

MIC Special Sessions: Fuel Cost Policy

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Fuel Cost Policy Impacts

| Action Required | Deadline | Who May Be Affected |
|--|----------|---------------------|
| Communicate proposed changes to the Fuel Cost Policy process and penalty calculations | 8/7/2019 | Market Sellers |
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| | | |
| | 10 | |



- All Market Sellers are required to have a PJM-approved Fuel Cost Policy (FCP) for each fuel type
- Annually, Market Sellers are required to either submit to PJM and the IMM an updated FCP that complies with OA Schedule 2 or confirm that their currently approved FCP remains compliant
- Based on two years of experience with the FCP process, there are opportunities for potential improvements to the rules and process governing FCPs.

Work Plan + Timeline

| | | Oct-Dec | Jan-Mar | Apr-June | Jul-Sep |
|------------------------|--|---------|---------|----------|----------------------------------|
| Key Work Activities | KW #1 Education on the current Fuel Cost Policy rules | | | F | CP due for annual review 6/15 |
| | KW #2 Education on cost-based offer development | | | | |
| | KW #3 Explore potential enhancements to Fuel Cost Policy rules. Initial review suggests the following categories for enhancements to PJM's fuel cost policies | | | | |
| | KW #4 Explore potential alternatives to PJM's current Fuel Cost Policy rules and cost-based offer rules. Initial review suggests that the mitigated offer or cost-based offer formation paradigms of neighboring ISOs/RTOs should be reviewed as candidates for adoption in PJM | | | | |

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Key Work Activities in PS/IC

- □ KW#3: Explore potential enhancements to Fuel Cost Policy rules. Initial review suggests the following categories for enhancements to PJM's fuel cost policies:
 - Requirement for zero marginal cost offer units (e.g., wind and solar) to have Fuel Cost Policies;
 - □ Requirement for self-scheduled units to have Fuel Cost Policies;
 - Need for Market Sellers, on an annual basis, to confirm that their annual Fuel Cost Policy remains compliant;
 - Lack of a penalty exemption and/or safe harbor for minor violations in a Market Sellers' Fuel Cost Policy, and/or lack of appropriate crediting mechanism for a market-seller's self-report of a potential Fuel Cost Policy violation.



- Special MIC sessions began in November 2018
 - 10 total meetings
- KW# 3 addressed by 3 proposals that will presented for consideration
 - IMM
 - PJM
 - Joint stakeholder proposal
- KW #4 work to continue through MIC Special Sessions in parallel



Areas of consensus

- Outside of Annual Review Process
- Outside Annual/Ongoing Review Approval Effective Date
- Standard of Review
- Platform
- Markets Gateway Data Validation(possible Phase II)
- Deadlines for FCP approvals for unit transfers and agent changes
- Establishing Expiration Dates
- Market Seller Identified Penalty Definition/Process
- IMM Review deadlines
- Units that require FCPs





Areas of limited or no consensus

- Annual Review
- Outside Annual/Ongoing Review Approval Expiration Date
- Market Seller deadlines
- PJM Review Deadlines
- Process for FCP approvals for unit transfers and agent changes
- Revocation Rights
- Penalty calculations



Next Steps

| | MIC | MRC | MC |
|-------------|-----------|-----------|-------------|
| First Read | 7.10.2019 | 7.25.2019 | |
| Endorsement | 8.7.2019 | 8.22.2019 | 8.22.2019 * |

* **Note**: Manual 15 – Cost Development requires Members Committee endorsement and Board of Managers approval in accordance with Operating Agreement Schedule 2