



Cost Development Subcommittee CONSENSUS PROPOSAL REPORT

Non-Regulatory and Energy Market Opportunity Cost

11/08/2011

This proposal brings forward manual language changes for Manual 15: Cost Development Guidelines to support the concepts that were approved by the MRC on June 23, 2010 and the required PJM compliance filing by FERC on October 6, 2011.

The proposal described below is being recommended by the Cost Development Subcommittee. Consensus was achieved by acclamation. This report was developed in accordance with procedures documented in Section 7 of the PJM Stakeholder Process Manual (Manual 34).

1. Recommended Proposal

This change to Manual 15 incorporates previously approved concepts for Non-Regulatory and Energy Market Opportunity Costs. Opportunity Cost in Manual 15 is the value associated with a specific generating unit's lost opportunity to produce energy during a higher valued period of time occurring within the compliance period. There are two types of opportunity costs in Manual 15:

1. Energy Market Opportunity Cost is applicable to the cost offer when a specific generating unit only has a limited number of available run hours due to limitations imposed on the unit by Applicable Laws and Regulations, for example, restrictions do to emissions limitations. (Approved by FERC on 10/25/2010)
2. Non-Regulatory Opportunity Cost is applicable to the cost offer when specific generating unit only has a limited number of starts or available run hours resulting from (i) the physical equipment limitations of the unit, for up to one year, due to original equipment manufacturer recommendations or insurance carrier restrictions, (ii) a fuel supply limitation, for up to one year, resulting from an event of force majeure (Approved by FERC on 10/6/2011)

There are two methods for calculating opportunity cost in Manual 15: the long term method (up to one year) and the short term method (less than 30 days). The long term method was approved and is already in Manual 15. Short Term method was approved by FERC on 10/6/2011 and is included in this revision. The short term method removes intra-month fuel volatility and uses Day Ahead prices for fuel and electricity in the calculation.

2. Stakeholder Process Summary

This language was reviewed and endorsed by CDS at the October 2011 meeting.



3. Appendix II: Stakeholder Participation

A list is provided here of the task force or subcommittee members who participated at the meeting where the final vetting of options/alternatives was completed, and those members who regularly participated at group meetings.

MEMBERS IN ATTENDANCE:

| | | |
|---------------------------|--|--------------------|
| Williams, Stan (Chair) | PJM Interconnection | Not Applicable |
| Ciampaglio, Tony | Constellation Energy Commodities Group, Inc. | Other Supplier |
| Gomez, Luis | Exelon Generation Co., LLC | Transmission Owner |
| Lopez, Johnny | PSEG Energy Resources and Trade LLC | Transmission Owner |
| Palcic, Ron | FirstEnergy Solutions Corp. | Transmission Owner |
| Walter, Laura (Secretary) | PJM Interconnection | Not Applicable |

ALSO IN ATTENDANCE:

| | | |
|----------------|---------------------------|----------------|
| Dugan, William | Monitoring Analytics, LLC | Not Applicable |
| Hauske, Tom | PJM Interconnection | Not Applicable |
| Modi, Vikram | Monitoring Analytics LLC | Not Applicable |

IN ATTENDANCE VIA WEB EX / TELECONFERENCE:

| | | |
|-----------------|------------------------------------|--------------------|
| Filomena, Guy | Customized Energy Solutions, Ltd.* | Not Applicable |
| Hoag, Richard | FirstEnergy Solutions Corp. | Transmission Owner |
| Horstmann, John | Dayton Power & Light Company (The) | Transmission Owner |
| Miller, Rod | PPL Generation, LLC | Transmission Owner |
| Schofield, Bill | Customized Energy Solutions, Ltd.* | Not Applicable |
| Siegrist, Hal | GenOn Energy Management, LLC | Generation Owner |

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