



To support the request to remove a generation capacity resource from capacity resource status, 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 change the capacity resource status of 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/IMM_RPM_ACR_Template_v14.2_20210729.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. 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
 - b. 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 proposed change is to move the unit behind the meter, please define all costs paid by the unit when it is in front of the meter which do not have to be paid when the unit is behind the meter.
6. If the subject unit provides black start service to PJM, please describe how the black start capability will be replaced when the subject unit changes status.

7. If the subject unit provides reactive service to PJM, please describe how the reactive capability will be replaced when the subject unit changes status.
8. 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.
9. 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?
10. Please provide any additional information relevant to the decision to change the capacity resource status of the unit.
11. Please provide the details of the interconnection to PJM, including the Interconnection Service Agreement (ISA) and single line diagram.
 - a. Please explain the proposed disposition of the Capacity Interconnection Rights (CIRs).
 - b. Please explain the proposed changes to the ISA.
12. Please explain why this request is consistent with PJM policy on Behind the Meter Generation explained at the MIC Special Session - Behind the Meter Generation Business Rules on Status Changes.