There was discussion at the July 31, 2015 meeting of the Resource Cost Work Group about the lack of a well-defined appeal process in the Verifiable Cost Manual.

The IMM volunteered to offer a couple of ideas to fuel the group’s further discussion.

Suggestion 1

The submitting company may appeal Verifiable Cost Decisions made by ERCOT staff in accordance with Section 20 of the Protocols:

* Notify ERCOT General Counsel of dispute
* Senior Representatives discuss
* Optional mediation and/or arbitration, with appeal to PUCT

Suggestion 2

The submitting company may appeal Verifiable Cost Decisions made by ERCOT staff to a 3-Member Panel composed of IMM, PUCT Staff, and ERCOT Sr. Representative.

Suggestion 3

When an aspect of resource-specific costs exceeds the generic cap by some margin, the information will be made public. Some margin could be either a value, a multiplier, or combination of both.

Examples (specific values to be determined):

* When the fuel adder exceeds $3.00/MMBtu (default is$ 0.50/MMBtu), the value will be made public.
* When variable O&M exceeds 120% Resource Category Generic caps, the information will be made public.