### MRTU Start-up and Minimum Load Bid Caps



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### Background

- MRTU provide two options for startup and minimum load bids:
  - Cost-based
    - Based on actual startup and min load fuel consumption specs
    - Updated based on daily spot market gas prices
  - Bid-based
    - Can exceed costs, but are fixed for 6-month period
    - MRTU filing assumed that 6-month period would deter excessive bids

#### Lack of any limit on start-up and minimum load bids may undermine/circumvent Local Market Power Mitigation

- When locational market power exits, generator could bid strategically to get units with very high startup/minimum load bids committed.
- Units with high startup/minimum load bids could be self-scheduled to avoid being priced out of the market when no market power exists.
- Even units outside of Local Capacity Areas (LCAs) can be needed under very high load conditions and/or due to temporary transmission outages.



# Initial Options Considered (Feb. 9 Whitepaper)

### Start-up

- Option 1: 100% of highest cost unit by category
  - e.g. short start vs. long start
- Option 2: 200% of units projected costs
- Option 3: 200% of "typical unit" by category

### Minimum Load

- Option 1: \$500 price cap
- Option 2: 200% of units projected costs
- Option 3: 200% of "typical unit" by category
  - e.g. peak, steam, combustion turbine





### **Revised Options (May 16 Whitepaper)**

- 200% of units projected costs
- 200% of units projected costs with additional cost recovery mechanism
  - Direct uplift for units bidding at 200% cap if spot gas prices rise 200%
- 300% of units projected costs

Projected cost based on maximum of six monthly futures prices for six month bid will remain in effect.



## **Current Options**

- Separate cap for units inside and outside of Local Capacity Areas (LCAs)
  - LCA units: 200%
  - Non-LCA units: 400%
- Provisions for spot market gas price increase
  - Direct uplift
  - Ability to revise bid
  - Ability to switch to cost-based option
- Eligibility for gas price provisions
  - Only LCA units bidding at 200% cap if spot price increases 200%
  - Any LCA unit if spot gas price increases 200% above gas index
  - Any LCA unit if cost-based option reaches bid
    - e.g. bid at 150% of projected costs + spot gas increase of 150%