### POTOMAC ECONOMICS

## IMM Quarterly Report: Fall 2025

Presented to:

Markets Committee of the Board of Directors

Carrie Milton
Potomac Economics

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#### **Fall Summary**

- MISO's markets performed competitively and mitigation was infrequent
- Energy prices rose 44 percent compared to last fall as gas prices rose between 53 and 56 percent and average load rose 2 percent
  - Shortage pricing rose significantly MISO experienced operating reserve shortages on 7 days, including one event lasting 40 minutes in September
- Day-ahead congestion rose 38 percent, while real-time congestion rose
   52 percent consistent with rising gas prices
  - Average hourly wind output fell 8 percent, and curtailments were down 41 percent year over year because of shifting weather patterns
  - Drought conditions in Canada led MISO to export to Manitoba on average, and flows across the RDT were generally in the South to North direction
- Real-time RSG more than doubled over last year
  - More than half was attributable to a long-lead time unit repeatedly committed in MISO South as indicated by a transmission outage study
  - It may be advisable to validate the study results in operations to ensure such commitments are efficient and necessary

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#### **Quarterly Summary**

Fall			Chan	ige <sup>1</sup>				Chan	ge <sup>1</sup>
		_	Prior	Prior			_	Prior	Prior
		Value	Qtr.	Year			Value	Qtr.	Year
RT Energy Prices (\$/MWh)	•	\$39.20	-19%	44%	FTR Funding (%)	•	99%	101%	100%
Fuel Prices (\$/MMBtu)					Wind Output (MW/hr)		10,739	55%	-8%
Natural Gas - Chicago		\$3.00	9%	56%	Wind Curtailed (MW/hr)		460	146%	-41%
Natural Gas - Henry Hub		\$3.27	8%	53%	Guarantee Payments (\$M) <sup>4</sup>				
Western Coal	•	\$0.84	4%	5%	Real-Time RSG	•	\$10.1	2%	161%
Eastern Coal	•	\$2.08	4%	20%	Day-Ahead RSG	•	\$9.7	5%	42%
Load (GW) <sup>2</sup>					Day-Ahead Margin Assurance	•	\$16.0	11%	25%
Average Load		73.6	-16%	2%	Real-Time Offer Rev. Sufficiency	•	\$1.3	113%	45%
Peak Load	•	106.3	-13%	0%	Price Convergence <sup>5</sup>				
% Scheduled DA (Peak Hour)		100.2%	99.2%	101.6%	Market-wide DA Premium	•	-0.2%	-0.7%	0.4%
Transmission Congestion (\$M)					Virtual Trading				
Real-Time Congestion Value		\$597.2	43%	52%	Cleared Quantity (MW/hr)	•	25,222	22%	10%
Day-Ahead Congestion Revenue		\$452.3	56%	38%	% Price Insensitive	•	58%	57%	49%
Balancing Congestion Revenue <sup>3</sup>		-\$43.5	-\$41.1	-\$8.6	% Screened for Review	•	3%	2%	2%
Ancillary Service Prices (\$/MWh)					Profitability (\$/MW)	•	\$0.7	\$0.3	\$0.4
Regulation	•	\$22.15	28%	53%	Dispatch of Peaking Units (MW/hr)		1,825	3,999	1,684
Spinning Reserves		\$3.53	4%	31%	Output Gap- Low Thresh. (MW/hr)	•	71	59	33
Supplemental Reserves	•	\$2.08	-18%	178%					
Short-Term Reserves	•	\$0.24	-87%	22%					

Key:

Expected

Monitor/Discuss

Concern

- Notes: 1. Values not in italics are the values for the past period rather than the change.
  - 2. Comparisons adjusted for any change in membership.
  - 3. Net real-time congestion collection, unadjusted for M2M settlements.
  - 4. Includes effects of market power mitigation.
  - 5. Values include allocation of RSG.

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#### **Quarterly Highlights: Fall 2025**

Net Load Ramp Challenges and Reserve Shortages (Slides 17-18)

- Net load ramp challenges continue to rise as solar penetration grows
  - Solar capacity grew 47 percent from last fall, increasing the average net load demand from 3 to 7 pm to almost 12 GW, up from 7 GW last fall
  - This doubled the contingency reserve shortages this fall, mainly from 5 7 pm
- One 40-minute contingency reserve shortage occurred on September 25 when prices averaged \$3150 per MWh
  - Changes in dynamic STR requirements could mitigate such shortages because they would lead to more resource commitments and imports
  - We analyzed the impacts of raising the STR requirements to be no lower than would be needed to replace its reserves after the largest contingency
    - We reran commitment and dispatch engines with this floor on the requirement
    - LAC would have recommended more than 1200 MW of commitments
    - This additional supply would have lowered the duration and magnitude of shortage pricing during this event by 50 percent
    - The effects would have been larger had imports responded sooner
  - We recommend MISO establish a floor on the dynamic STR requirement

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#### **Quarterly Highlights: Fall 2025**

Congestion-Related Issues (Slides 20, 23, and 26)

- Congestion patterns changed this fall compared to last year because of:
  - Fewer imports from Manitoba Hydro due to drought conditions in Canada
  - An 8 percent reduction in average hourly wind output average hourly curtailments were down more than 40 percent
  - These changes led to higher relative prices in the North this fall, compared to last fall, when prices in the North were lower than the system average prices
- Congestion was substantially inflated this fall by a number of factors:
  - 1. The TOs in the North switch from summer to winter ratings as late as Dec. 1
    - One constraint generated \$63 million in congestion from Oct. 1 until its rating was increased on Dec. 1 – Switching to a winter rating earlier (or otherwise adjusting for temperature) would have virtually eliminated this congestion
  - 2. Using Ambient Adjusted Ratings (AARs) and emergency ratings in real time would substantially reduce MISO's congestion (by \$96 million this fall)
    - MISO can accept real-time AARs in multiple ways today, yet less than 20 percent of binding constraints are adjusted for temperature

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#### **Quarterly Highlights: Fall 2025**

MISO South Transmission Emergency mid-September (Slide 22)

- On September 16, a major 500 kV transmission element was forced out of service, overloading 2 constraints and causing \$12 million in congestion
- MISO's operators declared a Transmission Emergency and took multiple actions in quick succession to avoid firm load shed, including:
  - Raised the top of the TCDC for the impacted constraints to \$8000 per MWh
  - Dispatched two units into their offered emergency ranges
  - Started 700 MW of generation to manage the constraints, including issuing early starts to multiple units that had day-ahead commitments
  - Manually re-dispatched (MRD) a nuclear unit and three other large units that continued long after the line's return and produced \$800,000 in DAMAP
- Key takeaways from the event
  - Operators' swift actions were key for preventing firm load shed and improved communications helped ensure units responded into their emergency ranges
  - The MRDs produced quick responses initially, but using improved TCDCs would substantially lower costs and better manage the violated constraints
  - We found a software issue that led to reserve shortages with no fix available.

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#### **Quarterly Highlights: Fall 2025**

Software Error and Market Re-pricing on TLR Constraints (Slide 24)

- In September, we identified an issue related to the TLR process, and MISO found that it affected TLR limits in the market for 8 days
  - MISO repriced the market under its Continuing Error provisions in 19 hours
- Effects on Oct. 9 were large as forced outages compounded the TLR error
  - 6 GW of wind was curtailed because of the TLR modeling error in hour 12
  - Forced outages of a nuclear and coal steam unit (1400 MW) in the South in the same hour led to high prices and prompted a large increase in imports
  - We collaborated with MISO using our market simulation system to determine appropriate pricing for this hour and other affected periods
  - However, re-pricing issues that affect the dispatch prices, and settlements throughout MISO is harmful to the integrity of the market
- We recommend MISO:
  - 1. Mitigate re-settlement harm by limiting market repricing to localized errors
  - 2. When repricing is warranted, employ reruns of the market software to produce accurate prices



#### **Quarterly Summary of IMM Investigations**

- We conducted multiple audits and investigations this quarter, including:
  - Four units for physical withholding and two units for overproduction
  - Two units for a potential Tariff violation related to inaccurate values in offers
  - Inaccurate generation testing data (GVTC)
  - Multiple wind and solar units failing to follow curtailment instructions
- We recommended MISO implement two sanctions for overproduction
- We continued to investigate past DR conduct, including:
  - Enrolled LMR capacity that reflect demand not included in the capacity requirements, a portion of which never existed at all
  - DRR failing to curtail when deployed for Contingency Reserve Deployments
- We have been investigating resource performance during emergencies
  - This has raised concerns that some resources have been over-accredited because their ability to perform during emergencies is overstated
  - We believe penalties comparable to proposed LMR penalties are needed

