# Variable Operation & Maintenance Definition

Cost Development Task Force December 6, 2010 Joseph Bowring William Dugan Vikram Modi



#### **Incremental Cost**

- Variable Operation and Maintenance Costs should include only short run incremental costs
- PJM Operating Agreement Schedule 2B provides for generators to include the following components of cost:
  - Incremental fuel cost
  - Incremental maintenance cost
  - Incremental labor cost; and
  - Other incremental operating costs.

# Operating and Maintenance Cost Guidelines

- CT Maintenance Adder Total dollars from FERC Account 553 divided by Equivalent Service Hours (ESH).
- FERC Account 553 "This account shall include the cost of labor, materials used and expenses incurred in maintenance of plant..."
- This includes only incremental costs, or short-run marginal costs, which are used to represent the cost of the next unit (MW) of energy, in PJM Energy Markets.

## **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."

### **VOM Proposed Change Draft Schedule**

12/06/10 - Review Proposal and Vote at CDTF

12/15/10 – Informational at MRC

01/19/11 - Vote at MRC

01/27/11 – Informational at MC

03/31/11 - Vote at MC

04/04/11 - 04/06/11 - PJM Board Meeting

#### 2014/2015 Base Residual Auction Timeline

03/02/11 – MMU Data Submittal Due

05/02/11 – RPM Auction opens



### **Units with Long Term Tolling Agreements**

- Long term tolling agreements may include variable and fixed components
- The appropriate variable costs to include in any cost-based energy offer:
  - Incremental fuel costs
  - Incremental VOM
- Fuel costs should be actual
- VOM may be estimated
  - Goal is to match actual incremental VOM
  - Exclude margins
  - Exclude other costs
  - A test for estimated VOM required to ensure reasonable accuracy



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