

# **Black Start Service Refurbishment Process Comments**

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February 15, 2011

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- Key Components
    - Added threshold provisions
      - Consideration for a black start unit that is retiring but would be *voluntarily* willing to continue with full refurbishment cost recovery to provide black start service.
      - Consideration for threshold levels that avoid the costs and effort to do a replacement procurement. (*Not every request for refurbishment should result in a replacement procurement process*).

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- Key Components
    - Removed Transmission Owner Contract
      - Black Start is a PJM service provided by competitive generation and not a TO service.

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- Key Components
    - Removed Evaluation Of Need And Changed It To Impact/Location
      - Black Start service need is already considered as part of the black start service market. Therefore no evaluation of if the black start unit is necessary.
      - Changed the evaluation to an impact study to determine where else a black start unit can be located to meet the black start service requirements. That list of potential sites will be the starting point for a competitive solicitation for a replacement resource.

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- Key Components
    - Added Provisions For A Retiring Black Start Resource
      - Older, Black Start resources may only be in the market as long as they do not incur major refurbishment expenses.
      - Any refurbishment evaluation should include the refurbishment of the entire black start unit in cases where it would otherwise retire and that resource *voluntarily* requests refurbishment costs to continue the service.
      - Where refurbishment of a black start unit in lieu of retirement are cost effective then that black start unit should recover its entire refurbishment cost under black start service.

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- Key Components
    - Added Provisions For A Transitioning Black Start Unit
      - Clarified that any request for a black start unit to remain in the service for an interim period is completely voluntary and that unit should recover its black start service payments under the tariff plus any avoidable costs it incurred as a result of remaining available as a black start service resource during the interim period. *(Should have the 10% adder applied consistent with CDG rules).*

# Conclusion



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Questions ?