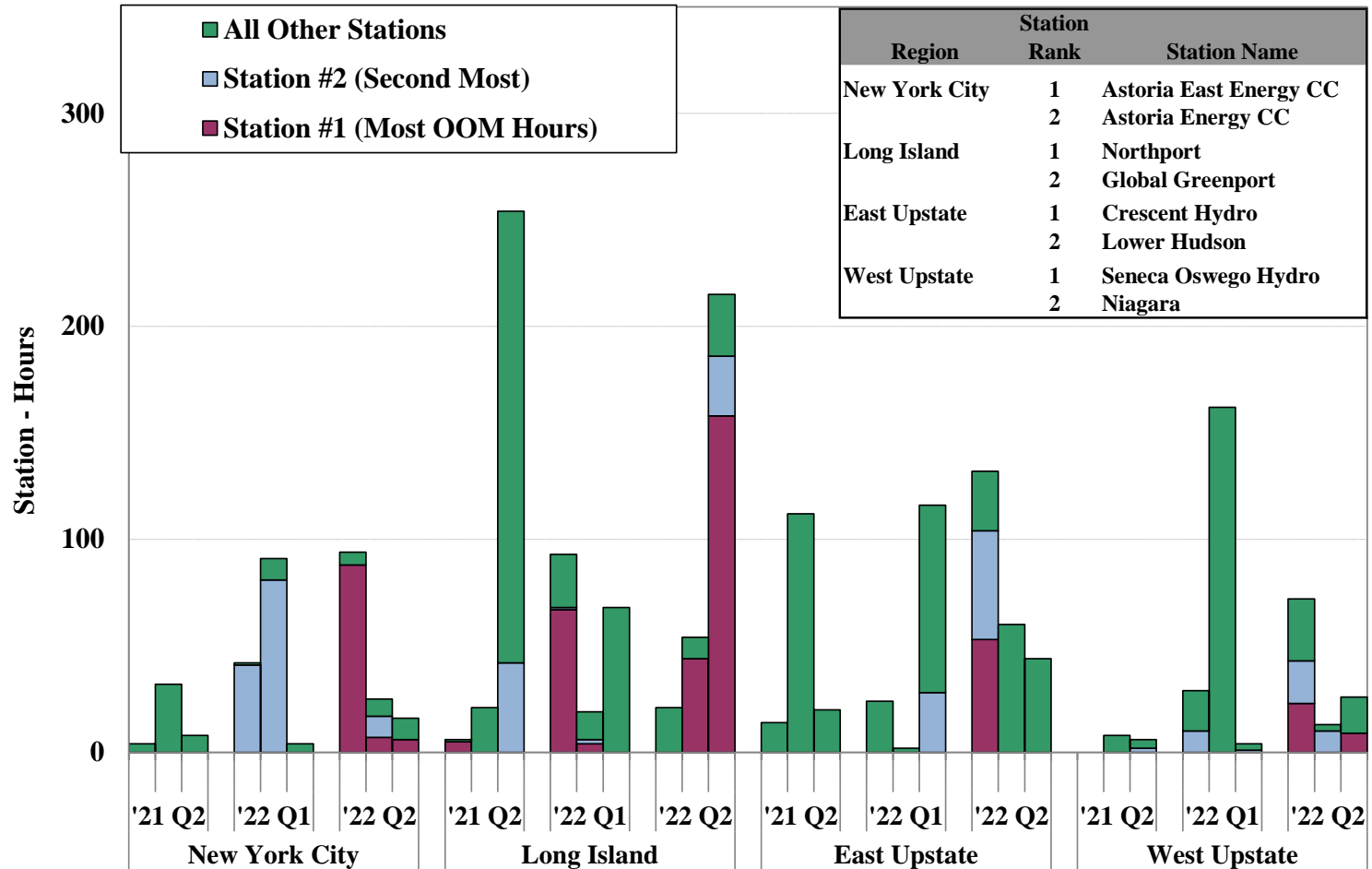
# Supplemental Commitment for Reliability in NYC by Reliability Reason and Load Pocket



Notes: For chart description, see slides [103](#) and [104](#)  
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# Frequency of Out-of-Merit Dispatch by Region by Month

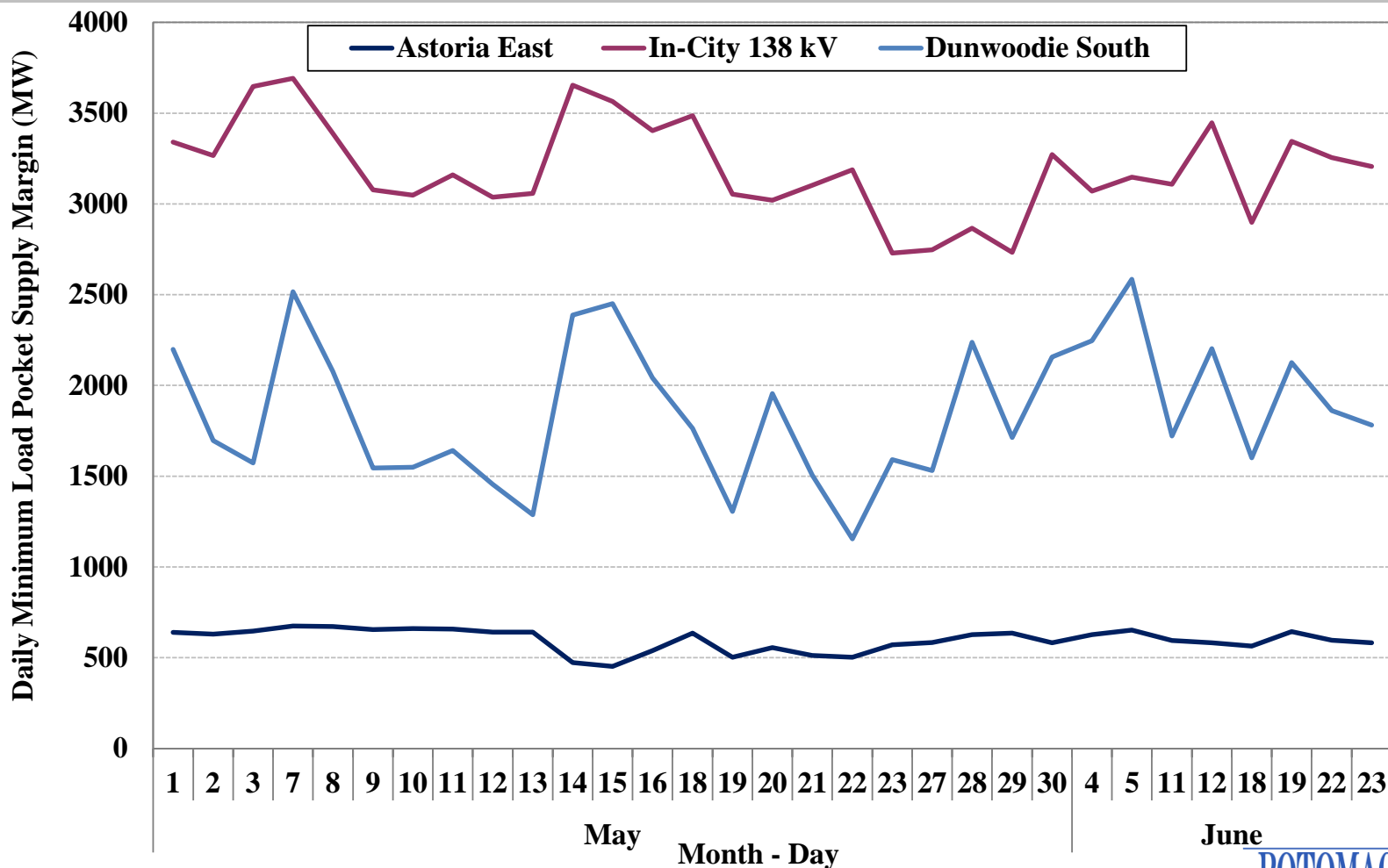


For chart description, see slides [103](#) and [104](#).



