



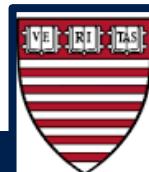
Pricing Rules for Electricity Auctions with Non-Convexities



Nicolas Stevens

Joint work with Anthony Papavasiliou & Yves Smeers

30th September 2024



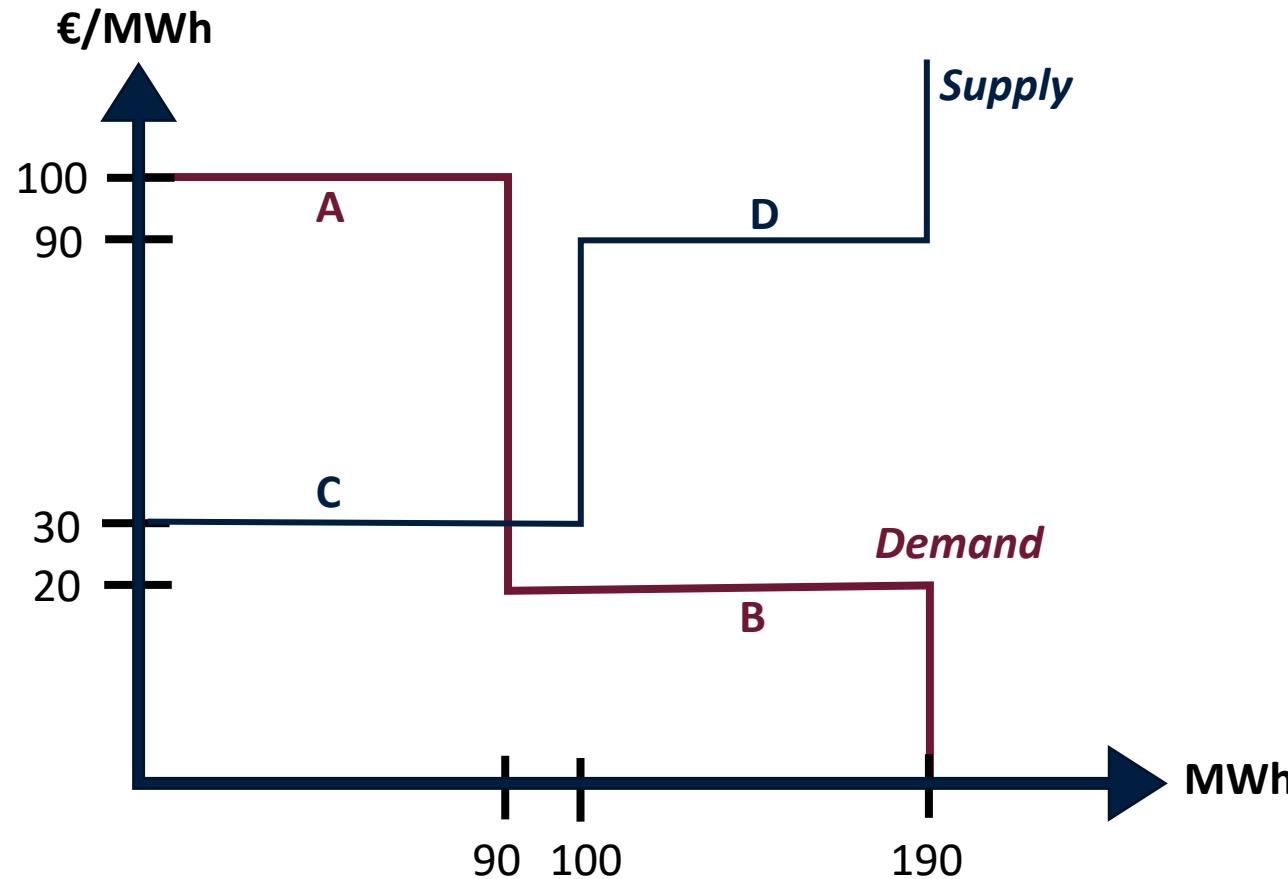
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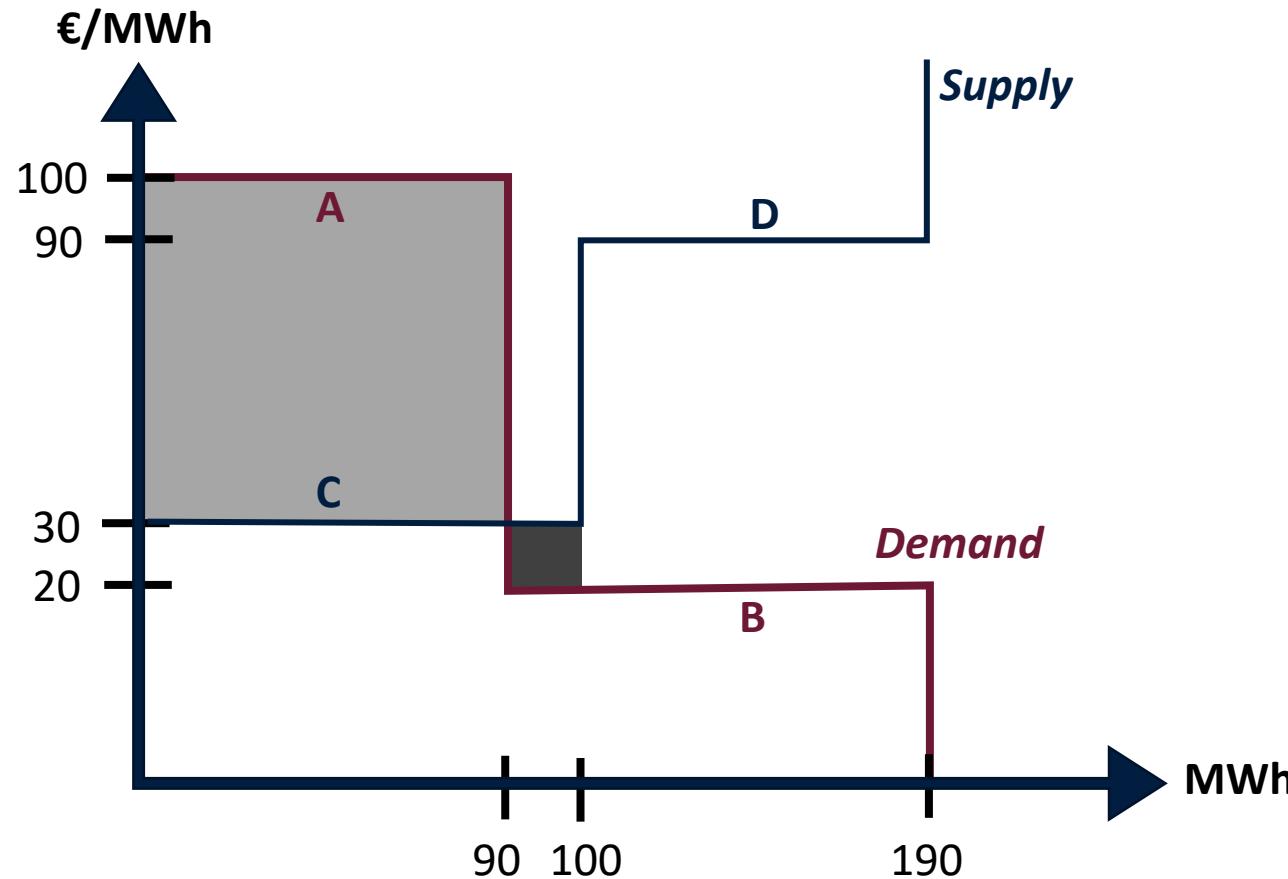
 **LiDAM**
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Pricing with indivisibilities



