Section 1: Introduction

1.7.3 No Load Cost

**No-Load Fuel** (MBTU/hour) -- is the total fuel to sustain zero net output MW at synchronous generator speed.

*No-load cost* – The no-load cost is the cost needed to create the starting point of a monotonically increasing incremental cost curve. The calculated no-load cost may have to be adjusted to ensure that the slope of the Generator Offer Curve is monotonically increasing.

Section 2: Policies for All Unit Types

2.5 No Load

2.5.1 No-Load Definitions

*No-load cost* is the hourly fixed cost, expressed in $/hr, required to create the starting point of a monotonically increasing incremental cost curve.

2.5.2 No-Load Fuel

All PJM members shall develop no-load costs for their units. The no-load heat input may be determined by collecting heat input values as a function of output and performing a regression analysis. The heat input values as a function of output may be either created from heat rate test data or the initial design heat input curve for an immature unit.

The minimum number of points to develop a heat input curve shall be 2 points for a dispatchable unit with a variable output and 1 point for a unit with a fixed output.

Sufficient documentation for each generating unit's no-load point in MBTUs (or fuel) per hour shall consist of a single contact person and/or document to serve as a consistent basis for scheduling, operating and accounting applications. The MMU can verify calculation methods used subject to the Cost Methodology and Approval Process including the elements of Attachment B.

2.5.3 No Load Calculation

The initial estimate of a unit's **No-Load Cost ($/Hr)** is the No-Load fuel Cost multiplied by the performance factor, multiplied by the (Total Fuel-Related Cost (TFRC))

\[
\text{No Load Cost}($ / \text{Hour}) = \left( \frac{\text{No Load Fuel} \times \text{Performance Factor}}{\text{TFRC}} \right)
\]

The unit’s generator offer curve must comply with PJM's monotonically increasing curve requirement. In some instances, the calculated no-load cost may have to be adjusted to ensure that the slope of the generator offer curve is monotonically increasing. The No-Load cost adjustment is limited to a maximum difference of $1/MW between the unit's first and second incremental cost offers.

As an alternative to adjusting the no-load cost, the no-load cost may also be calculated by subtracting the incremental cost (unit’s economic minimum cost-offer value multiplied by MW value) at the unit’s economic minimum point from the total cost (from the heat input at economic minimum value) at the unit’s economic minimum point.

\[
\text{No Load Cost}($ / \text{Hour}) =
\]
Economic Minimum

Note that if the unit of VOM is in terms of dollars per Equivalent Service Hours (ESH), the equation changes to:

\[
\text{No Load Cost} (\$/\text{Hour}) = \\
(\text{Economic Minimum Heat Input} \times \text{Performance Factor} \times \text{TFRC}) + \text{VOM} \\
- (\text{Economic Minimum Incremental Cost} (\$/\text{MWH}) \times \text{Economic Minimum (MW)})
\]

When using No Load Fuel to calculate No Load Cost, the user must submit block average cost and cannot select “Use Offer Slope” when entering cost information into eMKT. When using the alternative incremental cost method to calculate No-Load, the user must submit incremental cost and select “Use Offer Slope” when entering cost information into eMKT.

---

**Attachment B: No Load Calculation Examples**

The information included in this Attachment B provides guidance for calculating No-Load costs for various types of generating units.

**B.1 No-Load Fuel**

All PJM members shall use no-load fuel to develop no-load costs for their units. Since generating units cannot normally be run stable at zero net output, the no-load fuel may be determined by:

- Collecting heat input values as a function of output and performing a regression analysis,
- Using heat input values as provided by Original Equipment Manufacturer and performing a regression analysis,
- Using the initial design heat input curve for an immature unit and performing a regression analysis
- Determining the measured value of fuel consumed at zero net output from test data (moment of generator output breaker closure).
B.2 Typical Steam Unit Example

An example of collecting heat input values as a function of output and performing a regression analysis on the data to obtain the no-load fuel for a typical fossil steam unit is shown below:

