Quick fix on Dual Fuel Class definition

Problem / Opportunity Statement

For reference, the current definition of a combined cycle dual fuel resource is as follows (the combustion turbine dual fuel language is parallel):

> "*Gas Combined Cycle Dual Fuel Class" shall mean an ELCC Class consisting of Unlimited Resources of the combined cycle technology type that is primarily fueled by natural gas, and that attests that it has the capability to start and operate independently on an alternate, onsite fuel source up to its maximum capacity level during the winter season of the applicable Delivery Year in which it is providing capacity, and capable of operating on the alternate fuel for two 16-hour periods over two consecutive days at its maximum capacity level.*"

Ignition Start Must Be Completely Independent of Primary Fuel Type (Gas)

Some dual fuel units require a de minimis amount of non-alternate fuel in order to start, such as for pilot gas. This fuel is typically inside the fence of the dual fuel unit. The current definition of dual fuel class units under ELCC requires the unit to be able to start independently on the alternate fuel and disqualifies those using pilot gas. Many units require a de minimis amount of gas to start and then run/operate solely on the alternate fuel. Provided that these units do not depend upon nor need to nominate the primary fuel source (gas) in order to start, but instead have a source fuel within the station yard for a pilot burner, the class definition should be amended so that these units meet the definition of a dual fuel unit.

Ignition Must Be on the Alternate Fuel Rather Than Another Inside-The-Fence Source

Also, the current wording stipulates that the fuel source for starting and operating must be the same type fuel source. The wording is extremely stringent and specifies that starting must be independent on that single fuel source. The language is singular in that it refers to "an alternate onsite fuel source" and not "alternates" in the plural. Therefore, use of secondary pilot gas for starting is currently a disqualifier for inclusion in the dual-fuel class.

ELCC Is Not Counting an Important Resource Class

In the upcoming 2025/26 DY capacity auction, there is no Gas Combined Cycle Dual Fuel Class because many units did not attest to and meet the existing definition due to this limitation on ignition fuel. Hence, the reliability contribution of these dual fuel units is needlessly restricted. UCAP should be calculated correctly by logical class in order to have a properly functioning ELCC construct and accurate statement of capacity count across the RTO. To remedy this situation and still respect the concept of not relying on outside-the-fence fuel, the dual fuel language in the tariff can be modified with regard to starting a dual fuel unit to allow for more than one type fuel to be used for starting, provided that the fuel is behind the fuel meter (i.e., inside the fence line).