#### **Submittals to External Entities and Other Issues**

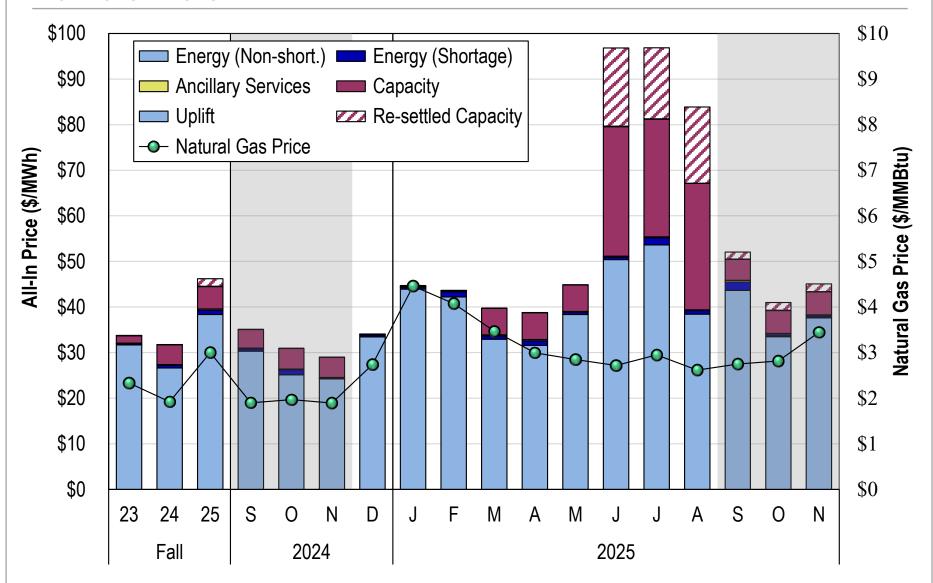
- During the Fall Quarter, we:
  - Responded to several FERC questions related to prior referrals and FERC investigations and responded to requests for information on market issues
  - Met with MISO on the Futures assumptions and provided feedback on the base case and sensitivity cases
- We continued to work with MISO to develop proposed new rules for determining firm flow entitlements for market-to-market settlements
- MISO implemented its Uninstructed Deviation Enhancement (UDE) flag in August to notify renewables they are flowing on binding constraints
  - Results have been mixed because of forecast errors, the low thresholds for sending the flag, and the lack of settlement incentives to follow dispatch
  - MISO is working to improve forecasting and maintaining higher thresholds
  - We are working with MISO to develop critical settlement penalties to provide efficient incentives to respond to the flag – planned implementation in Q2 2026
- NERC has released its 2025-2026 Winter Assessment and determined MISO is a normal risk, meaning no anticipated reserve shortages



# **Quarterly Market Results:** Fall 2025

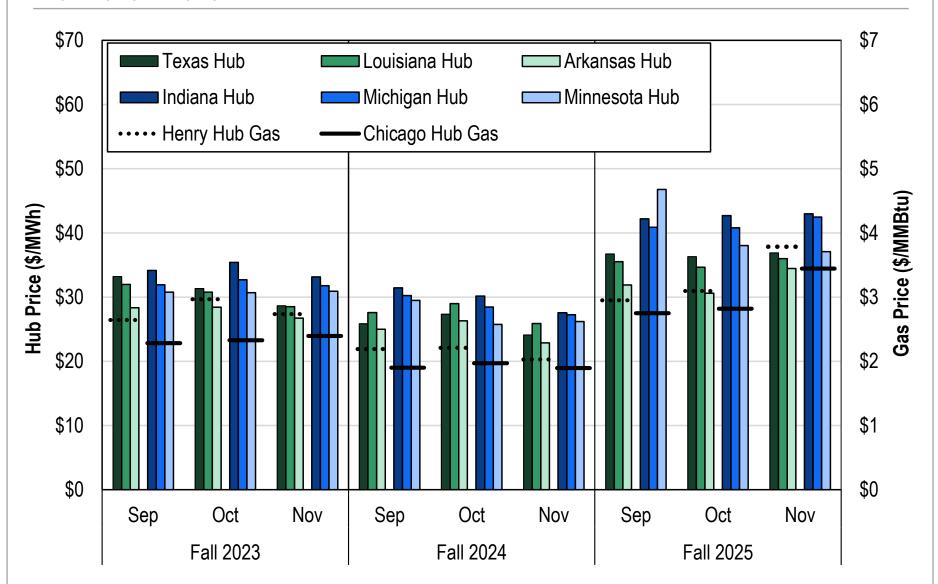
#### **All-In Price**

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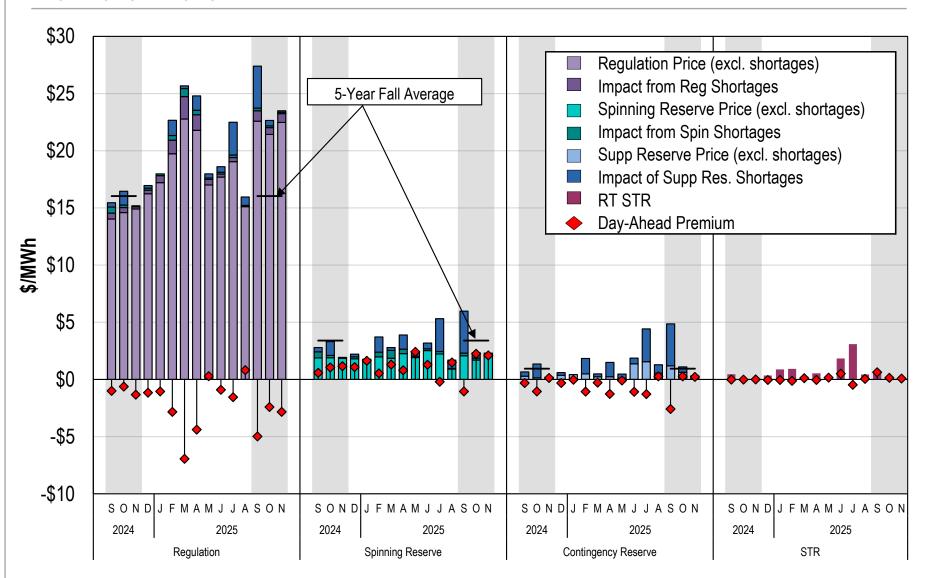
#### **Day-Ahead Average Monthly Hub Prices**

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#### **Ancillary Services Prices**

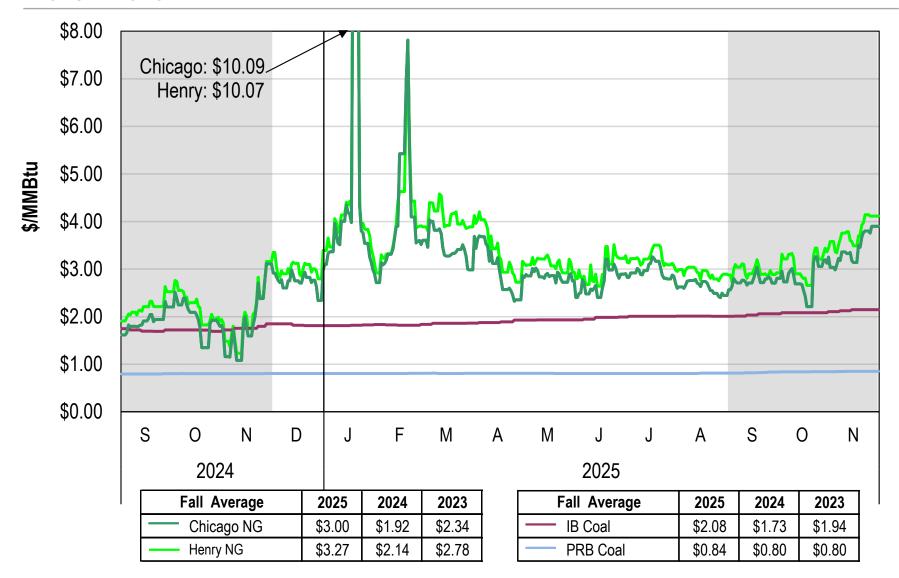
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#### **MISO Fuel Prices**

