## System Market Power and Hedging: Implications for Resiliency of the Wholesale Market

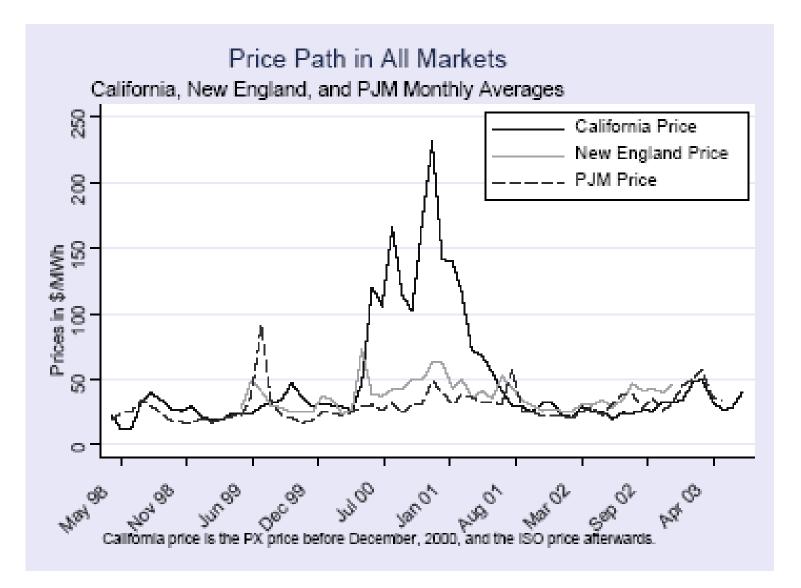
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#### Adequate Hedging of Energy Costs in Forward Markets is Critical for System Stability

- Obvious benefit of reducing price risk of energy purchases by LSEs
- Also shown to effectively reduce exercise of supplier market power in short term markets
  - Reduces *incentive* to exploit short term structural position
  - One LSE signing contracts can reduce risks to others
- Widely accepted as necessary to support generation investment/upkeep and reliable operations







From "Vertical Arrangements, Market Structure, and Competition: An Analysis of US Restructured Electricity Markets." Bushnell, Mansur, and Saravia, 2008.

# The Benefits from the Previous Page are NOT provided by Resource Adequacy

- RA as currently structured was designed to complement, not replace, contracting and hedging
- RA does not hedge energy price risk
- RA can reduce market power when it makes resources subject to mitigation
  - But dependent upon accuracy/stringency of mitigation
- RA likely insufficient to support generation investment if not accompanied by energy contracting
- RA has its own potential market power problems



### Are We Seeing Reduced Hedging?

- Full data are not collected on this, but
- Trend of CCA growth likely contributing to
  - Reduction in hedge positions by utilities
  - Change in utility position apparently not being offset by increased CCA hedging
- Contributing factors:
  - Credit ratings of newly formed CCAs
  - PCIA moves inversely with energy price index, distorting CCA exposure to energy prices
  - Desire/pressure on LSEs to demonstrate renewable procurement and avoid being seen as buying from gas units



#### Summary

- Recent uptick in events with high systemwide margins likely indicative of reducing hedging by LSEs
  - Systemwide MP a symptom of a wider problem
- Stronger systemwide mitigation may help but would not address the other issues created by reduced hedging and contracting
  - Would be damaging if viewed as a substitute for hedging
- We should be mindful that focus on systemwide mitigation not be viewed as "solving" all the problems

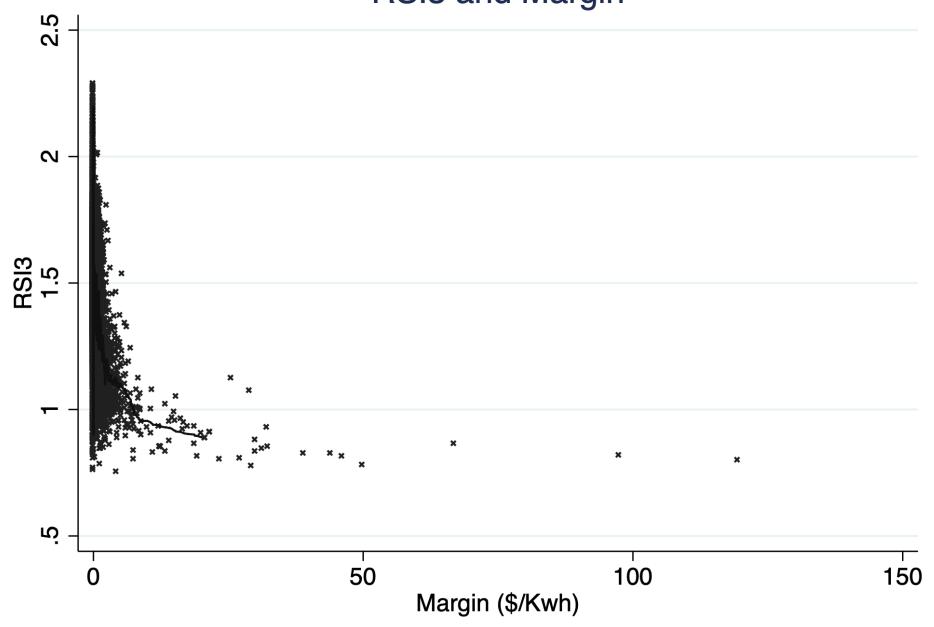


## Thank you

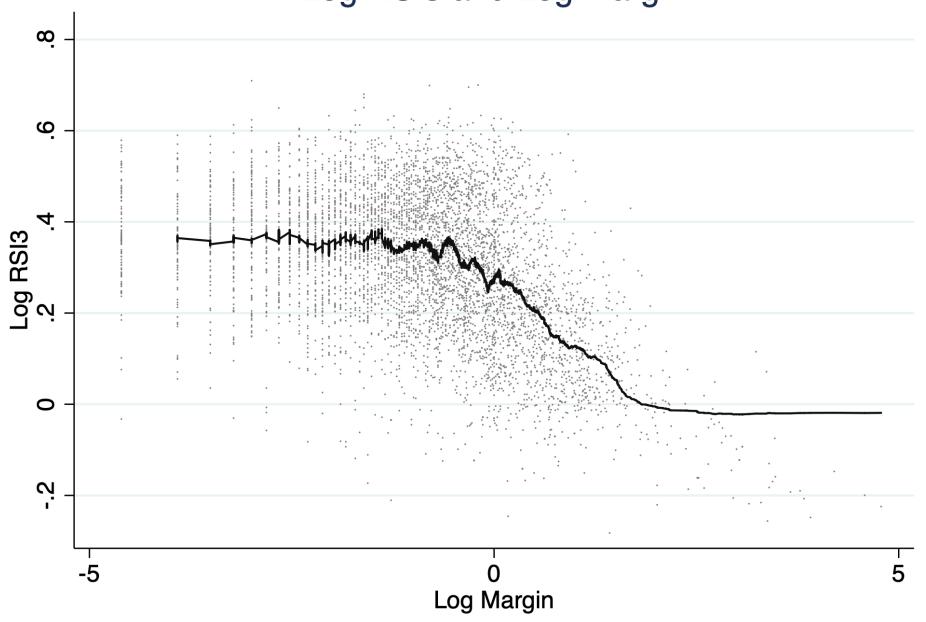
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#### Log RSI3 and Log Margin



#### RSI3 and Margin where RSI < 1