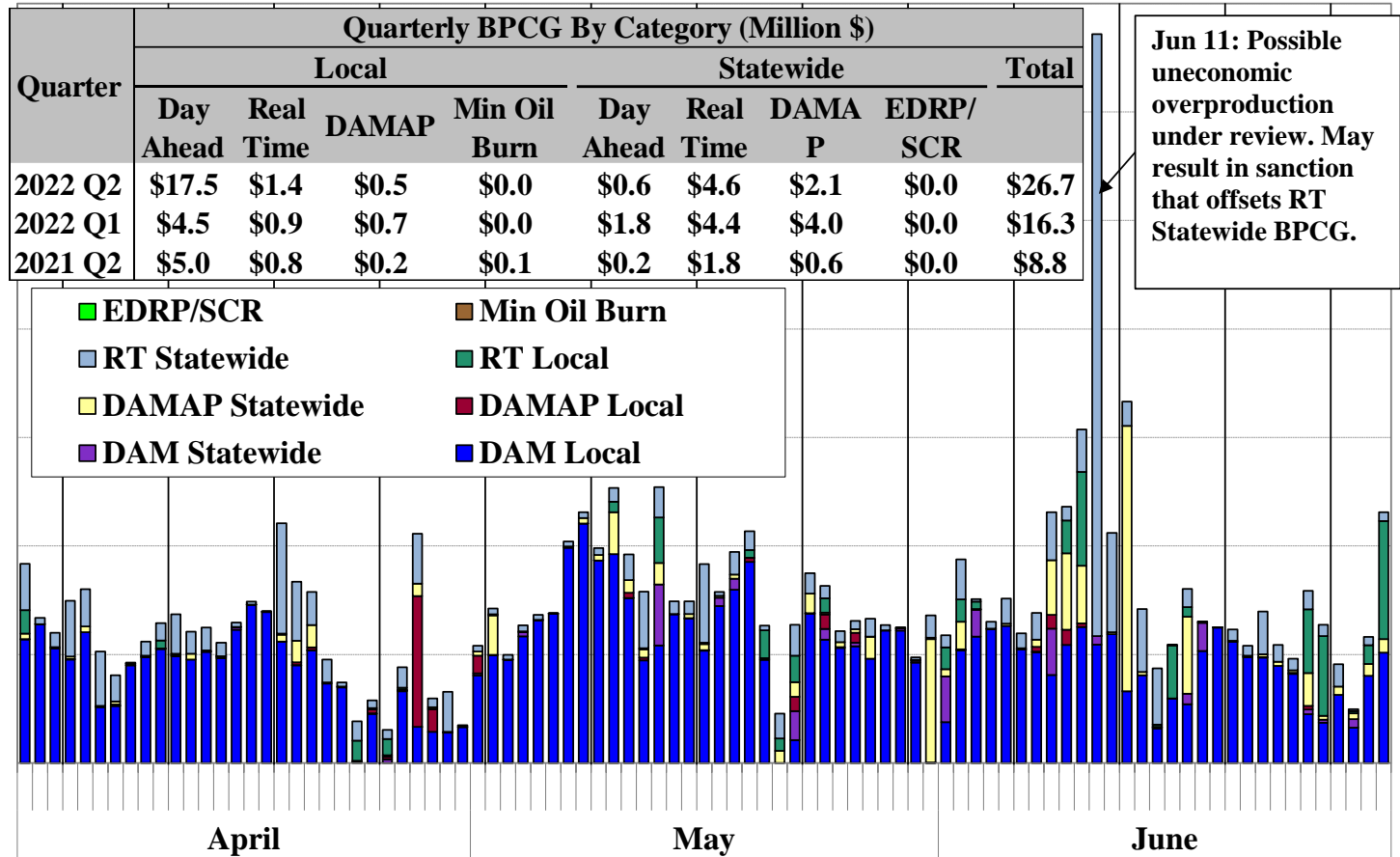
# Supply Margin in NYC Load Pockets

## After Removing NOx-only Committed ST and GT in the NOx Bubble



# Uplift Costs from Guarantee Payments

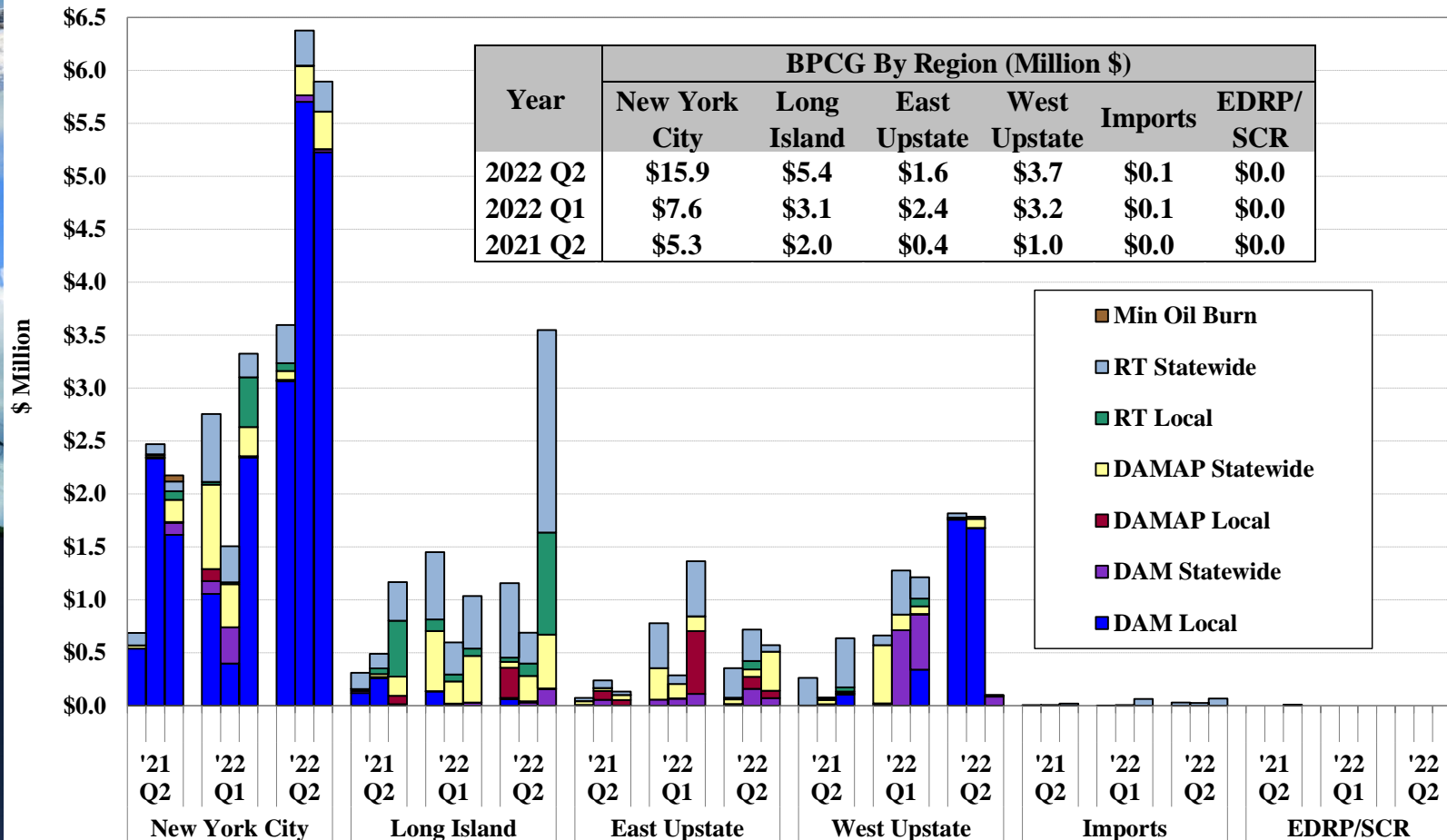
## Local and Non-Local by Category



Notes: 1. This data is based on information available at the reporting time and does not include some manual adjustments to mitigation, so it can be different from final settlements.

