

MARKETS & OPERATIONS POLICY COMMITTEE (MOPC)

Oct. 2, 9:00 am – 12:00 pm CT

Virtual Briefing

AGENDA

Presented by: Casey Cathey (SPP)

1. Accreditation: Performance-Based & Effective Load Carrying Capability
2. Demand Response Policy Update
3. Fuel Assurance Update



RESOURCE ADEQUACY BRIEFING – 10/2/2023

MARKET AND OPERATIONS POLICY
COMMITTEE

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SPP'S CURRENT RESOURCE ADEQUACY APPROACH

- Regional resource adequacy requirements imposed on Load Responsible Entities (“LREs”)
- LREs must demonstrate sufficient accredited capacity will be available to meet peak demand plus the Planning Reserve Margin (PRM) requirement
 - Summer Requirement (deficient LREs subject to deficiency payment)
 - Winter Requirement pending
- LREs build or procure capacity through bilateral market
- PRM requirement established through Loss of Load Expectation (LOLE) analyses performed at least biennially
- Compliance measured through annual data collection process



Capacity

Team members' collective ability to play

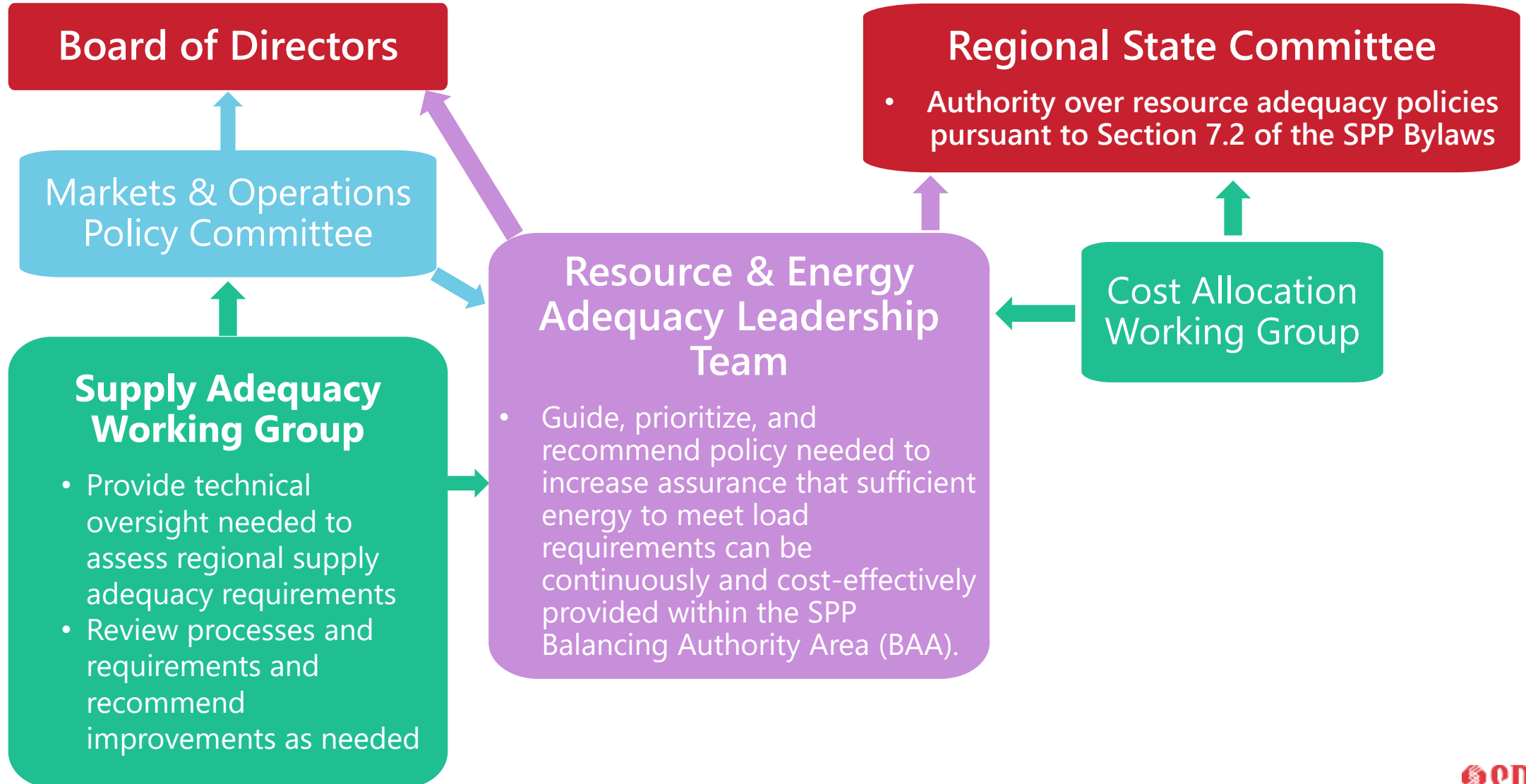
Energy

Output of players on field

Reserve margin

Ability of reserve players to contribute

RESOURCE ADEQUACY GOVERNANCE PROCESS



RESOURCE ADEQUACY CHALLENGES

Influx of intermittent renewable generation

Thermal generation retirements

Resource under-performance & unavailability

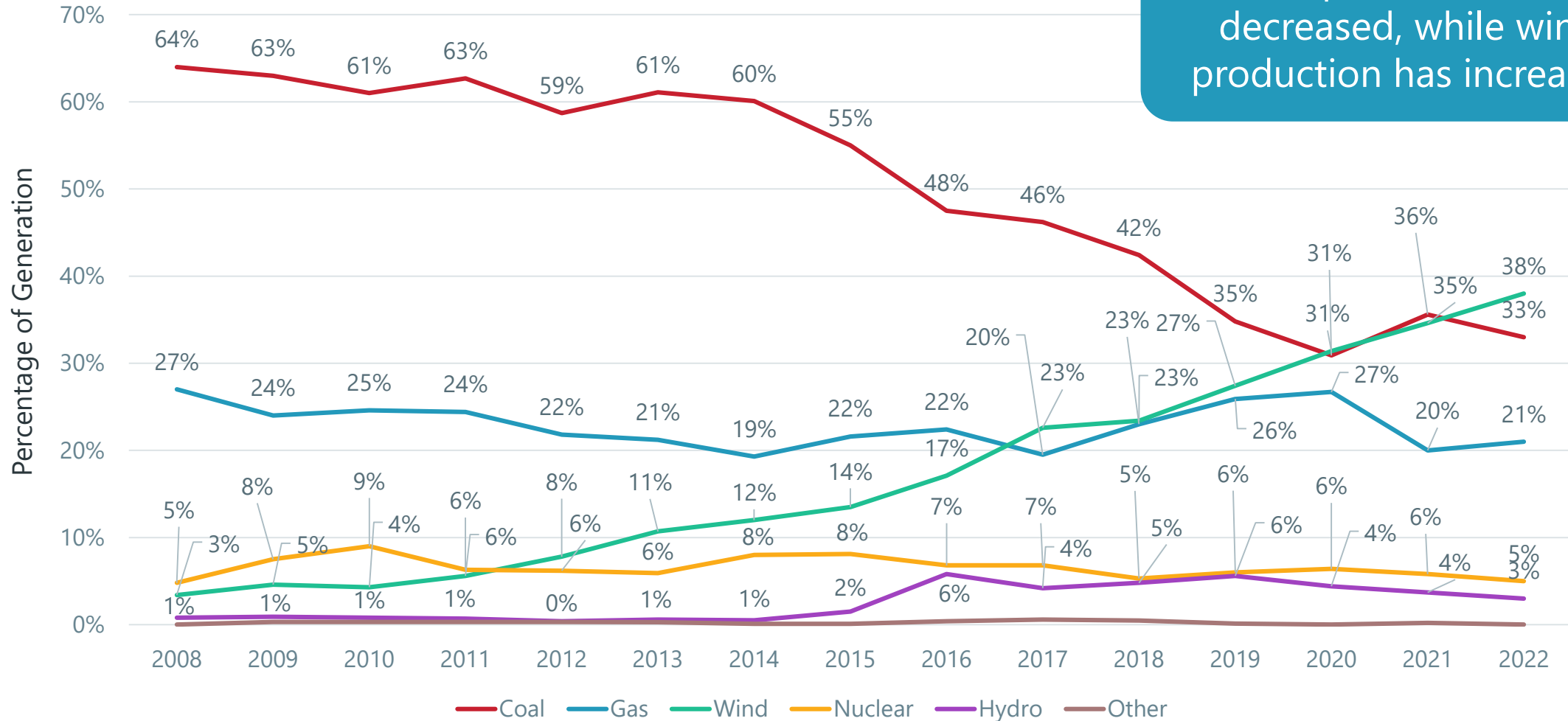
Increasing load & volatility

Extreme weather events

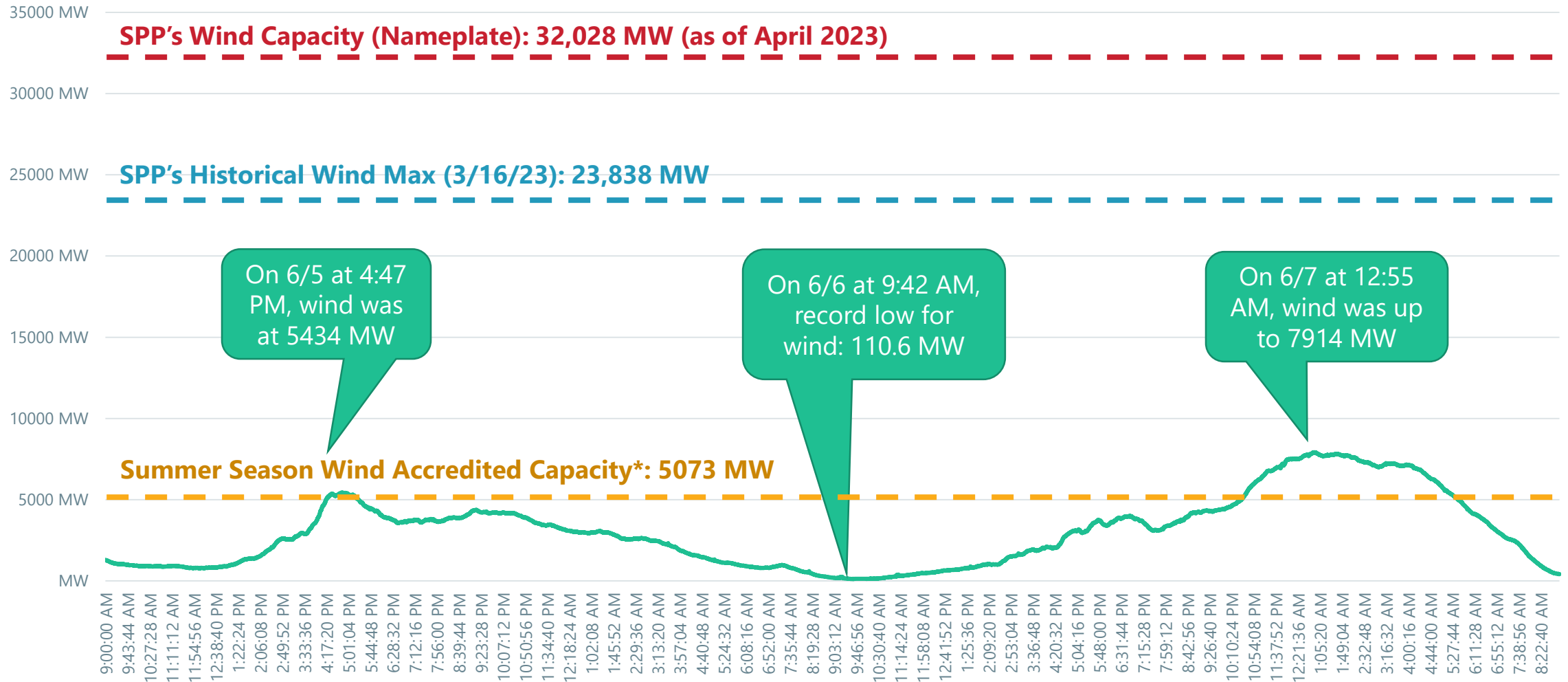
Reducing margins

SPP'S EVOLVING ENERGY MIX

Coal production has decreased, while wind production has increased



RESOURCE PERFORMANCE: WIND RAMP AND RECORD LOW (6/6/23) IN INTEGRATED MARKETPLACE

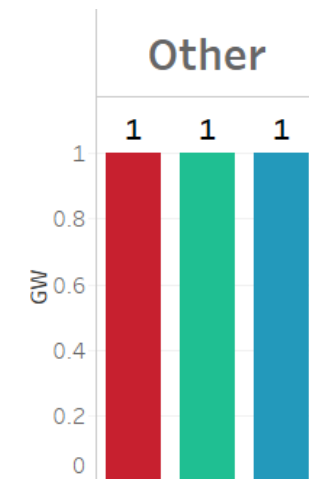
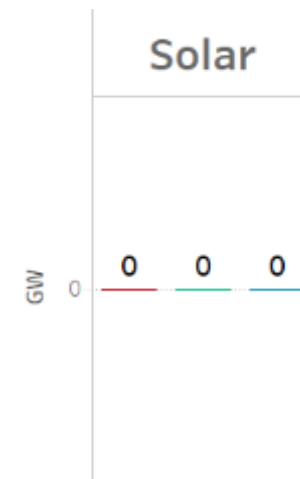
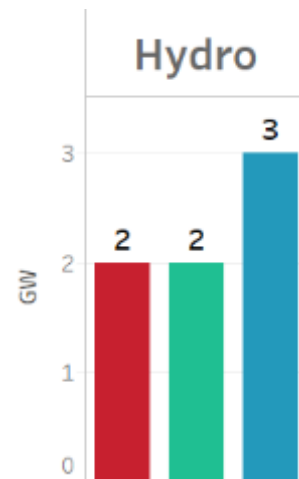
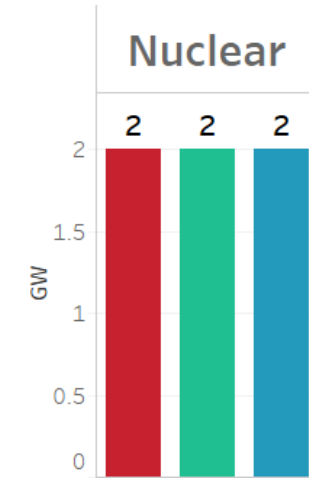
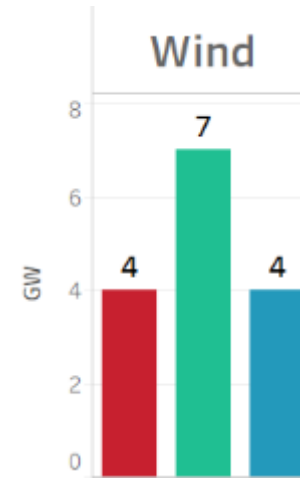
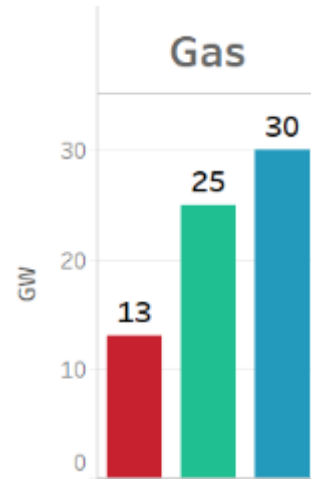
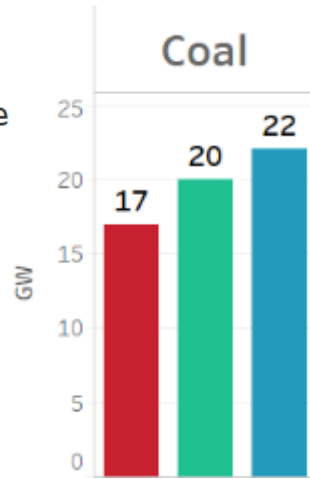


