

# Current Proposal for Start-up and Notification Time

- FirstEnergy agrees with current proposal except for the following:
  - 48 hour notification time.
  - 6 days notice to operating day for MAX Start-up and Notification Time.
- FirstEnergy feels exceptions should be made from both a market and reliability perspective.

# FirstEnergy Proposal

- In the peak periods (summer and winter) a reasonable timeframe for a unit to be on-line is 24 hours (notification plus start-up time not to exceed 24 hours)
- In shoulder periods (spring and fall) an approved exception with appropriate support can be made to extend online time to a total of 72 hours (notification plus start-up time not to exceed 72 hours)
- Market economics will define the next unit to be moved from reserve status to operational (on-line)
- It is in the best interest of the market and reliability for a unit receiving capacity payments to be online in a reasonable timeframe.