2. For chart description, see slide [106](#).

# Uplift Costs from Guarantee Payments By Category and Region



Notes: 1. BPCG data are based on information available at the reporting time that can be different from final settlements.

2. For chart description, see slide [106](#).



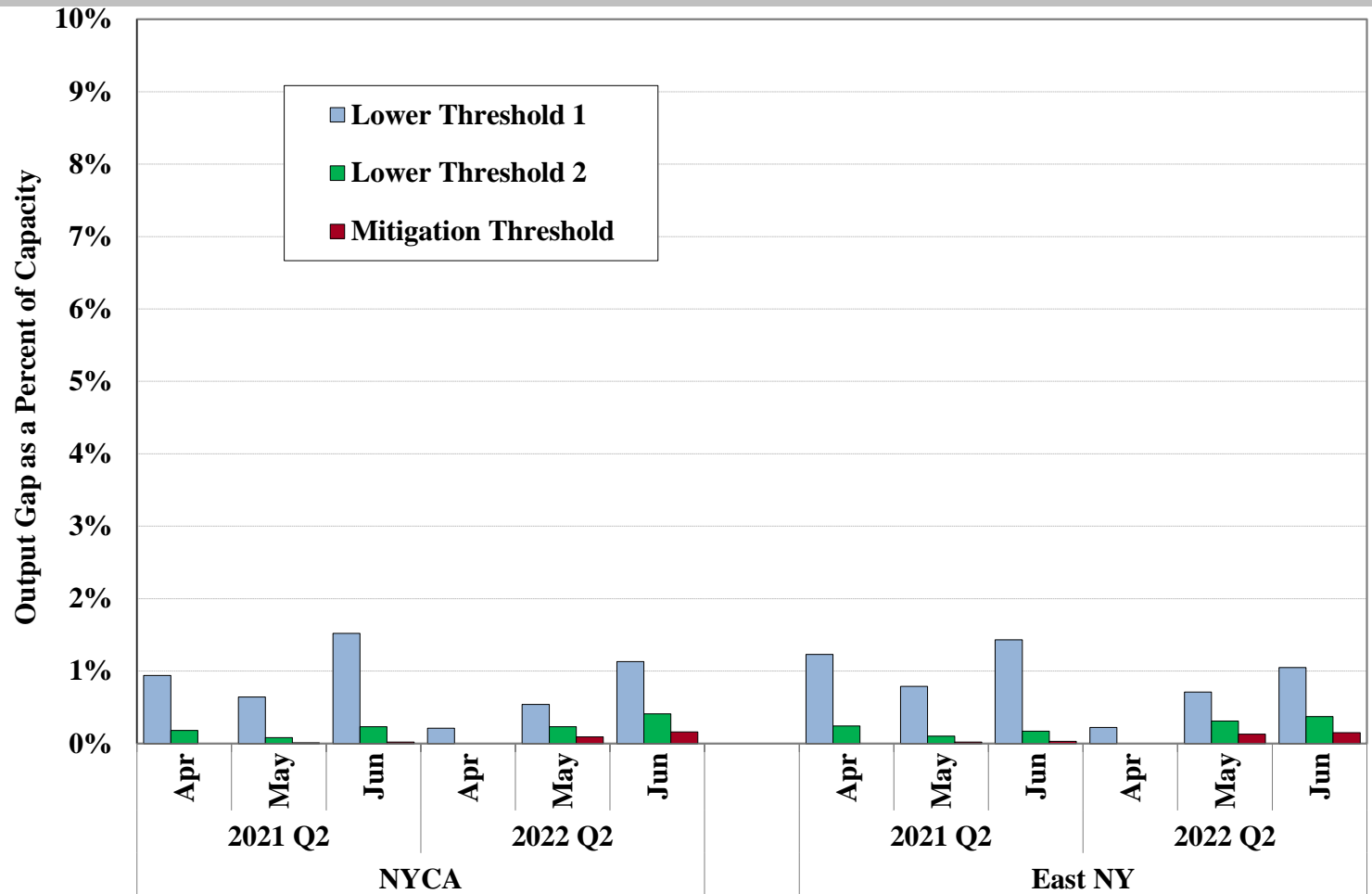
# Charts: Market Power and Mitigation





# Output Gap by Month

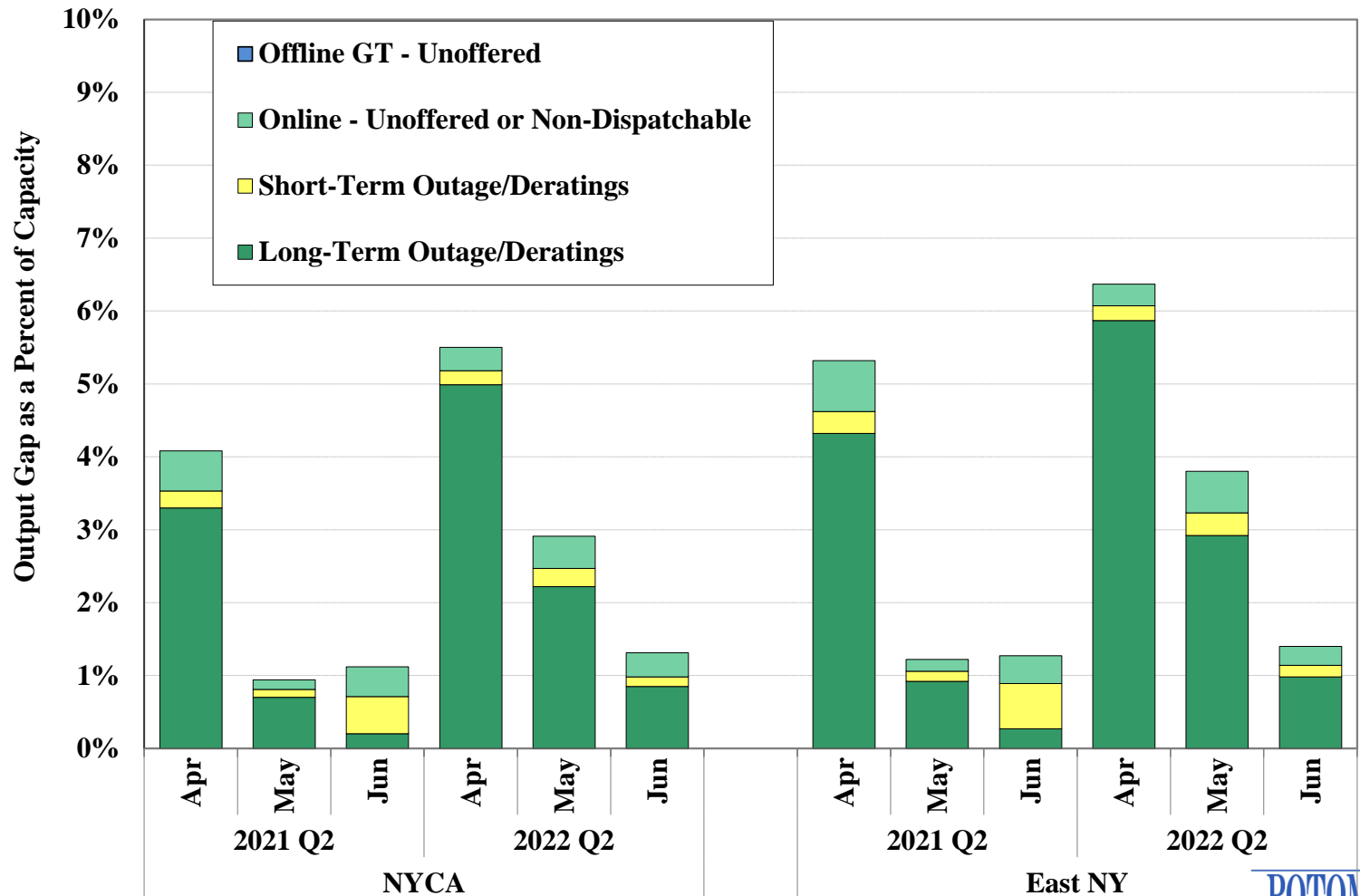
## NYCA and East NY





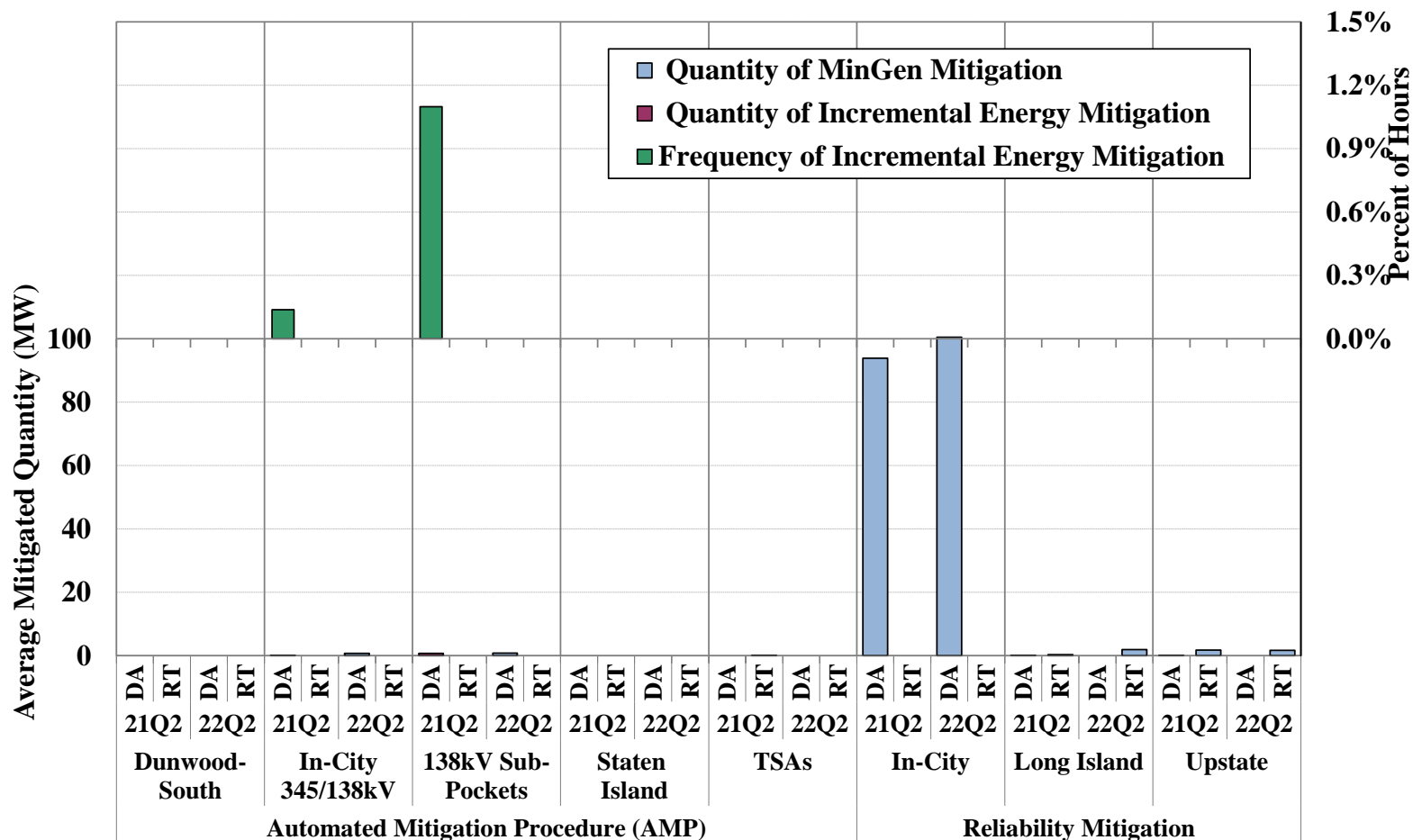
# Unoffered Economic Capacity by Month

## NYCA and East NY





# Automated Market Power Mitigation





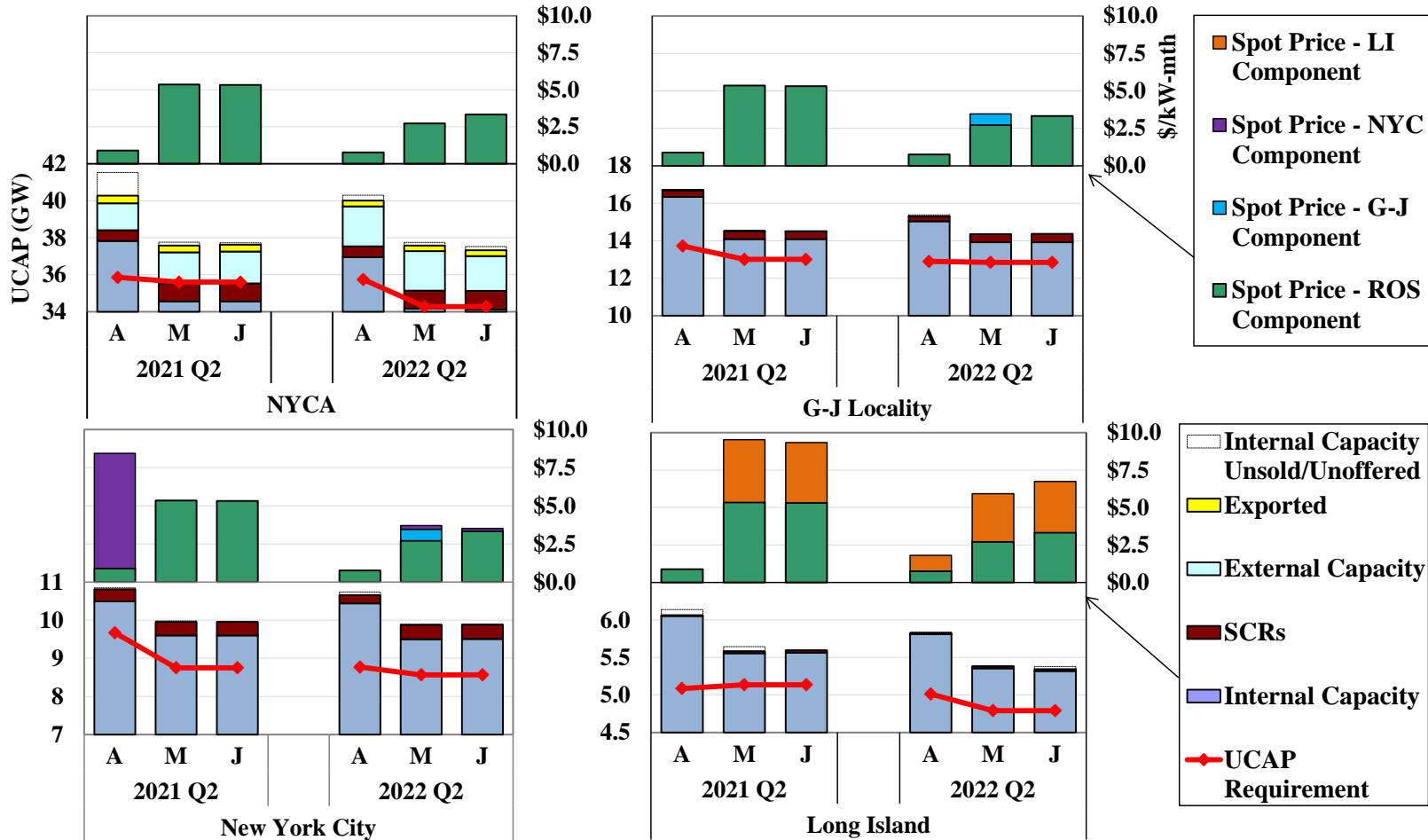
# Charts: Capacity Market





# Spot Capacity Market Results

## Monthly Results by Locality



# Key Drivers of Capacity Market Results

	NYCA	NYC	LI	G-J Locality
<b>Avg. Spot Price</b>				
2022 Q2 (\$/kW-Month)	\$2.27	\$2.66	\$4.83	\$2.52
% Change from 2021 Q2	<b>-41%</b>	<b>-58%</b>	<b>-27%</b>	<b>-35%</b>
<b>Change in Demand</b>				
Load Forecast (MW)	-566	-293	-111	-286
IRM/LCR	-1.1%	0.9%	-3.4%	1.6%
2022/23 Capability Year	119.6%	81.2%	99.5%	89.2%
2021/22 Capability Year	120.7%	80.3%	102.9%	87.6%
<b>ICAP Requirement (MW)</b>	<b>-1,033</b>	<b>-137</b>	<b>-289</b>	<b>-7</b>
<b>Key Changes in ICAP Supply (MW)</b>				
<i>Generation</i>	<b>-37</b>	<b>-27</b>	<b>-108</b>	<b>-328</b>
<i>Entry<sup>(3)</sup></i>	0	6	0	6
<i>Exit<sup>(3)</sup></i>	-480	-27	-33	-373
<i>Other Capacity Changes<sup>(1)</sup></i>	443	-6	-75	39
<i>Cleared Import<sup>(2)</sup></i>	<b>358</b>			

(1) Other changes include DMNC ratings, former exports, unsold capacity, etc.

(2) Based on average of quarterly cleared quantity.

(3) Includes change in sales from UDR line(s)



## Appendix: Chart Descriptions



## All-in Price

- Slide [20](#) summarizes the total cost per MWh of load served in the New York markets by showing the “all-in” price that includes:
  - ✓ An energy component that is a load-weighted average real-time energy price.
  - ✓ A capacity component that is calculated based on clearing prices in the monthly spot capacity auctions and capacity obligations in each zone, allocated over the energy consumption in that zone.
  - ✓ An uplift component that is based on local and statewide uplift from Schedule 1 charges, allocated over the energy consumed in the area.
  - ✓ An ancillary services component that is based on costs associated with operating reserves, regulation, voltage support, and black start.
    - For the purpose of this metric, these costs are distributed evenly across all locations.
  - ✓ The figure also shows representative natural gas prices for each location that is based on the following indices (plus transportation charges equal to \$0.27 per MMBtu for Zones A through I, \$0.20 per MMBtu for New York City, and \$0.25 per MMBtu for Long Island):