*Source: 2023 SPP Resource Adequacy Report

2021 WINTER STORM URI CAPACITY PERFORMANCE

02/16/2021 07:00

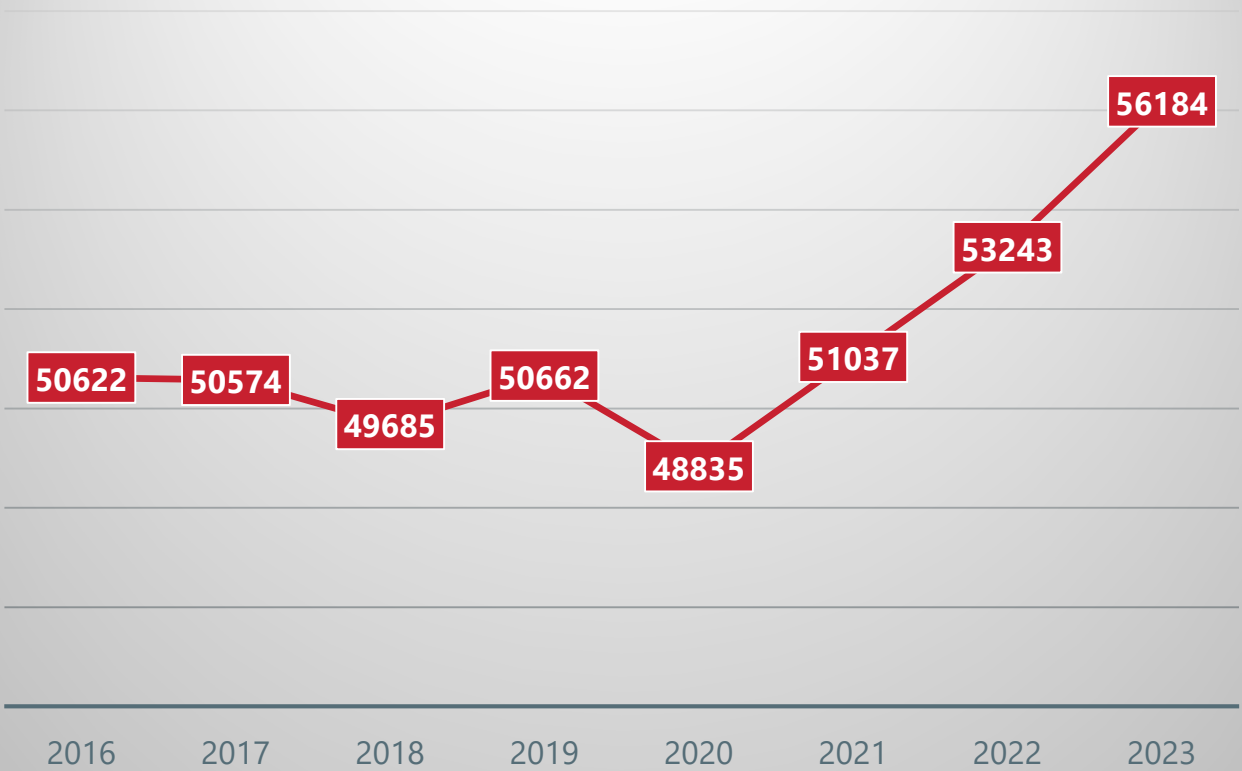
■ Available
■ 5-Year Available
■ Accredited



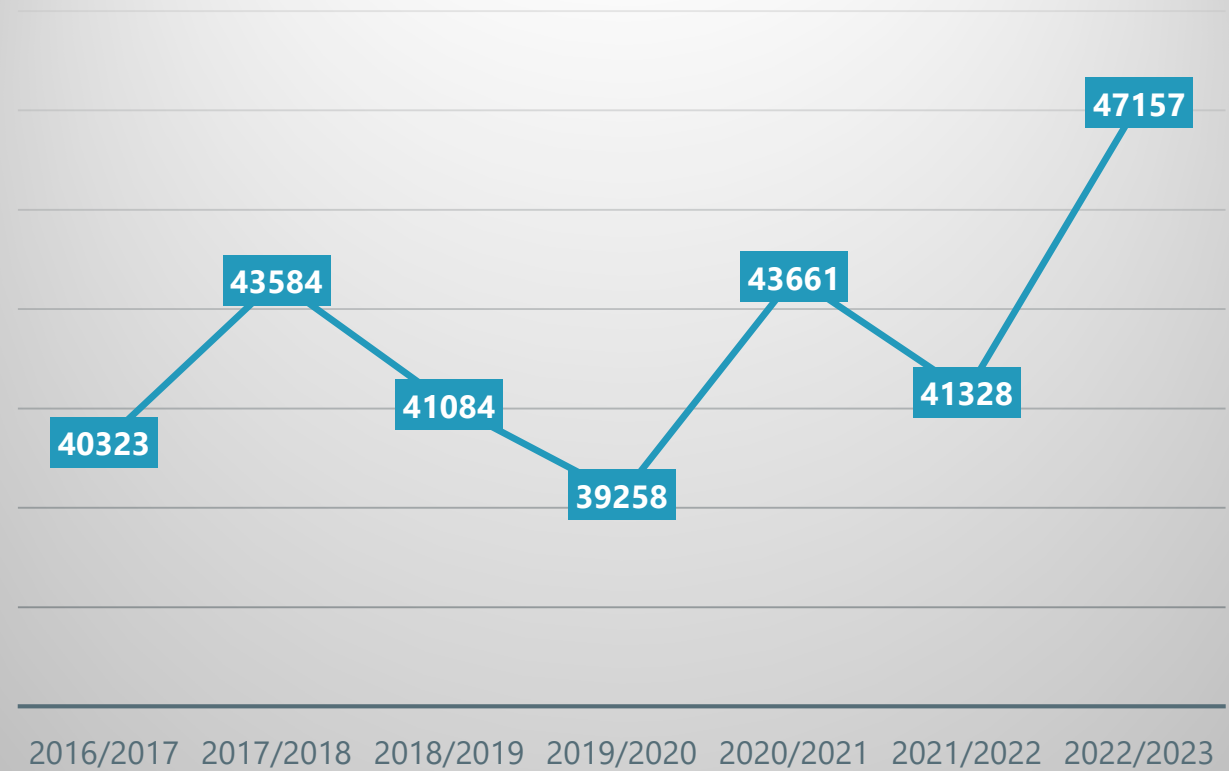
Fuel supply and mechanical issues were largest causes of generation unavailability

