

Max Emergency Proposal

OC

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IMM



Monitoring Analytics

Maximum Emergency

- **Committed Capacity Resources can offer MW as maximum emergency (max E) under four categories:**
 - **Environmental Limits**
 - **Fuel Limits**
 - **Temporary Emergency Conditions**
 - **Temporary MW Additions**



Fuel Limits Definition

- **Fuel limits: If physical events beyond the control of the resource owner result in the temporary interruption of fuel supply and there is limited onsite fuel storage. A fuel supplier's exercise of a contractual right to interrupt supply or delivery under an interruptible service agreement shall not qualify as an event beyond the control of the resource owner.**
- **Manual 13 adds additional condition: Inventories below 16 hours (CTs) and 32 / 240 hours (steam).**

Fuel Limits Issues

- **Conditions needed to be met are listed but not exactly quantified.**
- **Only covers fuel, does not include consumables.**
- **Only Manual 13 mentions inventory levels, which is not a condition in the OA.**
- **Provides no explicit alternative if conditions are not met.**



Fuel Limits: IMM Proposal

- **Expand category to include consumables.**
- **Create a new availability status category for units that do not meet the Max E Fuel Limits criteria:**
- **Fuel/Consumable Conservation**
 - **To be used when a committed resource is fuel limited (10 days or less of fuel in inventory).**
 - **Units using new category would be assessed a charge equal to:**
 - **$[(\text{Committed ICAP} \times \text{BRA Price}) / 24] \times \text{Hours Offered at Max E}$**
 - **Charges will be allocated to LSEs by day based on LSEs' capacity charges.**

Fuel Limits: IMM Proposal

- **Define conditions needed to meet fuel/consumable limits category:**
 - **Physical Event:** A physical event that affects the infrastructure used to procure, treat or transport the fuel/consumable.
 - **Beyond Owner's Control:** Owner has no other means to procure fuel for normal operation.
 - **Temporary Interruption:** No longer than seven days. Supplier must provide documented timeline for when operations are expected to be back to normal.
 - **Limited Onsite Fuel Storage:** Meant for oil.
 - **Not Interruptible Service:** Cannot be based on an interruptible contract or on having no contract at all.

Environmental Limits Definition

- **Environmental limits.** If the resource has a limit on its run hours imposed by a federal, state, or other governmental agency that will significantly limit its availability, on either a temporary or long-term basis. This includes a resource that is limited to operating only during declared PJM capacity emergencies by a governmental authority.
- **Manual 13 adds additional condition: Hours below 16 / 24 (CTs) and 32 hours (steam).**

Environmental Limits IMM Proposal

- **OC adder should be used first when applicable.**
- **Units that can operate for reliability, without the need for PJM to declare Max Gen, cannot use Max E.**
- **Units that can operate during emergencies (authorized by the environmental agency) can only use Max E once hours left are less than PLS min run time.**
- **Any unit that has a hard limit (i.e. cannot run even during emergencies) can use Max E based on the hours in Manual 13.**

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