The Definition of Costs and Cost Recovery

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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:
 - 。 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.

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