

Fuel Requirements for Black Start Resources

Poll Questions

Level of Fuel Assurance

- 1) Weighing the projected costs versus the reliability benefits, what level of Black Start Resource Fuel Assurance do you support?
- All Black Start resources must be Fuel Assured
 - 50% of Black Start resources must be Fuel Assured
 - 2 Black Start resources per TO zone must be Fuel Assured
 - No Black Start resources are required to be Fuel Assured, but PJM should weight fuel assurance higher in Black Start RFP evaluation (Status Quo).

Why did you select the option that you chose?

Universal Requirements

- 2) What should be the minimum run time requirement for Black Start resources to be considered fuel assured (i.e fuel for run hours at max load)?
- No run time requirement
 - 10 hours run time requirement
 - 16 hours run time requirement
 - 24 hours run time requirement

Why did you select the option that you chose?

Method of Fuel Assurance

- 3) Which of the following should be allowed for natural gas Black Start resources to become fuel assured? (Select as many as apply)
- Dual Fuel capability (onsite backup fuel)
 - Multiple pipeline connections
 - Firm Gas Supply and Transportation

Comments/Other suggestions:

- 4) Do you support a tiered run hour requirement with a tiered compensation for black start resources to maintain black start resource diversity?
- Yes
 - No

Comments/Other suggestions:

Period of commitment

- 5) If a Black Start resource makes capital improvements in order to become fuel assured, what should be the term of the capital recovery period?

- a. Utilize existing rates in OATT Sched 6A based on the age of the resource. Link: <https://www.pjm.com/directory/etariff/MasterTariffs/23TariffSections/4406.pdf>
- b. The greater of the Schedule 6A recovery period based on the age of the unit or 10 years
- c. Cost recovery amortized over the remaining life of the unit as applied by the owning entity.
- d. Additional options for units older than 15 years TBD?

Comments/Other suggestions:

Implementation/Transition Plan

- 6) How should Black Start resources that are not Fuel Assured be addressed?
 - a. PJM should immediately terminate Black Start service on these resources
 - b. These resources should be allowed to continue to provide Black Start service but be phased out over time
 - c. Resources on capital recovery rate can continue to provide Black Start service and will be included in the restoration plan but their MWs will not be included in the calculation of M36 black start to critical load requirements

Comments/Other suggestions:

- 7) When transitioning to Black Start Fuel Assurance requirements; these requirements should:
 - a. Go into effect immediately
 - b. Transition over a short period (2-3 years)
 - c. Go into effect for next RTO wide RFP (5 years)
 - d. Transition in over the next 2 RTO wide RFPs (approx. 10 years)

Comments/Other suggestions:

8. Any additional feedback?

Open text field