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2023 - 2025



#### **Capacity, Energy and Price Setting Share**

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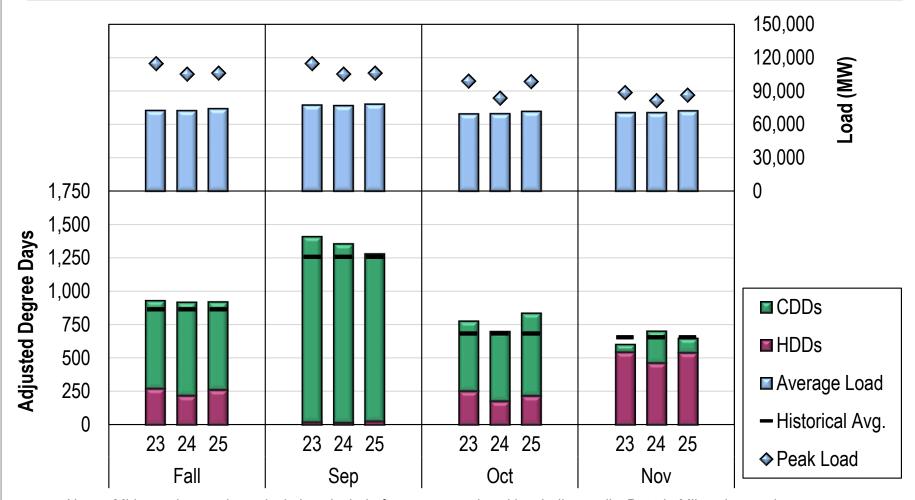
	Unforced Capacity					Output	Price Setting				
Fall	Total (	MW)	Share (%)		Share (%)		SMP (%)		LMP (%)		
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	
Nuclear	11,229	11,404	9%	8%	15%	14%	0%	0%	0%	0%	
Coal	37,862	37,007	30%	27%	26%	28%	36%	21%	78%	59%	
<b>Natural Gas</b>	61,177	62,700	48%	46%	37%	37%	62%	75%	89%	92%	
Oil	1,333	1,266	1%	1%	0%	0%	0%	0%	0%	0%	
Hydro	3,735	3,571	3%	3%	1%	1%	1%	0%	2%	2%	
Wind*	5,150	10,054	4%	7%	17%	15%	1%	1%	72%	66%	
Solar	5,793	8,566	5%	6%	3%	5%	0%	0%	6%	21%	
Other	Other 1,934 2,475 2%		2%	2%	1% 1%		0%	2%	1%	6%	
Total	128,212	137,043									

<sup>\*</sup> The seasonal wind ELCC rose from 15.6% in Fall 2024 to 30.7% in Fall 2025.

#### **Load and Weather Patterns**

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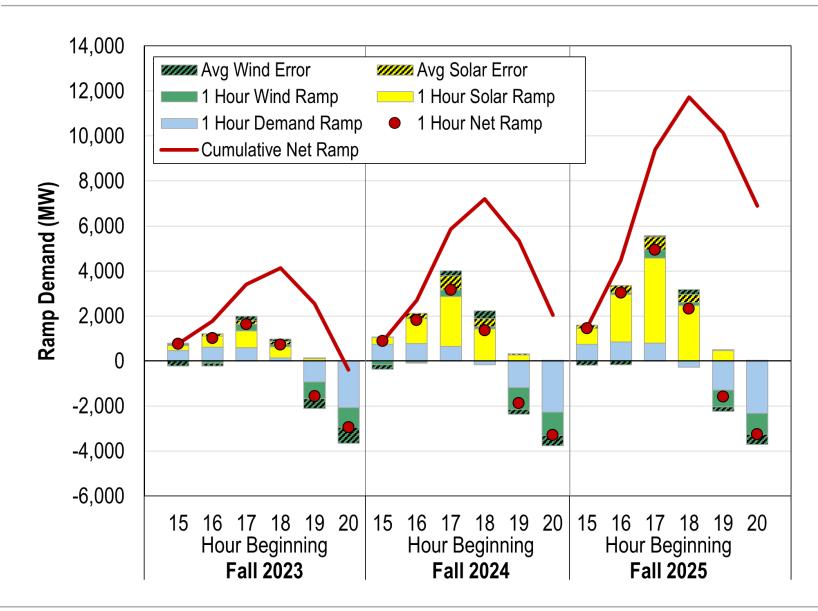
Fall 2023 – 2025



<u>Notes</u>: Midwest degree day calculations include four reprsentative cities: Indianapolis, Detroit, Milwaukee and Minneapolis. The South region includes Little Rock and New Orleans.