Each diamond in the graph above indicates one hourly heat input data point calculated from plant instrumentation during operations. A regression analysis was performed on the data collected to obtain the unit’s Heat Input curve as a function of Output with oil as a fuel:

\[
\text{Heat Input (mmBTU/Hr)} = 0.00156391 \times MW^2 + 9.68940 \times MW + 306.744
\]

Then the No-Load Fuel at zero output is

\[
\text{No - Load Fuel} = 306.744 \text{ mmBtu/hr}
\]

The initial estimate of a unit’s No-Load Cost ($/Hr) is:
Performance Factor = 1.02
Total Fuel related Cost (TFRC) = $14.00 mmBtu
No Load Cost ($/Hour) = 
(No Load Fuel * Performance Factor * TFRC) 
= 306.744 mmBtu/hr * 1.02 * $14.00/mmBtu 
= $4,380/hr

The unit’s Cost Curve must be developed to determine if adjustments are needed for the unit’s No-Load Cost. The Heat Input Curve Equation is used to determine the units heat input at various outputs. Total Operating Cost is calculated by:

VOM = $0.15/mmBtu

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Heat Input (mmBtu/hr)</th>
<th>Total Operating Cost ($/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>795.12</td>
<td>11,476</td>
</tr>
<tr>
<td>160</td>
<td>1897.08</td>
<td>27,381</td>
</tr>
<tr>
<td>310</td>
<td>3460.75</td>
<td>49,949</td>
</tr>
<tr>
<td>410</td>
<td>4542.29</td>
<td>65,559</td>
</tr>
<tr>
<td>525</td>
<td>5824.73</td>
<td>84,068</td>
</tr>
<tr>
<td>550</td>
<td>6109.00</td>
<td>88,171</td>
</tr>
</tbody>
</table>

The unit’s Incremental Cost ($/MWh) at various outputs can be determined arithmetically by the following equation:

Incremental Cost ($/MWh) =
Total Operating Cost MW2 − Total Operating Cost MW1/(MW2 − MW1)

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>141.91</td>
</tr>
</tbody>
</table>
When calculating the first increment, MW1 is zero and the Total Operating Cost MW1 is the No-Load Cost. Since the Incremental Costs are monotonically increasing, no adjustment to the No-Load Cost is required.

The unit’s Incremental Cost ($/MWh) at various outputs can also be determined by using the derivative of the Heat Input Curve:

\[
\text{Incremental Cost (}/MWh) = (2 \times 0.00156391 \times MW + 9.6894) \times \text{Performance Factor} \times (\text{TRFC + VOM})
\]

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>142.10</td>
</tr>
<tr>
<td>160</td>
<td>147.07</td>
</tr>
<tr>
<td>310</td>
<td>153.84</td>
</tr>
<tr>
<td>410</td>
<td>158.36</td>
</tr>
<tr>
<td>525</td>
<td>163.55</td>
</tr>
<tr>
<td>550</td>
<td>164.68</td>
</tr>
</tbody>
</table>

The no-load cost is calculated by subtracting the incremental cost (unit’s economic minimum cost-offer value multiplied by MW value) at the unit’s economic minimum point from the total cost (from the heat input at economic minimum value) at the unit’s economic minimum point.

\[
\text{No – Load Cost (}$/hr) = (\text{Economic Minimum Heat Input} \times \text{Performance Factor} \times (\text{TRFC + VOM})) - (\text{Economic Minimum Incremental Cost} \times \text{Economic Minimum MW})
\]
\[
= (795.12\text{mmBtu/hr} \times 1.02 \times (\$14.00/\text{mmBtu} + \$0.15/\text{mmBtu})) - (\$142.10/\text{MWh} \times 50 \text{ MW})
= \$4,370.97/\text{hr}
\]

Differences in the calculated No-Load between the two methods are due to the differences in using a block average cost offer method versus a sloped derivative cost offer. When using the derivative method, user must select “Use Sloped Offer” when entering cost information into eMKT.
B.3 Typical Combustion Turbine Example

