2021 BGE/PEPCO Zones Black Start Service Incremental Request for Proposal

PJM Interconnection April 7, 2021





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1.0: Purpose / Statement

1.1. Purpose

PJM, Baltimore Gas and Electric ("BGE"), and Potomac Edison Company ("PEPCO") (Transmission Owner ("TO")), have determined that there is a need for additional black start capability within the BGE and PEPCO transmission zones. Therefore, PJM is initiating the Black Start Incremental RFP process as documented in PJM Manual M14D, Generator Operational Requirements Section 10. Due to the timing of black start terminations in both zones, this RFP solicitation represents a 2nd Incremental RFP for the BGE zone and a 1st Incremental RFP for the PEPCO zone. Proposals submitted in the "2019 BGE/PEPCO zones 1st Incremental Black Start RFP" may be updated and resubmitted for re-consideration in this current RFP process.

Black Start Units must have the minimum capabilities listed below during restoration events. These capabilities must be demonstrated in accordance with the criteria set forth in the PJM Tariff and Manuals and will remain in effect for the duration of the commitment to provide Black Start Service in accordance with requirements of the PJM Tariff, Schedule 6A, as it may be amended from time to time, including the revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000.

- a. A Black Start Unit must have the ability to start without an outside electrical supply.
- b. A Black Start Unit must be able to close its output circuit breaker to a dead (de-energized) bus within 180 minutes (or less based on the characteristics of the specific critical load) of a request from the Transmission Owner or PJM.
- c. A Black Start Unit must maintain the following:
 - i. Maintain frequency under varying load with the governor operating in automatic isochronous mode
 - ii. Maintain voltage under varying load with automatic voltage regulator in automatic and voltage control mode(excludes controlling with power factor or MVAR control mode)
- d. A Black Start Unit is expected to maintain black start output for a period of time identified by each Transmission Owner's system restoration requirements (typically 16 hours).
- e. Black Start Units recovering cost under Paragraph 5 of Schedule 6A of the Tariff have an initial two year commitment to provide Black Start Service.
- f. Pending approval of PJM's filing at FERC in Docket No. ER21-1635-000, a Black Start Unit that has elected to recover capital cost under Tariff, Schedule 6A, section 6 and selected in this RFP has a Black Start Service commitment period for the lifetime of the Black Start equipment.

Potential Black Start Units should be physically located within the BGE or PEPCO Transmission zones or in adjacent zones (cross-zonal black start) if the proposed black start units are electrically close to the



BGE/PEPCO zones. Refer to Section 9 "2021 BGE/PEPCO Zones Incremental Black Start RFP Map". Within these geographic constraints, examples of acceptable responses include:

- Existing Black Start Capable Units not currently providing Black Start Service
- Conversion of existing generation unit(s) to become black start capable
- New (or interconnection queue) generation under development or construction that can become black start capable
- Existing industrial, manufacturing or cogeneration facilities capable of converting to black start to support system restoration
- Refurbishment of existing black start generators that otherwise would retire from black start and other services without the refurbishment

Potential bidders should be aware that if accepted, the proposed Black Start Unit will have to be included in the NERC Compliance Registry as a Generation Owner and Generation Operator, and as such, will be required to comply with all applicable NERC Reliability Standards. It is the sole responsibility of the Black Start Unit owner to ensure that its proposed Black Start Unit meets all applicable NERC Reliability Standards as necessary to support the provision of Black Start Service. PJM makes no representations or warranties regarding the ability of a Black Start Unit Owner to meet all applicable NERC Reliability Standards with regard to a specific proposed Black Start Unit upon acceptance of a submitted proposal.

See Section 7.9 "Black Start Generator Reference Guide for NERC Reliability Standards."

1.2. Black Start Service Availability Date

Offers should be for resources capable of providing Black Start Service by April 1, 2023. This includes completion of a successful black start test prior to providing Black Start Service. In addition, there is also time associated with updating restoration plans (by Transmission Owners), so PJM would prefer to have black start resources available and providing Black Start Service well in advance of the April 1, 2023 milestone. In certain cases, due to the time required to perform unit modifications, PJM will also consider proposals for Black Start Service later than the April 1, 2023 milestone date depending on location, black start need and evaluated cost.

1.3. Market Window

The market window for this RFP is from April 7, 2021, through August 6, 2021. See Section 4.0 "Proposal Guidelines" for details on two-tiered approach for RFP submittal.

1.4. Existing Black Start Resources

Existing Black Start Service providers do not need to respond to this RFP as they are expected to continue providing Black Start Service in accordance with the provisions of the PJM Tariff and applicable Manuals and any approved changes thereto.



In the event that an existing Black Start Unit owner desires to terminate its existing Black Start Service commitment, it must submit a termination notice in accordance with the black start termination process stated in PJM Tariff Schedule 6A and any approved changes thereto.

2.0: Company Background

2.1. Statement

Company Background

PJM Interconnection, L.L.C. ("PJM") ensures the reliability of the high-voltage electric power system serving 65 million people in all parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia. PJM coordinates and directs the operation of the region's transmission grid, which includes over 85,000 miles of transmission lines and generating units with 185,378 megawatts of installed capacity.

PJM administers a \$33 billion annual competitive wholesale electricity market with more than 1,000 participants buying and selling electric energy, capacity, ancillary services and transmission rights. PJM plans regional transmission expansion improvements to maintain grid reliability and relieve congestion.

Founded in 1927, PJM was the world's first continuing power pool. Today, it operates North America's largest power grid.

PJM's Operations

PJM's staff monitors the high-voltage transmission grid 24 hours a day, seven days a week. PJM keeps the electricity supply and demand in balance by sending price signals to supply resources, such as generators, to adjust how much energy they produce.

In managing the grid, PJM's experts study hundreds of "what if" scenarios and prepare to deal with virtually any event. Each variable that might affect supply and demand for electricity is carefully considered – from extreme weather conditions, emergency situations and equipment failures to the more easily anticipated cycles of hours, days, weeks and seasons.

PJM exercises a broader reliability role than that of a local electric utility. PJM system operators conduct dispatch operations and monitor the status of the grid over a wide area, using an enormous amount of telemetered data from about 143,900 points on the grid. This gives PJM a big-picture view of regional conditions and reliability issues, including those in neighboring systems.

