

## Fuel Cost Policy Guidelines for Natural Gas Resources

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## Fuel Cost Policy (FCP) Requirements

- Resources that wish to submit a non-zero cost-based offer into the energy market are required to either:
  - Have a PJM-approved Fuel Cost Policy; or
  - Follow the temporary cost offer methodology until PJM approves a new Fuel Cost Policy
    - (Published index settle price) x (resource's heat input curve)
    - Index pricing point assigned by PJM in consultation with Market Seller & timely input from IMM
    - Adders and other components of a cost-based offer cannot be included (e.g. VOM, emissions, & 10% adder)

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- Provide applicable indices and method for estimating fuel price
  - Estimation method should reflect the market price of fuel at the generator's location at the time the offer is submitted
  - Estimation method must be systematic and verifiable
    - Document a standardized method or methods for calculating fuel costs including objective triggers for each method
    - Fuel price should be able to be calculated by PJM/IMM after the fact with the same data available to market seller at time decision was made and documentation for that data from a public or a private source.
  - FCP should account for illiquid conditions



- Fuel supplier and/or broker's quotes may only be used if fuel supplier/broker is an independent third-party
  - Otherwise, must document estimation method for price quote in the FCP
- FCP should specify transportation or other adders incurred to deliver gas
  - Must be variable (\$/MMBtu)
  - Must be documented



- "Other adders" may include:
  - Contract rates
  - Gas pipeline storage, park & loan, or other similar tariff-based rates for gas balancing
    - Rates must be incurred before they can be included
- Gas pipeline penalties <u>cannot be included</u>
  - Rates charged for taking unauthorized gas in violation of an interstate pipeline and/or LDC tariff or contract
  - Balancing charges from ratable take gas
  - Gas balancing due to change in ownership cannot be included

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- FCP must specify using gas day (GD1 & GD2) when estimating fuel price
- All policies are required to have a day-ahead section
- The following sections are optional:
  - Rebid
  - Multiday (if estimation practices are different on holidays/weekends)
  - Intraday
    - Required to check gas prices 1x per day and update if costs decrease for uncommitted hours
    - Triggers required for additional updates
  - PJM will assume that offers are not being updated during these time periods if not included in the FCP



- Operating Agreement, Schedule 2: <u>https://agreements.pjm.com/oa/</u>
- Manual 15: <a href="https://pjm.com/-">https://pjm.com/-</a>
  /media/documents/manuals/m15.ashx
- MIRA Fuel Cost Policy Template for Natural Gas: <a href="https://www.monitoringanalytics.com/tools/docs/Natural\_Gas\_Cost\_Policy\_Template\_20200330.docx">https://www.monitoringanalytics.com/tools/docs/Natural\_Gas\_Cost\_Policy\_Template\_20200330.docx</a>
- Fuel Cost Policy Guidelines: <a href="https://pjm.com/markets-and-operations/energy/fuel-cost-policies">https://pjm.com/markets-and-operations/energy/fuel-cost-policies</a>





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