    - (a) Tennessee Z4 200L index for the West Zone, (b) the minimum of TN Z6 and Iroquois Zone 2 indices during the months Dec through Feb, and TN Z4 200L index otherwise for Central New York; (c) Iroquois Waddington index for North Zone; (d) the minimum of TN Z6 and Iroquois Z2 indices for the Capital Zone; (e) the average of Iroquois Z2 index and the Tetco M3 index for Lower Hudson Valley; (f) Transco Zone 6 (NY) index for New York City, and (g) the Iroquois Z2 index for Long Island. A 6.9 percent tax rate is also included NYC.





# Real-Time Output and Marginal Units by Fuel

- Slide [24](#) shows the quantities of real-time generation by fuel type.
  - ✓ Real time generation by fuel type is derived from data reported to the U.S. Environmental Protection Agency (“EPA”) and the U.S. Energy Information Administration (“EIA”).
  - ✓ Pumped-storage resources in pumping mode are treated as negative generation. “Other” includes Methane, Refuse, Solar & Wood.
- Slide [25](#) summarizes how frequently each fuel type was on the margin and setting real-time LBMPs in these regions.
  - ✓ More than one type of generator may be on the margin in an interval, particularly when a transmission constraint is binding. Accordingly, the total for all fuel types may be greater than 100 percent.
    - For example, if hydro units and gas units were both on the margin in every interval, the total frequency shown in the figure would be 200 percent.
  - ✓ When no generator is on the margin in a particular region, the LBMPs in that region are set by:
    - Generators in other regions in the vast majority of intervals; or
    - Shortage pricing of ancillary services, transmission constraints, and/or energy in a small share of intervals.



## Emission by Region

- Slides [26-30](#) evaluate emissions from generators in the NYISO market.
  - ✓ Slide [26](#) shows the historical trend of annual total emissions since 2000 in the NYISO footprint for CO<sub>2</sub>, NO<sub>x</sub>, and SO<sub>2</sub>.
  - ✓ Slides [27-28](#) show quarterly emissions across the system by generation fuel type for CO<sub>2</sub> and NO<sub>x</sub>.
    - Emission values are given for 7 regions as well as the system as a whole.
    - The emission tonnage is given by aggregating the total pollution from operations on the various fossil fuel types for each month of the quarter.
    - The inset tables in each chart provides summary data on the total tonnage of emissions by fuel type for three recent quarters.
  - ✓ Slides [29-30](#) evaluate NO<sub>x</sub> emission during the quarter in the non-attainment areas in New York City and Long Island, respectively, on a daily basis.