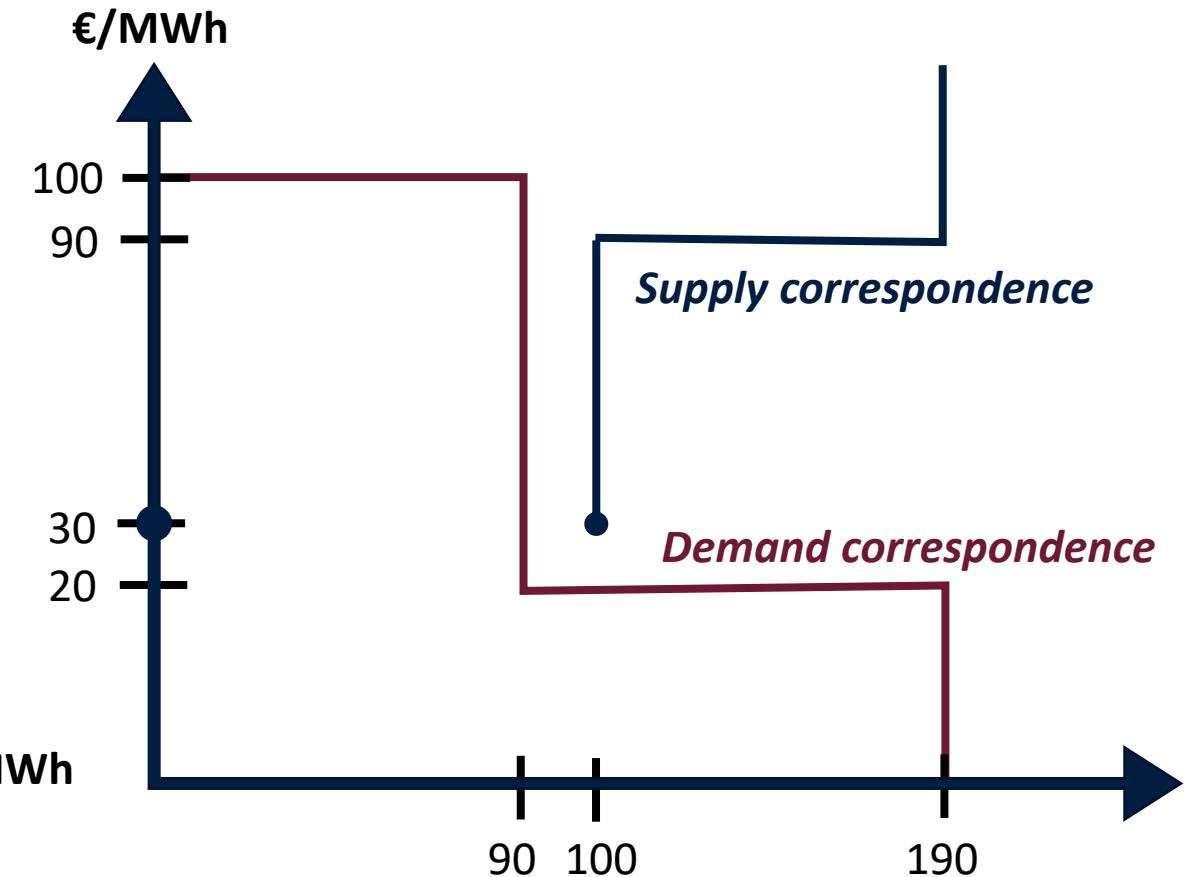
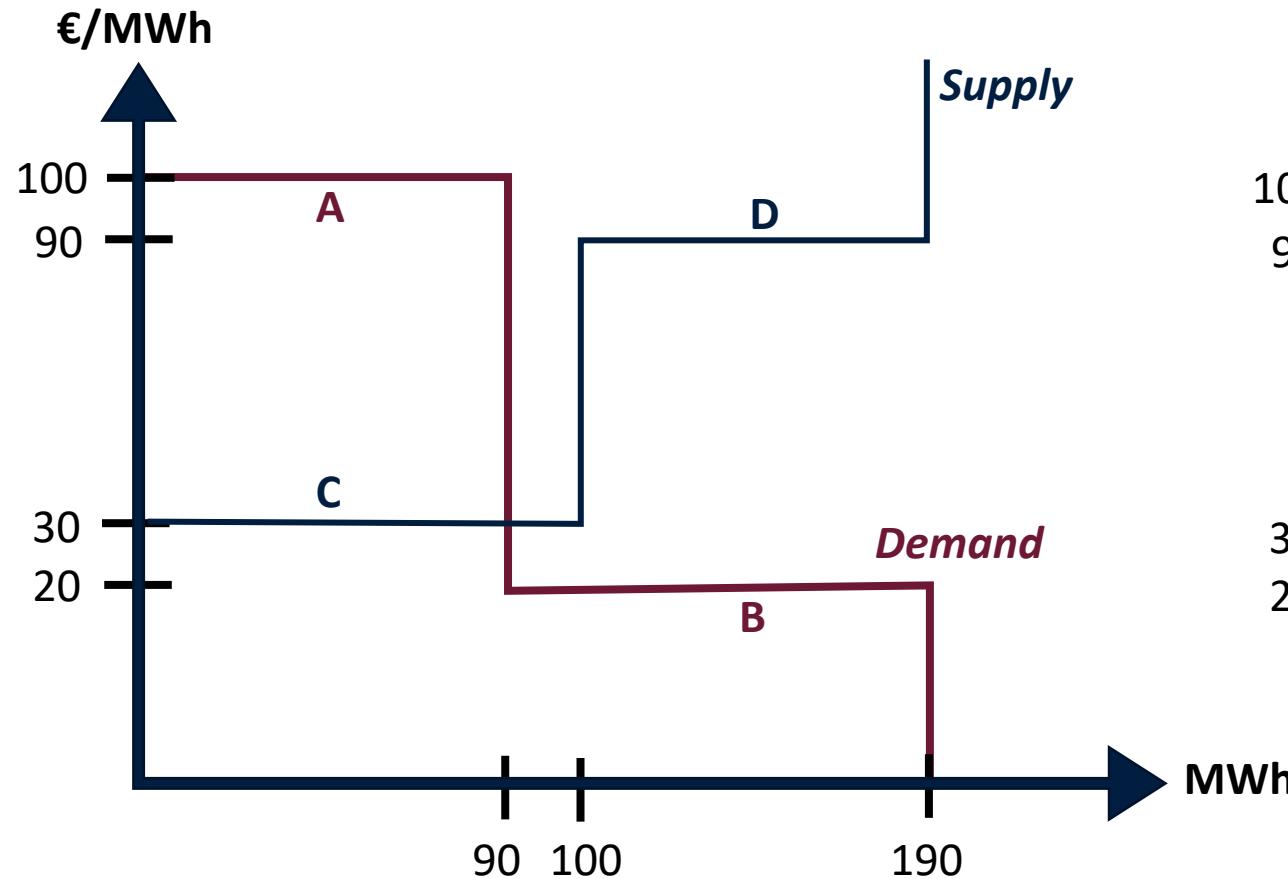
- **C** is *indivisible* (all-or-nothing)
- Welfare optimum solution is to clear **A**, **C** and a fraction of **B**
- What is the right price?
 - At 20€/MWh **C** is not willing to produce
 - At 30€/MWh, **B** is not willing to consume

Pricing with indivisibilities



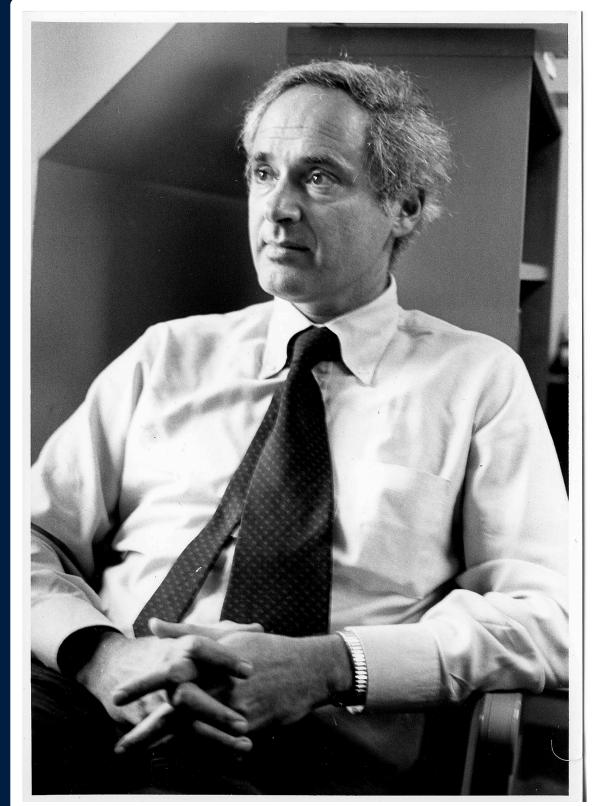
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Pricing with indivisibilities



*“in the presence of indivisibilities in production,
prices simply don’t do the jobs that they were
meant to do”*

(Scarf, 1994)



Markets for power

- *Specificities of electricity as a commodity* → need for coordination
 - Exchanged through an **electrical grid** : physical network constraints
 - Demand must be met just-in-time by production
 - **Difficult/expensive to store**
 - **Low elasticity** of demand (few substitutes & lack of metering)
- *Deregulation of power systems:*
 - From a **coordination by a firm** to a coordination through **market transactions** (Coase, 1937)
 - Electricity market design

*“The old problem asks which unit should be committed ;
the new problem asks what market design will best solve the old problem.”*

(Stoft, 2002)

Electricity auctions in a nutshell

1) Centralized market

- Closed-gate auction
- Uniform-price auction

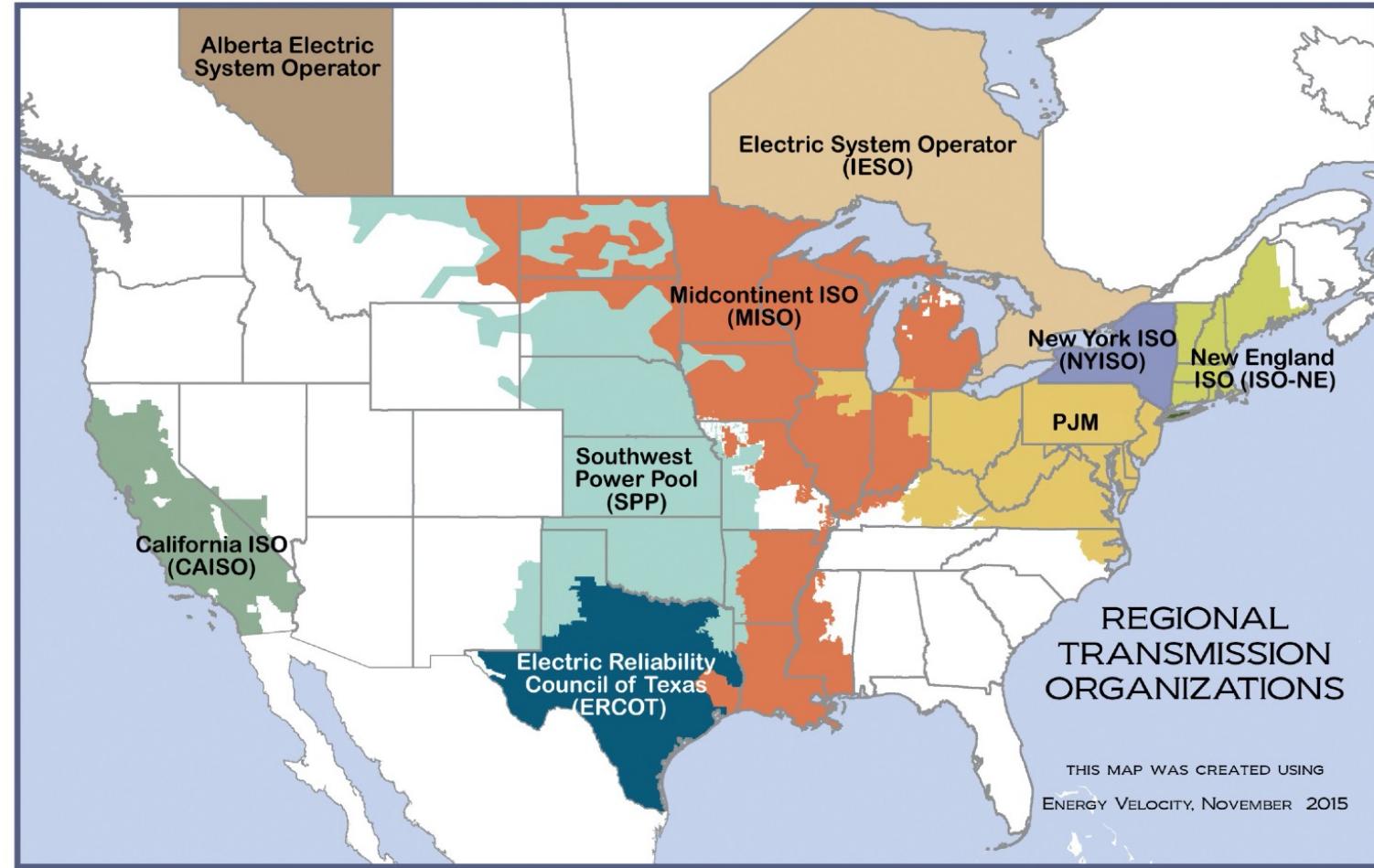
2) Integration of multiple commodities

- Electrical energy, transmission capacity & ancillary services products
- Multi-periods : typically, 24 hours
 - The “pricing problem” is thus a **multi-dimensional problem**: computation of hundreds or even **thousands of prices in a single market session**

3) Multi-parts, non-convex bids → issue discussed in the first slide

- Account for the cost structure (production cost, start-up cost, etc.) & operational constraints (ramp, up time constraint, etc.) of suppliers
- Unit commitment model (US)
- Portfolio bidding (EU)

Electricity markets in the US



1992 : Energy Policy Act

creation of ISOs that operate the market

Early 2000': NYISO “hybrid pricing”

