

# **Proposed Revisions to Black Start Service Rules (OATT Schedule 6A)**

MIC

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## MMU Position

- **The revisions to Schedule 6A approved by the FERC last year do not require any change (ER09-730)**
- **The BSSWG proposal to add the incentive rate (para. 5) to the cost-based formula rate (para. 6), results in inappropriate piecemeal ratemaking and double recovery**
- **No special tariff provisions are required to account for the treatment of different asset lives**
- **The MMU is considering whether a compromise proposal could be developed**
- **Black Start Service units collecting rates approved directly by the FERC should remain presumptively not eligible for recovery of costs under Schedule 6A during the period FERC rates remain effective due to the potential for inappropriate double recovery (para. 17)**