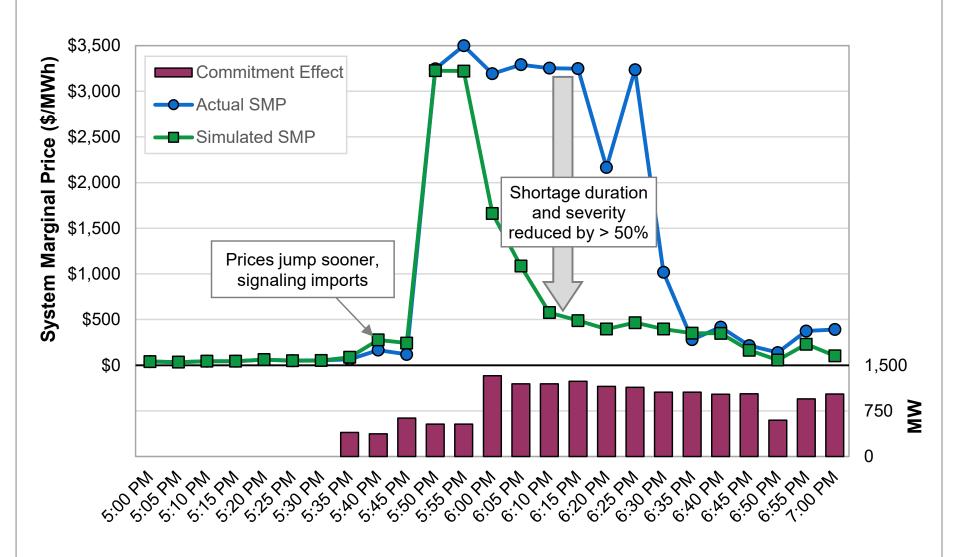


#### **Evening Hours Net Load Ramp**



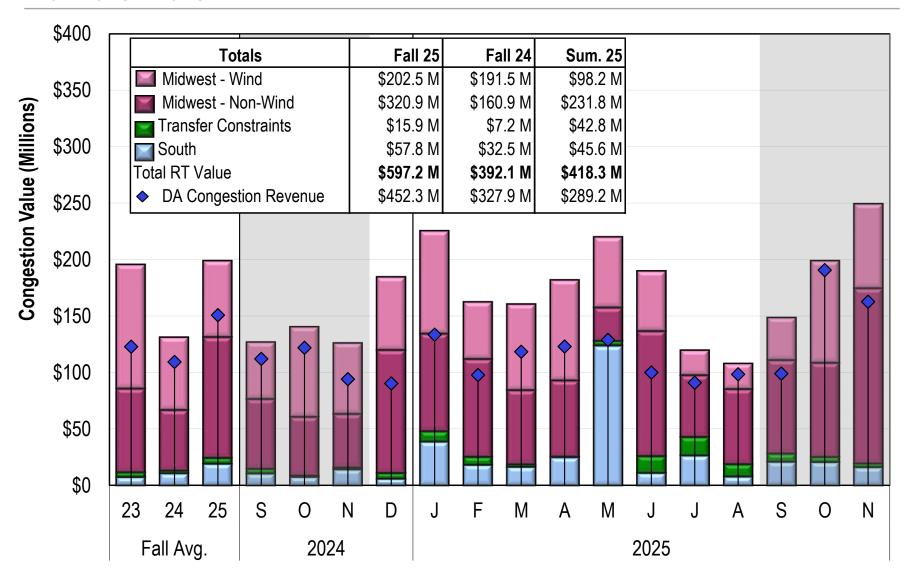


#### **September 25 Extended Operating Reserve Shortage**



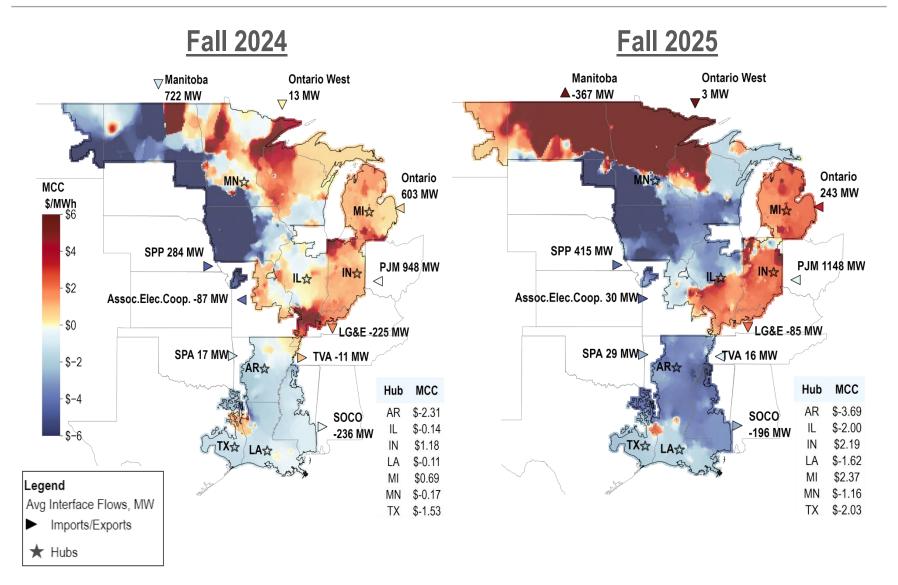
#### **Value of Real-Time Congestion**

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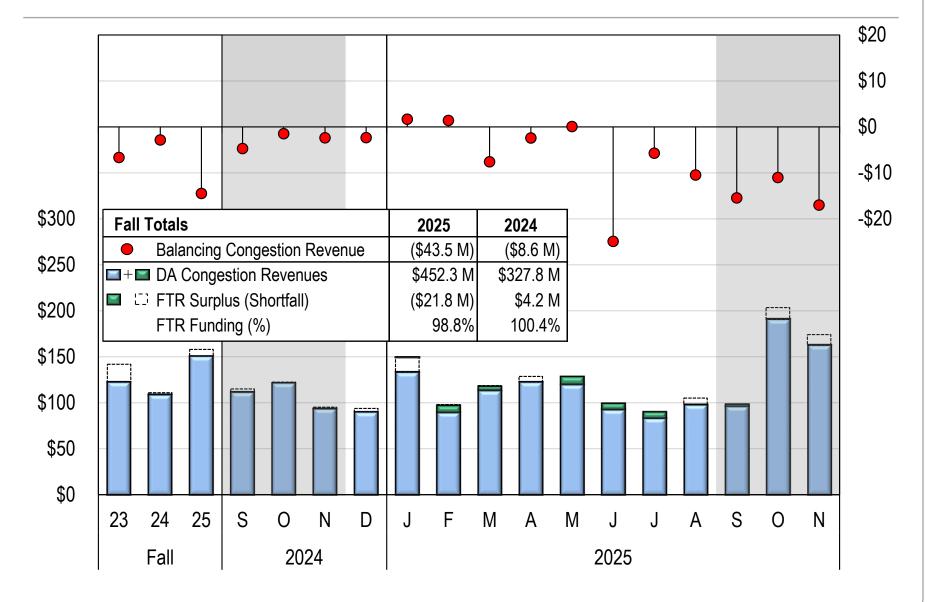
#### **Average Real-Time Congestion Components**

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#### Day-Ahead and Balancing Congestion and FTR Funding **ECONOMI**



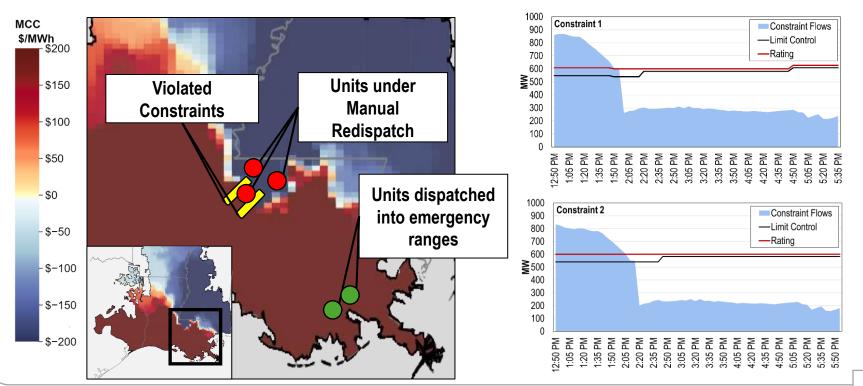


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### Local Transmission Emergency (LTE) on September 16 ECONOMICS

#### Management of LTE in the South

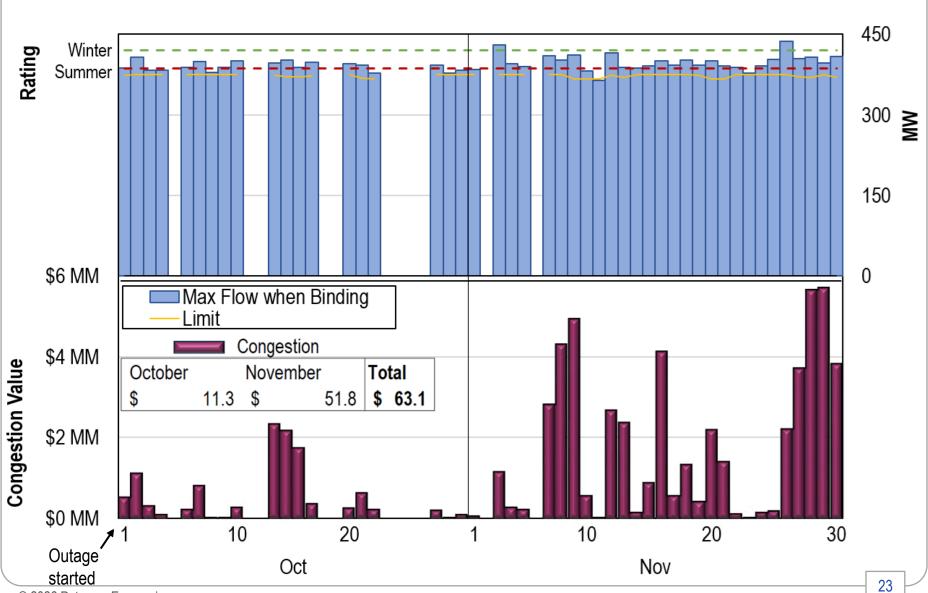
- MISO declared an LTE on Sept. 16 when a 500 kV forced line outage caused severe violations on two constraints – MISO took quick actions to avoid load shed
- Units with opposite effects on the constraints were manually dispatched to balance the violations on the two constraints, causing nearly \$800,000 in DAMAP
  - Recommended changes in constraint demand curves would allow the market dispatch to balance these violations, lowering costs and eliminating the DAMAP



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#### **Daily Congestion on Outage-Impacted Constraint**