Marginal pricing traditionally adopted by many ISOs to clear the market + side payments

2014: FERC launches consultation about price formation

2015 : MISO implements ELMP

2017 : PJM made similar proposal

1990

2000

2010

2020

Electricity markets in Europe

☐ Institutional framework:

- TSOs operate the grid
- “**Nominated Electricity Market Operators**” (NEMOs) operate the market

1993 : European Single Market
1996 : First Energy Package (kickoff the liberalization of the power sector)

2000

2003 – 2009 : Second & Third Energy Package (unbundling of competitive and regulated segments)

2010

2020



Electricity markets in Europe

❑ Institutional framework:

- TSOs operate the grid
- “Nominated Electricity Market Operators” (NEMOs) operate the market

❑ EU Electricity market — “Price Coupling of Regions”:

- 27 countries
- 30 TSOs
- 16 NEMOs
- 4.66 TWh daily trade

1993 : European Single Market

1996 : First Energy Package (kickoff the liberalization of the power sector)

1990

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2010

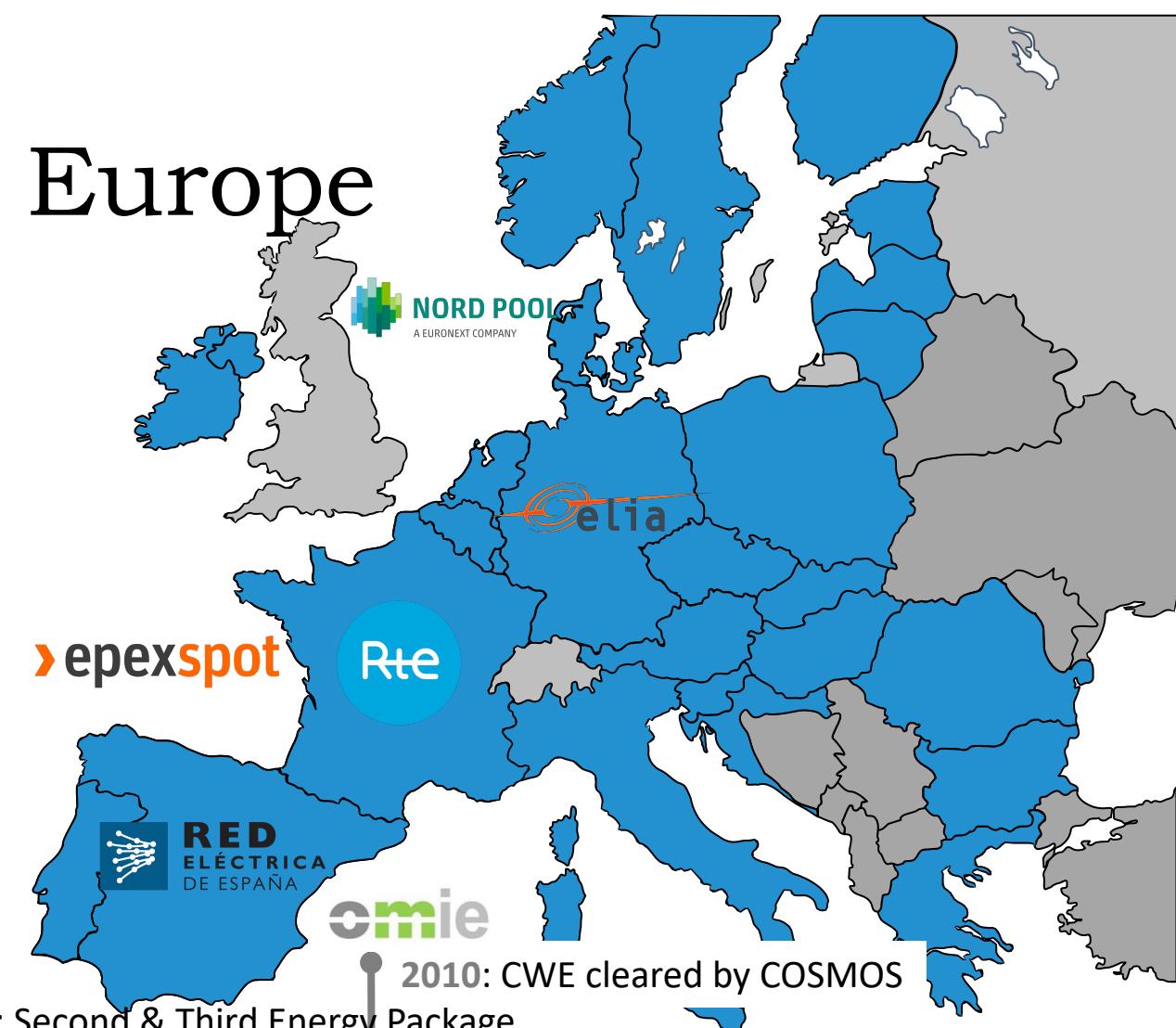
2020

2003 – 2009 : Second & Third Energy Package
(unbundling of competitive and regulated segments)

2006: Trilateral Market Coupling

2010: CWE cleared by COSMOS

2014: Single Day-Ahead Coupling (SDAC), Price Coupling of Regions



Objectives of the work

- Ongoing **discussions among European stakeholders** & research undertaken by NEMOs to **reform the current EU pricing rule** (NEMO Committee, 2020a ; MCSC, 2022 ; SDAC, 2023)
- How to price the indivisibilities has also been a **vivid subject of debate in the US** for the past 20 years: heterogeneous and changing policies
- **Objective of the paper** : contribute to these discussions, in particular the reform of the European pricing rules
 - Formalize the problem
 - Theoretical cross-comparison of several pricing approaches
 - Numerical simulations on auction dataset

Motivations

- Theoretical motivation
- Policy relevance: both in US and EU markets

Theoretical framework

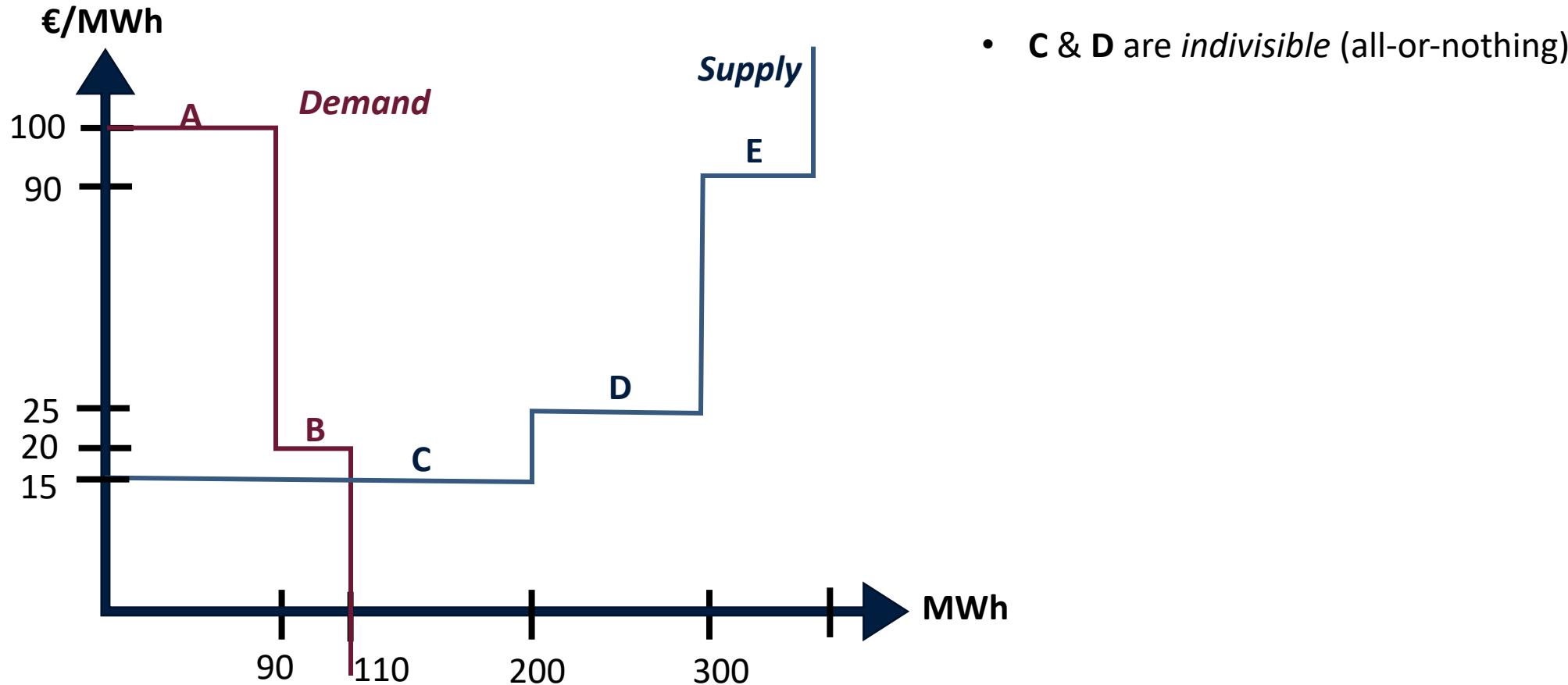
- Formalize the problem
- Solution to the problem — pricing schemes: marginal pricing, convex hull pricing...