PJM's Markets



The company coordinates the continuous buying, selling and delivery of wholesale electricity through robust, open and competitive spot markets. In operating the markets, PJM balances the needs of suppliers, wholesale customers and other market participants and continuously monitors market behavior.

PJM's wholesale electricity market is similar to a stock exchange. It establishes a market price for electricity by matching supply with demand. PJM's online tools make trading easy for members/customers by enabling them to submit bids and offers and providing them with continuous real-time data.

Market participants can follow market fluctuations as they happen and make informed decisions rapidly, responding to high prices and bringing supply resources to the region when demand is high.

PJM's Planning

PJM manages a sophisticated regional planning process for generation and transmission expansion to ensure the continued reliability of the electric system. PJM is responsible for maintaining the integrity of the regional power grid and for managing changes and additions to the grid to accommodate new generating plants, substations and transmission lines.

In addition, PJM analyzes and forecasts the future electricity needs of the region. Its planning process ensures that the growth of the electric system takes place efficiently, in an orderly fashion, and that reliability is maintained.

3.0: General Terms

By submitting a proposal to this RFP, you are agreeing to be bound by the rates, terms and conditions of service as set forth in PJM's Open Access Transmission Tariff, ("Tariff"), the Amended and Restated Operating Agreement of PJM Interconnection, L.L.C. ("Operating Agreement"), and/or all other applicable PJM Manuals or other governing agreements (collectively, the "Governing Agreements"), as they may be amended from time to time, including the PJM Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000, as accepted by FERC.

Acceptance of RFP proposals by PJM will be in the form of a notification letter which references the applicable provisions of the Governing Agreements. There will be no separate agreement for Black Start Service between the Black Start Unit Owner and PJM since all the terms and conditions are covered by the Governing Agreements referenced above and any approved subsequent changes thereto

PJM explicitly states that any discrepancies between this RFP document and the Governing Agreements shall be resolved in favor of those Governing Agreements. The notification letter conveys no rights other than those specified in the Governing Documents as referenced above.



3.1. Offer in Effect

A proposal may not be modified by the respondent between August 6, 2021, and November 1, 2021, as defined in the RFP Timeline, and respondent so agrees in submitting the proposal. A proposal may be withdrawn or cancelled by written notice to PJM at any time prior to entering Black Start Service. A unit can only recover black start costs by entering Black Start Service.

3.2. Acceptance of Proposal

PJM reserves the right to reject any and all submitted proposals and any portion of a specific proposal, as well as the right to waive any informality or irregularity in any proposal received by PJM. PJM also reserves the right to award an agreement to a respondent based on factors other than price. PJM assumes no obligation under this RFP and is not bound to procure goods or services from any respondent to this RFP. PJM assumes no obligation to provide a reason for rejection of a respondent's proposal. PJM reserves the right to amend or withdraw this RFP at any time. Respondents assume the risk that PJM may reject proposals for any reason, may reject all proposals, may make no award, and may withdraw the RFP without incurring any liability.

3.3. Retention of Respondent Material

PJM reserves the right to retain all proposals, including proprietary documentation regardless of which response is selected.

3.4. Confidential Matters – PJM Data

All data and information gathered by the respondent and its agents, including this RFP, shall be treated by the respondent and its agents as both confidential and Critical Electric Infrastructure Information (CEII). The respondent and its agents shall not disclose or communicate the aforementioned matters to a third party, or use them in advertising, publicity, propaganda, and/or in another job or jobs, unless written consent is obtained from PJM.

4.0: Proposal Guidelines

4.1. Initial RFP Proposal Submission (Level 1)

PJM is implementing a two-tiered approach to the Incremental Black Start RFP process. Interested parties shall submit Level 1 proposals for proposed black start solutions for one or more proposed Black Start Units, including sufficient basic information required for PJM to make initial determination on whether to proceed with requesting that resource owner submit a Level 2 proposal for further consideration.

Level 1 proposal information is detailed in Section 8 of this RFP and generally includes the following:



- 1. Unit identifying information (e.g., name/location/contact information, PJM Marketunit ID, interconnection switchyard/voltage level, Transmission Owner zone)
- 2. Unit characteristics (ICAP, black start MW, unit type, primary/secondary fuel, fuel type, fuel storage/firm gas contracts)
- 3. General operational characteristics (minimum load, emissions limitations, CC steam by-pass capabilities)

PJM is requesting that parties interested in submitting a Level 1 proposal in response to this Request for Proposal provide a non-binding response by email by 23:59 on May 10, 2021. The Black Start RFP Level 1 Response Form shall be downloaded from the PJM website (https://www.pjm.com/markets-and-operations/ancillary-services.aspx), completed, and emailed to: BlackStart@pjm.com.

PJM will notify all Level 1 proposals on a determination of whether or not to proceed with a Level 2 proposal (Target is May 31, 2021). PJM's notification to a resource owner requesting a Level 2 proposal is not a guarantee that the RFP proposal will be selected; it is just an initial indication that PJM may be interested in pursuing further analysis and studies to determine the viability of the proposal.

For Level 2 proposals, bidders shall provide a full RFP proposal with detailed responses completed for identified units in accordance with Section 5.0.

4.2. RFP Proposal Submission (Level 2)

Level 2 RFP Proposals shall be submitted to PJM by 23:59 on August 6, 2021. The RFP Timeline (Section 4.5) outlines other relevant dates related to RFP Proposal submission and evaluation.

Delivery of Proposals

Proposals shall be submitted via email to <u>BlackStart@pim.com</u>. Each proposal shall consist of answers to ALL questions as indicated in Section 5 "RFP Proposals."

4.3. Evaluation and Acceptance of Proposals

PJM will work with its Transmission Owners ("TOs") to evaluate proposals and select viable black start solutions based on the basis of Critical Load requirements, location, cost and operational considerations (cranking load, start time, etc.).

Existing Black Start Units with a remaining term of commitment tied to a cost recovery rate would automatically be selected for the length of the recovery period. Existing Black Start Units on bilateral contracts with TOs would be automatically selected for use in those zones.



PJM utilizes the following evaluation criteria in the RFP selection process, working in collaboration with the TOs to select black start solutions for each zone. Preferred black start solutions typically include units located in close proximity (from a transmission topology perspective) to PJM-defined critical loads, which are loads to support quicker starting steam units, CTs, Combined Cycle units, nuclear safe shutdown loads, and electric-powered gas compressor stations.