    - The emission tonnage is shown separately for oil-fired units and gas-fired units in stacked bars, where gas-fired units are also grouped based on technology: (a) combined-cycle; (b) steam turbine; (c) gas turbines that were in service before 2000; and (d) gas turbines that were in service since 2000.
    - The line in slide [29](#) shows the emission from STs in NYC that were supplementally committed for local reliability as a percent of total emission in NYC.



# Emission Costs by Unit Type

## Natural Gas Fired Resources

- Slide [23](#) shows estimates for the generation-weighted average hourly marginal costs of the two main emissions, CO<sub>2</sub> and NO<sub>x</sub>, by month for each of the following unit types firing on natural gas:
  - ✓ Combined cycles, Steam Turbines, and Peaking units.
- Emission cost estimates are calculated based on:
  - ✓ Daily price indexes for RGGI (CO<sub>2</sub>) and CSAPR Group 3 (NO<sub>x</sub>) emissions allowances.
  - ✓ CO<sub>2</sub> emission coefficient of 118 Lb/MMBtu for natural gas.
  - ✓ Generation-weighted average hourly NO<sub>x</sub> emission rates for each unit type based on actual operations during June 2022 from EPA CEMS data.
  - ✓ Heat rate assumptions of 7.5 MMBtu/MWh for combined cycles, 11 MMBtu/MWh for steam turbines, 9.4 MMBtu/MWh for Peakers (post-2000), and 13.25 MMBtu/MWh for Peakers (pre-2000).
- Actual unit-specific emission rates and associated costs may vary substantially for each individual unit based on factors like (a) heat rate efficiency, (b) level of emission control technology at the plant, and (c) typical output factor during operations, etc.



# Ancillary Services Prices

- Slides [35-39](#) summarize day-ahead and real-time prices for eight ancillary services products during the quarter:
  - ✓ 10-min spinning reserve prices in NYC, eastern NY, and Western NY;
  - ✓ 10-min non-spinning reserve prices in NYC, eastern NY, and Western NY;
  - ✓ Regulation prices, which reflect the cost of procurement, and the cost of moving generation of regulating units up and down.
    - Resources were scheduled assuming a Regulation Movement Multiplier of 8 per MW of capability, but they are compensated according to actual movement.
    - Real-time Regulation Movement Charges shown on Slide [38](#) are estimated by dividing total movement charges by real-time scheduled regulation capacity.
  - ✓ 30-min operating reserve prices in western NY and NYC; and
  - ✓ 30-min operating reserve prices in SENY.
- The number of shortage intervals in real-time for each ancillary service product are also shown.
  - ✓ A shortage occurs when a requirement cannot be satisfied at a marginal cost less than its “demand curve”.
  - ✓ The highest demand curve values are currently set at \$775/MW.