PEAK LOAD TRENDS

SPP Historical Summer Peaks



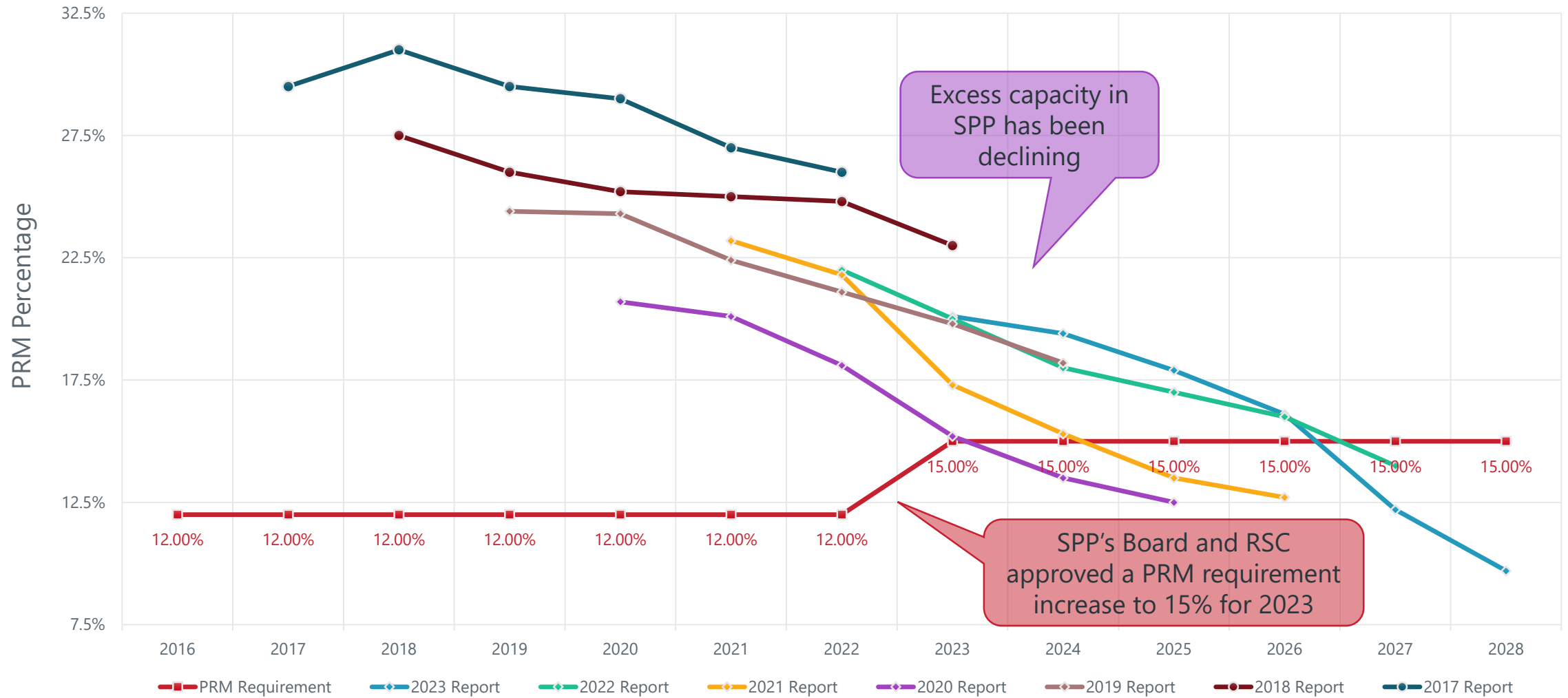
SPP Historical Winter Peaks



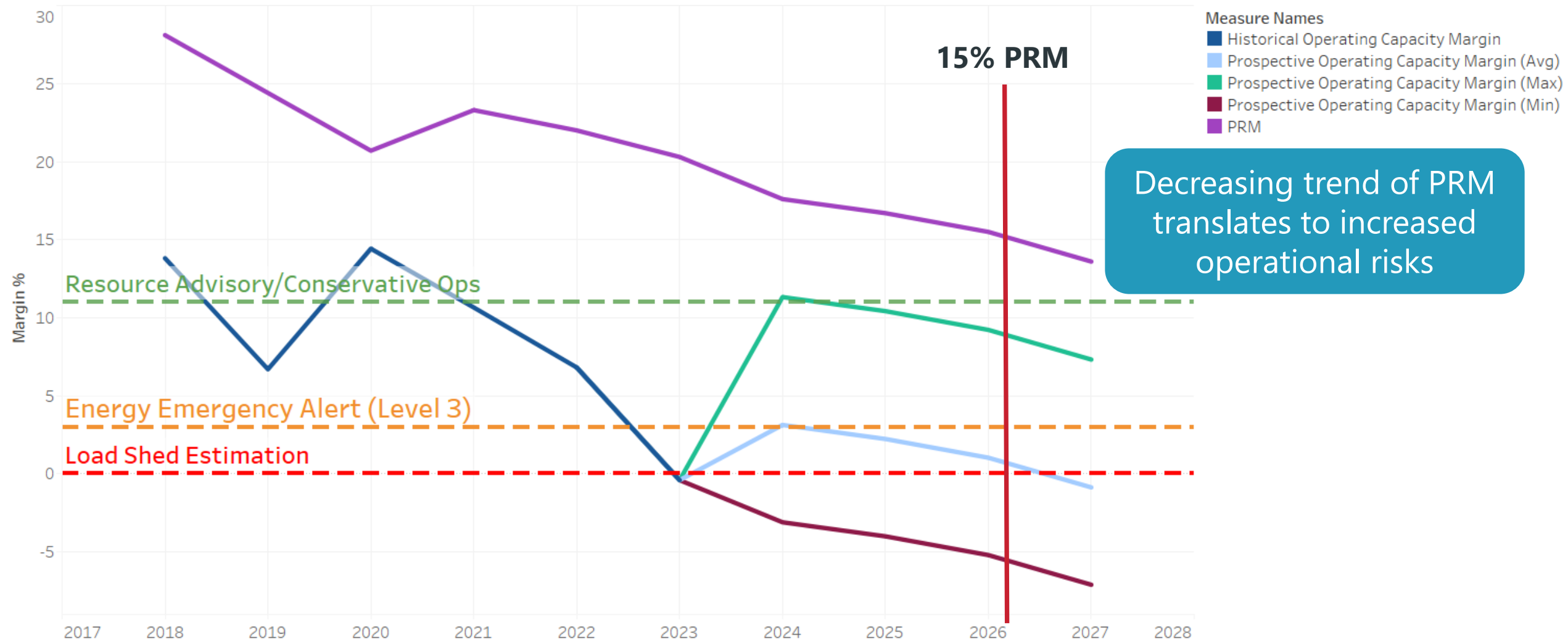
2023 summer peak load 5.5% higher than previous peak and 2022/23 winter peak 8% higher than previous winter peak

HISTORICAL MARGIN PROJECTIONS

Historical 6-year PRM Projections



PRM VS. OPERATING CAPACITY MARGIN



Operating Capacity Margin – Minimum value per year of total capacity MWs available minus load shown as a percentage of the load (Note the WWE has been excluded)

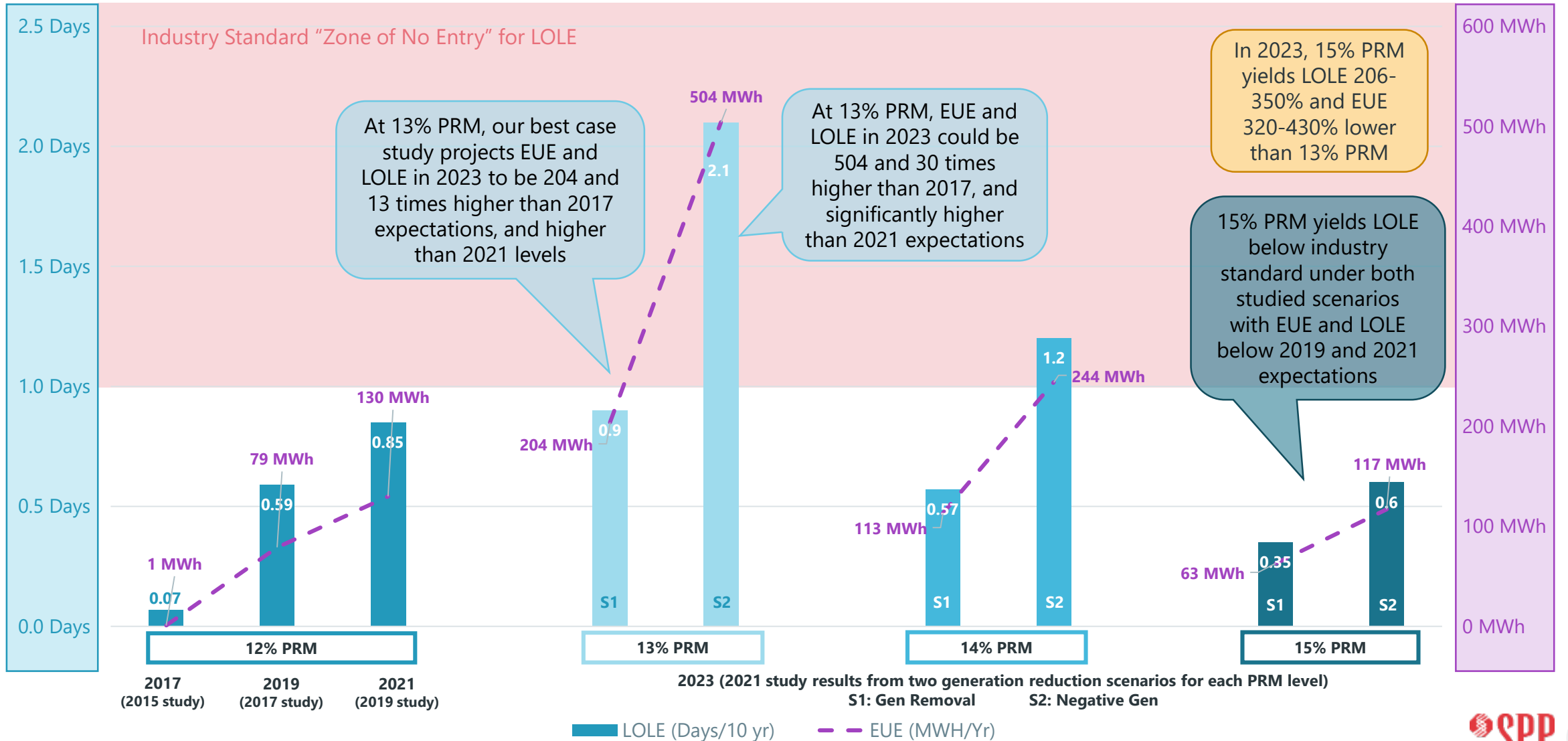
INCREASING RISKS

LOSS OF LOAD EXPECTATION (LOLE)

EXPECTED UNSERVED ENERGY (EUE)

LOLE (Days Per 10 Years)

EUE (Annual MWh)



TOPICS OUTLINE

What is Accreditation and why is it important?

What is Performance-Based Accreditation?

What is Effective Load Carrying Capability?

What did SPP propose and why did FERC reject?

What were the major issues debated after FERC's rejection?

What issues were resolved and how?

What are the remaining issues?

How will they be addressed?

What is staff's view on compromises and remaining issues?