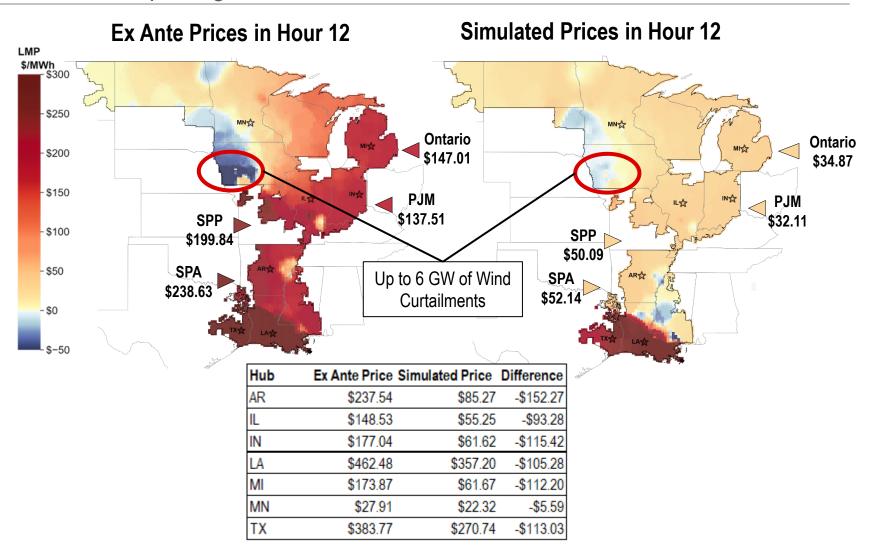
Effects of Switching to Winter Ratings



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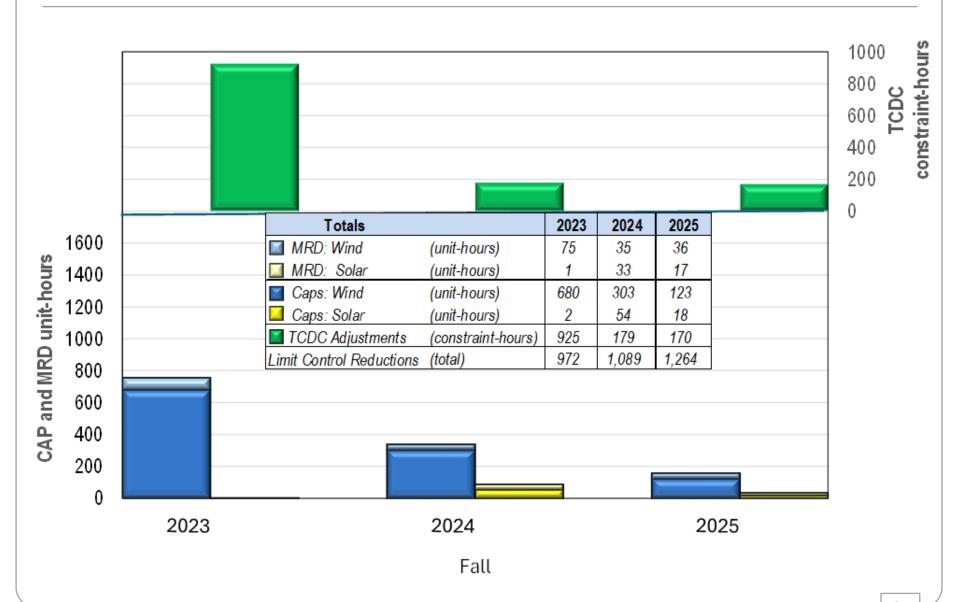
#### **Continuing Error for TLR Constraints**

October 9 Re-pricing Results



#### **MISO Operator Actions for Congestion Management**

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#### Benefits of Ambient-Adjusted and Emergency Ratings

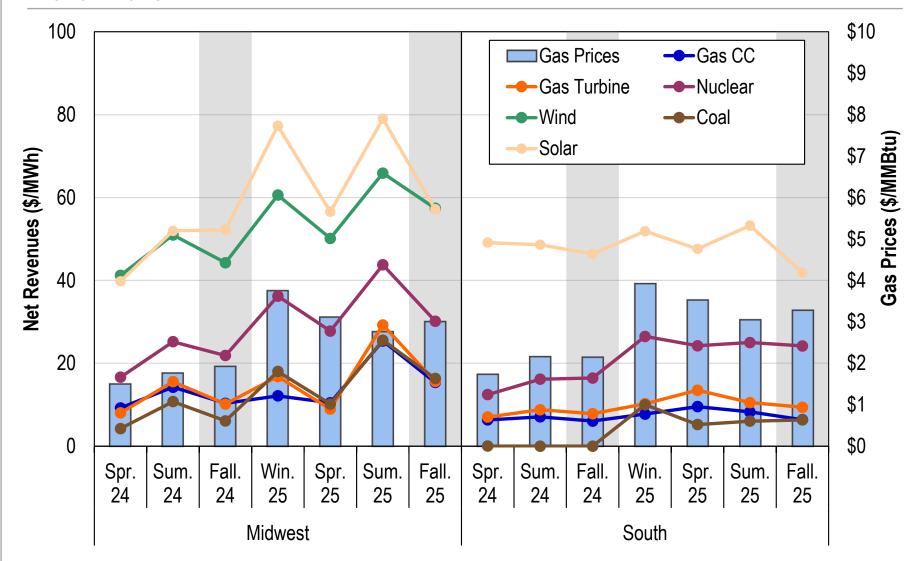
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		Sav	ings (\$ Millions	— # .f.F!!!			
Fall		Ambient Adj. Ratings	Emergency Total Ratings		<ul><li># of Facilites</li><li>for 2/3</li><li>of Savings</li></ul>	Share of Congestion	
2024	Midwest	\$27.2	\$25.04	\$52.3	17	12.6%	
	South	\$0.7	\$0.87	\$1.6	3	4.2%	
	Total	\$27.9	\$25.9	\$53.8	20	11.9%	
2025	Midwest	\$71.0	\$21.79	\$92.8	15	17.0%	
	South	\$1.4	\$1.62	\$3.0	3	5.0%	
	Total	\$72.4	\$23.4	\$95.8	18	15.8%	

#### **Net Revenues by Technology**

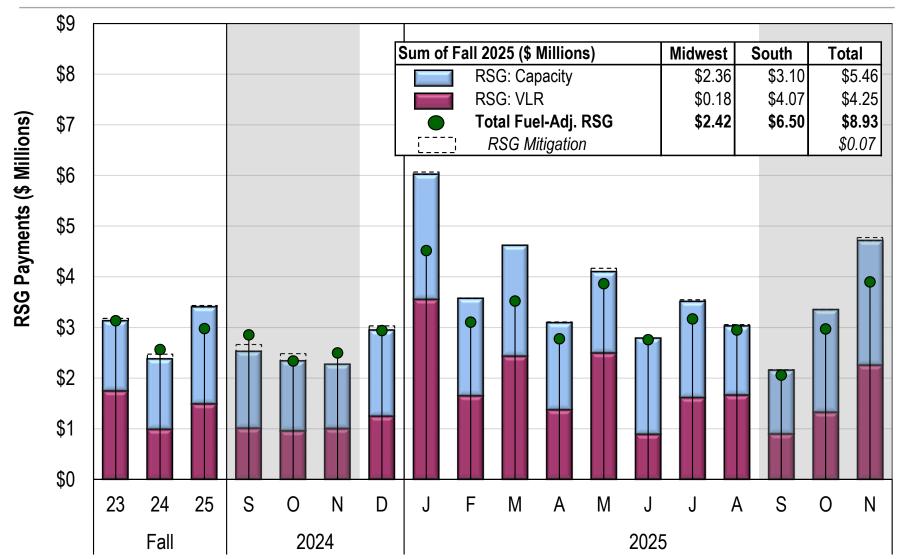
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2023 - 2025