Numerical simulations

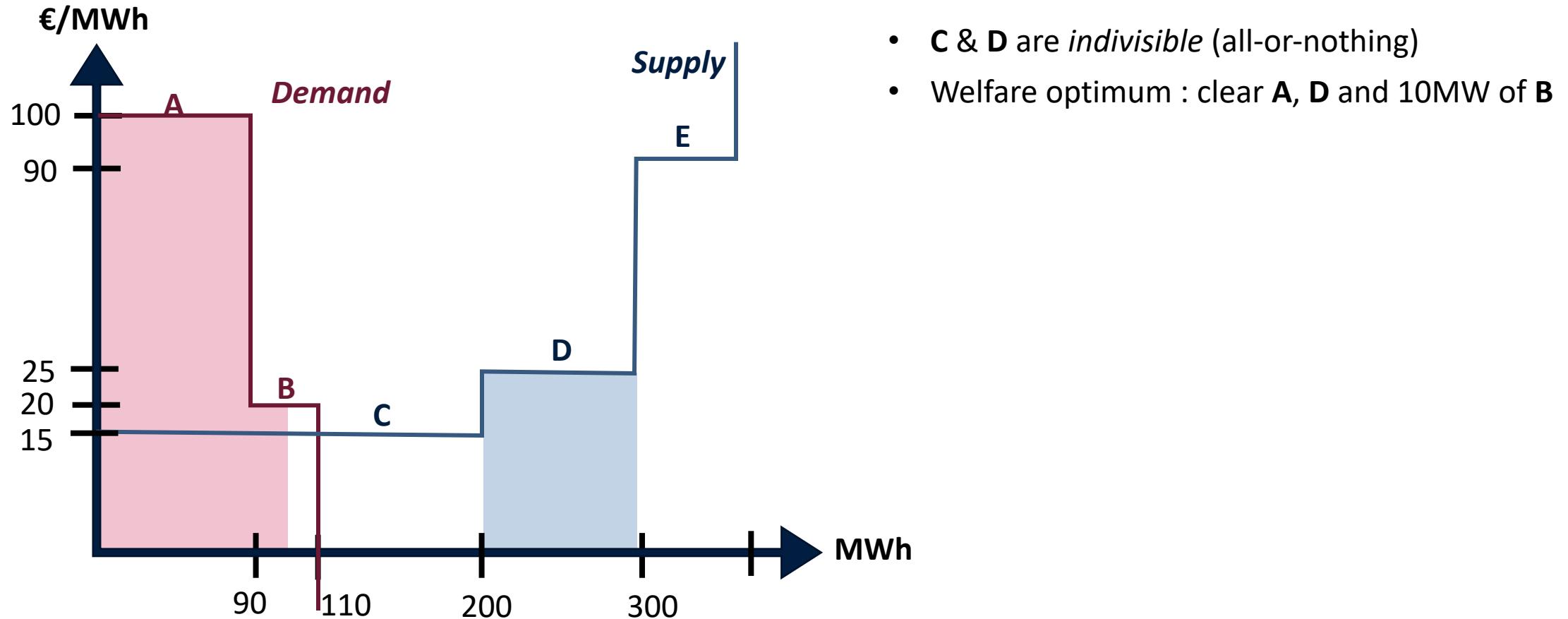
- Numerical analysis on auction datasets
- Cross comparison of different pricing schemes
- Some advantages of convex hull pricing

Conclusion

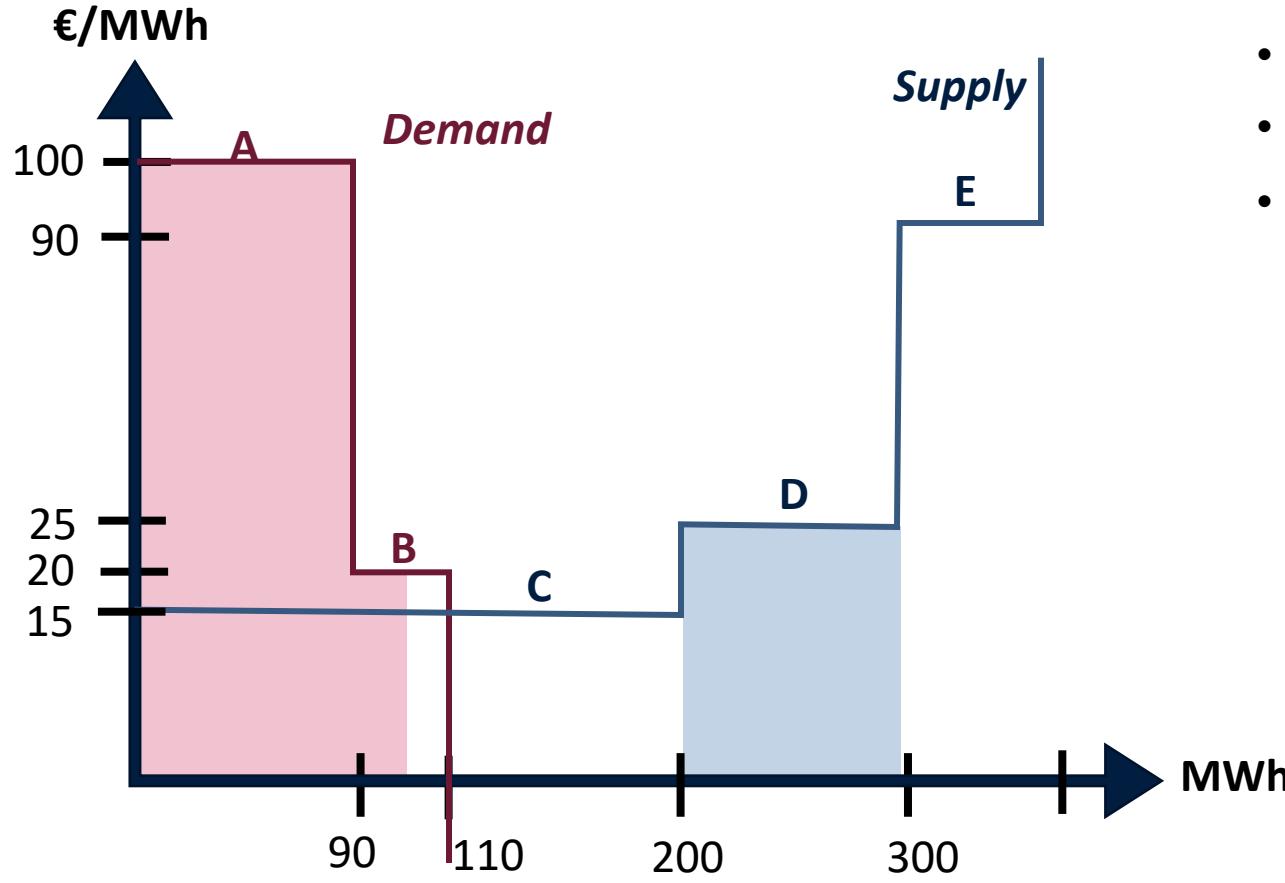
How to measure the consistency between price & cleared allocation



How to measure the consistency between price & cleared allocation



How to measure the consistency between price & cleared allocation



- **C & D** are *indivisible* (all-or-nothing)
- Welfare optimum : clear **A**, **D** and 10MW of **B**
- What is the right price?
 - **15€/MWh**
 - B has a lost opportunity of 50€
 - C is ok
 - D has a revenue shortfall of 1,000€
 - **20€/MWh**
 - B is ok
 - C has a lost opportunity of 1,000€
 - D has a revenue shortfall of 500€
 - **25€/MWh**
 - B has a revenue shortfall of 50€
 - C has a lost opportunity of 2,000€
 - D is ok

Two metrics to compare the candidate pricing approaches

- ***Lost opportunity costs (LOC)***

$$LOC = \max(\text{profit under price } p^*) - \text{cleared profit}$$

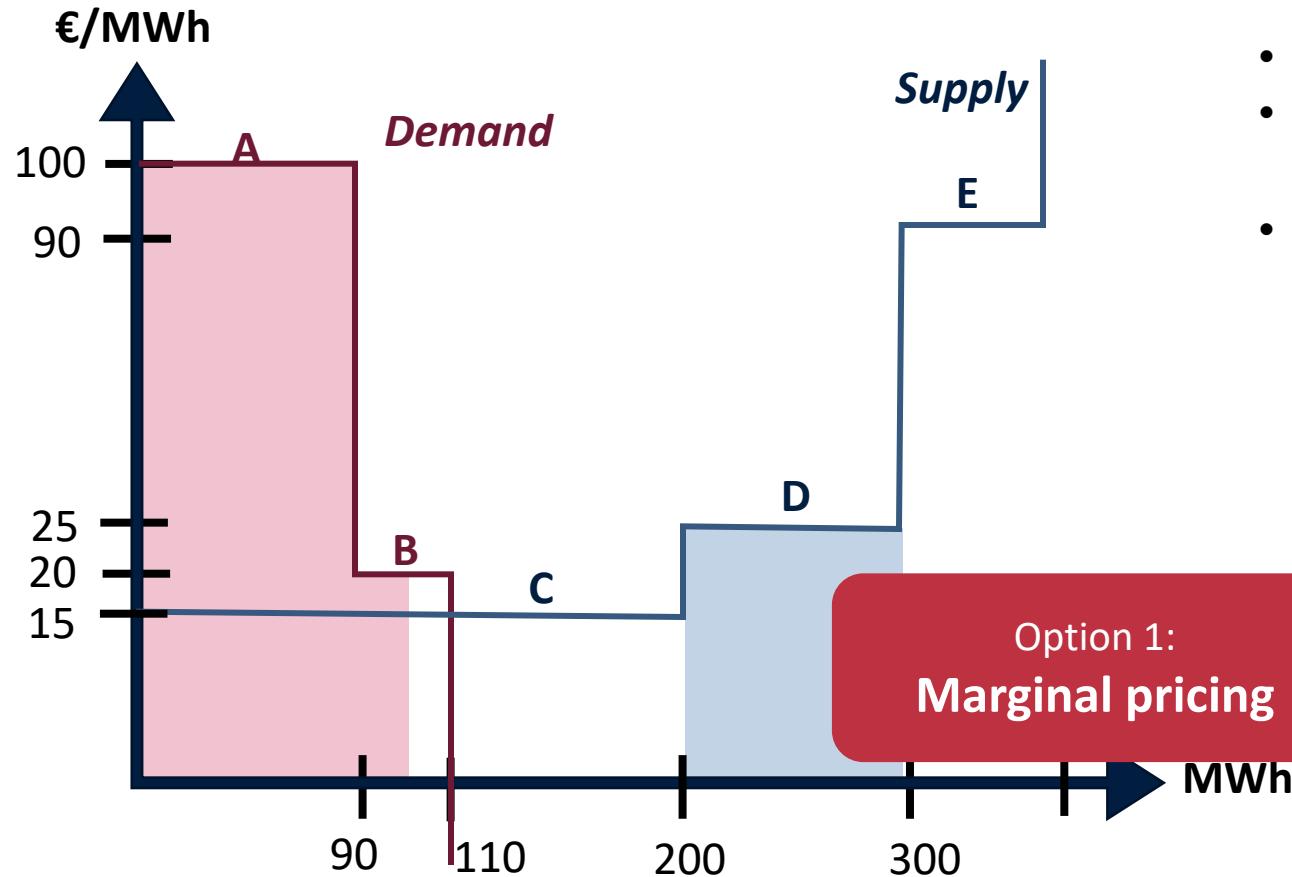
- It measure the **incentive-compatibility** of prices and dispatch instructions
- **Does the price support the cleared allocation?** If not, the dispatch could unravel as suppliers “self-schedule”