An example of using the design heat input curve and performing a regression analysis to obtain the no-load fuel for a simple cycle combustion turbine with peak firing is shown below:

Each diamond in the graph above is a design heat input data point obtained from the original equipment manufacturer or calculated by heat balance. A regression analysis was performed on the design data to obtain the unit’s Heat Input curve as a function of Output with natural gas as a fuel:

$$\text{Heat Input (mmBTU/Hr)} = 0.0498 \times MW^2 + 0.8122 \times MW + 578.23$$

Then the No-Load Fuel at zero output is

$$\text{No - Load Fuel} = 578.23 \text{ mmBtu/hr}$$

The initial estimate of a unit’s **No-Load Cost ($/Hr)** is:

Performance Factor = 1.02
Total Fuel related Cost (TFRC) = $4.00 mmBtu

No Load Cost($ / Hour) =
( No Load Fuel * Performance Factor * TFRC)
= 578.23mmBtu/hr * 1.02 * $4.00/mmBtu
= $2,359/hr

The unit’s Cost Curve must be developed to determine if adjustments are needed for the unit’s No-Load Cost.
The Heat Input Curve Equation is used to determine the units heat input at various outputs. Total Operating Cost
is calculated by:
Maintenance Factor  = 1.0 for Minimum & Base  (=4.0 for Peak)
VOM = $75.00/ESH

Total Operating Cost ($/hr) = Heat Input * Performance Factor * TFRC + Maintenance Factor * VOM

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Heat Input (mmBtu/hr)</th>
<th>Total Operating Cost ($/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>70</td>
<td>879.02</td>
<td>3,662</td>
</tr>
<tr>
<td>90</td>
<td>1054.57</td>
<td>4,378</td>
</tr>
<tr>
<td>100</td>
<td>1157.28</td>
<td>5,022</td>
</tr>
</tbody>
</table>

The unit’s Incremental Cost ($/MWh) at various outputs can be determined arithmetically by the following
equation:

Incremental Cost ($/MWh) =
Total Operating Cost MW2 − Total Operating Cost MW1/(MW2 − MW1)

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>70</td>
<td>18.61</td>
</tr>
<tr>
<td>90</td>
<td>35.82</td>
</tr>
<tr>
<td>100</td>
<td>64.42</td>
</tr>
</tbody>
</table>
When calculating the first increment, MW1 is zero and the Total Operating Cost MW1 is the No-Load Cost. Since the Incremental Costs are monotonically increasing, no adjustment to the No-Load Cost is required.

The unit’s Incremental Cost ($/MWh) at various outputs can also be determined by using the derivative of the Heat Input Curve:

\[
\text{Incremental Cost ($/MWh)} = \frac{(2 \times 0.0498 \times \text{MW} + 0.8122) \times \text{Performance Factor} \times \text{TFRC} + \Delta \text{VOM}/\Delta \text{MW}}{}
\]

Since VOM is in the units of $/hr it can only be added to the first incremental and any incremental where the maintenance factor changes.

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>70</td>
<td>32.83</td>
</tr>
<tr>
<td>90</td>
<td>39.89</td>
</tr>
<tr>
<td>100</td>
<td>66.45</td>
</tr>
</tbody>
</table>

The no-load cost is calculated by subtracting the incremental cost (unit’s economic minimum cost-offer value multiplied by MW value) at the unit’s economic minimum point from the total cost (from the heat input at economic minimum value) at the unit’s economic minimum point.

\[
\text{No-Load Cost ($/hr)} = \\
\quad = (\text{Economic Minimum Heat Input} \times \text{Performance Factor} \times \text{TFRC}) + \text{VOM} \\
\quad \quad \quad - (\text{Economic Minimum Incremental Cost} \times \text{Economic Minimum MW}) \\
\quad = (879.02\text{mmBtu/hr} \times 1.02 \times $4.00/\text{mmBtu}) + ($75.00/\text{ESH}) - ($32.83/\text{MWh} \times 70 \text{ MW}) \\
\quad = $1,363.30/\text{hr}
\]

