

SMECO Comments – PJM’s Proposed BGE Zone RMR Units’ RA Contribution criteria

PJM: 11.21.24 Members Committee Meeting

BGE RMR Units' RA Contribution Criteria

PJM's RMR RPM supply-stack (as \$0 price-taker) RA inclusion criteria:

- Reasonably expected to be able to operate for the entire delivery year.
- Has available run hours greater than required for transmission support.
- Be available for PJM dispatch for PJM emergencies (subject to an outage).

PJM's as-proposed criteria, as applied to the BGE RMR units:

BGE RMR Unit:	ICAP	UCAP	In/Out	Summary of rationale:
Brandon Shores 1	635	533	Out	Talen-Sierra Club Agreement(s) barring coal burn after 12.31.25. Agreement(s) need to be modified or, or a FPA 202(c) order is required. Concern over 90-day DOE order cycle.
Brandon Shores 1	638	536	Out	
H.A. Wagner 3	305	226	In	Ample Run time availability.
H.A. Wagner 4	397	294	TBD/~ Out	~ 438 Run hours/year, unclear if adequate to support Francis Scott Key Bridge rebuild.

See slides 28 & 29: <https://pjm.com/-/media/committees-groups/committees/mrc/2024/20241107-special/item-02---capacity-market-adjustments---presentation.ashx>

26/27 & 27/28 DY RMR Treatment

Issues: For Brandon Shores to be included in the RPM Supply stack, either PJM/Talen need to obtain a DOE order Section 202(c) to override Talen-Sierra Club agreement barring coal burn at Brandon Shores after 12.31.25, or the agreements need to be amended. PJM's 11.7.24 Special MRC presentation (at slide 29) appears to convey that Brandon Shores supply stack inclusion may not occur due to fact that a DOE order may have to be re-issued every 90 days.

Comments: If a DOE FPA 202(c) order is issued, SMECO submits that a DOE order should qualify the Brandon Shores units (and Wagner 4 if DOE order is requested/issued) for RPM supply stack inclusion due to fact that DOE, upon issuance of 1st order (which we would know about well before 26/27 DY BRA), is likely to continue to issue such orders to address regional reliability.