

### Deactivation Analyses Period

#### Problem / Opportunity Statement

##### Summary

- Currently, PJM Tariff Part V, section 113.2 only affords PJM 30 days from receipt of the deactivation notice to inform the Generator Owner, or its Designated Agent, whether the deactivation of the generating unit would adversely affect the reliability of the Transmission System. This very short duration puts undue burden on PJM Planning, PJM Operations, and Transmission Owner staff. Additionally, Part V of the Tariff has no provisions to extend time to complete analyses to account for multiple deactivations within one request or multiple requests submitted close in time.
- PJM is also clarifying the requirement to provide with the Deactivation Notice a good faith estimate for the time period to return the unit to operation only applies to mothballing.

##### Deactivation Analyses

- The existing rules afford PJM 30 days to perform necessary reliability analyses, which includes the following:
  - developing necessary cases aligned with the proposed deactivation date;
  - running the necessary reliability studies such as generation delivery, load delivery, N-1-1;
  - confirming study results with the affected TO(s);
  - receiving and verifying adequacy of TO(s) proposed mitigation(s), which can include multiple iterations and options;
  - coordinating with PJM Operations to identify operational solutions as interim measures; and
  - obtaining reasonably accurate schedules for all upgrades to determine the duration of generator operation extension is needed for system reliability.

##### Opportunity to be seized

- PJM seeks to make Tariff and Manual changes that provide more time to complete analyses, allow additional and improved studies, and provide the ability for more efficient work control and consistency regarding timing of deactivation studies.

##### Why it warrants consideration in the PJM stakeholder process

- The PJM stakeholders are needed to approve the Manual language. PJM will provide the proposed Tariff changes to allow stakeholders confirmation that the associated Manual changes align.



## Problem/Opportunity Statement

### Identify opportunities for education

- PJM will provide a Power Point presentation to educate stakeholders on both the existing and proposed processes.

### Document if the new work is to address specific technical issues and/or to address broader policy issues

- This work addresses specific technical issues PJM incurs under existing Tariff provisions.

### Include any outcomes that have occurred to-date as a result of the issue

- PJM and TO staff are significantly burdened due to randomness, volume of deactivation notifications and prescribed limited study durations. Study and solution quality is also in jeopardy due to limited schedule.

### Include potential additional consequences if no action is taken

- Without process improvement, PJM and TO staff are continuously vulnerable to unanticipated work volume. Some deactivations may impact system reliability significantly; thus, additional duration for study and mitigation determination is prudent to help assure reliability is maintained and provide better upgrade schedule and costs. Also, establishing a consistent schedule provides more efficient work control for both PJM and the affected TO(s).