Coal Price NPRR Comments

1. Potential Impacts
   1. Settlements and Billing (S&B)
   2. Commercial Systems Integration (CSI)
   3. Registration System (REG)
   4. Market Management Systems (MMS)
   5. Multiple systems to import new daily coal price
2. Ercot currently calculates emission prices on a monthly basis
3. Should the coal price be used for:
   1. Setting the DAM/RUC/MOC caps,
   2. Make Whole payments, or
   3. Both
4. Since the coal price already includes transportation, shouldn’t the $0.5/MMBtu adder not be included in offer caps?
5. RCWG recommended changing the $18/MWh price to a heat rate times an index price. An average minimum energy heat rate of 11.5 MMBtu/MWh seems appropriate for a typical coal-fired unit. Where the format would be:
   1. Coal and Lignite = 11.5 MMBtu/MWh \* ((Percentage of FIP \* FIP) + (Percentage of FOP \* FOP + Percentage of Coal\* Coal))/100, as specified in Minimum-Energy Offer;