- ***Revenue shortfall (RS)*** (or “make-whole payments”)

$$RS = -\min(0 ; \text{cleared profit})$$

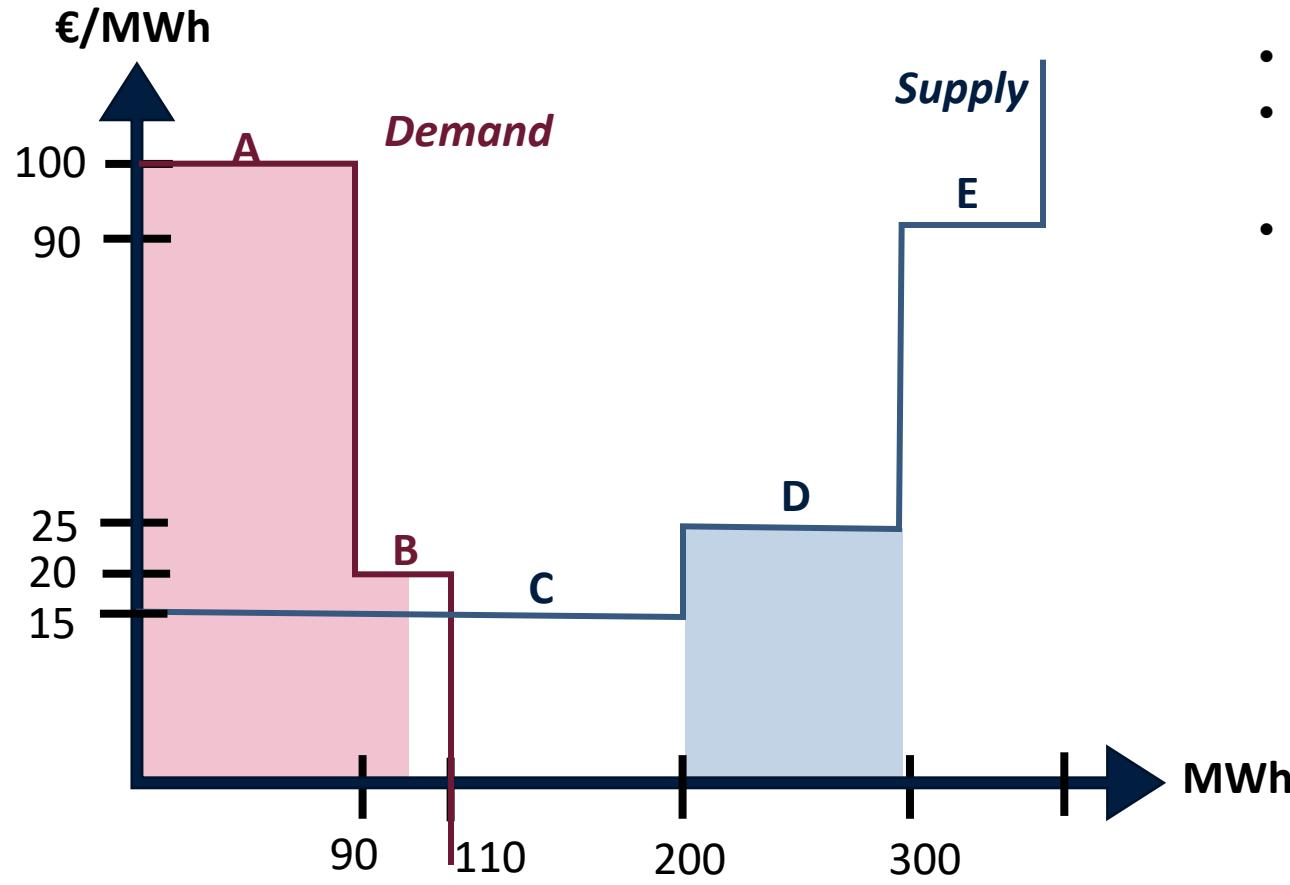
- It measure the **revenue-adequacy** of prices and dispatch instructions
- **Does the uniform price enable the market participants to break even?**

Three candidate pricing schemes



- C & D are *indivisible* (all-or-nothing)
- Welfare optimum solution: clear A, D and 10MW of B
- What is the right price?
 - **15€/MWh**
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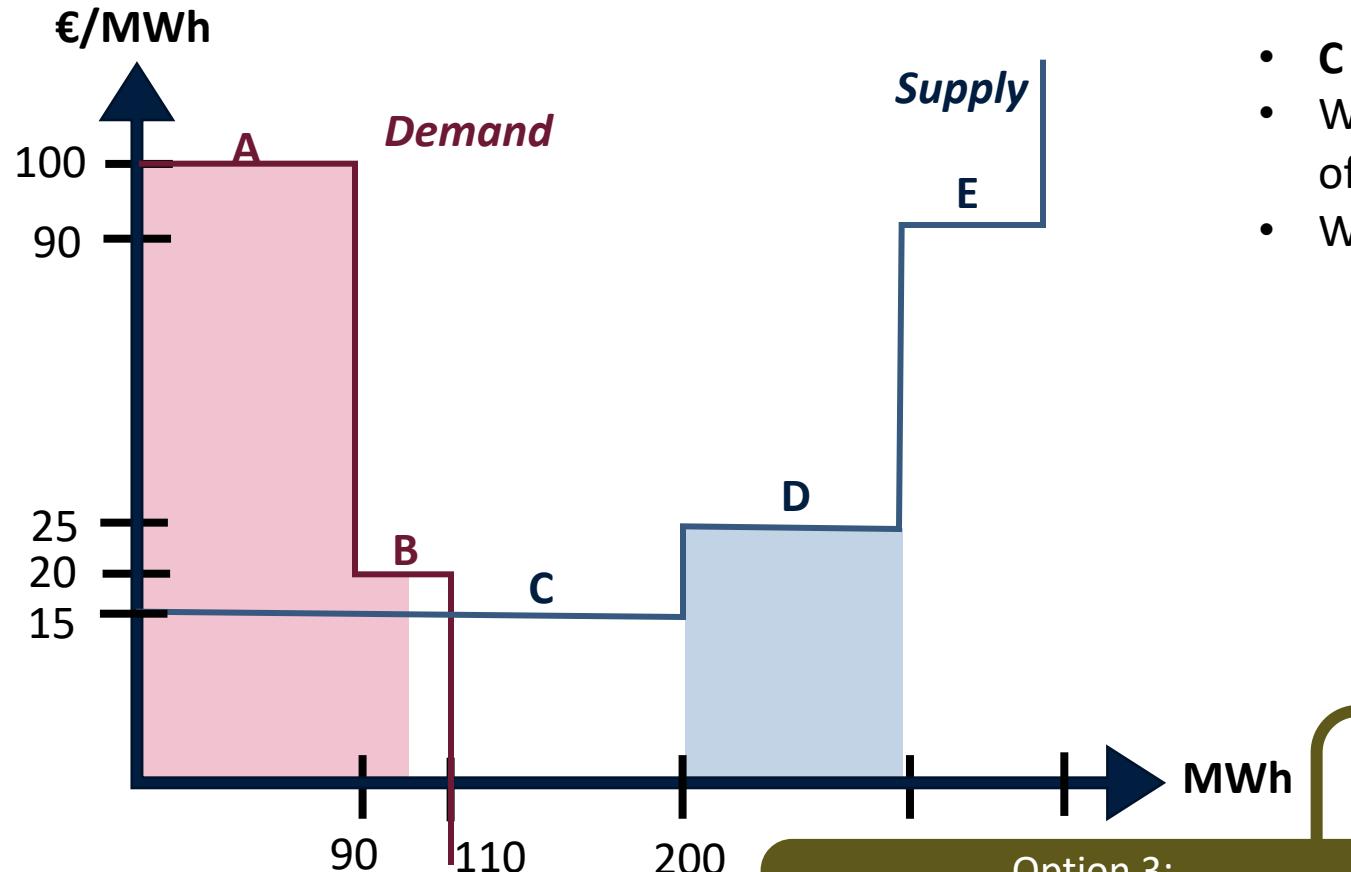
Three candidate pricing schemes



- C & D are *indivisible* (all-or-nothing)
 - Welfare optimum solution is the A-D-E line at 100€/MWh
 - What is the right price?
- Option 2:
Convex Hull Pricing (CHP)

 - **15€/MWh**
 - B has a lost opportunity of 50€
 - C is ok
 - D has a revenue shortfall of 1,000€
 - **20€/MWh**
 - B is ok
 - C has a lost opportunity of 1,000€
 - D has a revenue shortfall of 500€
 - **25€/MWh**
 - B has a revenue shortfall of 50€
 - C has a lost opportunity of 2,000€
 - D is ok

Three candidate pricing schemes



Option 3:
**Minimal Make-whole
Payment Pricing (MMWP)**

- **C & D** are *indivisible* (all-or-nothing)
- Welfare optimum solution: clear **A**, **D** and 10MW of **B**
- What is the right price?
 - **15€/MWh**
 - B has a lost opportunity of 50€
 - C is ok
 - D has a revenue shortfall of 1,000€
 - **20€/MWh**
 - B is ok
 - C has a lost opportunity of 1,000€
 - D has a revenue shortfall of 500€
 - **25€/MWh**
 - B has a revenue shortfall of 50€
 - C has a lost opportunity of 2,000€
 - D is ok

Three candidate pricing schemes

Pricing scheme	Objective	Computation	Math. Formulation	References
Marginal Pricing (MP)		Easy	Fix binary variables (primal-dependent)	O'Neill et al. (2005)
Convex Hull Pricing (CHP)	Minimize LOC	Difficult but can be solved: (Stevens and Papavasiliou, 2022)	Convex hull of prod. & cons. sets (primal-dual separated)	Hogan and Ring (2003) and Gribik et al. (2007)
Minimal Make- Whole Payment pricing (MMWP)	Minimize RS	Easy	Solve ad-hoc problem	Madani and Papavasiliou (2022), Bichler et al. (2022)

- O'Neill, R.P., Sotkiewicz, P.M., Hobbs, B.F., Rothkopf, M.H., Stewart Jr, W.R., 2005. Efficient market-clearing prices in markets with nonconvexities. European journal of operational research 164, 269–285.
- Gribik, P.R., Hogan, W.W., Pope, S.L., et al., 2007. Market-clearing electricity prices and energy uplift. Cambridge, MA .
- Bichler, M., Knörr, J., Maldonado, F., 2022. Pricing in nonconvex markets: How to price electricity in the presence of demand response. Information Systems Research 34, 652–675.
- Madani, M., Papavasiliou, A., 2022. A note on a revenue adequate pricing scheme that minimizes make-whole payments. 18th International Conference on the European Energy Market (EEM) , 1–6.
- PJM, 2017. Proposed enhancements to energy price formation.
- Stevens, N., Papavasiliou, A., 2022. Application of the level method for computing locational convex hull prices. IEEE Transactions on Power Systems 37, 3958–3968.

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- Theoretical
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Theoretical framework

- Formalize the problem
- Solution to the problem — pricing schemes: marginal pricing, convex hull pricing...

Numerical simulations

- Numerical analysis on auction datasets
- Cross comparison of different pricing schemes
- Some advantages of convex hull pricing

Conclusion

Two auction datasets used to compare the pricing schemes

FERC Dataset*	CWE dataset
~1000 power units	~70 power units
Sophisticated unit commitment model	Simpler unit commitment model
Convex & non-convex power units	Only non-convex power units
Possibility of inaction holds	Possibility of inaction does not hold
No network	Network of 30 bidding zones
11 load scenarios, 24 periods	12 load scenarios of 24 and 96 periods
Public data	Private data

Some advantages of convex hull pricing

1

Marginal pricing leads to poor incentives for market participants

Table 2

Incentives of market agents on the **CWE dataset** depending on the price (average over 12 scenarios).

