



# Parameter Limited Schedule Exception Process

# Term of Exception vs Length of Deficiency

- Term of Exception and Length of Deficiency are conflated
- Terms of Exception
  - Temporary – one time exception lasting 30 days or less
  - Period Exception – lasting at least 31 days and no more than one year
  - Persistent Exception – lasting for at least one year
- Question: how does one obtain an exception for a deficiency expected to last 20 months because of availability of replacement parts?
- Question: does the clock start when the deficiency occurs or when the exception is granted?

# The Fixed Deadline

- Request [Period and Persistent Exceptions] submitted by Market Sellers to PJM and MMU no later than February 28, preceding the 12 month period from June 1 to May 31 during which the exception is requested to commence
- Based on this rule, a unit whose deficiency becomes apparent on March 1<sup>st</sup> and requires 20 months to repair
  - Must go 15 months without any exception
  - May only qualify for period exception for remaining 5 months
- How do new units that undergo commissioning testing between 3/1 and 5/31 obtain initial exceptions?

# The Exception Owner

- Who owns the exception – the Market Seller?
- What happens to the exception if the Market Seller changes either by contract or transfer of control
- What happens if the unit operator changes?