RFP proposals with dual fuel capability with on-site storage or gas units with multiple pipeline connections will be given a higher level of consideration in the RFP evaluation process. Resource owners submitting a proposal that does not meet PJM's fuel assurance evaluation criteria outlined below are strongly encouraged to submit various proposal options to meet PJM's fuel assurance criteria.

PJM evaluation criteria includes:

- 1. Technical Feasibility
 - a. Reliability Analysis/NERC Standard EOP-005 Studies
 - Feasibility of power flow study results, including operating within thermal and voltage limits, Black Start Unit has adequate reactive capability to handle line charging of cranking path and critical load requirements.
 - ii. Feasibility of dynamic simulation study results, including operating within voltage, frequency and stability limits.
 - b. Unit Location/Characteristics
 - i. Geographically and electrically diverse from other black start resources in the TO zone.
 - ii. Within TO zone or cross-zonal black start.
 - iii. Interconnection voltage level.
 - iv. Type of resource: CT, Combined Cycle (or CT that is part of a Combined Cycle plant), Hydro, Diesel, Storage, Hybrids (renewables with storage), etc.
 - v. Unit can serve multiple transmission outlets or support redundant cranking paths.
 - vi. Unit can provide black start to more than one TO zone
 - vii. Age of unit
 - c. Operational/Environmental Restrictions
 - i. Limitations such as slow ramp to minimum load after synchronizing, minimum load requirements for stabilizing load, turn down ratio, other operational limitations.
 - ii. Environmental permit change needed to operate at emergency minimum output during restoration, other environmental limitations.



- iii. Unit is able to meet minimum run hour requirements per OATT Schedule 6A (16 hours or as indicated in TO Restoration Plan).
- iv. Unit's historical availability (GADs).

d. Black Start Testing Requirements

- i. Is unit able to meet PJM black start testing requirements, in accordance with the terms and conditions of the Tariff, and Manuals, as amended from time to time, including the Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000, as accepted by FERC. (e.g., ability to close to a dead bus in 180 min., ability to operate at reduced loads during testing while islanded)?
- ii. Or, are testing exemptions required (e.g., special switching, stabilizing loads, breaker closing to a live bus, load banks).

2. Fuel Assurance

- a. Fuel Type/Fuel diversity
- b. Dual fuel capability/availability, including logistics assessment such as:
 - i. Can unit start on both primary and secondary fuel?
 - ii. Is different start-up fuel required before running on primary or alternate fuel?
 - iii. Special switching requirements to move from primary to alternate fuel (or vice versa)
- Analysis of the bidder's description of the level of onsite fuel storage, any permitting limitations (and challenges to obtain permits) associated with burning on-site fuel and a description of the planned arrangements to both obtain and replenish on-site fuel;
- d. Primary firm gas transportation contract vs. secondary firm or interruptible gas contracts;
- e. Analysis of the bidder's detailed description of planned or existing interconnections to one or more natural gas pipelines.

Cost/Schedule

- a. Annual Revenue Requirements (Capital Costs, Net Present Value comparison)
 - i. Capital Costs/Black Start MWs
 - ii. Net Present Value/Black Start MWs
- b. Black Start cost recovery period
- c. Any unit entering Black Start Service through this RFP and recovering capital costs will have a black start commitment period for the lifetime of the black start equipment pending FERC acceptance of PJM's Black Start Termination, Substitution, Minimum Tank Suction Level, CRF filing in FERC Docket No ER21-1635-000 subject to any approved future changes thereto. See additional detail in Section 6.1.2.



- d. Cost recovery method Base Formula Rate, NERC CIP Rate, Capital Recovery Factor Rate, FERC Rate.
- e. Proposed Black Start Service date alignment with requested in service date (4/1/2023).

Opportunity for cross-zonal black start coordination

PJM will work with the TOs to identify areas to identify cross-zonal black start opportunities as detailed in PJM Manual M36, if necessary to address black start needs

4.4. PJM Contact Information

ALL communication regarding this RFP should be sent electronically to only the contact email address below.

PJM Contact for all RFP communications:

BlackStart@pim.com

4.5. RFP Timeline

RFP Process Milestone	Date
PJM posts RFP	April 7, 2021
RFP interested parties submit Level 1 proposals to PJM	May 10, 2021
PJM provides response to Level 1 proposals	May 31, 2021
Bidders submit RFP Level 2 proposals to PJM	August 6, 2021
PJM evaluation and award of viable Black Start solutions	August 6, 2021 – November 1, 2021

5.0: RFP Proposals (Level 2)

RFP Level 2 Proposals at a minimum will include responses to all questions in Section 5.0. For questions that do not apply, please indicate "Not Applicable."

5.1. Purpose and Scope

5.1.1. Facility

- 5.1.1.1. Name of facility:
- 5.1.1.2. Indicate owner of facility:
- 5.1.1.3. Geographic details: Indicate the physical location of the generator including: city/town, county, state, latitude and longitude



5.1.1.4. Indicate age of facility:

5.1.2. Black Start Unit

- 5.1.2.1. Indicate the type of resource CT, Combined Cycle (or CT that is part of a Combined Cycle plant), Hydro, Diesel, Storage, Hybrids (renewables with storage), etc.
- 5.1.2.2. Indicate the manufacturer (GE, Siemens, etc.), and the model/unit type (7FA, etc.) for each of the Black Start unit(s) proposed. For configurations involving a diesel or battery or CT or other resource cranking the Black Start Unit, include this information for the cranking resource and the Black Start Unit. See Section 6.5 "Black Start Unit Configurations".
- 5.1.2.3. Indicate the black start MW capability of the intended Black Start Unit and the full plant (if applicable). Indicate whether MW capability is in terms of ICAP, maximum dependable capability or nameplate MW rating.
- 5.1.2.4. Indicate the Black Start Unit fuel type(s) including the fuel(s) used (if different) for any starting or cranking engines/diesels.
- 5.1.2.5. For a plant with multiple units, identify which units are being proposed as black start resources.

 Also indicate which of the other units can be started by the proposed black start units.
- 5.1.2.6. Indicate whether the black start unit is capable of operation in automatic isochronous mode or if it is controlled manually in isochronous mode.

