

## Fuel Cost Policy and Hourly Offers Filing Manual 15 Conforming Changes



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The February 3<sup>rd</sup> FERC ruling on Hourly Offers accepted a significant portion of what PJM filed, with some items to be modified to support the filing:

- Several sections of Manual Language (M15) to be put into the Tariff (Operating Agreement) and some modifications to accommodate FERC order:
  - Standard of Review & when non-compliant
  - Penalty termination details, penalty allocation, and addition of a rebuttal period
  - Timeline for review of new and existing resources
  - Components of cost clarification
  - Dispute resolution clarification



## The FERC ruling affirmed:

- PJM's standard of review
  - Verifiable & systematic
- PJM's final authority to approve Fuel Cost Policies
- Penalty structure
- PJM Operating Agreement prohibits Maintenance Adders and Additional Labor Costs from being recovered in Avoided Cost Rates



## Systematic and Verifiable

## What does that mean?

- A series of steps that are followed to get to the creation of the cost-based offer
- These steps should have thresholds and triggers associated with them
- The steps should be able to be followed logically
- Explanations for liquid and poor liquidity markets should be defined
- An auditor should be able to follow the steps and arrive at the cost-based offer



- PJM Compliance Filing due <u>March 6, 2017</u>
  - Effective Date for <u>Fuel Cost Policies</u>, <u>May 15</u>, 2017
  - Implementation Date of <u>Hourly Offers</u>, <u>November 1</u>, 2017
- Manual 15 Changes
  - PJM MIC Special Session, February 21, 2017
  - MRC First Read, February 23,
  - MRC Endorsement, March 23
  - MC Endorsement, April 27
- Fuel Cost Policy Annual Review Process June 15 November 1, 2017