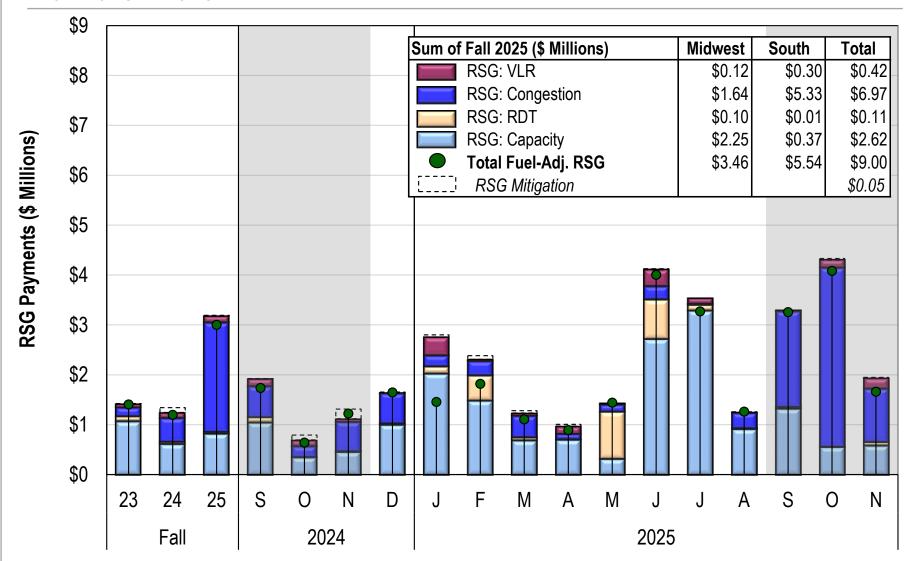
#### **Day-Ahead RSG Payments**

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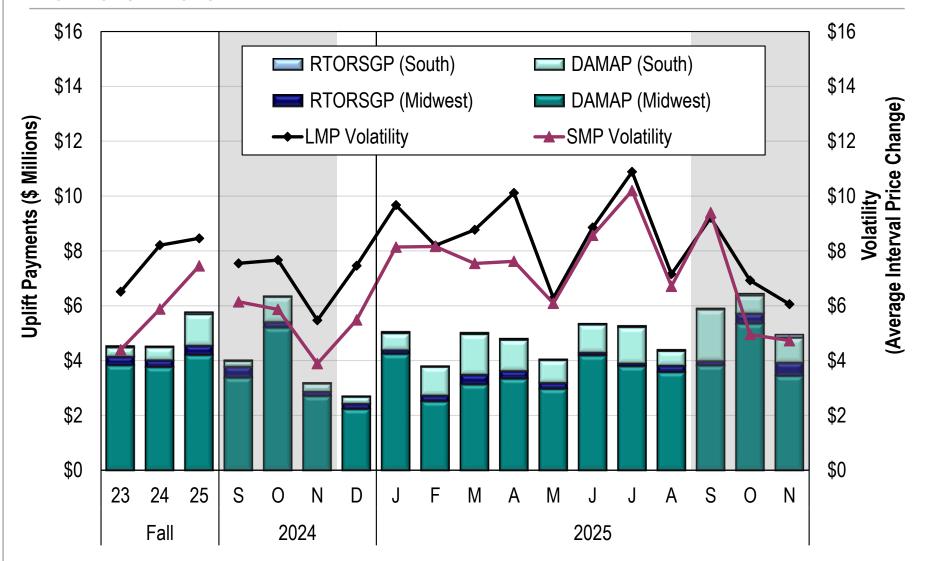
#### **Real-Time RSG Payments**

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#### **Price Volatility Make Whole Payments**

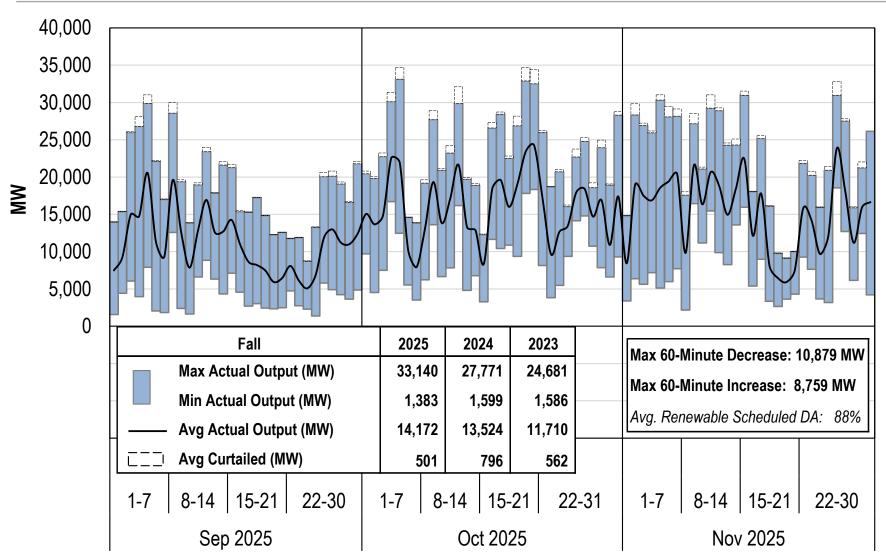
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#### Wind and Solar Output in Real Time

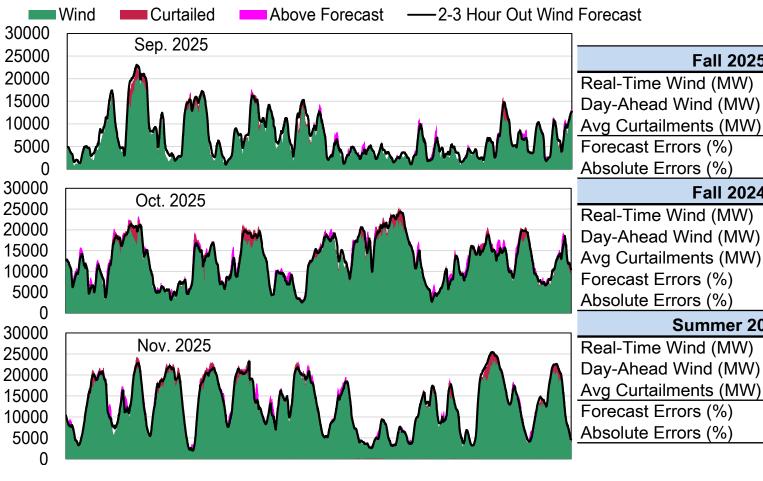


Daily Range and Average



#### Wind Forecast and Actual Output

Fall 2025



Fall 2025	
Real-Time Wind (MW)	10,739
Day-Ahead Wind (MW)	9,348
Avg Curtailments (MW)	460
Forecast Errors (%)	0.3%
Absolute Errors (%)	10.7%
Fall 2024	
Real-Time Wind (MW)	11,611
Day-Ahead Wind (MW)	10,548
Day-Ahead Wind (MW) Avg Curtailments (MW)	10,548 780
• ,	•
Avg Curtailments (MW)	780
Avg Curtailments (MW) Forecast Errors (%)	780 0.3%
Avg Curtailments (MW) Forecast Errors (%) Absolute Errors (%)	780 0.3%

Forecast Errors (%)

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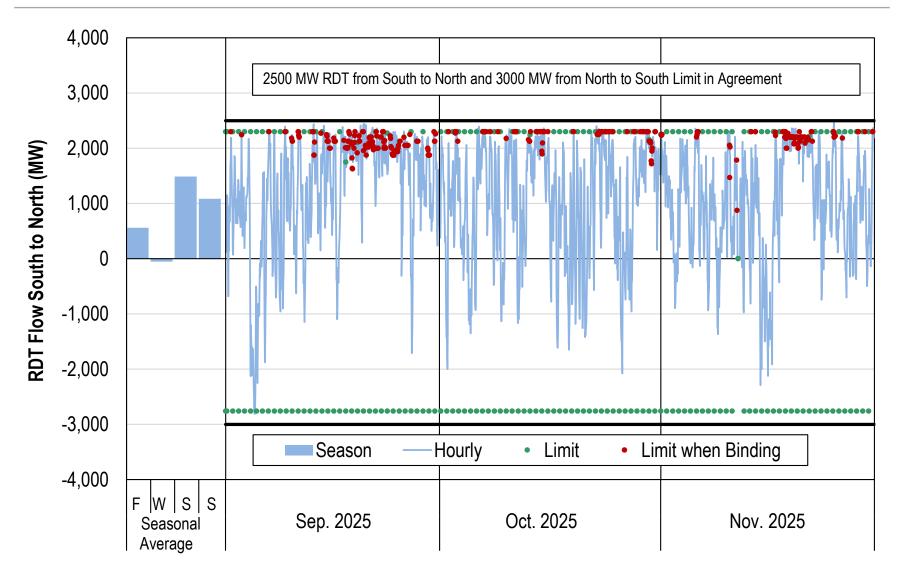
8.5%

16.6%

#### **Real-Time Hourly Inter-Regional Flows**

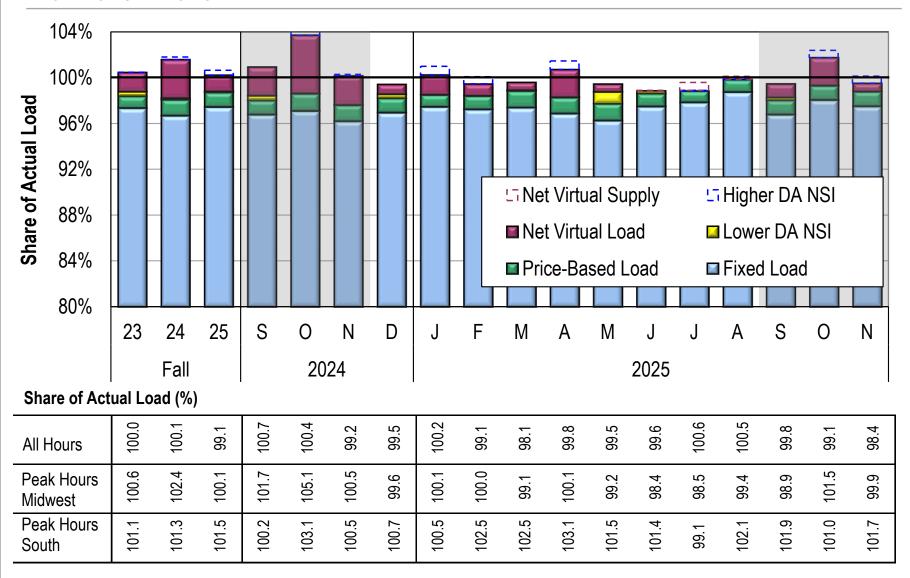
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Fall 2025