Differences in the calculated No-Load between the two methods are due to the differences in using a block average cost offer method versus a sloped derivative cost offer. When using the derivative method, user must select “Use Sloped Offer” when entering cost information into eMKT.
B.4 Typical 2 on 1 Combined Cycle with Duct Burning Example

An example of using the design heat input curve and performing a regression analysis of the data to obtain the no-load fuel for a two on one combined cycle with duct burners is shown below:

Each diamond in the graph above is a design heat input data point obtained from the original equipment manufacturer or calculated by heat balance. A regression analysis was performed on the design data to obtain the unit’s Heat Input curve as a function of Output with natural gas as a fuel:

\[
\text{Heat Input (mmBTU/Hr)} = 0.0078 \times MW^2 + 4.5164 \times MW + 312.36
\]

Then the No-Load Fuel at zero output is

\[
\text{No Load Fuel} = 312.36 \text{ mmBtu/hr}
\]

The initial estimate of a unit’s No-Load Cost ($/Hr) is:

Performance Factor = 1.02
Total Fuel related Cost (TFRC) = $4.00 mmBtu

No Load Cost($ / Hour) =
( No Load Fuel * Performance Factor * TFRC)
= 312.36 mmBtu/hr * 1.02 * $4.00/mmBtu
= $1,274/hr

The unit’s Cost Curve must be developed to determine if adjustments are needed for the unit’s No-Load Cost. The Heat Input Curve Equation is used to determine the units heat input at various outputs. Total Operating Cost is calculated by:

Maintenance Factor = 1.0
VOM = $75.00/ESH

Total Operating Cost ($/hr)
= Heat Input * Performance Factor * TFRC + Maintenance Factor * VOM

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Heat Input (mmBtu/hr)</th>
<th>Total Operating Cost ($/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>872.58</td>
<td>3,635</td>
</tr>
<tr>
<td>135</td>
<td>1064.23</td>
<td>4,417</td>
</tr>
<tr>
<td>270</td>
<td>2100.41</td>
<td>8,720</td>
</tr>
<tr>
<td>300</td>
<td>2369.28</td>
<td>9,817</td>
</tr>
</tbody>
</table>

The unit’s Incremental Cost ($/MWh) at various outputs can be determined arithmetically by the following equation:

Incremental Cost ($/MWh) =
Total Operating Cost MW2 – Total Operating Cost MW1 / (MW2 – MW1)

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>22.48</td>
</tr>
<tr>
<td>135</td>
<td>26.06</td>
</tr>
</tbody>
</table>
When calculating the first increment, MW1 is zero and the Total Operating Cost MW1 is the No-Load Cost. Since the Incremental Costs are monotonically increasing, no adjustment to the No-Load Cost is required.

The unit’s Incremental Cost ($/MWh) at various outputs can also be determined by using the derivative of the Heat Input Curve:

\[
\text{Incremental Cost ($/MWh) = } \frac{(2 \times 0.0078 \times \text{MW} + 4.5164) \times \text{Performance Factor} \times \text{TFRC} + \Delta \text{VOM/ΔMW}}{
\]

Since VOM is in the units of $/hr it can only be added to the first incremental and any incremental where the maintenance factor changes.

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>25.82</td>
</tr>
<tr>
<td>135</td>
<td>27.02</td>
</tr>
<tr>
<td>270</td>
<td>36.17</td>
</tr>
<tr>
<td>300</td>
<td>37.52</td>
</tr>
</tbody>
</table>

The no-load cost is calculated by subtracting the incremental cost (unit’s economic minimum cost-offer value multiplied by MW value) at the unit’s economic minimum point from the total cost (from the heat input at economic minimum value) at the unit’s economic minimum point.

\[
\text{No - Load Cost ($/hr) = } \frac{(\text{Economic Minimum Heat Input} \times \text{Performance Factor} \times \text{TFRC} + \text{VOM})}{\text{Economic Minimum Incremental Cost} \times \text{Economic Minimum MW}}
\]

\[
= (872.58\text{mmBtu/hr} \times 1.02 \times \$4.00/\text{mmBtu}) + ($75.00/\text{ESH}) - ($25.82/\text{MWh} \times 105 \text{ MW})
\]

\[
= $924.03/\text{hr}
\]

Since VOM is in the units of $/hr it can only be added to the first incremental and any incremental where the maintenance factor changes.
Differences in the calculated No-Load between the two methods are due to the differences in using a block average cost offer method versus a sloped derivative cost offer. When using the derivative method, user must select "Use Sloped Offer" when entering cost information into eMKT.

