**No-Load Definition: Issue Summary**

**Issue:**

All generation owners in PJM are required to submit cost-based offers according to the guidelines set forth in Manual 15, Cost Development Guidelines. A variable portion of the cost offer is based on No Load cost. The current definition of No Load costs in Manual 15 lacks sufficient clarity to properly compute and evaluate costs. Additionally, the Manual provides no information on how No Load costs are computed for a combined-cycle unit though this is provided for every other unit type.

Please refer to the following links for material related this issue.

- [No Load Definition: Issue Tracking](#)
- [No Load Problem Statement](#)

**Interests:**

The following interests were identified at the February, 2011 CDS:

- Current practices should be appropriate reflected in the market rules. The rules should reflect the need for adjustment of no load to create monotonically increasing offer curves
- Create rules for the development of No Load costs for Combined Cycles that are consistent with the rules for other units.

**Design Criteria:**

The following design criteria were identified at the February, 2011 CDS:

- Development of a single method and preferred definition of no load.
- Create a clear procedure for calculation of no load costs
- The need to adjust no load costs to create monotonically increasing curves must be maintained
- Solution cannot require finer information granularity than physically exists
- Development of a clear calculation procedure so that no load that is calculated by the MMU and by market participants should be the same number