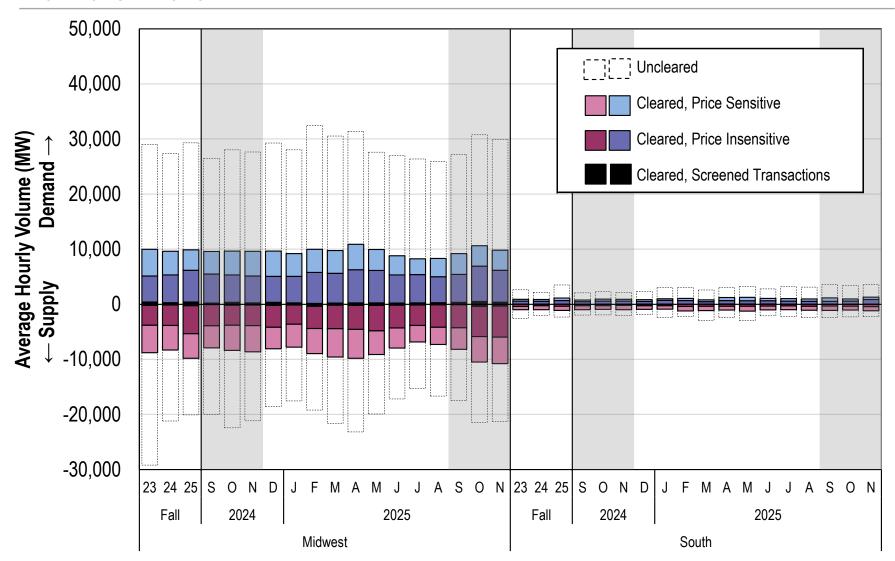
#### **Day-Ahead Peak Hour Load Scheduling**

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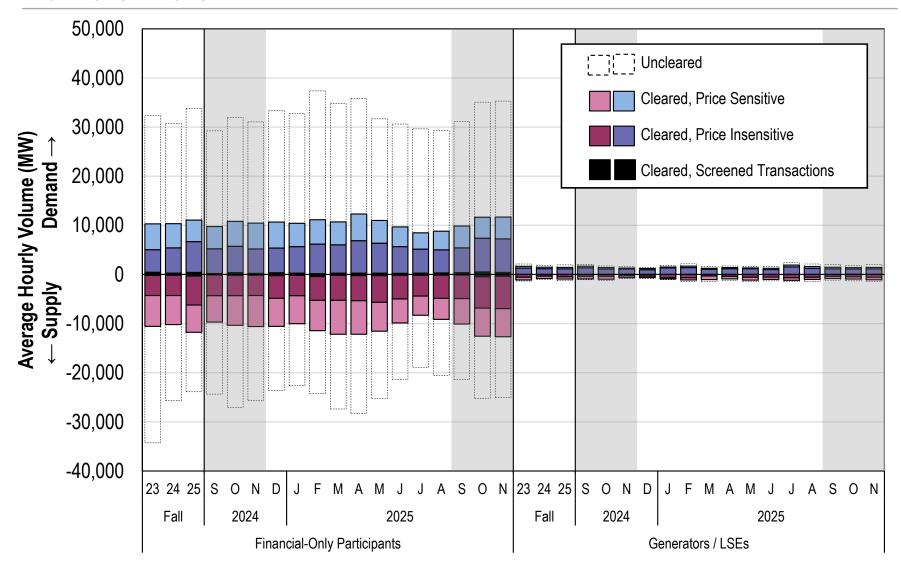
#### **Virtual Load and Supply**

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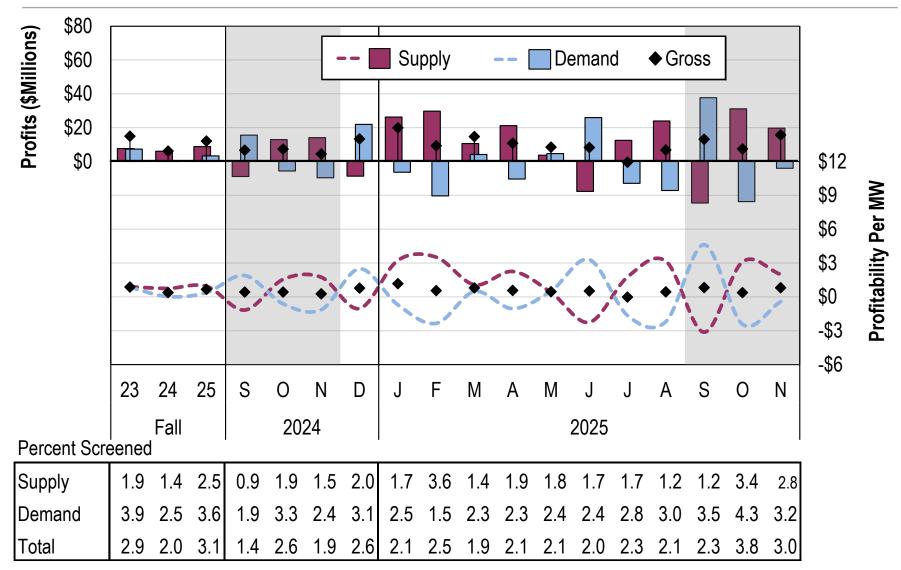
#### Virtual Load and Supply by Participant Type





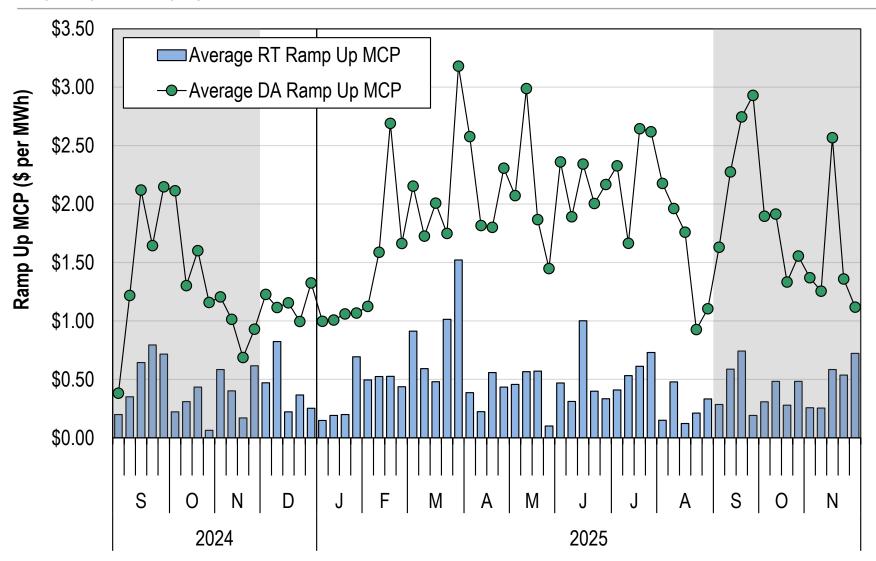
#### **Virtual Profitability**

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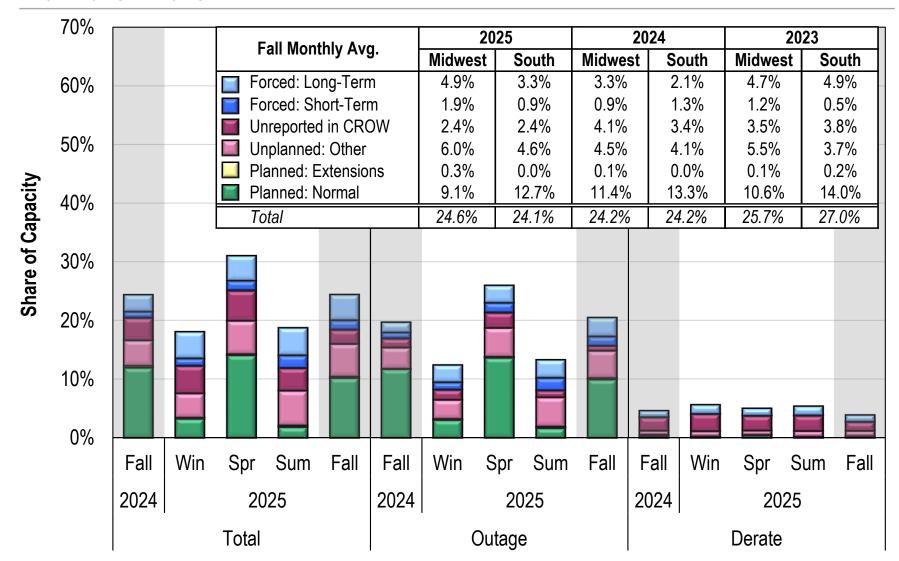
#### **Day-Ahead and Real-Time Ramp Up Price**