ACCREDITATION OF RESOURCES

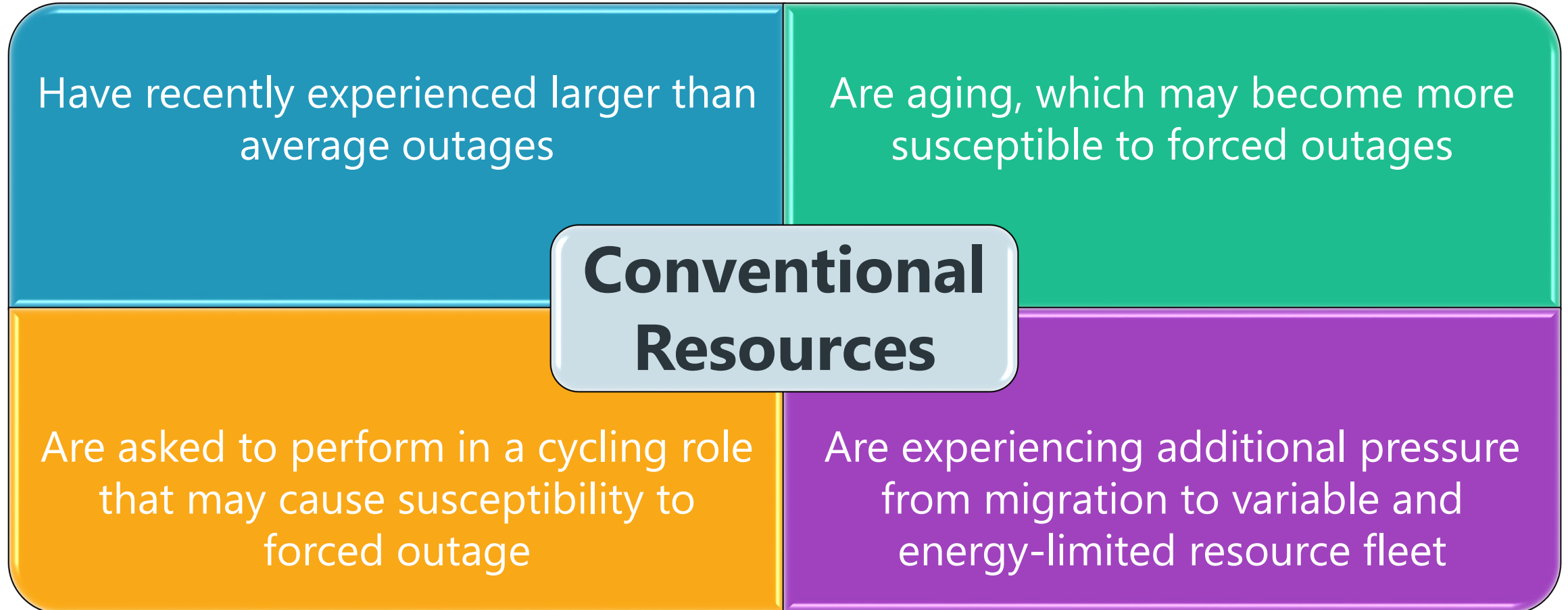
Value of capacity of specific resources is determined by the accreditation of those resources

- Capacity of resources feeds into PRM calculation
- Critical that resources are not overvalued

PERFORMANCE BASED ACCREDITATION

DRIVERS AND CONSIDERATIONS

Ensure Balancing Authority (BA) resource fleet can continue to maintain reliability under normal and extreme operational conditions



PERFORMANCE-BASED ACCREDITATION BENEFITS

VALUES

conventional resources that are reliable and available to perform when needed most

INCENTS

underperforming resources to improve

ENSURES

appropriate capacity value to calculate PRM

PROVIDES

capability to meet system needs

- Does not change the total capacity required to meet system reliability but impacts entities differently

ACCREDITATION METHODOLOGY

Each conventional resource's Accredited Capacity is determined using

- the demonstrated net generating capability and
- the resource's calculated EFORd for the applicable season

Accredited Capacity

= demonstrated net generating capability \times (1 - EFORd)

ELCC OVERVIEW AND STUDY PRIORITY FOR SOLAR, WIND AND STORAGE

ACCREDITATION OF RENEWABLE RESOURCES

Capacity value of specific resources is determined by the accreditation of the same resource type

- Critical that resources are not overvalued

Accreditation of wind, solar, and energy storage (ESR) resources will be determined by the Effective Load Carrying Capability (ELCC) analysis

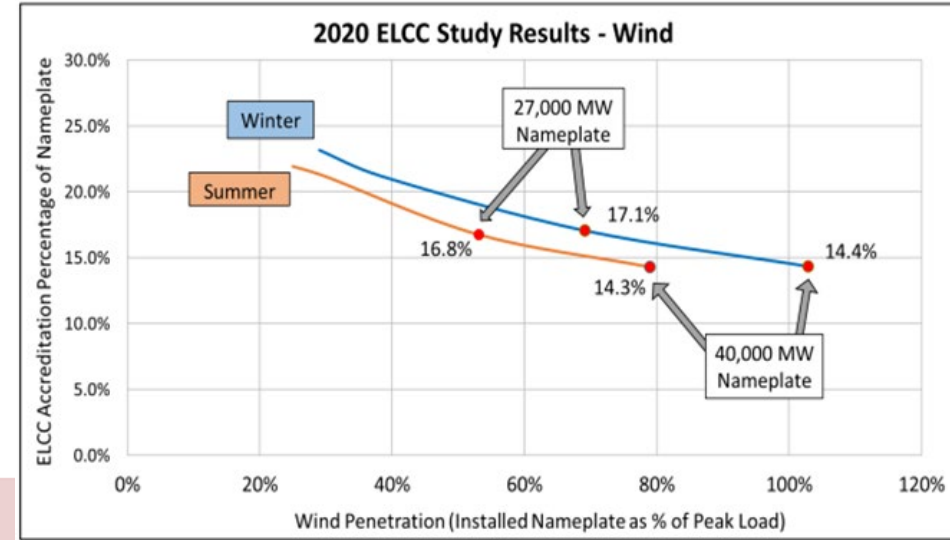
Effective Load Carrying Capability (ELCC) is defined as the amount of incremental load a resource can dependably and reliably serve during peak hours

Adopts system ELCC methodology in ELCC study process that aligns with LOLE study methodologies

TIER REQUIREMENTS

ELCC Tier Structure

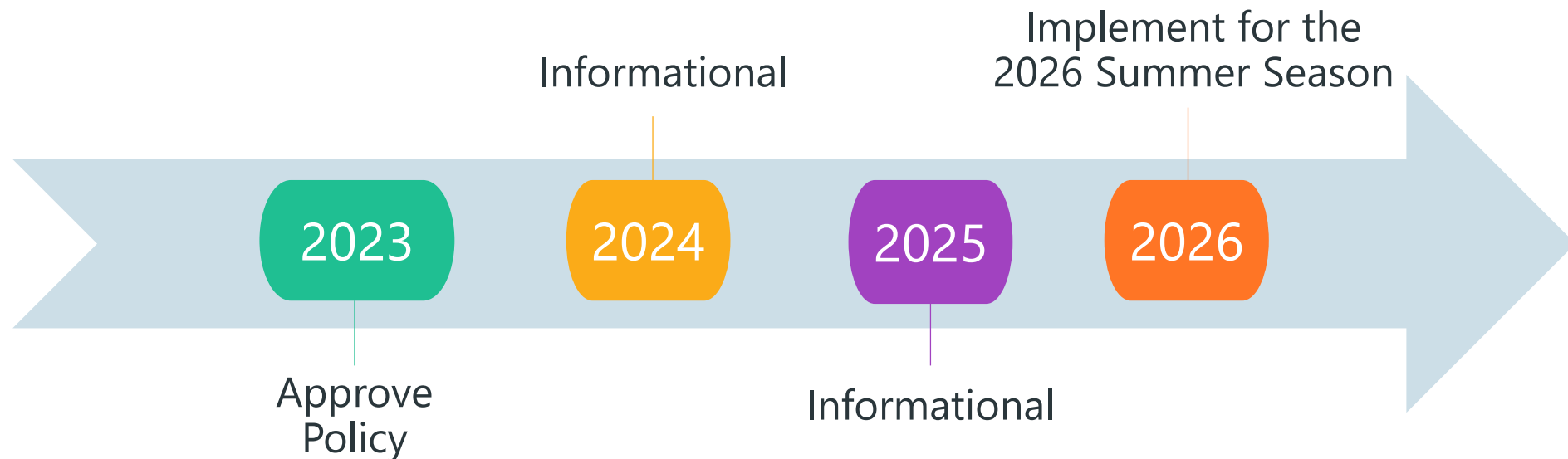
- Two tiered structure
 - Tier 1 (firm transmission service)
 - Tier 2 (non-firm transmission service)
- Study only firm transmission service amounts in Tier 1
- Applies to wind, solar, and electric storage resources



PBA/ELCC TIMELINE

PBA AND ELCC TIMELINE

- Single year Implementation timeline for PBA and ELCC
 - 2026 Implementation year for PBA and ELCC
 - Performed every year for the Summer and Winter Seasons
 - Transition period removed for PBA



FERC REJECTION

HIGH LEVEL REVIEW OF ELCC POLICY CONTAINED IN FILING REJECTED BY FERC

Accreditation based on the performance of wind/solar resources during times of system reliability need

All system conditions considered

Contained provisions for prioritizing resources with firm service and to allow stabilization of accreditation for a portion of each LRE's resource portfolio (aka 'Tier' process).