5.1.3. Interconnection

- 5.1.3.1. Identify the station name and voltage level of the interconnecting station, and Transmission Owner zone.
- 5.1.4. Necessary Upgrade(s) for BS Capability
 - 5.1.4.1. Briefly describe the modifications that are required to convert the facility to black start. If adding a diesel, please indicate quantity, the manufacturer, model, and rating of the unit, as well as which unit it will be cranking.

5.2. Generator Operational Details

5.2.1. One-Line Diagram

5.2.1.1. Provide a one-line diagram for the black start facility. The one-line diagram should include the proposed RFP response unit(s), all associated auxiliary loads, and transmission and distribution



level equipment. Formal drawings are not required. Legible hand-written mark-ups of existing diagrams are sufficient. Visio diagrams with adequate detail are also sufficient.

5.2.2. Start-Up Sequence Description

5.2.2.1. If known, list the steps that the plant would follow immediately following a full or partial black out to get the Black Start Unit started, close to a dead bus, and any anticipated GO/TO coordination for load pickup from the Black Start Units minimum load to economic maximum load. The description should include clear references to the one-line diagram.

5.2.3. Reactive Capability

5.2.3.1. Include a reactive (MVAR) capability curve (D-Curve), including MW, Min. MVAR, Max. MVAR, and a table including up to 8 MW points (if possible) with associated minimum and maximum MVAR points. Include the maximum sustained lagging and leading (MVAR absorption) capability and any anticipated operational restrictions to the MVAR capability curve.

5.2.4. Start-Up Time

- 5.2.4.1. Indicate the estimated time to close to a dead bus, the time to ramp to minimum load, and the time to ramp to economic max load. If offering more than one unit for Black Start Service, all units must be capable of closing to a dead bus in 180 minutes when requested to start by Transmission Owner or PJM.
- 5.2.4.2. Indicate whether the unit will be staffed 24 x 7 if is selected to provide Black Start Service. If the plant will not be staffed 24 x 7, can the unit be started remotely? If so, describe the plan for starting the black start unit in the event of a telemetry failure.

5.2.5. Fuel Assurance

- 5.2.5.1. Indicate primary and secondary (if available) fuel type(s).
- 5.2.5.2. If a primary or secondary fuel is natural gas, indicate gas transportation and supply arrangements. Indicate if these arrangements are primary firm or non-firm transportation contracts as well as any alternate pipeline feeds. Indicate any arrangements for the unit to secure additional fuel.
- 5.2.5.3. If unit is dual fuel capable, provide the following details:
 - Can the unit start on both primary and secondary fuel?
 - Is different start-up fuel required before running on the primary or alternate fuel?



- Indicate any special fuel switching requirements to move from primary to alternate fuel (or vice versa)
- 5.2.5.4. Indicate the amount of time the Black Start Unit can run on its own fuel supply. Also indicate any issues with maintaining at least 16 hours of continuous output, per PJM business rules such as:.
 - If the black start unit relies on a cranking resource (diesel generator, battery, or combustion turbine) for auxiliary power, verify the diesel generator has sufficient fuel for 16 hours of operation and a minimum of 4 starts in a 24 hour period.
 - If the Black Start unit does not rely on a cranking resource (diesel generator, battery, or combustion turbine) for auxiliary power, verify the diesel has sufficient fuel for a minimum of 4 starts in a 24 hour period.
- 5.2.5.5. Describe the level of onsite fuel storage, any permitting limitations (and challenges to obtain permits) associated with burning on-site fuel and a description of the planned arrangements to both obtain and replenish on-site fuel;
- 5.2.5.6. Indicate the on-site fuel storage by type, volume/tank size, and number of hours of output assuming sustained economic maximum output of the black start unit. Explain the fuel supply and replenishment arrangements for this resource and explain the planned contractual arrangements for same. If fuel is not constantly maintained in the storage tanks, please indicate the details on why and when fuel is stored.
- 5.2.6. Applicable minimum load, environmental, and black start testing restrictions
 - 5.2.6.1. Does the unit require stabilizing load that exceeds internal plant loads? If so, indicate the amount of load external to the plant that is needed upon initial breaker closure. The external load requirement will be coordinated with the Transmission Owner for restoration planning purposes.
 - 5.2.6.2. Minimum output restrictions at various stages of the startup sequence.
 - 5.2.6.3. Specify the units maximum allowable time at minimum load. Preference is placed on those units that are able to "idle" for the longest time serving only house load with no net output to the transmission grid because this reduces the complexity of GO/TO load pickup coordination. Plants that have multiple units should consider the potential of cranking auxiliaries of other units as additional "house load."
 - 5.2.6.4. What is the unit's minimum load under the current emissions permit?



- 5.2.6.5. What is the lowest load the unit can operate in a stable steady state configuration if there were no emission permit restrictions?
- 5.2.6.6. Confirm the feasibility of obtaining an emissions permit modification to allow the black start unit to operate at the lowest possible load for restoration and black start testing? Units with emergency waivers or permits that allow low load capabilities for extended periods of time are strongly preferred.
- 5.2.6.7. Include the ramp rate and any variations in ramp rates that may apply.
- 5.2.6.8. Can the unit perform an annual Black start Test where it operates isolated from the grid in isochronous mode carrying only station auxiliary load for at least thirty minutes? If not, specify alternative test options.
- 5.2.6.9. For Combined Cycle units can the combustion turbines be operated in simple cycle mode?
 - 5.2.6.9.1. If so, identify for how long? (Summer/Winter)
 - 5.2.6.9.2. If not, does the unit have steam bypass capability?
- 5.2.6.10. What is the minimum and maximum load the combustion turbine can operate in Steam bypass mode? Indicate any time limitations for operating in either mode.
- 5.2.6.11. Is the station's auxiliary load greater than the combustion turbine's lowest possible minimum load? If not greater, then provide MW difference.
- 5.2.7. Refurbishment of Existing Black Start or Black Start Capable Resources
 - 5.2.7.1. Is the existing unit black start capable in accordance with the requirements stated in Tariff, Schedule 6A, and PJM Manual 12 Balancing Operations.
 - 5.2.7.1.1. If not, what modifications are required?
 - 5.2.7.2. For existing black start capable units that would otherwise retire, identify any equipment overhauls or refurbishment work that would be required for continued reliable Black Start Service.

5.3. Project Schedule

5.3.1. Estimated In-Service Date



Indicate the estimated in-service date as a black start capable unit. For the purpose of this RFP proposal, assume a project start date of November 1, 2021. Dates will be adjusted based on actual award date.

