

Monitoring Analytics, LLC 2621 Van Buren Avenue, Suite 160 Valley Forge Corporate Center Eagleville, PA 19403

Phone: 610-271-8050 Fax: 610-271-8057

To support the analysis of the deactivation of the subject unit, the IMM requests the following information.

- 1. Fuel/operating information
 - a. Unit full load heat rate
 - b. Primary fuel
 - c. Description of any changes in fuel procurement that have significantly impacted or will significantly impact operating costs for the unit
 - d. Actual operating hours for the prior three calendar years
 - e. Source of and documentation for forward looking fuel prices, such as contract or future index
 - f. Current fuel policy
- 2. Please provide the analysis supporting the decision to deactivate the unit including:
 - a. Expected revenue streams broken out by market (energy, capacity, bilateral)
 - b. Expected (or budgeted) costs including breakouts for incremental operating costs which are a function of short term unit operation, and avoidable cost rates. Incremental costs are defined in PJM Manual 15 and Avoidable Cost Rates are defined in PJM Open Access Transmission Tariff (OATT) Attachment DD § 6.8. As a guide, a default Avoidable Cost Rate template can be found at:
 - http://www.monitoringanalytics.com/tools/docs/RPM ACR Template v14.xlsx
 - c. Any capital expenditures necessary for continued operations of the unit, including any documentation supporting the capital cost estimate and operations and maintenance costs such as a third party engineering study
 - d. Any sensitivity analyses performed on future power price and fuel price outlooks
 - e. What market pricing changes would be necessary for a reversal of the retirement decision
 - f. Any presentations or analysis presented to management to support the deactivation
- 3. Environmental regulations
 - a. Description, timing, and documentation for any current or pending environmental regulations that affect unit availability or future viability
 - Any capital expenditures for environmental controls necessary for continued operations
 of the unit, including any additional documentation supporting the capital cost estimate
 and operations and maintenance costs, such as a third party engineering study

- 4. Please list and describe any bilateral contracts or forward positions associated with the unit.
- 5. If the unit is being mothballed, please describe the conditions under which the unit would be brought out of mothball and provide any details on cost estimates associated with reactivation.
- 6. Please indicate the market value of the unit (or plant) for re-sale.
- 7. If the deactivated unit provides black start service to PJM, please describe how the black start capability will be replaced when the subject unit is deactivated.
- 8. If the deactivated unit provides reactive service to PJM, please describe how the reactive capability will be replaced when the subject unit is deactivated.
- 9. Please provide a calculation of gross revenues and net revenues for the unit for the last three years, broken out by revenue type, including energy market, capacity market, ancillary services markets (including reactive capability compensation and black start compensation), and bilateral contracts.
- 10. Does the unit receive "Reactive Supply and Voltage Control" revenue based on a FERC decision/order?
 - a. If so, please provide the order and the docket number.
 - b. If so, please provide the annual reactive revenue requirement.
 - c. If so, will you notify the FERC of a change to Annual Reactive Revenue Requirement per OATT Schedule 2?
 - d. If so, will you notify PJM?
 - e. If so, how much will the annual reactive revenue requirement be reduced?
- 11. Please provide any additional information relevant to the decision to deactivate the unit.