Filed in 2021 with a requested effective date of 2023 summer

Filing rejected on legal procedural grounds

Concurrence of one commissioner urged SPP to consider equitable treatment of all resources

DOCKET ER22-379 TIMELINE

- 11/10/21 – SPP submitted tariff revisions
- 2/11/22 – FERC Deficiency Letter
- 5/10/22 – FERC Deficiency Letter
- 8/5/22 – Order – Accepting Tariff Revisions **(1st Order)**
- 9/2/22 - Clean Energy Advocates submits Request for Rehearing
- 9/6/22 – SPP – Compliance filing
- 9/27/22 – Protest – Clean Energy
- 10/3/22 and 12/9/22 –Sierra Club & Solar Energy Industries Assn. Appeal to DC Circuit. Notice of Denial of Rehearing by Operation of Law
 - 12/12/22 – Appeal - ACPA, NRDC,
- 3/2/23 – Order – Addressing Arguments Raised on Rehearing **(2nd Order)**
- 3/31/23 – Deadline to file rehearing request (FERC)

FERC ORDERS ON SPP'S ELCC FILINGS – MARCH 2023

- 34. Upon consideration of the arguments raised on rehearing, we find that the Commission erred, in the August 2022 Order, by accepting, subject to condition, SPP's proposed tariff revisions. Section 205 of the FPA and the Commission's regulations require that rates be "clearly and specifically" stated. These requirements ensure that the public has adequate notice of the proposed rate, and that the Commission has an opportunity to evaluate the proposal to ensure that it is just and reasonable and not unduly discriminatory or preferential.
- 35. In the August 2022 Order, the Commission found that a definition of seasonal net peak load must be clearly defined in SPP's Tariff in order to provide sufficient notice as to how SPP will calculate its ELCC values. While the Commission made this finding as part of an overall finding that SPP's capacity accreditation methodology significantly affects rates and therefore accepted SPP's filing subject to the condition that these details must be in the Tariff pursuant to the rule of reason, **the Commission did so without SPP providing a definition of seasonal net peak load. We find that this resulted in a lack of adequate notice to interested parties and does not comport with the notice requirement under section 205 of the FPA and the Commission's regulations.** Accordingly, we hereby set aside the August 2022 Order's acceptance of SPP's proposal and reject SPP's proposal without prejudice.

KEY TAKEAWAYS

- **Clements:**

- “expect[s] prompt action by SPP on reforms, including a just and reasonable and not unduly discriminatory approach to capacity accreditation, to address reliability concerns.”
- “believe[s] that it is important to send SPP a clear signal of what I expect as it goes back to the drawing board. In my view, the proposal that SPP submitted to the Commission was both unjust and unreasonable and unduly discriminatory.”

- **Danly:**

- “I strongly encourage SPP to address all of them [Clean Energy Advocates [CEA] arguments] when it submits its new FPA section 205 filing. Otherwise, this already protracted litigation will continue even longer.”
 - CEA raised:
 - (1) Satisfy the rule of reason;
 - (2) 205 Filing provide clear notice of proposal(s);
 - (3) Address accreditation of wind and solar resources and thermal resources in a similar manner.

REAL TEAM RECOMMENDATION



Move to recommend to the Regional State Committee (RSC) and the Board of Directors to direct SAWG to separate the ELCC and PBA into two separate revision request proposals. The ELCC RR should reflect guidance provided by FERC in docket number ER22-379. The two revision requests should be harmonized to explain how treatment of resources is equitable and appropriate. SAWG should complete both revisions requests for consideration by the SPP Board of Directors and the RSC no later than October of 2023. Upon approval, the SPP Staff should file both revision requests in parallel.

PBA AND ELCC CHALLENGES AND SOLUTIONS

PBA AND ELCC CHALLENGES AND SOLUTIONS (AS OF APRIL 2023)

- Initial effective dates of PBA and ELCC accreditation were not aligned
 - Solution: Align for Summer 2026 effective date
- Amount of historical data to include in PBA
 - Removal of catastrophic events was considered
 - Solution: Current recommendation from REAL to SAWG is to use 7 years historical with no catastrophic event removal
 - **SAWG 9/26 action: Keep 10 years (Vote: Yes – 5 votes, No – 6 votes, Abstain – 3 votes)**
- Three tiers of ELCC allocation per fuel type
 - Percentage of tier 1 (35% wind and 20% solar) was noted to be problematic at FERC
 - Solution: Tier % was removed. Now all ELCC fuel types have 2 tiers (firm and non-firm).

PBA AND ELCC CHALLENGES AND SOLUTIONS (AS OF APRIL 2023)

- Adopt system ELCC methodology in ELCC study process
 - Solution: Alignment of LOLE and ELCC studies
- Allocation on LRE load shapes for Tier 1 and SPP BA load shape for Tier 2
 - Solution: Education. Tier 1 for LRE is intended to allow for LREs to best develop their individual resource plans to meet their resource adequacy requirement and obligations

REAL DIRECTIVES TO SAWG

POTENTIAL POLICY CHANGES (NEAR TERM)

- The following policy changes from the suggestions of the MMU could be implemented while maintaining the structural framework and timeline of RR554 and RR568
 - Historical data to be included in the calculation of EFORd
 - Change from 10 years to 7 years
 - Add Out of Management Control (OMC) events for ELCC calculation
 - SAWG approved policy language to add OMC event for ELCC
 - Yes – 16 votes, No – 0 votes, Abstain – 0 votes
 - Consider weighting for PBA during Resource Advisories, Conservative Operations, and EEA events
 - Was pushed to the Fuel Assurance policy discussion

REMAINING MMU CONSIDERATIONS

Consideration: Establish an accountability mechanism to ensure accreditation translates into availability

- LREs required to consistently make enough accredited capacity available to cover their load obligation
- Deficient LREs will pay a fee based on MWs deficient and level of system need
- Fees will be distributed to all LREs offering accredited resources in day-ahead and real-time markets above their accreditation

Solution: SPP staff suggests a separate RR for enhancing 'availability' definition, per MMU's considerations, possibly along with the outage policy initiative and subsequent Revision Request

REMAINING MMU/APA CONSIDERATIONS

- Consideration: Planned and Maintenance Outages and derates are excluded from the PBA calculation
 - If planned, maintenance, and OMC outages are to be exempt from assessment for PBA resources, they should also be exempt from group-level assessment for ELCC resources
- Solution: SAWG voted to develop policy to exclude OMC and Planned/Maintenance events from ELCC Studies
 - Voting results: Yes – 7 votes, No – 2 votes, Abstain – 7 votes

NEXT STEPS FOR PBA/ELCC

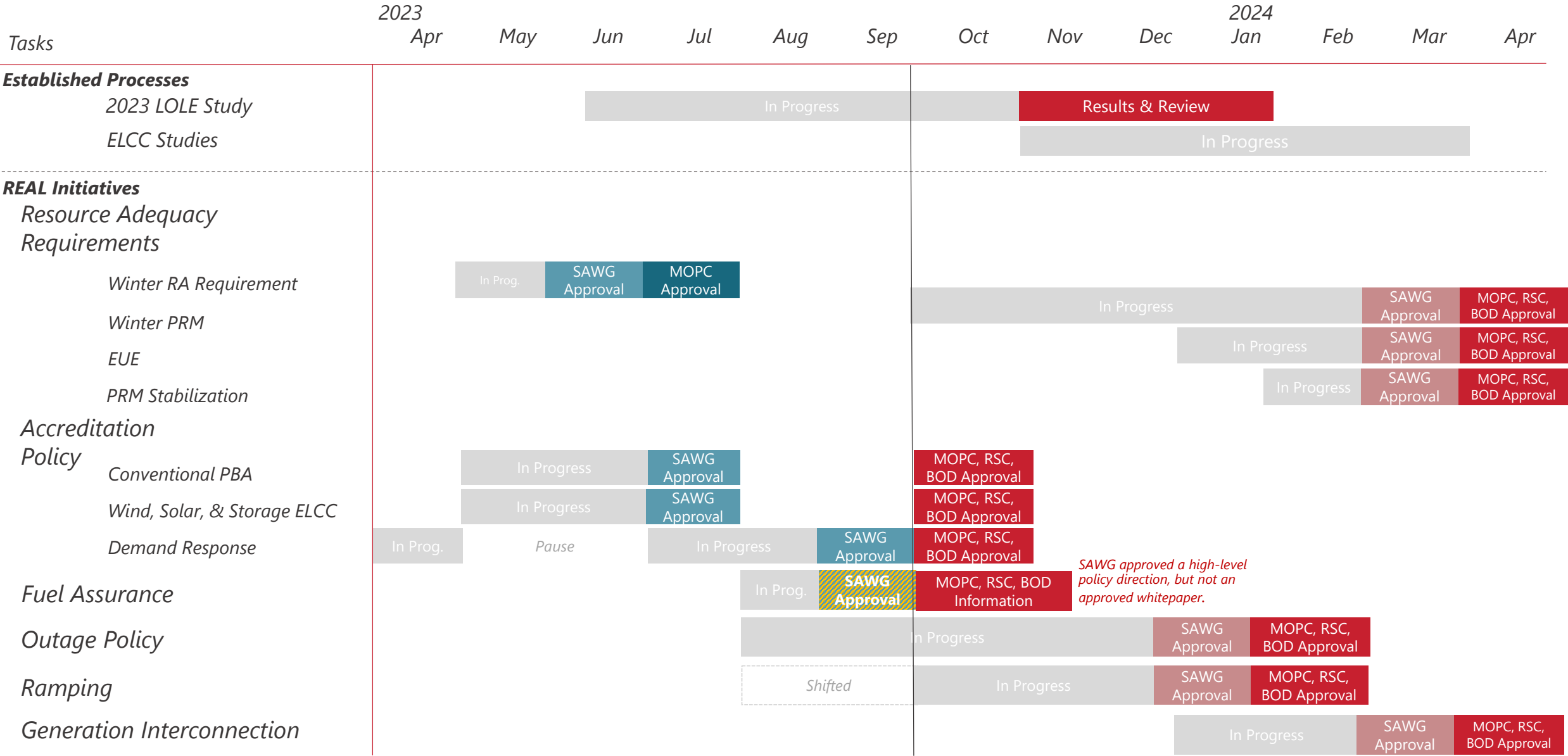
- 10/3 CAWG approval item
- 10/5 REAL approval item
- October MOPC, RSC, & BOD meetings

