



# Problem/Opportunity Statement

## FUEL COST POLICY (FCP) UPDATES FOR M15

### PROBLEM / OPPORTUNITY STATEMENT

Manual 15 Language regarding requirements for Fuel Cost Policies does not explicitly address situations where a Market Seller or the Market Seller's designated agent (e.g., energy manager) may be affiliated with such Market Seller or its agent's fuel supplier. Such affiliation could lead to Market Sellers submitting cost-based offers that reflect unverifiable fuel costs. That is, there may be inherent incentives for a fuel supplier to provide a fuel cost estimate to an affiliated Market Seller or designated agent of such Market Seller that may not be reflective of the expected fuel cost or the market price. Such an outcome could be used by Market Sellers that have market power (e.g., fail the three pivotal supplier test) to potentially manipulate the market by obtaining a fuel cost estimate from an affiliated fuel supplier that may not reflect market pricing of fuel costs. Such an approach would allow Market Sellers to set energy prices at an uncompetitive level. PJM proposes to address this gap in market power mitigation by specifying that Market Sellers (or their designated agents) may not obtain fuel cost estimates from affiliated fuel suppliers.