5.3.2. Project Schedule

Detail the project milestones in tabular and/or graphical form. Include the milestone description and projected start/finish dates.

5.3.3. Procurement Plan

Detail any work that is planned with vendors.

5.4. Total Estimated Capital and Annual Black Start Service Costs

5.4.1. Total Estimated Upgrade Capital Cost

In addition to any details provided, include a tabular summary of the estimated upgrade capital costs.

Costs in RFP Proposal are to consist of an estimate of projected actual costs, including contingency as appropriate. Cost recovery is based on actual costs. Actual project costs with supporting documentation will be submitted to the Independent MarketMonitor (IMM) for review upon completion of project in accordance with Tariff, Schedule 6A. All capital cost estimates including contingencies will be evaluated by the Independent MarketMonitor and PJM for consistency with the rates and terms set forth in PJM Tariff Schedule 6A. Proposals with cost estimates deemed by PJM to be inconsistent with those rates and/or terms may be rejected.

See RFP Section 6.1.1 for additional details on how to estimate a Black Start Unit's Annual Black Start Revenue Requirements.

5.4.2. Estimated Annual Fixed Black Start Service Cost

Proposals shall include an indication of the desired cost recovery method for the unit's Fixed Black Start Service Costs (Fixed BSSC) (Capital). Only one of the following rates should be selected:

- 1. Proposed Black Start Units electing to not document Black Start Capital Costs or not requiring additional Black Start Capital Costs should select the Base Formula Rate.
- 2. Proposed Black Start Units that choose to recover documented Black Start Capital Costs (including capital costs for NERC Standard Compliance) should select the Capital Cost Recovery Rate (CRF). For units that select the Capital Cost Recovery Rate, the Levelized CRF and Black Start Service Term of Commitment are based on the Age of the Black Start unit as of the In-Service Date.
- 3. Proposed Black Start Units electing to recover only the Black Start Capital Costs associated with compliance with applicable mandatory NERC CIP Reliability Standards should select the Capital Cost



Recovery Rate – NERC-CIP Specific Recovery. For units that select the Capital Cost Recovery Rate – NERC-CIP Specific Recovery the Levelized CRF and Black Start Service Term of Commitment are based on the Age of the Black Start Unit as of the In-Service Date or the Capital Improvement Lifespan.

4. Proposed Black Start Units electing to recover Black Start Capital Costs outside the Tariff will need FERC to approve the desired cost recovery. Black Start Units requesting cost recovery, not otherwise provided in the Tariff, in accordance with a FERC-approved rate are required to file, and receive approval of, their cost recovery method with FERC upon acceptance for Black Start Service.

5.4.3. Estimated Black Start Service Annual O&M Cost

Proposals shall include the unit's projected annual Variable Black Start Service Costs ("Variable BSSC") (Black Start O&M including the cost to maintain compliance with NERC Reliability Standards) to provide the Service. Provide a tabular summary of any estimated annual O&M costs to provide Black Start Service from the unit(s).

5.4.4. Estimated Black Start Service Annual Fuel Storage Cost

Proposal for units that use oil fuel shall include an estimate of the annual Fuel Storage Costs. Estimates should be based on a 16 hour run period and a Bond Rate of 3.50 percent.

5.5. Black Start Unit Owner Contact Information

	Name	Title	Company	Phone Number	Email Address
Primary Contact					
Alternate Contact					

6.0: Black Start Business Rules Summary

6.1. Black Start Service Compensation & Commitment

6.1.1. Black Start Service Annual Revenue Requirements

Selected Unit's Black Start Annual Revenue Requirements will be calculated based upon actual costs submitted to the PJM Independent Market Monitor review and PJM for approval.



Details of the PJM Black Start Annual Revenue Rates available are contained in the Tariff, Schedule 6A, section 18, as amended from time to time, including the Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000. Black Start Annual Revenue Requirements are calculated using the following equation:

{(Fixed BSSC) + (Variable BSSC) + (Training Costs) + (Fuel Storage Costs)} * (1 + Z)

6.1.2. Pending Changes to Black Start Compensation, Commitment, and Termination Rules

PJM recently filed changes to Tariff, Schedule 6A in FERC Docket No. ER21-1635-000 https://www.pjm.com/directory/etariff/FercDockets/6067/20210407-er21-1635-000.pdf including revisions to Black Start Annual Revenue Requirement's Capital Recovery Factors, Black Start commitment periods, Black Start Annual Revenue Requirement Minimum Tank Suction Level Calculations and Black Start Termination rules. The information below is provided for informational purposes only and subject to change because the proposed Tariff revisions are subject to FERC acceptance to be effective.

6.1.2.1. Black Start Annual Revenue Requirement Capital Recovery Factors (CRF)

As proposed, Black Start Annual Revenue Requirement CRFs for units selected in this RFP and in the future, will be a revised during the unit's capital recovery period calculated annually in accordance with the PJM Tariff and Manuals

6.1.2.2. Black Start Capital Cost Recovery Commitment Period

As proposed, Black Start Units that are selected under this RFP and choose to recover documented Black Start Capital Cost under a Capital Cost Recovery Rate shall commit to provide Black Start Service from such Black Start Units for an initial capital recovery period based upon the age of the Black Start Unit plus the remaining life of the Black Start equipment.

6.1.2.3. Minimum Tank Suction Level (MTSL)

Under the proposed changes a Black Start Unit's Fuel Storage Costs will only be eligible to recover the carrying cost for the portion of the MTSL volume that is directly related to Black Start.

6.1.2.4. Black Start Termination rules for units on a Capital Cost Recovery Rate

Under the proposed Tariff revisions, Black Start Units that are selected under this RFP and choose to recover documented Black Start Capital Cost under a Capital Cost Recovery Rate may terminate their lifetime Black Start Service commitment with one year advance notice and consent of PJM, provided the Black Start Unit's owner demonstrates to the satisfaction of PJM that at least one of the reasons stated in the Tariff for such termination apply.