SUPPLY ADEQUACY WORKING GROUP WORK PLAN

AREAS OF EMPHASIS TO MITIGATE RA RISK

- Appropriate accreditation of resources
 - Conventional resources
 - Variable Energy Resources (including ESR)
 - Demand Response
- Winter Season requirements
 - Separate PRM for winter
 - Fuel Assurance
 - Temperature correlated outages
- Planning Reserve Margin methodology changes
 - Winter PRM impacts
 - Future use of EUE/LOLE
- Load Forecasting
 - Electrification impacts
- Future Resource Mix/EUE Study

SAWG WORK PLAN



RA POLICY TARGETS

Policy	MOPC target	Non-Binding	Binding
RR to add winter RAR	July 2023	Winter 2023/2024	Winter 2024/2025
ELCC/PBA accreditation RRs	October 2023		Summer 2026
Fuel Assurance policy	October 2023	TBD	TBD
Demand Response policy	October 2023	TBD	TBD
Ramping RAR policy	January 2024	Summer 2024	Summer 2025
Improved outage policies	January 2024	Winter 2024/2025	Winter 2026/2027
Add separate winter PRM	April 2024	Winter 2024/2025	Winter 2026/2027
Normalized EUE standard	April 2024	Summer 2025	Summer 2026
VOLL metric and usage policies	April 2024	TBD	TBD
PRM stabilization/projection policies	April 2024	TBD	TBD

RA POLICY TARGETS

Policy	MOPC target	Non-Binding	Binding
Outage Policy/Availability RR	April 2024	Winter 2024/2025	Winter 2026/2027
Fuel Assurance RR	July 2024	Winter 2024/2025	Winter 2026/2027
Demand Response RR	July 2024	Winter 2024/2025	Winter 2026/2027
Ramping RAR RR	July 2024	Summer 2024	Summer 2027

RA STUDY TIMELINE TARGETS

Study	Scoping end	Start	End
2023 Loss of Load Expectation (LOLE) Summer Study	January 2023	March 2023	October 2023
2023 Loss of Load Expectation (LOLE) Winter Study	January 2023	March 2023	March 2024
2023 LOLE sensitivities including those needed for Winter PRM	Fall 2023	November 2023	March 2024
Effective Load Carrying Capability (ELCC)	N/A	August 2023	June 2024
Future Resource Mix/Expected Unserved Energy Study	June 2023	July 2023	November 2023*
Value of Lost Load	November 2023	January 2024	August 2024
Future Energy and Resource Needs Study (FERNS)	December 2023	January 2024	December 2024

*Winter results dependent upon 2023 LOLE Study sensitivities



DEMAND RESPONSE POLICY UPDATE

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Demand Response Policy Objectives and Topics

Primary Policy Objectives

- Considering potential for increases in large loads that may claim DR accreditation
 - Develop a policy that accurately accredits DR resources according to reliability contribution
 - Develop standards for DR programs qualification to drive consistency
 - Develop a policy that facilitates a diversity of DR programs
 - Curtailable customer load, AC load management, water heaters, etc.
 - Allows entities to bring all resources that may be beneficial to the system
 - Develop verification process to ensure DR programs perform at expected levels

Additional Topics

- Energy adequacy issues relating to non-market participation of many DR programs
- Operational reporting for real-time load reduction

CURRENT DEMAND RESPONSE POLICY

CURRENT DEMAND RESPONSE TYPES

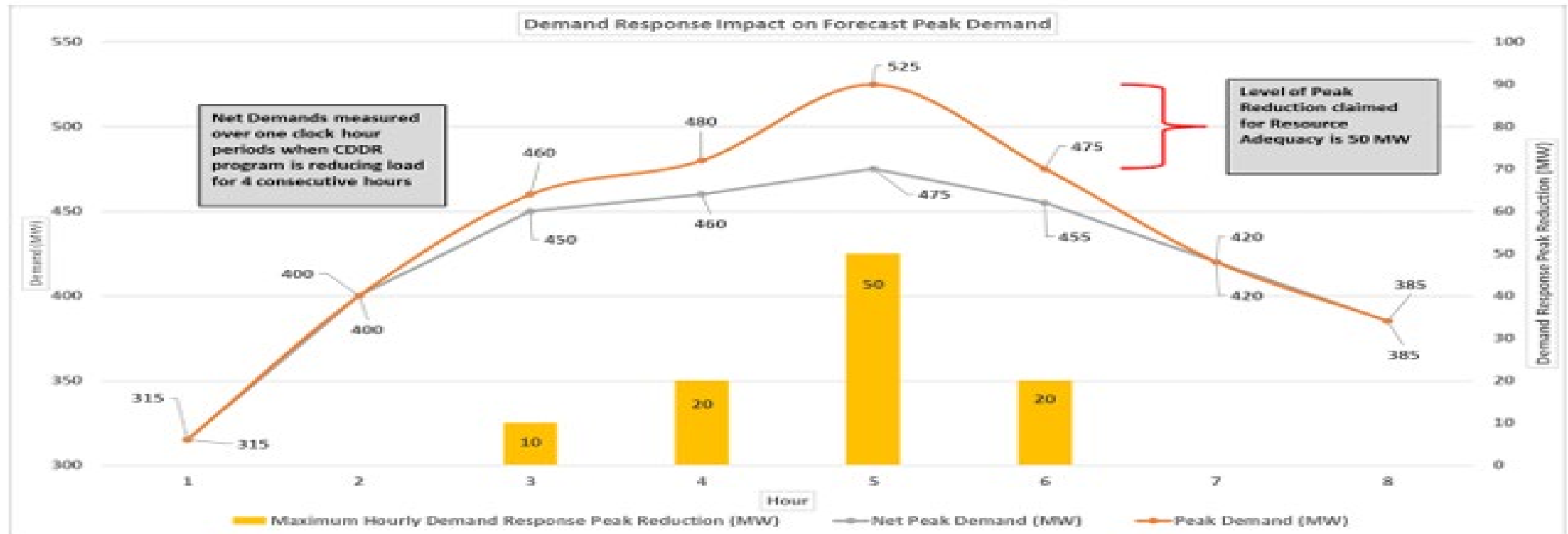
Non-Controllable and Non-Dispatchable Demand Response Programs are Demand Response Programs that are Non-Controllable and Non-Dispatchable by the Transmission Provider, Market Participant, or the Load Responsible Entity (LRE) and are accounted for in the LRE's forecasted Peak Demand

Controllable and Dispatchable Demand Response Programs are measurable load reduction program(s)

- Capable of being controlled or dispatched by a Load Responsible Entity (LRE), a Market Participant, or the Transmission Provider
- A Demand Response Program is currently counted as 100% accreditation of its 'nameplate' value, which is determined by testing

CURRENT ACCREDITATION VALUE - MEASUREMENT

- The amount of load reduction that can be claimed for the program is the LRE's forecasted Peak Demand compared to the LRE's forecasted Net Peak Demand
- If the program causes the forecasted Net Peak Demand to shift to a different hour than the forecasted Peak Demand, the claimed level of load reduction is based on the highest level of projected reduction achieved during four consecutive hours