	MP	CHP	ELMP	MMWP	MMWP*	MMWP**
Dispatch Cost				5,489,000		
Av. Price [€/MWh]	42.8	43.4	47.3	27.7	23.8	52.6
Num. Suppl. with LOC	33.2%	35.9%	45.3%	83.6%	63.4%	64.3%
Av. LOC per Suppl.	3,528	278	1,285	141,834	29,326	27,066
LOC	Tot.	83,543	8,093	42,948	98,681,795	41,808,171
	Suppl.	83,543	6,810	39,006	8,746,513	1,350,259
	Net.	0	1,282	3,942	89,935,282	40,457,912
RS	Tot.	10,550	1,987	8,508	0	0
	Suppl.	10,550	1,987	8,508	0	0
	Net.	0	0	0	0	0

Some advantages of convex hull pricing

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RS	Tot. Suppl. Net.	10,550 10,550 0	1,987 1,987 0	8,508 8,508 0	0 0 0	0 0 0

Intuition: fixed “indivisible” costs (start-up, etc.) are not reflected in the price signal

Some advantages of convex hull pricing

2

CHP significantly improves the incentives of the market participants

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Incentives of market agents on the CWE dataset depending on the price (average over 12 scenarios).

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Significant improvement of **total** incentives (LOC) for the participants under CH

Some advantages of convex hull pricing

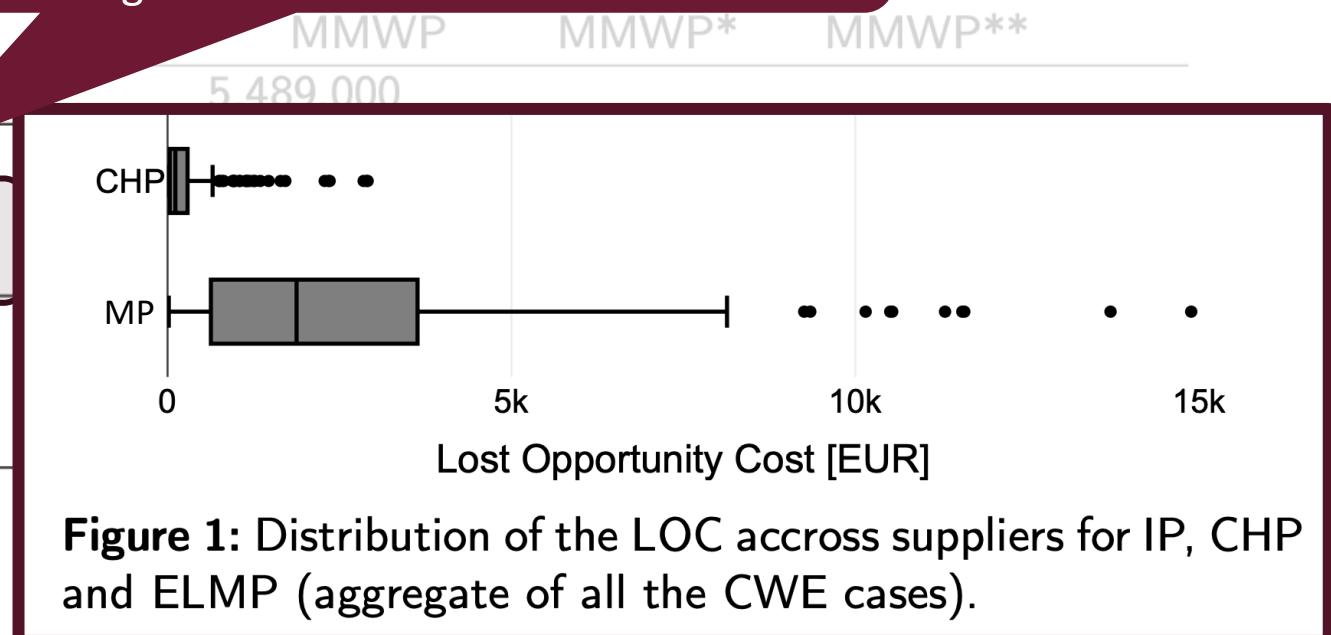
2

CHP significantly improves the incentives of the market participants

Table 2
Incentives of market agents on the CWE da

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Dispatch Cost		
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LOC		
Tot.	83,543	8,093
Suppl.	83,543	6,810
Net.	0	1,282
RS		
Tot.	10,550	1,987
Suppl.	10,550	1,987
Net.	0	0

Distribution of the LOC across participants: CHP
improves significantly the average LOC born by individual agents



Some advantages of convex hull pricing

2

CHP significantly improves the incentives of the market participants

Table 1

Incentives of market agents on the FERC dataset depending on the price (average over 11 scenarios).

		MP	CHP	ELMP	MMWP	MMWP*	MMWP**
	Dispatch Cost				29,780,000		
	Av. Price [\$/MWh]	28.8	28.7	28.8	56.3	26.8	28.9
	Num. Suppl. with LOC	3.4%	1.8%	7.5%	79.2%	24.7%	9.5%
	Av. LOC per Suppl.	628	19	37	148,232	4,577	94
LOC	Tot.	37,576	323	2,801	130,147,114	1,176,050	14,217
	Conv.	0	67	94	1,978,501	5,268	79
	Non-Conv.	37,576	257	2,707	128,168,613	1,170,782	14,137
RS	Tot.	669	19	206	0	0	0
	Conv.	0	0	3	0	0	0
	Non-Conv.	669	19	203	0	0	0

Some advantages of convex hull pricing

2

CHP significantly improves the incentives of the market participants

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Av. Price [\$/MWh]	28.8	28.7	28.7	28.7	28.7	28.7	28.7
Num. Suppl. with LOC	3.4%	1.8%	7.1%	7.1%	7.1%	7.1%	7.1%
Av. LOC per Suppl.	628	19	37	37	37	37	37
	Tot.	37,576	323	3,801	130,147,114	1,176,050	14,217
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Significant improvement of **total** incentives (LOC) for the participants under CH

Some advantages of convex hull pricing

3

With CHP, the LOC are bounded : they do not grow with market size

Table 6

Results of CHP and IP pricing on FERC datasets (load profile 2015-08-01_1w) depending on the market size. The initial 50-unit market is multiplied by a factor ranging from 2 to 20.

Number of Plants	Market Size		Convex Hull Pricing		Marginal Pricing	
	Av. Hourly Load (MW)	Tot. Cost (\$)	LOC (\$)	LOC (%) Tot. Cost)	LOC (\$)	LOC (%) Tot. Cost)
50	4,900	1,820,308	11,222	0.62%	276,383	15.18%
100	9,800	3,631,286	13,114	0.36%	538,713	14.84%
150	14,700	5,444,099	16,841	0.31%	805,370	14.79%
200	19,600	7,245,546	9,202	0.13%	1,060,574	14.64%
250	24,500	9,052,185	6,756	0.07%	1,320,763	14.59%
300	29,400	10,857,007	2,492	0.02%	1,579,297	14.55%
350	34,300	12,666,418	2,817	0.02%	1,842,613	14.55%
400	39,200	14,475,824	3,136	0.02%	2,105,629	14.55%
450	44,100	16,290,191	8,417	0.05%	2,373,870	14.57%
500	49,000	18,099,571	8,711	0.05%	2,636,708	14.57%
1000	98,000	36,183,999	2,280	0.01%	5,258,840	14.53%

Some advantages of convex hull pricing

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- With marginal pricing, the LOC grows with the market size
- With CHP not

Some advantages of convex hull pricing

4 Minimizing the LOC also leads to moderate RS

Table 2

Incentives of market agents on the CWE dataset depending on the price (average over 12 scenarios).

	MP	CHP	ELMP	MMWP	MMWP*	MMWP**
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Num. Suppl. with LOC	33.2%	35.9%	45.2%	82.6%	62.4%	64.3%
Av. LOC per Suppl.	3,528	278	1,328	1,328	1,328	1,328
LOC	Tot.	83,543	8,093	42,394	40,457,912	19,539,062
	Suppl.	83,543	6,810	39,342	39,342	39,342
	Net.	0	1,282	3,942	3,942	3,942
RS	Tot.	10,550	1,987	8,508	0	0
	Suppl.	10,550	1,987	8,508	0	0
	Net.	0	0	0	0	0

this is because $RS \leq LOC$
 $\rightarrow RS = \text{incentive to self-schedule at } 0$

Some advantages of convex hull pricing

5

Minimizing the RS, on the other hand, exacerbates the LOC significantly

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Incentives of market agents on the FERC dataset depending on the price (average over 11 scenarios).

	MP	CHP	ELMP	MMWP	MMWP*	MMWP**
Dispatch Cost				29,780,000		
Av. Price [\$/MWh]	28.8	28.7	28.8	56.2	28.9	28.9
Num. Suppl. with LOC	3.4%	1.8%	7.5%	1,100	1,100	1,100
Av. LOC per Suppl.	628	19	37	1,100	1,100	1,100
LOC	Tot.	37,576	323	2,801	130,100,010	1,170,702
	Conv.	0	67	94	1,100	1,100
	Non-Conv.	37,576	257	2,707	128,100,010	1,170,702
RS	Tot.	669	19	206	0	0
	Conv.	0	0	3	0	0
	Non-Conv.	669	19	203	0	0

Minimizing RS:

- Mild requirement
- Many ways to do it (not one single unambiguous pricing outcome)

Some advantages of convex hull pricing

5

Minimizing the RS, on the other hand, exacerbates the LOC significantly

Table 1

Incentives of market agents on the FERC dataset depending on the price (average over 11 scenarios).

	MP	CHP	ELMP	MMWP	MMWP*	MMWP**
Dispatch Cost				29,780,000		
Av. Price [\$/MWh]	28.8	28.7	28.8	56.3	26.8	28.9
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RS	Tot.	669	19	206	0	0
	Conv.	0	0	3	0	0
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Minimizing RS leads to 0
RS in these cases

Some advantages of convex hull pricing

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Av. Price [\$/MWh]	28.8	28.7	28.8	56.3	26.8	28.9
Num. Suppl. with LOC	3.4%	1.8%	7.5%	79.2%	24.7%	9.5%
Av. LOC per Suppl.	628	19	37	148,232	4,577	94
	Tot.	37,576	323			14,217
LOC	Conv.	0	67			79
	Non-Conv.	37,576	257			14,137
	Tot.	669	19			0
RS	Conv.	0	0			0
	Non-Conv.	669	19			0

But it exacerbate the LOC

Some advantages of convex hull pricing

5

Minimizing the RS, on the other hand, exacerbates the LOC significantly

Table 2

Incentives of market agents on the CWE dataset depending on the price (average over 12 scenarios).