6.1.3. Black Start Service Annual Revenue Components

Only one of the following rates should be selected for the unit's Fixed Black Start Service Costs (Fixed BSSC) (Capital) in accordance with the terms and conditions of the Tariff, Schedule 6A, and the PJM Manuals, as they may be amended from time to time, including the Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000.:

- 1. Proposed Black Start Units electing to not document Black Start Capital Costs or not requiring additional Black Start Capital Costs should select the Base Formula Rate.
- 2. Proposed Black Start Units that choose to recover documented Black Start Capital Costs (including capital costs for NERC Standard Compliance) should select the Capital Cost Recovery Rate (CRF). For units that select the Capital Cost Recovery Rate, the Levelized CRF and Black Start Service Term of Commitment are based on the Age of the Black Start unit as of the In-Service Date.
- 3. Proposed Black Start Units electing to recover only the Black Start Capital Costs associated with compliance with applicable mandatory NERC CIP Reliability Standards should select the Capital Cost Recovery Rate NERC-CIP Specific Recovery. For units that select the Capital Cost Recovery Rate NERC-CIP Specific Recovery the Levelized CRF and Black Start Service Term of Commitment are based on the Age of the Black Start Unit as of the In-Service Date or the Capital Improvement Lifespan.
- 4. Proposed Black Start Units electing to recover Black Start Capital Costs outside the Tariff guidelines will need FERC to approve the desired cost recovery. Unit's requesting cost recovery in accordance with a FERC-approved rate are required to file, and receive approval of, their cost recovery method with FERC upon acceptance for Black Start Service.

The unit's projected annual Variable Black Start Service Costs ("Variable BSSC") should include Black Start O&M and the cost to maintain compliance with NERC Reliability Standards necessary to provide the Service.

Black Start Unit's will be compensated for Training Costs at the level of \$3,750 per year per plant.

Units that use Oil Fuel shall estimate the annual Fuel Storage Costs based on a 16 hour run period and a Bond Rate of 3.50 percent.



Units using the Base Formula Rate for Fixed Black Start Service Costs will be able to use an Incentive Factor (Z) of 10 percent. For all other Fixed Black Start Service Rates, the incentive Factor (Z) will be 0 percent.

Additional guidance on the calculation of a Unit's Annual Black Start Service Revenue Requirements may be found in the <u>Black Start Cost Submittal Forms</u>. Please select the tab associated with the Fixed Black Start Service Cost Rate chosen.

6.1.4. Submittal of Estimated Capital Cost, Actual Capital Cost and Annual Black Start Service Costs

6.1.4.1. Evidence of upgrade Cost

If selected, submittal of data supporting actual capital and annual black start service costs to PJM and the PJM Independent Market Monitor ("IMM") in accordance with Paragraph 17B of Schedule 6A of the Tariff is required.

6.1.4.2. Timing of submittal of estimated costs

A selected Black Start Unit owner will submit a best estimate of the unit's projected actual upgrade capital costs, variable Black Start Service costs, and fuel storage costs to PJM at the time the unit enters Black Start service, to serve as an interim annual revenue requirement until reconciliation and approval of final actual upgrade capital costs is complete.

6.1.4.3. Timing of review and final determination of actual costs:

A selected Black Start Unit owner must submit supporting data and documentation of actual upgrade capital costs to PJM and the IMM no later than 90 days after entering Black Start Service. The supporting data and documentation can be submitted on a monthly basis as incurred or as a single submittal at the completion of the work, but all cost documentation must be submitted no later than 90 days after the unit enters Black Start service.

A selected Black Start Unit owner must submit documentation of actual annual revenue costs including variable black start cost and fuel storage costs to PJM and the IMM within 90 days after entering Black Start Service. Annual variable black start service can include annualized capital costs, Black Start O&M costs, existing unit level annual VOM costs and NERC Standard compliance costs.

6.1.4.4. Timing of Black Start Service monthly credits

New Black Start Unit owner's monthly Black Start credits will be held by PJM in a non-interest bearing account until PJM or the Federal Energy Regulatory Commission accepts the owner's



annual revenue requirement pursuant to Section 17B of Schedule 6A of the Tariff. Monthly Credits for the unit's annual revenue requirement including recovery of actual upgrade costs will begin after the Black Start Unit's annual revenue requirement is accepted by PJM and will include monthly credits held by PJM back to the unit's in-service date including any required estimated revenue true up.

6.1.4.5. Supporting Documentation

Supporting documentation for actual capital costs will include but not be limited to the following:

- 1) third party invoices supporting costs for contractor services and materials;
- 2) time sheets or other project tracking documentation for internal labor costs (components of labor rates) including rate sheets and applicable overheads;
- when internal costs are charged to the project, they must include documentation supporting all costs that will be included and a breakdown of how the costs were developed;
- 4) when application and certificates for payment are used to confirm completion of any portion of the project, they must be signed and notarized. The signature and notarization must be visible on any copies provided.

Supporting documentation for variable black costs and fuel storage costs (if applicable) will include but not be limited to the following:

- 5) third party invoices supporting costs for contractor services and materials;
- 6) time sheets or other project tracking documentation for internal labor costs (components of labor rates) including rate sheets and applicable overheads;
- 7) if the unit can be fired on oil, additional required documentation for the claimed Minimum tank Suction Level(s), size of tanks, and burn rates. If the tank is shared with other resources, a complete explanation with all supporting data of how tank use is shared and the allocation factor(s) used is required.

6.1.4.6. Cost evidence disputes

The IMM will provide feedback and attempt to come to agreement on the level of each component in the Black Start Service revenue requirement within 90 days after the Black Start Unit owner's final submittal of cost documentation or other date as specified in Schedule 6A paragraph 17B.



If the IMM and the Black Start Unit owner are unable to come to an agreement on the project upgrade costs or any other annual costs to be reimbursed to the Black Start Unit owner, then the Black Start Unit owner must notify PJM that it disagrees with the IMM's determination of costs within seven days after the IMM submittal of the annual revenue requirement to PJM. The Black Start Unit owner shall also submit its proposed costs to PJM provided it has participated in good faith in the process and the Black Start revenue requirements are no higher than the level defined in any agreement reached by the Black Start Unit owner and the IMM. PJM will review the proposed costs submitted by Black Start Unit owner, and determine whether to accept the owner's proposed costs within 30 days after the Black Start Unit owner written disagreement. If the Black Start Unit owner and PJM are unable to reach agreement on the costs to be reimbursed, then the Black Start Unit owner may file its own proposed costs for reimbursement with the Federal Energy Regulatory Commission for approval.