IMPACTS TO THE PRM

Due to limitations in software and processes, Demand Response Programs have been treated as resources in SPP's biennial Loss of Load Expectation (LOLE) study

- These resources were generally allowed to turn on when needed to satisfy reliability needs

Starting in the 2023 LOLE study, SPP included Demand Response limitations to the programs that were included in the study – including limitations on calls and durations of call of the program

If accreditation methodology does not change, DR will be 'over-counted' in accreditation value relative to its reliability value resulting in an increase to the PRM

CURRENT POLICY ANALYSIS

The current policy is not well suited to meet future challenges

- Existing policy has worked for limited penetrations of demand response that has had capacity requirements within the available margin of the system and was needed only during the highest peak times of the year
- Existing policy is ill-suited to account for large amounts of increased penetration of demand response that will potentially increase off-peak demand to levels beyond the amount of firm capacity
- With increased penetration, existing policy will not accurately quantify the value of demand response's ability to meet reliability needs of the system

When realistic limitations of demand response programs are appropriately modeled within SPP's LOLE study combined with no adjustment to the accreditation value assigned to the programs, the need for a higher regional Planning Reserve Margin is apparent

- Increasing saturation of demand response under the current policy shifts additional requirements on other LREs via the Planning Reserve Margin

POLICY RECOMMENDATIONS – LOAD MODIFIERS

RECOMMENDATIONS – LOAD MODIFIER RESOURCE TYPE DESIGNATION

Load Modifiers will serve as a reduction in the non-coincident peak load value which LRE resource adequacy requirements are calculated

To qualify a demand response program under this construct, the program will be subject to substantial requirements, including the ability to continuously curtail load consumption without limitation during regional capacity constrained periods.

Load Modifiers are subject to Capability and Operational testing requirements

A Summer Season or Winter Season capability test establishes the Resource Adequacy Value

RECOMMENDATIONS - LOAD MODIFIER AVAILABILITY

A Load Modifier must be available to be deployed by the region to avoid entering EEA1 status and continue to be available throughout all EEA levels.

- Unlimited duration requirements assure that programs are available during the time of system need even though they are allowed to reduce the LRE NCP value

To support this availability requirement, SPP will provide a notification for Load Modifiers to be activated during Conservative Operations and prior to utilization of all available generation capacity that would lead to entering into EEA1.

Consistent with the availability requirements, Load Modifiers, shall be called by the region to avoid entering into an EEA event and must reduce load to minimum levels continuously throughout all EEA periods until notification is received from SPP that they may return to full load levels

Real-time Operational data must be available at customer load metering point for all Load Modifiers.

Per contractual arrangements, LREs are responsible to ensure that load modifiers are deployed

POLICY RECOMMENDATIONS – DEMAND RESPONSE RESOURCES

RECOMMENDATIONS – DEMAND RESPONSE RESOURCE TYPE DESIGNATION

Demand Response Resources

- Demand Response Resources are loads which may be temporarily reduced when called but have duration limitations, availability limitations, or voluntary participation.
- These resources may be used to satisfy an LRE's resource adequacy and reserve requirements but are accredited at their determined reliability contribution to the SPP region.

Capacity Value

- Due to the reliability risk associated with using the current accreditation methodology (See policy paper Section 2.1 and Section 2.5) it is recommended to use equivalent Effective Load Carrying Capability (ELCC) methodology on a seasonal basis to determine the reliability contribution of, and accreditation for, Demand Response Resources.

RECOMMENDATIONS – DEMAND RESPONSE

RESOURCE TYPE DESIGNATION

- Demand Response Resource Tiers
- TIER 1 – 8 HOUR DURATION AND HIGH AVAILABILITY
 - Continuous Duration Requirement – 8 hours
 - Available Call Frequency – 1 call per 24 hours
 - Available Calls per Season – no limit
 - Seasonal Hours Limit – no limit
- TIER 2 – 6 HOUR DURATION AND INTERMEDIATE AVAILABILITY
 - Continuous Duration Requirement – 6 hours
 - Available Call Frequency – 1 call per 24 hours
 - Available Calls per Season – 20 events
 - Seasonal Hours Limit – 120 hours
- TIER 3 – 4 HOUR DURATION AND LIMITED AVAILABILITY
 - Continuous Duration Requirement – 4 hours
 - Available Call Frequency – 1 call per 24 hours
 - Available Calls per Season – 12 events
 - Seasonal Hours Limit – 48 hours

RECOMMENDATIONS – DEMAND RESPONSE RESOURCE AVAILABILITY

Availability

- Demand Response Resources must be available per their qualifications for accreditation tiers. Market registered Demand Response Resources shall be activated consistent with their market offerings
- All non-market registered Demand Response must be available to be deployed by the region to avoid entering into an EEA event and must be reduced to minimum load levels continuously throughout all EEA periods until notification is received by SPP that they may return to full load levels
- Real-time Operational data must be available for all Demand Response Resources

POLICY RECOMMENDATION - TESTING REQUIREMENTS

POLICY RECOMMENDATION - CAPABILITY TEST

Summer and Winter Season Capability Test performed every three years (not to exceed 40 months)

Capability Test shall be completed during a peak load period in the Summer and Winter Season

Physical or operational modification which impact capability shall have an Out of Season Capability Test performed to receive full claimed load reduction value; The Out of Season Capability Test is only allowed for the first Summer and Winter Season after a physical or operational modification is made

First year of operation can only be claimed for 50% of the expected capacity unless validated by an Out of Season Capability Test which is performed to 100% of the claimed load reduction value. The Out of Season Capability Test is only allowed for the first Summer and Winter Season for a new Load Modifier

POLICY RECOMMENDATION - OPERATIONAL TEST

Must have a Summer and Winter Season Operational Test completed

Operational Test shall be completed during a peak load period in the Summer and Winter Season

The Summer and Winter Season Operational Test shall be conducted at a minimum of 50% claimed capability for a minimum of one hour

If deployed during a peak load period in the Summer and Winter Season, the deployment of that Load Modifier can suffice in place of the Operational Test



FUEL ASSURANCE UPDATE

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SAWG DISCUSSION

- The SAWG had two small group meetings focused on fuel assurance to discuss potential approaches
- At the September meeting there were three different approaches discussed based on the small group recommendations
 - Prescriptive Requirements
 - Rules required for qualification of resources; that, if not met, may result in reduced or no accreditation
 - Accreditation Requirements
 - Modifications to PBA that put more emphasis on fuel related outages
 - Operational Requirements

PRESCRIPTIVE REQUIREMENTS

Create requirements to ensure fuel can be reliably transported from source to power plants.

- This may be through transportation requirements or on-site fuel storage that mitigates transportation requirement need
 - On-site fuel availability exceeding 48 hours OR
 - Proof of firm transportation to support continuous operation for a minimum of 48 hours. (May be satisfied with firm natural gas contracts for at minimum turn-down capacity)

ACCREDITATION ADJUSTMENT

Modify Fuel Related OMC Exemptions

- Narrow OMC exemption in PBA to exclude all fuel related issues. This creates an accreditation incentive for entities to further enhance their reliability, including on-site fuel storage and enhanced fuel delivery.

ACCREDITATION ADJUSTMENT

PBA Weighting for Critical Periods

- Utilizing the PBA construct, create a multiplier during critical periods that incentivizes investments for availability during those periods, either through winterization or enhanced fuel supply arrangements.
- Example: Weighting on event basis (2x weighting for conservative ops, 3x weighting for EEA1, 5x weighting for EEA2, EEA3)

ACCREDITATION ADJUSTMENT

Non-Fuel Secure Accreditation Adjustment

- For resources not meeting prescriptive requirements, adjust accreditation to reflect the availability of non-fuel secure resources during the previous extreme weather event such as Uri and Elliot
- Example: if non-fuel secure resources were 60% available during Uri and Elliot, then the capacity rating (pre PBA) gets reduced by 40% resources not meeting prescriptive requirements

OPERATIONAL CHANGES

Improved
Market
Dispatch
to Enhance
Reliability

- Enhance operational dispatch strategies to start units prior to extreme cold conditions and keep them online
- Delegated to REAL Operations Subgroup

FUEL ASSURANCE NEXT STEPS

- SAWG voted to pursue the following direction:
 - (by a vote of 13 yes, 2 no, 1 abstain)
- SAWG will develop policy to incorporate weighting for PBA based on critical system periods and consider modification to the OMC exceptions related to fuel-related outages.
- SAWG will also consider policy for PBA and ELCC adjustments to reflect new reliability investments.
- SAWG also recommends that SPP enhancement of operational dispatch strategies to start units prior to extreme cold conditions and keep them online.