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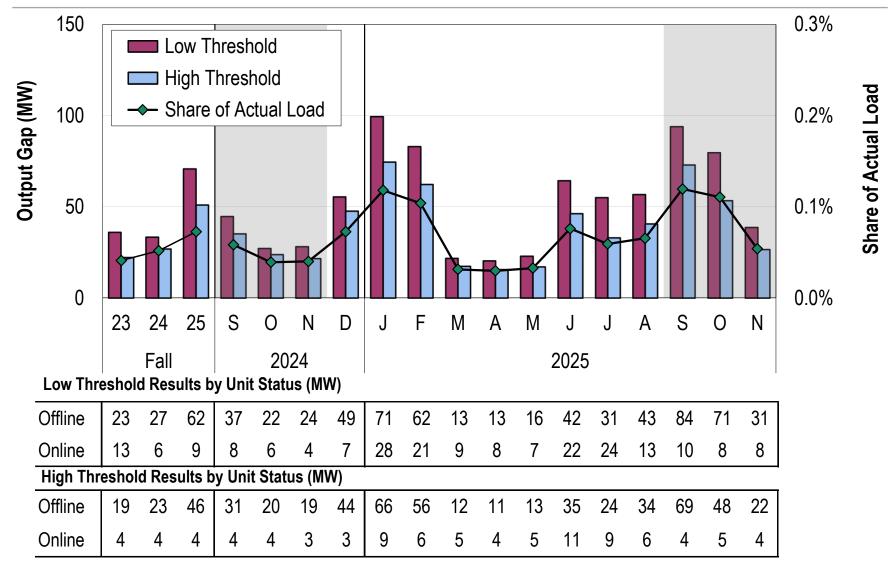
#### **Generation Outages and Deratings**





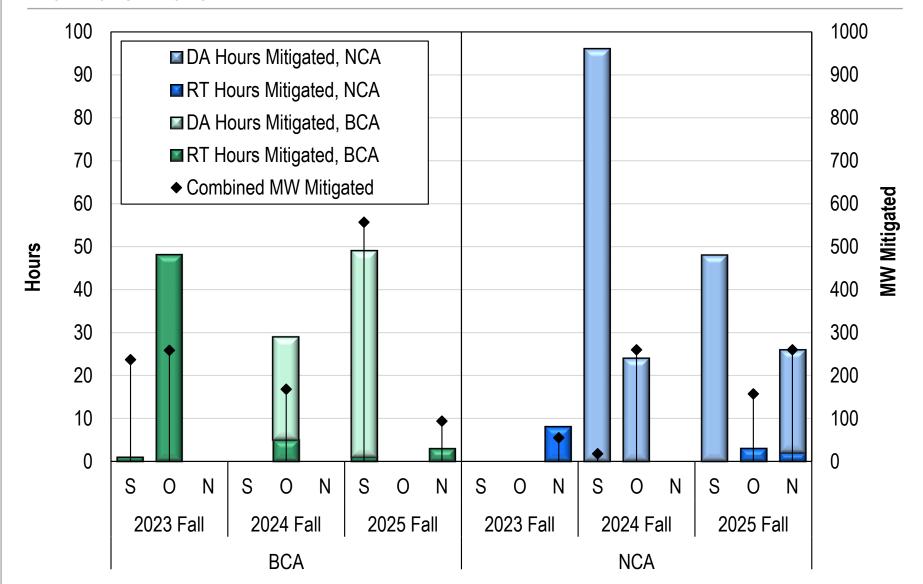
#### **Monthly Output Gap**

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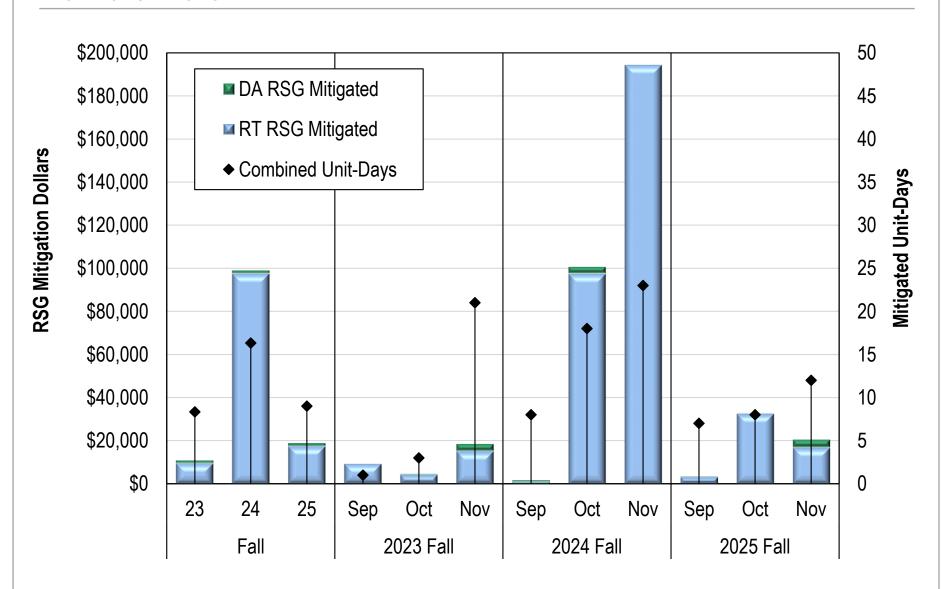
#### **Day-Ahead And Real-Time Energy Mitigation**

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#### **Day-Ahead And Real-Time RSG Mitigation**

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#### **List of Acronyms**

•	AAR	Ambient-Adjusted Ratings	•	ORDC	Operating Reserve Demand Curve
•	AMP	Automated Mitigation Procedures	•	PITT	Pseudo-Tie Issues Task Team
•	BCA	Broad Constrained Area	•	PRA	Planning Resource Auction
•	CDD	Cooling Degree Days	•	PVMWP	Price Volatility Make Whole Payment
•	CMC	Constraint Management Charge	•	RAC	Resource Adequacy Construct
•	CTS	Coordinated Transaction Scheduling	•	RDT	Regional Directional Transfer
•	DAMAP	Day-Ahead Margin Assurance Payment	•	RSG	Revenue Sufficiency Guarantee
•	DDC	Day-Ahead Deviation & Headroom Charge	•	RTORSGP	Real-Time Offer Revenue Sufficiency
•	DIR	Dispatchable Intermittent Resource			Guarantee Payment
•	HDD	Heating Degree Days	•	SMP	System Marginal Price
•	ELMP	Extended Locational Marginal Price	•	SOM	State of the Market
•	JCM	Joint and Common Market Initiative	•	STE	Short-Term Emergency
•	JOA	Joint Operating Agreement	•	STR	Short-Term Reserves
•	LAC	Look-Ahead Commitment	•	TLR	Transmission Loading Relief
•	LSE	Load-Serving Entities	•	TCDC	Transmission Constraint Demand Curve
•	M2M	Market-to-Market	•	UD	Uninstructed Deviation
•	MSC	MISO Market Subcommittee	•	VLR	Voltage and Local Reliability
•	NCA	Narrow Constrained Area	•	WUMS	Wisconsin Upper Michigan System

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