6.1.4.7. Changes to revenue requirement

If a Black Start Unit owner incurs additional costs after the initial in-service date to maintain the Black Start Unit's black start capability, the Black Start Unit owner can submit data evidencing those costs to the IMM pursuant to Paragraph 17 of Schedule 6A and adjust its revenue requirement going forward to recover such costs, along with an applicable extension to the black start commitment term. However, the existing revenue requirement must be effective at least for 12 months prior to making such change. Per Paragraph 17 of Schedule 6A: "No change to a Black Start Service revenue requirement shall become effective until the existing revenue requirement has been effective for at least 12 months."

6.1.5. Compensation for Energy Output

6.1.5.1. Testing

The Black Start Unit will be tested annually and must have a successful annual test on record within the preceding 13 months in order to receive Black Start Service revenues in accordance with paragraphs 12 and 14 of Schedule 6A of the Tariff, as amended from time to time, including the Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000. Compensation for the energy output delivered by the Black Start Unit during annual testing will be provided at the higher of the Black Start Unit's cost-capped offer or real-time locational marginal price ("LMP") in accordance with paragraph 13 of Schedule 6A of the Tariff and Manual 28 Section 5.2.7. Typically, Black Start Units close to a dead bus during the test and do not provide energy to the grid. Test compensation for such a unit consists of the unit's start cost plus one hour of no-load.

6.1.5.2. Emergency black start dispatch



In the event of emergency black start dispatch, a Black Start Unit owner shall be compensated for the Black Start Unit's energy output at the unit's cost-capped offer, until such time that PJM is able to reestablish the energy markets and calculate a LMP.

6.1.5.3. Cost-capped offer

The unit's Cost based offer will be developed in accordance with the guidelines provided in Manual 15 "Cost Development Guidelines."

6.1.6. Service after Initial Commitment Term & Termination of Service

6.1.6.1. Service after Initial Commitment Term

Black Start Units recovering cost under Tariff, Schedule 6A, section 5have an initial two year commitment to provide Black Start Service.

Pending approval of PJM's filing at FERC in Docket No. ER21-1635-000, a Black Start Unit that has elected to recover capital cost under Tariff, Schedule 6A, section 6 and selected in this RFP has a Black Start Service commitment for the initial capital recovery period based on the age of the unit plus the lifetime of the Black Start equipment. the After the initial capital recovery period is completed a Black Start Unit will receive the compensation set forth in the Tariff for units under PJM Tariff, Schedule 6A, section 5.

As set forth in PJM Tariff, Schedule 6A, section 18, for purposes of such compensation for a Black Start Unit's with a term of commitment under Paragraph 5, "Black Start Unit Capacity" means the entire installed capacity of the current delivery year of Black Start Unit.

6.1.6.2. Termination by Black Start Unit

Black Start Unit selected in this RFP, pursuant to PJM Tariff, Schedule 6A, section 5, foregoing documented capital cost recovery may terminate provision of Black Start Service with one year advance notice to PJM after the initial two year commitment.

Black Start Units selected pursuant PJM Tariff, Schedule 6A, section 6, electing to recover documented capital cost may terminate provision of Black Start Service with one year written advance notice to PJM and the consent of PJM, provided that it will forgo any existing entitlement to future black start revenues. Pending approval of PJM's filing at FERC in Docket No. ER21-1635-000, Black Start Units that are selected under this RFP and choose to recover documented Black Start Capital Cost under a Capital Cost Recovery Rate may terminate their lifetime Black Start Service commitment provided the



Black Start Unit's owner demonstrates to the satisfaction of PJM that at least one of the following reasons for such termination apply:

- A. Black Start Unit retirement or deactivation with at least one year's notice;
- B. Expiration of a state, federal, or other governmental agency permit(s) required for Black Start Service with at least one year's notice; or
- C. Additional capital is required by the Black Start Unit owner to maintain Black Start Service capability. In which case, the Black Start Unit will submit a proposal in to PJM's Black Start Service RFP in accordance with the procedures set forth in Manual 12 and only continue to provide Black Start Service if selected by PJM in the RFP evaluation process.

6.1.6.3. Termination by PJM

Pursuant to of Tariff, Schedule 6A, PJM may terminate provision of Black Start Service with one year advance notice to Black Start Unit owner (before or after actual in-service of the Black Start Unit), but the Black Start Unit owner will be reimbursed for any amount of unrecovered Fixed BSSC (as defined in the Tariff) for a period not to exceed five years.

If PJM terminates the contract before in-service date, the Black Start Unit owner will cease work on the project and submit all costs expended up to the date of termination to PJM (for reimbursement in accordance with the Tariff). Such costs will include but not be limited to payment for equipment completed (both received and completed but not shipped), cancellation payments and non-refundable advance payment.

If PJM cancels or terminates any portion of its Tariff and such cancellation or termination would affect the existing rights of the Black Start Unit owner to receive compensation for Black Start Service, then PJM shall nonetheless be required to reimburse the Black Start Unit owner for any amount of unrecovered Black Start Service revenues to which the Black Start Unit owner has an existing entitlement.

6.2. Testing

6.2.1. Annual Test

To receive Black Start Service revenues, the Black Start Unit must have a successful black start test on record with PJM within the preceding 13 months in accordance with Tariff, Schedule 6A, as amended from time to time, including the Tariff revisions filed by PJM on April 7, 2021, in Docket No. ER21-1635-000. During its black start test, the Black Start Unit must be able to close to a dead bus and be able to maintain voltage in automatic voltage control mode and maintain frequency in automatic isochronous control for 30



minutes. A Black Start unit that is unable to maintain voltage or frequency for 30 minutes must have a state, federal, or other governmental agency permit limiting the run time.

6.2.2. Failed Annual Test

If the Black Start Unit fails the annual test, it may be re-tested within a 10 day period without financial penalty as long as the 10 day period does not cross over the 13 month requirement. If the Black Start Unit does not successfully pass a black start test within the 10 day period immediately following a failed test, monthly black start revenues will be forfeited from the time of the first day of the month in which the unsuccessful test occurred until the first day of the first month after the unit successfully passes a black start test.

If the Black Start Unit owner does not make the necessary repairs to enable the Black Start Unit to pass the annual test within 90 days of the due date for the annual test, the Black Start Unit will immediately cease to qualify as a Black Start Unit. Provided, however, the 90 day period may be extended up to one year with PJM approval. If the 90-day period is extended, the Black Start Unit owner will continue to forfeit all revenues starting from the first day of the month in which the unsuccessful test occurred until the first day of the first month after the unit successfully passes a black start test.