## Day-Ahead NYCA 30-Minute Reserve Offers

- Slide [40](#) summarizes the amount of reserve offers in the day-ahead market that can satisfy the statewide 30-minute reserve requirement.
  - ✓ These quantities include both 10-minute and 30-minute and both spinning and non-spin reserve offers. (However, they are not shown separately in the figure.)
  - ✓ Only offers from day-ahead committed (i.e., online) resources and available offline quick-start resources are included, since they directly affect the reserve prices.
  - ✓ The stacked bars show the amount of reserve offers in each select price range for West NY (Zones A to E), East NY (Zones F to J), and NYCA (excluding Zone K).
    - Long Island is excluded because the current rules limit its reserve contribution to the broader areas (i.e., SENY, East, NYCA).
    - Thus, Long Island reserve offer prices have little impact on NYCA reserve prices.
  - ✓ The black line represents the equivalent average 30-minute reserve requirements for areas outside Long Island.
    - The equivalent 30-minute reserve requirement is calculated as NYCA 30-minute reserve requirement minus 30-minute reserves scheduled on Long Island.
    - Where the lines intersect the bars provides a rough indication of reserve prices (less opportunity costs).



# Regulation Market Requirements and Prices

- Slide [42](#) displays several aspects pertaining to the regulation requirements, prices, and relationship between scheduled regulation capacity and actual regulation movement in the past 36-month period.
- The topmost chart displays information relevant to the regulation requirement and the regulation movement-to-capacity ratio.
  - ✓ The blue column bars show the average monthly regulation requirement.
  - ✓ The secondary y-axis shows the average movement-to-capacity ratio for each month.
- The bottom chart shows the average monthly prices.
  - ✓ The columns show the average monthly regulation capacity prices in the day-ahead market.
  - ✓ The two lines show the real-time capacity prices and movement prices.



# Day-Ahead Load Scheduling and Virtual Trading

- Slide [44](#) shows the quantity of day-ahead load scheduled as a percentage of real-time load in each of seven regions and statewide by day.
  - ✓ Net scheduled load = Physical Bilaterals + Fixed Load + Price-Capped Load + Virtual Load – Virtual Supply
- Slide [45](#) shows monthly average scheduled and unscheduled quantities and gross profitability for virtual trades in the past 24 months.
  - ✓ The table identifies virtual trades with relatively large profits or losses that exceed 50 percent of the average zone LBMP.
  - ✓ Large profits may indicate modeling inconsistencies between day-ahead and real-time markets, and large losses may indicate manipulation of the day-ahead market.
- Slide [46](#) summarizes virtual trading by region including average quantities of scheduled virtual supply and load and gross profitability for seven NY regions and four groups of external proxy buses.
  - ✓ The top portion of the chart also shows average day-ahead scheduled load (as a percent of real-time load) by geographic region.
  - ✓ Virtual imports/exports are included as they have similar effects on scheduling.
    - A transaction is deemed-“virtual” if its day-ahead schedule is greater than its real-time schedule.



# Efficiency of CTS Scheduling with PJM and NE

- Slide [48](#) evaluates the performance of CTS with PJM and NE at their primary interfaces in the quarter. The table shows:
  - ✓ The percent of quarter-hour intervals during which the interface flows were adjusted by CTS (relative to the estimated hourly schedule).
  - ✓ The average flow adjustment from the estimated hourly schedule.
  - ✓ The production cost savings that resulted from CTS, including:
    - Projected savings at scheduling time, which is the expected production cost savings at the time when RTC determines the interchange schedule.
    - Net over-projected savings, which is the portion of savings that was inaccurately projected because of PJM, NYISO, and ISO-NE price forecast errors.
    - Other Unrealized savings, which are not realized due to: a) real-time curtailment; and b) interface ramping.
    - Actual savings (= Projected – Over-projected – Other Unrealized).
  - ✓ Interface prices, which are forecasted prices at the time of RTC scheduling and actual real-time prices.
  - ✓ Price forecast errors, which show the average difference and the average absolute difference between actual and forecasted prices across the interfaces.





# RTC and RTD Price Difference vs Load Forecast Difference

- Slide [49](#) summarizes the RTC/RTD divergence metric results for detrimental factors in the second quarter of 2022.
  - ✓ See Section IV.D and Figure A-79 in the Appendix of our SOM 2021 report for detailed descriptions of the metric and chart.
- Slide [50](#) shows a histogram of the differences in systemwide load forecasts (including load biases by operators) between RTC and RTD at the quarter-hour intervals (i.e., at :00, :15, :30, :45) in the second quarter of 2022.
  - ✓ For each tranche of the histogram, the figure summarizes the accuracy of the RTC price by showing:
    - The average of the RTC LBMP minus the RTD LBMP;
    - The median of the RTC LBMP minus the RTD LBMP; and
    - The mean absolute difference between the RTD and RTC LBMPs.
  - ✓ LBMPs are shown as zonal-load-weighted prices at the quarter-hour intervals for both RTC and RTD.



# RTC and RTD Price Difference vs Load Forecast Difference

- Slide [51](#) shows these pricing and load forecasting differences by time of day.
  - ✓ The stacked bars in the lower portion of the figure show the frequency, direction, and magnitude of differences between RTC and RTD load forecast levels in tranches.
  - ✓ The upper portion of the figure summarizes the accuracy of the RTC price forecast by showing:
    - the average RTC LBMP minus the average RTD LBMP; and
    - the mean absolute difference between the RTD and RTC LBMPs.



# Real-Time System Price Maps at Generator Nodes

- Slides [53](#) and [54](#) show maps of real-time LBMPs at generator nodes across the entire NYISO system and in New York City specifically to illustrate congestion patterns in both areas.
  - ✓ Prices are load-weighted real-time hourly LBMPs.
  - ✓ Generators are marked as circles of various sizes and colors which are determined based on market outcomes:
    - Circle size is developed based on real-time generation from each generator across the quarter.
    - Colors are scaled based on the load-weighted real-time prices at each node.
    - However, both circle sizes and color scales are not necessarily the same at the same generator location in the system map and the NYC map. Because these are independently determined based on the set of generators analyzed in each map.
  - ✓ Natural gas prices for major indices and load-weighted external energy prices are also provided.
    - External LBMPs are not scaled to size in like manner as the generators.
    - Natural gas pipeline connections are given for the NYC price map to illustrate approximate gas delivery points to the city from three major pipelines.



# Transmission Congestion and Shortfalls

- Slides [55](#), [56](#), [57](#), and [58](#) evaluate the congestion patterns in the DAM and RTM and examine the following categories of resulting congestion costs:
  - ✓ Day-Ahead Congestion Revenues are collected by the NYISO when power is scheduled to flow across congested interfaces in the DAM, which is the primary funding source for TCC payments.
  - ✓ Day-Ahead Congestion Shortfalls occur when the net day-ahead congestion revenues are less than the payments to TCC holders.
    - Shortfalls (or surpluses) arise when the TCCs on a path exceed (or is below) its DAM transfer capability in periods of congestion.
    - These typically result from modeling differences between the TCC auction and the DAM, including assumptions related to PAR schedules, loop flows, and transmission outages.
  - ✓ Balancing Congestion Shortfalls arise when DAM scheduled flows over a constraint exceed what can flow over the constraint in the RTM.
    - The transfer capability of a constraint falls (or rises) from day-ahead to real-time for the similar reasons (e.g., deratings and outages of transmission facilities, inconsistent assumptions regarding PAR schedules and loop flows, etc.).
    - In addition, payments between the NYISO and PJM related to the M2M process also contribute to shortfalls (or surpluses).