**B.5 No-Load Cost Adjustments**

The calculated no-load cost may need to be adjusted to allow for the first incremental point of the unit’s generator offer curve to comply with PJM’s monotonically increasing curve requirement.

An example of adjusting the no-load cost for a typical natural gas fired Steam Unit after calculation follows. Heat input values as a function of output was collected for a typical fossil steam and a regression analysis was performed to obtain the no-load.

![Typical Natural Gas Heat Input Output Curve for 550 MW Steam Unit from Plant Instrumentation Data](image)

Each diamond in the graph above indicates one hourly heat input data point calculated from plant instrumentation during operations. A regression analysis was performed on the data collected to obtain the unit’s Heat Input curve as a function of Output with oil as a fuel:

Heat Input (mmBTU/Hr) =
Then the No-Load Fuel at zero output is

\[
\text{No - Load Fuel} = 238.232 \text{ mmBtu/hr}
\]

The initial estimate of a unit's **No-Load Cost ($/Hr)** is:

- Performance Factor = 1.02
- Total Fuel related Cost (TFRC) = $4.00 mmBtu

\[
\text{No Load Cost}($ / \text{Hour}) = \\
(\text{No Load Fuel} \times \text{Performance Factor} \times \text{TFRC}) \\
= 238.232 \text{ mmBtu/hr} \times 1.02 \times \frac{4.00}{\text{mmBtu}} \\
= 972/\text{hr}
\]

The unit's Cost Curve must be developed to determine if adjustments are needed for the unit's No-Load Cost. The Heat Input Curve Equation is used to determine the units heat input at various outputs. Total Operating Cost is calculated by:

- VOM = $0.15/mmBtu

\[
\text{Total Operating Cost ($/hr)} = \text{Heat Input} \times \text{Performance Factor} \times (\text{TFRC} + \text{VOM})
\]

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Heat Input (mmBtu/hr)</th>
<th>Total Operating Cost ($/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>774.58</td>
<td>3,279</td>
</tr>
<tr>
<td>160</td>
<td>1957.15</td>
<td>8,285</td>
</tr>
<tr>
<td>310</td>
<td>3575.53</td>
<td>15,135</td>
</tr>
<tr>
<td>410</td>
<td>4658.16</td>
<td>19,718</td>
</tr>
<tr>
<td>525</td>
<td>5906.85</td>
<td>25,004</td>
</tr>
<tr>
<td>550</td>
<td>6178.82</td>
<td>26,155</td>
</tr>
</tbody>
</table>
The unit's Incremental Cost ($/MWh) at various outputs can be determined arithmetically by the following equation:

\[
\text{Incremental Cost ($/MWh)} = \frac{\text{Total Operating Cost MW2} - \text{Total Operating Cost MW1}}{(\text{MW2} - \text{MW1})}
\]

When calculating the first increment, MW1 is zero and the Total Operating Cost MW1 is the No-Load Cost. However due to the quality of the heat input data, the first increment of the cost offer was greater than the second increment. This is shown in the graph below:

