The Definition of Costs and Cost Recovery

Cost Development Subcommittee April 25, 2011 Joe Bowring William Dugan Vikram Modi



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Incremental Cost Background

- Variable Operation and Maintenance Costs should include only short run incremental costs
- PJM Operating Agreement Schedule 2 provides for generators to include the following components of cost:
 - Incremental fuel cost
 - Incremental maintenance cost
 - Incremental labor cost; and
 - Other incremental operating costs



Avoidable Cost Rate (ACR) Rules

- Currently, any cost includable in offers to the PJM Energy Market is not includable in an Avoidable Cost Rate, per Tariff:
- PJM Tariff Attachment DD, Section 6.8 "For the purpose of determining an Avoidable Cost Rate, avoidable expenses are incremental expenses directly required to operate a Generation Capacity Resource that a Generation Owner would not incur if such generating unit did not operate in the Delivery Year or meet Availability criteria during Peak-Hour Periods during the Delivery Year."
- "For the purpose of determining an Avoidable Cost Rate, avoidable expenses shall exclude variable costs recoverable under cost-based offers to sell energy from operating capacity on the PJM Interchange Energy Market under the Operating Agreement."



Types of Cost

- Short run marginal cost
 - Costs that are incurred directly as a result of operating the unit. For example:
 - \circ Fuel
 - Emission Allowances
 - Consumables
- Avoidable cost or going forward cost (ACR)
 - Costs that would be avoided if the unit did not operate for a year. For example:
 - Combustion inspections
 - Major Inspection



Types of Costs

- **Fixed Cost**
 - Investments (APIR). For example:
 - Turbine
 - 。 SCR





Issue

- Cost types need to be mapped to:
 - Energy offers in Manual 15
 - Capacity offers (ACR)
 - Capacity offers (APIR)
- Incremental maintenance needs to be defined clearly in Manual 15.



Monitoring Analytics, LLC 2621 Van Buren Avenue Suite 160 Eagleville, PA 19403

(610) 271-8050

MA@monitoringanalytics.com

www.MonitoringAnalytics.com

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