## Transmission Congestion and Shortfalls (cont.)

- Slide [55](#) summarizes day-ahead congestion revenue and shortfalls, and balancing congestion shortfalls over the past two years on a monthly basis.
  - ✓ The upper portion of the figure shows balancing congestion revenue shortfalls, and the lower portion of the figure shows day-ahead congestion revenues collected by the NYISO and day-ahead congestion shortfalls. The sum of these two categories is equal to the total net payments to TCC holders in each month.
- Slide [56](#) examines in detail the value and frequency of day-ahead and real-time congestion along major transmission paths by quarter.
  - ✓ The value of transfers is equal to the marginal cost of relieving the constraint (i.e., shadow price) multiplied by the scheduled flow across the transmission path.
  - ✓ In the day-ahead market, the value of congestion equals the congestion revenue collected by the NYISO.
  - ✓ In the real-time market, the value of congestion does not equal the congestion revenue collected by the NYISO, since most real-time power flows settle at day-ahead prices rather than real-time prices.
- Slides [57](#) and [58](#) show the day-ahead and balancing congestion revenue shortfalls by transmission facility on a daily basis.
  - ✓ Negative values indicate day-ahead and balancing congestion surpluses.



## Transmission Congestion and Shortfalls (cont.)

- Congestion is evaluated along major transmission paths that include:
  - ✓ West Zone Lines: Primarily 230 kV transmission constraints in the West Zone.
  - ✓ West to Central: Including transmission constraints in the Central Zone and interfaces from West to Central.
  - ✓ North Zone: The Moses-South interface and other lines in the North Zone and leading into Southern New York.
  - ✓ Central to East: The Central-East interface and other lines transferring power from the Central Zone to Eastern New York.
  - ✓ Capital to Hudson Valley: Primarily lines leading into SENY (e.g., the New Scotland-Leeds line, the Leeds-Pleasant Valley line, etc.)
  - ✓ NYC Lines: Including lines into and within the NYC 345 kV system, lines leading into and within NYC load pockets, and groups of lines into NYC load pockets that are modeled as interface constraints.
  - ✓ Long Island: Lines leading into and within Long Island.
  - ✓ External Interfaces – Congestion related to the total transmission limits or ramp limits of the external interfaces.
  - ✓ All Other – All of other line constraints and interfaces.



# NY-NJ PAR Operation Under M2M with PJM

- Slide [48](#) evaluates operations of NY-NJ PARs under M2M with PJM during the following periods of noticeable congestion differential between NY and PJM:
  - ✓ When NY costs on relevant M2M constraints exceed PJM costs by: a) \$10/MWh to \$20/MWh; b) \$20/MWh to \$30/MWh; or c) more than \$30/MWh.
  - ✓ When PJM costs on relevant M2M constraints exceed NY costs by: a) \$10/MWh to \$20/MWh; b) \$20/MWh to \$30/MWh; or c) more than \$30/MWh;
  - ✓ The market cost is measured as the constraint shadow price multiplied by the PAR shift factor, summed over relevant M2M constraints in each 5-minute market interval and then averaged over each half-hour period.
  - ✓ The top portion of the figure shows two stacked bars for each evaluation group, representing the total number of 30-minute intervals with and without any PAR tap movements.
  - ✓ The bottom portion of the figure shows average actual PAR flows (blue bar), compared with their average M2M targets (red diamond).



# OOM Actions to Manage Network Reliability

- Transmission constraints on the 115 kV and lower voltage networks in New York are often resolved in ways that include:
  - ✓ Out of merit dispatch and supplemental commitment of generation;
  - ✓ Curtailment of external transactions and limitations on external interface limits;
  - ✓ Use of an internal interface transfer limit that functions as a proxy for the limiting transmission facility; and
  - ✓ Adjusting PAR-controlled lines on the high voltage network.
- Slide [60](#) shows the number of days in the quarter when various resources were used to manage constraints in five areas of upstate New York:
  - ✓ West Zone;
  - ✓ Central Zone;
  - ✓ Capital Zone;
  - ✓ North & Mohawk Valley Zones; and
  - ✓ Long Island (mostly constraints on the 69kV system).
- In addition, the figure also reports the number of days when OOM commitments were made to satisfy N-1-1 reserve needs in several local load pockets.





# Constraints on the Low Voltage Network

- Slide [61](#) shows the number of hours and days in the quarter when various resources were used to manage 69 kV (“69 kV OOM”) and TVR (“Transient Voltage Recovery”) constraints in four local areas of Long Island:
  - ✓ Valley Stream: Mostly constraints around the Valley Stream bus;
  - ✓ Brentwood: Mostly constraints around the Brentwood bus;
  - ✓ East of Northport: Mostly the C.\_ISLIP-Hauppauge and the Elwood-Deposit circuits;
  - ✓ East End: Mostly the constraints around the Riverhead bus and the TVR requirement.
  - ✓ For a comparison, the tables also show the frequency of congestion management on the 69 kV and 138 kV constraints via the market model.
- Slide [61](#) also shows our estimated LBMP impacts in each LI load pocket that result from explicitly modeling 69 kV and TVR constraints in the market software.
  - ✓ The following generator locations are chosen to represent each load pocket:
    - Barrett ST for the Valley Stream pocket;
    - NYPA Brentwood GT for the Brentwood pocket;
    - Holtsville IC for the East of Northport pocket; and
    - Green Port GT for the East End pocket.



## N-1 Constraints in New York City

- The NYISO sometimes operates a facility above its Long-Term Emergency (“LTE”) rating if post-contingency actions (e.g., deployment of operating reserves) would be available to quickly reduce flows to LTE.
  - ✓ The use of post-contingency actions is important because it allows the NYISO to increase flows into load centers and reduce congestion costs.
  - ✓ However, the service provided by these actions are not properly compensated.
- Slide [62](#) shows such select N-1 constraints in New York City. In the figure,
  - ✓ The left panel summarizes their DA and RT congestion values in the quarter.
    - The blue bars represent the congestion values measured up to the seasonal LTE ratings of the facilities (i.e., constraint shadow cost\*seasonal LTE summed over all intervals); and
    - The red bars represent the congestion values measured for the additional transfer capability above LTE (i.e., constraint shadow cost\*(modeled constraint limit – seasonal LTE) summed over all intervals).
  - ✓ The bars in the right panel show the seasonal LTE and STE ratings for these facilities, compared to the average N-1 constraint limits used in the market software.



# Duct Burner RPU Performance and Real-Time Availability

- Slide [63](#) shows a case study of real-time performance of a combined-cycle unit that failed to follow 5-minute instructions during an RPU event due to its inability to fire the duct burner within 10-minutes.
  - ✓ The two lines show the levels where resource capacity shifts from baseload without duct burners (gray line) to the duct burner range (red line). Capacity values are not given for confidentiality purposes.
  - ✓ The blue columns show the actual output produced by the resource in each RTD and RTD-CAM interval. The black dotted line shows the 5-minute instructions by the market model.
  - ✓ A faded box highlights the RPU timeframe and the red-patterned area between the columns and the instructed output line outlines the duct burner output that was not delivered by the station.
- Slide [64](#) shows quarterly average real-time duct burner data across all applicable units during this quarter on an hourly basis.
  - ✓ The two charts on the left side show the amount of duct burner capacity scheduled or made available for scheduling within the timeframes that are unlikely deliverable for energy and reserves. These values show: (a) the average amount of MWs scheduled to provide 10-minute spinning reserves and regulation services; and (b) the amount of 5-minute up-ramping capability assumed to be available by duct burners.
  - ✓ The two charts on the right side show capacity that was not made available in offers for either energy and/or reserves from units with duct burners, including: (a) the average amount of duct burner capacity unavailable in real-time because of no offer in this range or non-dispatchable due to inflexible self-schedule level; and (b) the average amount of baseload capacity that was available but not offered for reserves in real-time because the units were disqualified from offering reserves.





## GT Start-up Performance

- Slides [65-66](#) show the results of the NYISO's auditing process for 10- and 30-minute GTs in the past 12-month period, compared to performance measured for economic GT starts by the market model (including starts by RTC, RTD, and RTD-CAM) in the same period. In each table,
  - ✓ The performance is measured as the GT output at 10 or 30 minutes after receiving a start-up instruction as a percent of its UOL.
  - ✓ The rows show the number of units with an average performance in the quarter that falls in each performance range from 0 to 100% with a 10% increment.
    - The left hand side of the table shows these numbers based on performance measured during economic starts;
    - While the right hand side of the table shows numbers based on audit results.
    - The units that are in service but were never started by RTC, RTD, or RTD-CAM in the examined period are placed in a separate category of “Not Evaluated”, which also includes units that we could not assess their performance reliably because of data issues.
  - ✓ An example read of the table (slide [65](#)): “26 10-minute GTs exhibited a response rate of 90 to 100 percent during economic starts in the examined period, 26 of them were audited 56 times in total with 2 failures”.