	MP	CHP	ELMP	MMWP	MMWP*	MMWP**
Dispatch Cost				5,489,000		
Av. Price [€/MWh]	42.8	43.4	47.2	27.7	23.9	52.6
Num. Suppl. with LOC	33.2%	35.9%	41.2%	37.7%	33.9%	64.3%
Av. LOC per Suppl.	3,528	278	1,112	890	720	27,066
LOC	Tot.	83,543	8,093	41,390,000	8,740,515	1,550,259
	Suppl.	83,543	6,810	39,000	8,740,515	1,250,017
	Net.	0	1,282	3,942	89,935,282	40,457,912
RS	Tot.	10,550	1,987	8,508	0	0
	Suppl.	10,550	1,987	8,508	0	0
	Net.	0	0	0	0	0

In presence of network constraint, this becomes dramatic

Motivations

- Theoretical
- Policy relevance: both in US and EU markets

Theoretical framework

- Formalize the problem
- Solution to the problem — pricing schemes: marginal pricing, convex hull pricing...

Numerical simulations

- Numerical analysis on auction datasets
- Cross comparison of different pricing schemes
- Some advantages of convex hull pricing

Conclusion

Conclusion

- Pricing the non-convexities in electricity auctions is a **long-lasting debate**
 - In the **US**: heterogeneous and changing policies
 - Recent discussions in **Europe** to reform the market pricing rule
- **Marginal pricing** could be an upgrade as compared to the current pricing rule: improvement in both **welfare** and **scalability**...
- But **Convex hull pricing comes with many benefits**
 - Significantly improves the incentives of the market participants
 - Ensures revenue shortfall remain contained
 - Guarantee that the LOC become relatively small when the market size increases
- While **minimizing the revenue shortfall**—or “make-whole payments”—may sound like a reasonable, target, it may also result in unbearable (and unbounded) lost opportunity costs

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Most of the material is based on :

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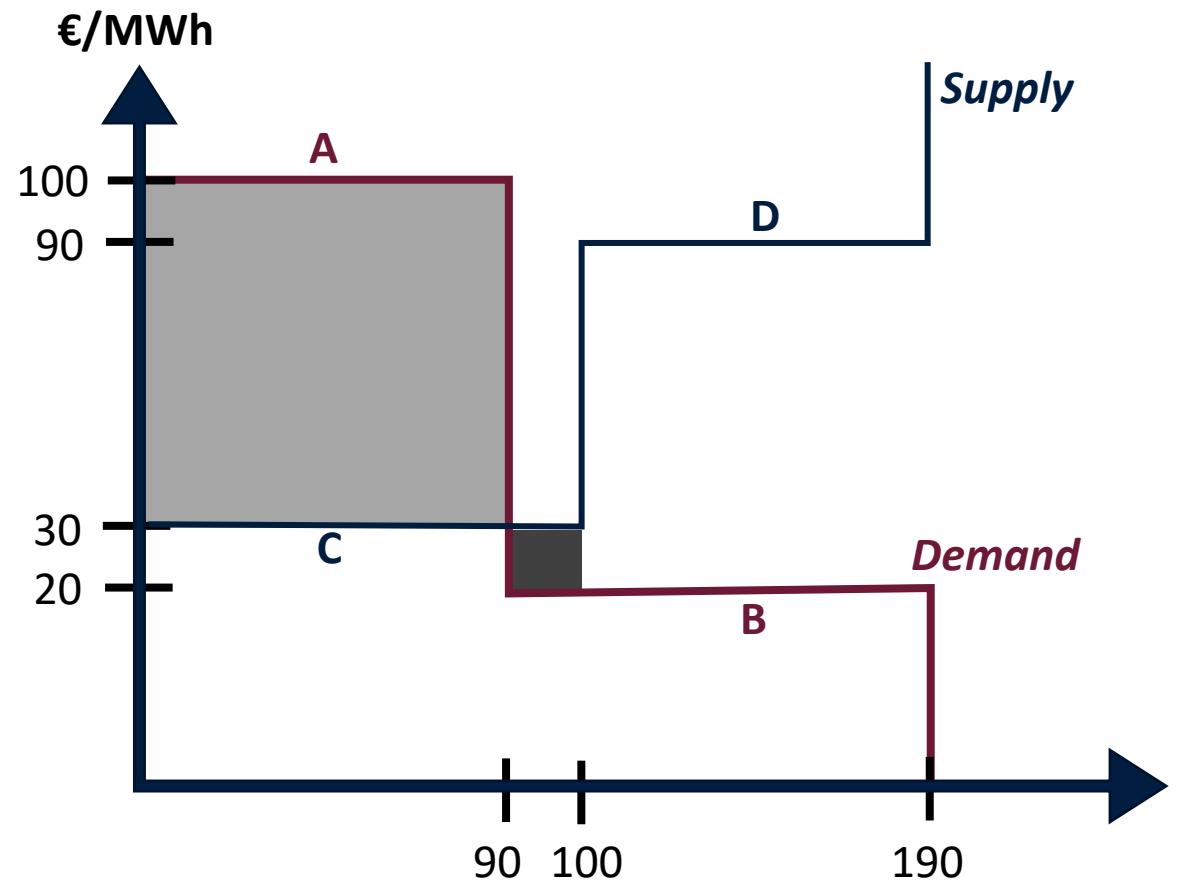
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Thank you!

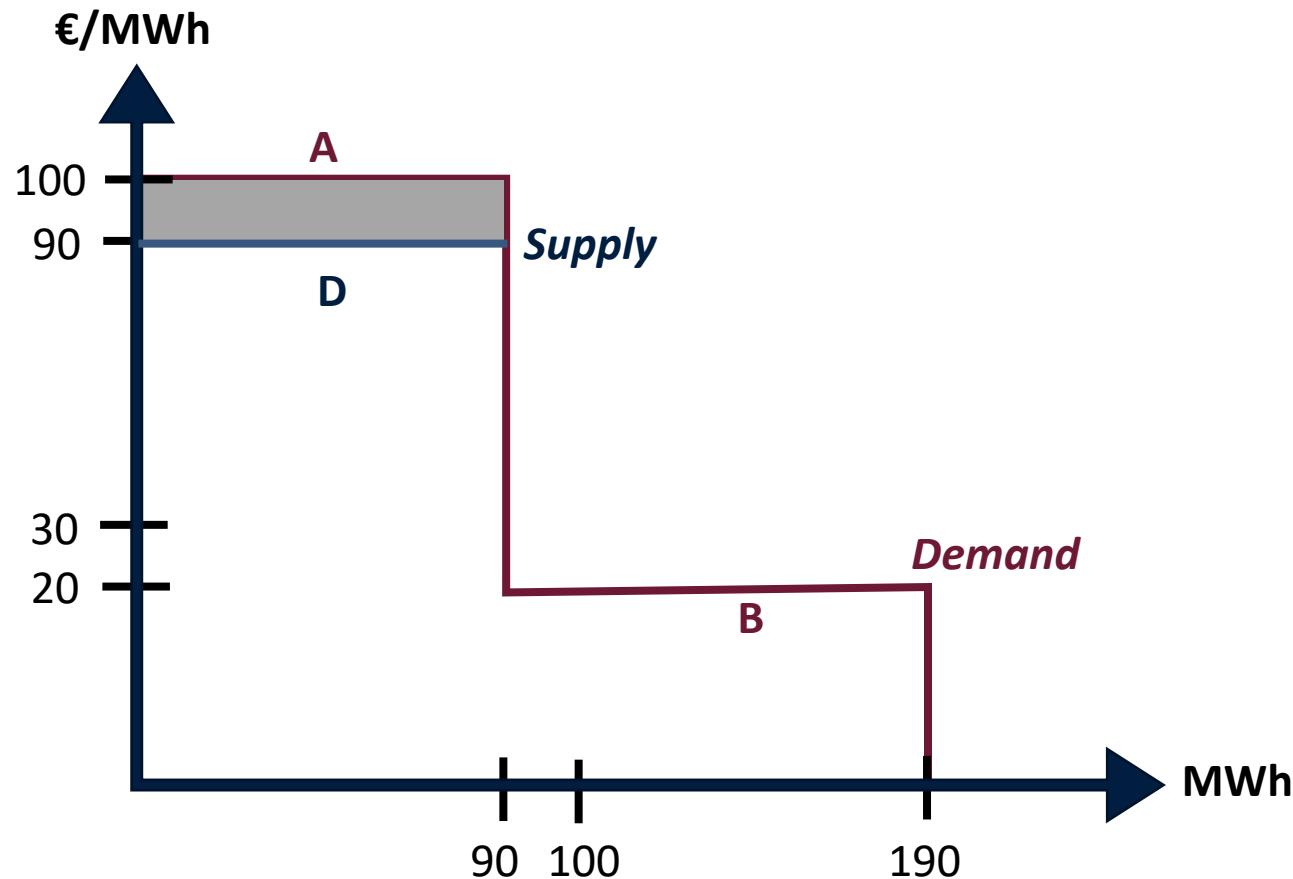
Nicolas Stevens
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Current European pricing rule



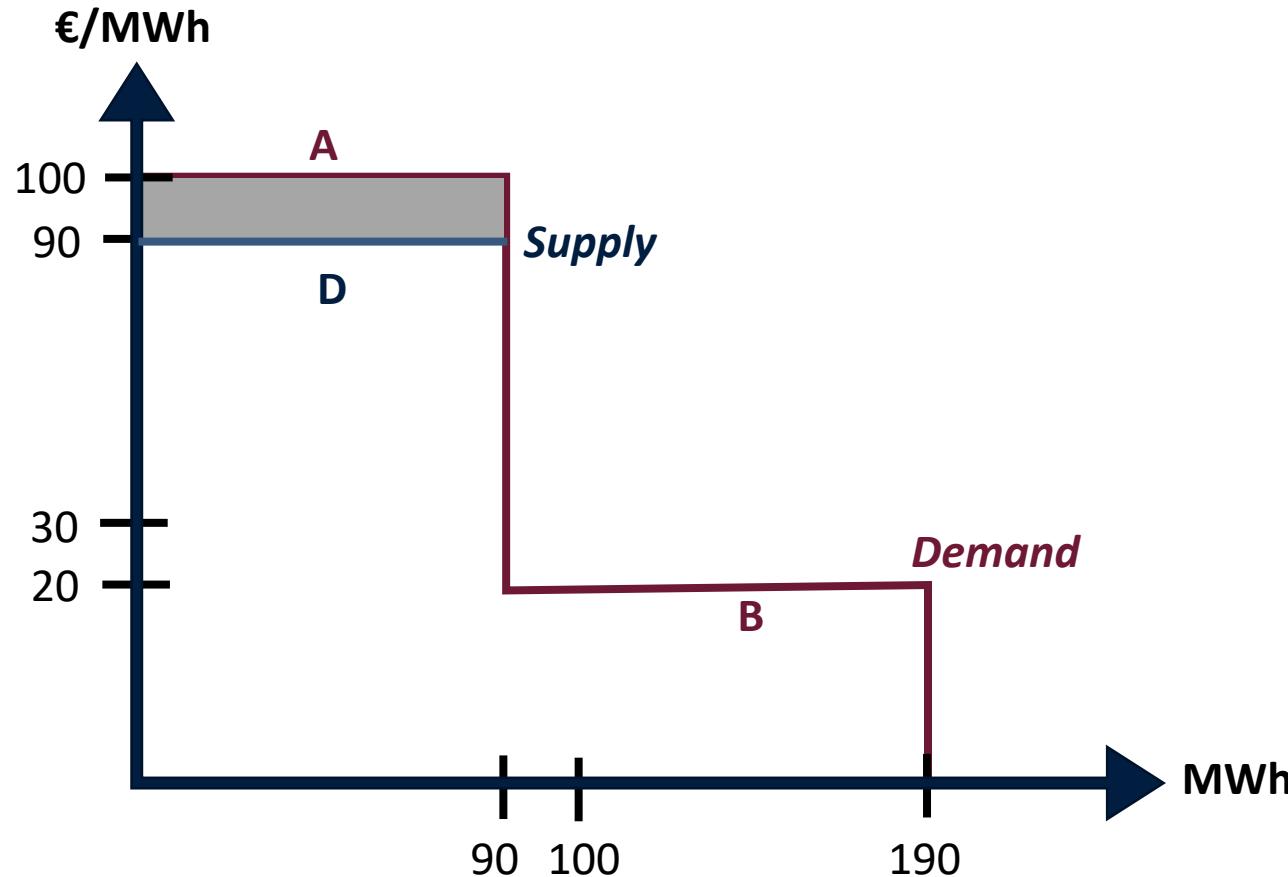
- Efficient solution: clear A, C and a fraction of B