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>46.14</td>
</tr>
<tr>
<td>160</td>
<td>45.51</td>
</tr>
<tr>
<td>310</td>
<td>45.67</td>
</tr>
<tr>
<td>410</td>
<td>45.83</td>
</tr>
<tr>
<td>525</td>
<td>45.96</td>
</tr>
<tr>
<td>550</td>
<td>46.05</td>
</tr>
</tbody>
</table>
The No-Load cost was then raised to $1007.76 until the first increment of the cost offer was less than $1/MWh below the second increment, producing a monotonically increasing curve in the graph below:
To avoid making adjustments to the No-Load, first calculate the unit's Incremental Cost ($/MWh) at various outputs using the derivative of the Heat Input Curve:

\[
\text{Incremental Cost ($/MWh)} = (2 \times 0.000148321 \times \text{MW} + 10.7195) \times \text{Performance Factor} \times (\text{TFRC} + \text{VOM})
\]

<table>
<thead>
<tr>
<th>Output (MW)</th>
<th>Incremental Cost ($/MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>45.43</td>
</tr>
<tr>
<td>160</td>
<td>45.58</td>
</tr>
<tr>
<td>310</td>
<td>45.76</td>
</tr>
<tr>
<td>410</td>
<td>45.89</td>
</tr>
<tr>
<td>525</td>
<td>46.03</td>
</tr>
<tr>
<td>550</td>
<td>46.06</td>
</tr>
</tbody>
</table>
The no-load cost is calculated by subtracting the incremental cost (unit’s economic minimum cost-offer value multiplied by MW value) at the unit’s economic minimum point from the total cost (from the heat input at economic minimum value) at the unit’s economic minimum point.

\[
\text{No – Load Cost ($/hr)} = \\
(\text{Economic Minimum Heat Input} \times \text{Performance Factor} \times (\text{TRFC} + \text{VOM})) - (\text{Economic Minimum Incremental Cost} \times \text{Economic Minimum MW}) \\
= (774.58\text{mmBtu/hr} \times 1.02 \times ($4.00/\text{mmBtu} + $0.15/\text{mmBtu})) - ($45.43/\text{MWh} \times 50 \text{ MW}) \\
= $1007.3/\text{hr}
\]

Differences in the calculated No-Load between the two methods are due to the differences in using a block average cost offer method versus a sloped derivative cost offer. When using the derivative method, user must select “Use Sloped Offer” when entering cost information into eMKT.

**B.6 Combustion Turbine Zero No-Load Example**

A zero No-Load example for a simple cycle combustion turbine with a single offer block is shown below:
Each diamond in the graph above is a design heat input data point obtained from the original equipment manufacturer or calculated by heat balance. A regression analysis can be performed on the design data to obtain the unit’s Heat Input curve as a function of Output with natural gas as a fuel:

\[
\text{Heat Input (mmBTU/Hr)} = 0.0498 \times MW^2 + 0.8122 \times MW + 578.23
\]

Or the fuel input to the unit during operation can be directly measured.

The unit may be submitted with a single cost offer block and zero **No-Load Cost ($/Hr).**

\[
\text{No Load Cost} = 0/\text{Hr}
\]

The unit’s Heat Input Curve Equation or actual measured fuel input data is used to determine the unit’s heat input at its maximum output (100MW).

\[
\begin{align*}
\text{Heat Input (mmBTU/Hr)} &= 0.0498 \times MW^2 + 0.8122 \times MW + 578.23 \\
0.0498 \times (100)^2 + 0.8122 \times (100) + 578.23 &= 1157.28 \text{ mmBtu/hr}
\end{align*}
\]

Total Operating Cost at 100 MW is calculated by:

\[
\begin{align*}
\text{Total Operating Cost ($/hr)} &= \text{Heat Input} \times \text{Performance Factor} \times \text{TFRC} + \text{Maintenance Factor} \times \text{VOM} \\
&= 1157.28 \text{ mmBtu/hr} \times 1.02 \times $4.00/\text{mmBtu} + 4.0 \times $75/\text{hr} \\
&= $5,022/\text{hr}
\end{align*}
\]

The unit’s Incremental Cost ($/MWh) at maximum output with a zero No-Load Cost is calculated by:

\[
\text{Incremental Cost ($/MWh)} =
\]
Total Operating Cost Maximum Output/(Maximum Output)

($5,022)/(100MW)

= $50.22 /MWh