6.3. Black Start Unit/Transmission Owner Coordination

Black Start Unit and TO will coordinate the modification to the electrical protection system (transmission system and Black Start Unit Facility) to protect the Black Start Unit and grid during black start startup and operation. Each party will be responsible for the cost of any upgrades to its portion of the system (i.e., Black Start Unit owner will be responsible for upgrades to the Black Start Unit, TO will be responsible for upgrades to the Transmission System).

The Black Start Unit owner and TO will develop the communication protocol between TO and Black Start Unit to meet black start dispatch requirements.

The Black Start Unit owner and TO will develop the TO System Restoration Plan to include the Black Start Unit operational limitations.

The Black Start Unit owner and PJM will develop procedures for both the Black Start Unit acceptance test and annual test.

6.4. In-Service Date Delays

The Black Start Unit owner will make every reasonable effort to make the estimated in-service date indicated in their RFP proposal. Should the project be delayed, The Black Start Unit owner will immediately notify PJM of the



delay and make every effort to minimize the impact. The Black Start Unit owner will not be required to pay any penalty for any such delays.

6.5. Black Start Unit Configurations

Note that configurations where the cranking unit of the Black Start unit offers into PJM's Capacity or Energy Markets, and cranks the designated Black Start runit that also offers into the Capacity or Energy Markets are unacceptable. In that case, wherethe cranking diesel offers into PJM's capacity or Energy Markets, then the cranking diesel is the Black Start Unit and the cranked unit is critical load.

7.0: Black Start Generator Reference Guide

7.1. Index of Documents and Manuals

PJM Open Access Transmission Tariff Schedule 6A – Black Start Service – existing version and proposed future revisions

Provides the PJM Tariff requirements for black start generators.

Manual M-01, Rev 43 – Control Center and Data Exchange Requirements

Describes the control center and telecommunication requirements between PJM and its members.

Manual M-10, Rev 39 - Pre-Scheduling Operations

Describes the pre-scheduling process and information required from generation resources.

Manual M-12, Rev 42 – Balancing Operations - existing version and proposed future revisions Describes the real time operations process.

Manual M-14D, Rev 53 – Generator Operational Requirements

Provides a general overview of generator operational requirements.

Manual M-27, Rev 93 – Open Access Transmission Tariff Accounting

Describes the accounting for transmission services within the PJM Open Access Transmission Tariff.

Manual M-36, Rev 28 – System Restoration

Describes how PJM and the PJM Members are expected to respond to system disturbance conditions or system blackout.

NERC Reliability Standards



7.2. PJM Open Access Transmission Tariff Schedule 6A – Black Start Service

Existing version

http://www.pim.com/directory/merged-tariffs/oatt.pdf

http://www.pjm.com/directory/etariff/MasterTariffs/23TariffSections/4406.pdf

- Black Start Service Provisions
- Performance Standards and Outage Restrictions
- Testing Requirements
- Revenue Requirements and Recovery Rates
- Credits
- Charges

7.3. Manual M-01, Rev 42 – Control Center and Data Exchange Requirements

http://pjm.com/~/media/documents/manuals/m01.ashx

- Member Control Center Requirements
 - Data and voice communications
 - Staffing
 - Facility requirements
 - Periodic testing of telecommunications

7.4. Manual M-10, Rev 39 – Pre-Scheduling Operations

http://pim.com/~/media/documents/manuals/m10.ashx

Planned Outage Restrictions for Black Start Units

7.5. Manual M-12, Rev 42 - Balancing Operations

Existing version

http://pim.com/~/media/documents/manuals/m12.ashx

- Black Start Service
- Definitions
- Minimum Critical Unit Requirements
- Product Description
 - Generator Owner's Commitment
 - Performance Standards
 - Testing
 - Training Standards and Records
 - Non-performance
 - Termination of Black Start Service



- Attachment C: PJM Black Start Report Forms for:
 - Black Start Tests Generation and Transmission
 - Automatic Load Rejection Tests
 - Formulaic Cost Data
 - Actual Cost Data

7.6. Manual M-14D, Rev 53 – Generator Operational Requirements

http://pim.com/~/media/documents/manuals/m14d.ashx

- Black Start Generation Procurement
 - Black Start Selection Process
 - Black Start Incremental RFP Process
 - Generator reactive capability testing requirements for Black Start Units.

7.7. Manual M-27, Rev 93 – Open Access Transmission Tariff Accounting

http://pim.com/~/media/documents/manuals/m27.ashx

- Black Start Service Accounting
- Black Start Service Credits and Charges

7.8. Manual M-36, Rev 28 – System Restoration

http://pim.com/~/media/documents/manuals/m36.ashx

- Generation
 - Communications
 - Governor & Frequency Control
 - Cranking Paths
 - Cranking Power
- Transmission
 - Voltage Regulation and Control
 - Energization Guidelines
- System Restoration Plan Guidelines
- Cross Zonal Coordination
- Minimum Critical Black Start Requirement

7.9. NERC Reliability Standards

http://www.nerc.com/pa/Stand/Pages/default.aspx



8.0: Black Start RFP Level 1 Response Form

Company Name:			
Unit Name:			
Unit Address:	Contact Name:		
	Contact Address:		
Unit MarketID:			
Unit ICAP:	Contact Email:		
Type of Unit (CT, CC, Steam, etc.):	Contact Phone:		
Interconnection Voltage Level:			
Inteconnected Swyd Name:			
TO Zone (if known):			
Primary Fuel:	Secondary Fuel (if applicable):		
If oil fired, oil storage on site? YES□ NO□	If gas fired, firm gas transportation? YES□ NO□		
Proposed black start MW:			
Unit minimum load (under current air permit):			
Emission limitations for operation below minimum (e.g. start-up time to	o reach air permit compliance):		
For Combined Cycle (CC) Units Only			
Simple Cycle available? YES ☐ NO☐			
Steam bypass available? YES ☐ NO☐			
Percent of CT Output allowed by steam bypass:			
Please send all Level 1 Responses to <u>BlackStart@pjm.com</u>			

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9.0: 2021 BGE/PEPCO Zones Incremental Black Start RFP Map

