VOM Packages Summary Highlighted cells indicate components that match the Main Motion

nigniignted cells indicate compo	onents that match the Main Motion Motion Motion	1st Alternative Motion	2nd Alternative Motion	3rd Alternative Motion
Key Points	EIA Defaults	РЈМ	IMM	RECO
Operating Costs	Allowable operating costs include lubricants, chemicals, Limestone, Trona, Ammonia, acids, caustics, water injection, and demineralizers.	Allowable operating costs include lubricants, chemicals, Limestone, Trona, Ammonia, acids, caustics, water injection, and demineralizers.	The variable operations costs are the short run marginal expenses for consumables, other than fuel, to generate the next increment of power, including water, water chemistry, emission control reagents, and lubricants. Other terms in M15 that resemble operations costs, such as other fuel related costs, incremental parameter adjustment, VOM should be deleted and consolidated as variable operations costs.	Variable operations cost consists of consumables, other than fuel, to generate the next increment of power, including water, water chemistry, emission control reagents, and lubricants.
Incremental Maintenance	Maintenance cost incurred as a result of electric production can be included in start costs, no-load, and/or incremental energy offer.	Maintenance cost incurred as a result of electric production can be included in start costs, no-load, and/or incremental energy offer.	Remove from cost-based energy offers.	Maintenace costs can be included in either the capacity offer or incremental energy offer. If included in the incremental energy offer, no maintenace costs can be included in the capacity offer and only maintenance costs (\$/MWh) up to the VOM limit by fuel type specified in M-15 can be included. VOM limits by fuel type in M-15 will be updated every two years using the BLS Producer Price Index.
CT & CC Major Inspection & Overhauls	Can be included in either Energy or Capacity Offer	Can be included in either Energy or Capacity Offer	Status Quo. Not includable in cost-based energy offers.	Can be inlcuded in either the capacity offer or incremental energy offer up to VOM limit by fuel type
VOM Defaults	EIA new build VOM defaults can be used in lieu of actual history	lieu of actual history. Operating	Benchmark for short run marginal costs provided by the MMU.	VOM limits by fuel type in specified in M-15
Labor	Only staff overtime or contractor labor associated with incremental maintenance can be included.	Only staff overtime or contractor labor associated with incremental maintenance can be included.	Remove from cost-based energy offers.	Can be inlcuded in the capacity offer or incremental energy offer up to VOM limit by fuel type
FERC Accounts	Can be used minus straight time labor	Can be used minus straight time labor	FERC accounts are not needed. Remove FERC account references from M-15.	Can be included up to VOM limit by fuel type
Cyclic Starting and Peaking Factors	Status Quo	Status Quo	Remove cyclic starting and peaking factors from M-15.	Cyclic Starting and Peaking Factors can not be used
Immature Units	First Year - EIA Defaults Second Year - Actual History or EIA Default	First Year - SOM Defaults Second Year - Actual History or SOM Default	Not Applicable	Use VOM limits by fuel type specified in M-15
•	No Fixed Costs in Energy Offer - Friendly Amendment June MRC		No Fixed Costs in Energy Offer	No Fixed Costs in Energy Offer
M-15 Manual Changes	Yes	Yes	Yes	Yes
	No	Yes	Yes	Yes
OA Changes Tariff Changes	No	Yes		
rann changes	IVU	ies	Yes	Yes
Implementation		VOM - upon Board approval of M-15 Changes Fixed Cost - upon FERC approval of OA changes	30 days after FERC approval of OA and Tariff changes	See above. If no tariff or OA changes necessary, upon approval of M-15 Manual changes.