



## **Organization of PJM States, Inc. (OPSI)**

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### **OPSI RESOLUTION # 2013-3**

#### **OPSI Resolution to Support the PJM/IMM Recommendation for Revising the Must-Offer Exception Deadline**

**WHEREAS**, owners of generation in the PJM footprint are required to file a “Request for Exception” to the Reliability Pricing Model’s (RPM’s) must-offer requirement no later than 120 days prior to the Base Residual Auction (*i.e.* 120 days prior to mid-May); *and*

**WHEREAS**, the purpose of the 120-day requirement is to ensure that PJM and its Independent Market Monitor (IMM) are given a reasonable amount of time to review such an exception request and ask for a FERC resolution should a disagreement arise; *and*

**WHEREAS**, according to PJM and the IMM, the 120-day requirement for a Request for Exception (if due to a generating unit deactivation) does not afford a reasonable amount of time for PJM to incorporate the impact of a generating unit’s deactivation in the upcoming Base Residual Auction (BRA), nor does it provide a reasonable amount of time for the market to react by offering potential new generation in the upcoming BRA; *and*

**WHEREAS**, PJM and the IMM are recommending that the deadline for a “Request for Exception” to the RPM must-offer requirement should be made no later than five months prior to the posting of the BRA planning parameters (*i.e.* five months prior to early February) ; *and*

**WHEREAS**, the PJM/IMM recommended increase of the time between a “Request for Exception” to the RPM must-offer requirement and the upcoming BRA will allow a sufficient amount of time for PJM to develop a reasonable reliability solution that would be reflected in the BRA planning parameters, and for the market to react to such information; *and*

**NOW, therefore, be it resolved**, that the OPSI Board supports the PJM/IMM recommendation for revising the must-offer exception deadline, and accordingly, supports the revision of Section 6.6(g)(A) of Attachment DD of the Open Access Transmission Tariff to be consistent with the PJM/IMM recommendation.

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Approved unanimously by the Board of Directors of the Organization of PJM States, Inc. on April 4, 2013