# Supplemental Commitments and OOM Dispatch

- Slides [68](#), [69](#), and [70](#) summarize out-of-market commitment and dispatch, which are the primary sources of guarantee payment uplift.
- Slide [68](#) shows the quantities of reliability commitment by region in the following categories on a monthly basis:
  - ✓ Day-Ahead Reliability Units (“DARU”) Commitment – occurs before the economic commitment in the DAM at the request of local TO or for NYISO reliability;
  - ✓ Day-Ahead Local Reliability (“LRR”) Commitment – occurs in the economic commitment in the DAM for TO reliability in NYC;
  - ✓ Supplemental Resource Evaluation (“SRE”) Commitment – occurs after the DAM;
  - ✓ Forecast Pass Commitment – occurs after the economic commitment in the DAM.
- Slide [69](#) examines the reasons for reliability commitments in NYC where most reliability commitments occur.
  - ✓ Based on a review of operator logs and LRR constraint information (where a unit is considered to be committed for a LRR constraint if the constraint would be violated without the unit’s capacity), each NYC commitment (flagged as DARU, LRR, or SRE) was categorized for one of the following reasons:



# Supplemental Commitments and OOM Dispatch (cont.)

- NOx Only – If needed for NOx bubble requirement and no other reason.
  - Voltage – If needed for ARR 26 and no other reason.
  - Thermal – If needed for ARR 37 and no other reason.
  - Loss of Gas – If needed for IR-3, a sudden loss of gas supply in NY, and no other reason except NOx.
  - Multiple Reasons – If needed for two or three of the following reasons: voltage support, thermal support, NOx, or loss of gas. The capacity is shown multiple times for each separate reason in the bar chart.
- ✓ For voltage and thermal constraints, the capacity is shown by the load pocket that was secured.
  - Slide [70](#) summarizes the frequency (measured by the total station-hours) of Out-of-Merit dispatches by region on a monthly basis.
    - ✓ The figure excludes OOMs that prevent a generator from being started, since these usually indicate transmission outages that make the generator unavailable.
    - ✓ In each region, “Station #1” is the station with the highest number of OOM hours in its region in the current quarter; “Station #2” is the station with the second-highest number of OOM hours; all other stations are grouped together.



## Supply Margin in NYC Load Pockets After Removing NO<sub>x</sub>-only Committed ST and GT in the NO<sub>x</sub> Bubble

- Steam units in New York City are often LRR-committed solely to satisfy the NO<sub>x</sub> Bubble requirement in the Ozone season.
  - ✓ On many of these days, even if both the committed ST and its supported GTs were unavailable, all N-1-1 criteria could be satisfied by other resources.
    - This questions the necessity of such commitments in each day of the Ozone season.
- Slide [71](#) shows our evaluation of the necessity in the quarter.
  - ✓ The figure shows the daily minimum supply margin in the relevant load pockets after the removal of the NO<sub>x</sub>-committed STs and their supported GTs in the NO<sub>x</sub> Bubble.
  - ✓ The evaluation is done on days when the ST is NO<sub>x</sub>-only committed in the day-ahead market.
  - ✓ A positive minimum supply margin indicates that both the ST and associated GTs were not needed to satisfy any N-1-1 criteria in the load pocket.





# Uplift Costs from Guarantee Payments

- Slides [72](#) and [73](#) show uplift charges in the following seven categories.
  - ✓ Three categories of non-local reliability uplift are allocated to all LSEs:
    - Day Ahead: For units committed in the DAM (usually economically) whose day-ahead market revenues do not cover their as-offered costs.
    - Real Time: Typically for quick-start resources that are scheduled economically, or units committed or dispatched OOM for bulk system reliability whose real-time market revenues do not cover their as-offered costs.
    - Day Ahead Margin Assurance Payment (“DAMAP”): For generators that incur losses because they are dispatched below their day-ahead schedule when the real-time LBMP is higher than the day-ahead LBMP.
  - ✓ Four categories of local reliability uplift are allocated to the local TO:
    - Day Ahead: From Local Reliability Requirements (“LRR”) and Day-Ahead Reliability Unit (“DARU”) commitments.
    - Real Time: From Supplemental Resource Evaluation (“SRE”) commitments and Out-of-Merit (“OOM”) dispatched units for local reliability.
    - Minimum Oil Burn Program: Covers spread between oil and gas prices when generators burn oil to satisfy NYC gas pipeline contingency reliability criteria.
    - DAMAP: For units that are dispatched OOM for local reliability reasons.
  - ✓ Slide [72](#) shows these seven categories on a daily basis during the quarter.
  - ✓ Slide [73](#) summarizes uplift costs by region on a monthly basis.





# Potential Economic and Physical Withholding

- Slides [75](#) and [76](#) show the results of our screens for attempts to exercise market power, which may include economic and physical withholding.
- The screen for potential economic withholding is the Output Gap, which is the amount of economic capacity that does not produce energy because a supplier submits an offer price above the unit's reference level by a substantial threshold.
  - ✓ We show output gap in NYCA and East NY, based on:
    - The state-wide mitigation threshold (the lower of \$100/MWh and 300 percent); and
    - Two other lower thresholds (100 percent and 25 percent).
- The screen for potential physical withholding is the Unoffered Economic Capacity, which is the amount of economic capacity that is not available to the market because a supplier does not offer, claims a derating, or offers in an inflexible way.
  - ✓ We show the unoffered economic capacity in NYCA and East NY, from:
    - Long-term outages/deratings (at least 7 days);
    - Short-term outages/deratings (less than 7 days);
    - Online capacity that is not offered or offered inflexibly; and
    - Offline GT capacity that is not offered in the real-time market.
  - ✓ Long-term nuclear outages/deratings are excluded from this analysis.



# Automated Market Power Mitigation

- Slide [77](#) summarizes the automated mitigation that was imposed in the day-ahead and real-time markets (not including BPCG mitigation) in the quarter.
  - ✓ The bars in the upper panel shows the percent of hours when incremental energy offer mitigation was imposed on one or more units in each category.
  - ✓ The bars in the lower panel shows the average mitigated capacity.
    - Mitigated quantities are shown separately for flexible output range of units (i.e., Incremental Energy) and the non-flexible portion (i.e., MinGen).
  - ✓ The left portion shows the amount of mitigation by the Automated Mitigation Procedure (“AMP”) on economically committed units in NYC load pockets.
  - ✓ The right portion shows the amount of mitigation on the units committed for reliability in New York City, Long Island, and the upstate area.
  - ✓ Mitigation of gas turbine capacity is shown in the Incremental Energy category whenever the incremental energy offer or the startup offer is mitigated.



# Spot Capacity Market Results

- Slides [79](#) and [80](#) summarize market results and key drivers in the monthly spot capacity auctions.
  - ✓ Slide [79](#) summarizes available and scheduled Unforced Capacity (“UCAP”), UCAP requirements, and spot prices that occurred in each capacity zone by month.
    - Sales associated with Unforced Deliverability Rights (“UDRs”) are included in “Internal Capacity,” but unsold capacity from resources with UDRs is not shown.
  - ✓ Slide [80](#) compares the year-over-year changes in capacity spot prices by Locality and shows variations in key factors that drove these changes, including:
    - The changes in the UCAP requirements, which are affected by changes in the forecasted peak load, the minimum capacity requirement, and the derating factors;
    - The changes in the UCAP supply, which are affected by changes in new entry, mothballing and retirement, and DMNC test values; and
    - The changes in the demand curves, which are mostly affected by the assumptions used in each demand curve reset process.
      - The most recent reset was done for the Capability Periods from 2021 to 2025.