

Calpine Corporation Comments on PJM Fuel Security Initiative
September 21, 2018

PJM developed a draft proposal for fuel security as outlined in the “Valuing Fuel Security” scoping document released by PJM on April 30, 2018 and further developed in numerous stakeholder meetings. Calpine believes that the attached “Fuel Security in the PJM Interconnect: Natural Gas and Dual-fuel Resources” report prepared by Energyzt Advisors, LLC may be helpful to PJM in its current fuel security endeavor. The Energyzt report examines resiliency associated with natural gas-fired generation and also with gas-fired generation with oil backup. The fuel supply structures of natural gas and oil are examined from a resilience perspective, which relates both to the ability to withstand a resilience event, as well as the ability to recover and assistance in recovering from a resilience event. The operational flexibility, redundant, multi-mode supply and backup abilities of gas-fired generation make it uniquely valuable in dealing with resilience events. The Energyzt report describes these characteristics and capabilities in detail, as well as making some recommendations on the competitive market design that may assist in reaching resilience objectives.

Thank you for considering the referenced report in the ongoing PJM Fuel Security initiative.