Current European pricing rule



- Efficient solution: clear **A**, **C** and a fraction of **B**
- **Current European SDAC rule:**
 - Reject block **C**, clear **A** & **D**
 - Price: 90€/MWh

Current European pricing rule

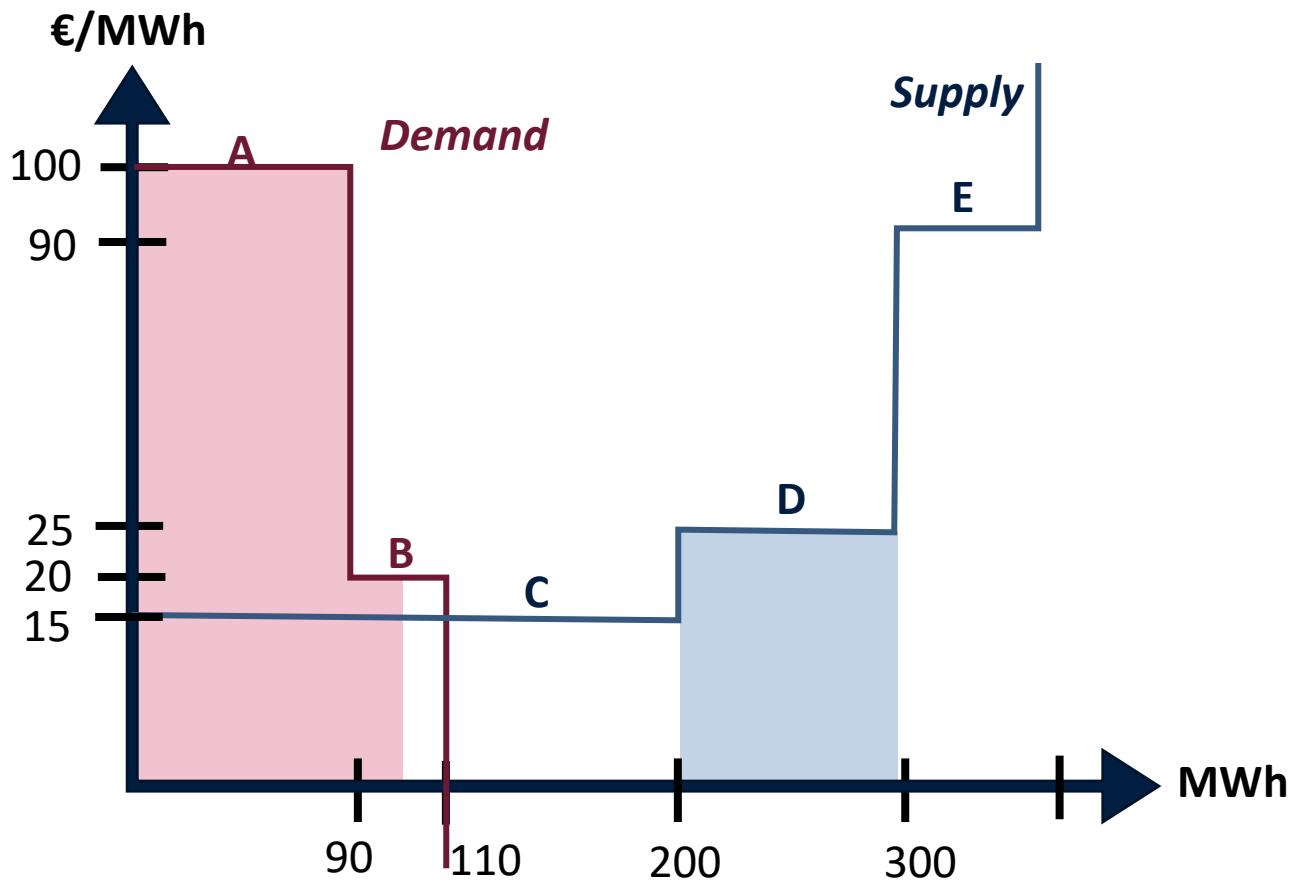


- Efficient solution: clear A, C and a fraction of B
- **Current European SDAC rule:**
 - Reject block C, clear A & D
 - Price: 90€/MWh
- 3 main **issues**
 - Inefficiencies
 - Not an equilibrium
 - Computational scalability issues

Some advantages of convex hull pricing

2 Advantages of minimizing the LOC over the RS

CHP vs MMWP



- C & D are *indivisible* (all-or-nothing)
- Welfare optimum : clear A, D and 10MW of B
- It is **impossible to find a uniform price that eliminate revenue shortfalls for all market participant in a two-sided auction**
- Here:
 - $p \geq 25$ to ensure 0 RS for D
 - $p \leq 20$ to ensure 0 RS for B
- **Some discrimination is in any case needed with elastic load**
- If load is **inelastic** (this is the case in the numerical simulations): **any price that is high enough ensures zero RS... → significant indeterminacy**

Some advantages of convex hull pricing

1

Significant improvements of incentives for the market' participants

Table 1

Incentives of market agents on the FERC dataset depending on the pricing rule

		IP	CHP	ELMP			
	Dispatch Cost						
	Av. Price [\$/MWh]	28.8	28.7	28.8			
	Num. Suppl. with LOC	3.4%	1.8%	7.5%			
	Av. LOC per Suppl.	628	19	37			
	Tot.	37,576	323	2,801			
LOC	Conv.	0	67	94			
	Non-Conv.	37,576	257	2,707			
	Tot.	669	19	206			
RS (in LOC)	Conv.	0	0	3			
	Non-Conv.	669	19	203			
	Tot.	36,907	304	2,596	130,147,114	1,176,050	14,217
FO	Conv.	0	66	91	1,978,501	5,268	79
	Non-Conv.	36,907	238	2,505	128,168,613	1,170,782	14,137

Nonetheless, let's stress that it does not mean that each participant is better off under CHP: some could be better off under IP.

Proposition: under IP pricing, all convex participants have zero LOC.

Some advantages of convex hull pricing

1

Significant improvements of incentives for the market' participants

Table 2

Incentives of market agents on the CWE dataset depending on the

		IP	CHP	ELMP			
Dispatch Cost					5,481,232	1,250,017	19,539,062
Av. Price [€/MWh]	Av.	42.8	43.4	47.3	90,512	8,746,513	1,250,017
Num. Suppl. with LOC		33.2%	35.9%	45.3%	89,935,282	40,457,912	19,539,062
Av. LOC per Suppl.		3,528	278	1,285	90,512	8,746,513	1,250,017
LOC	Tot.	83,543	8,093	42,948	90,512	8,746,513	1,250,017
	Suppl.	83,543	6,810	39,006	89,935,282	40,457,912	19,539,062
	Net.	0	1,282	3,942	89,935,282	40,457,912	19,539,062
RS (in LOC)	Tot.	10,550	1,987	8,508	0	0	0
	Suppl.	10,550	1,987	8,508	0	0	0
	Net.	0	0	0	0	0	0
FO	Tot.	72,993	6,106	34,440	98,681,795	41,808,171	20,789,079
	Suppl.	72,993	4,823	30,499	8,746,513	1,350,259	1,250,017
	Net.	0	1,282	3,942	89,935,282	40,457,912	19,539,062
RS (not in LOC)	Tot.	897,653	877,040	730,234	0	0	0
	Suppl.	897,653	877,040	730,234	0	0	0
	Net.	0	0	0	0	0	0

The network is a “convex participant”

Proposition: under IP pricing, all convex participants have zero LOC.

Some advantages of convex hull pricing

4

Consistency between LOC-minimization and welfare-maximization

CHP vs IP

Table 5

Sensitivity of lost opportunity cost to the primal optimality gap, depending on the price. The simulations are performed on CWE dataset (Spring WD 24). All figures are in €.

Proposition: under CHP or ELMP, the relationship between optimality gap and LOC is monotone

Proposition: under IP or MMWP, the relationship between optimality gap and LOC is *not* monotone

Opt. gap	Tot. Cost	IP LOC	ELMP LOC	CHP LOC	MMWP LOC	MMWP* LOC	MMWP** LOC
0.1%	5,213,357	115,043	43,346	12,611	127,174,509	46,374,970	25,487,688
0.09%	5,212,947	101,212	42,937	12,201	128,078,572	46,380,214	25,477,625
0.08%	5,212,121	194,521	42,111	11,375	128,503,837	46,534,306	25,374,010
0.07%	5,212,121	194,521	42,111	11,375	128,503,837	46,534,306	25,374,010
0.06%	5,211,690	129,455	41,680	10,944	129,671,679	46,505,121	25,366,511
0.05%	5,211,057	119,929	41,047	10,312	129,665,324	46,286,384	25,414,900
0.04%	5,210,885	119,579	40,875	10,140	129,855,305	46,366,246	25,411,805
0.03%	5,210,743	119,360	40,733	9,997	127,937,157	46,371,886	25,411,662
0.02%	5,210,685	119,351	40,675	9,940	127,677,227	46,360,290	25,411,605
0.01%	5,210,685	119,351	40,675	9,940	127,677,227	46,360,290	25,411,605

Some advantages of convex hull pricing

4

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Going from **0.09%** to **0.08%** reduces the costs by **826€...**
...but it increases the LOC by **93,309€**. Which solution
should be preferred?