



Updates to OATT

Behind the Meter Generation Business Rules on Status Changes

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Members Committee

November 17, 2021

- Allows a BTMG unit that received Capacity Interconnection Rights (CIRs) to elect to operate all or a portion of its capacity as a Generation Capacity Resource for a Delivery Year
 - Allows unit to change status from Generation Capacity Resource to BTMG status or vice versa (up to CIRs awarded)
 - Election notification required just prior to start of the Delivery Year
- Language was in place prior to RPM and was not updated with RPM implementation

- Existing Generation Capacity Resources are subject to Must Offer Requirement in RPM Auctions
 - Option to seek must offer exception
 - Must follow the removal of Generation Capacity Resource status process in advance of DY RPM Auction to remove MWs from Capacity Market
- Exception to Must Offer Requirement for Intermittent, Capacity Storage Resources, and Environmentally Limited Resources
 - Option to not offer all or portion of their available capacity
 - Must follow the removal of Generation Capacity Resource status process in advance of DY RPM Auction to remove MWs from Capacity Market

Deadline Date Conflicts in OATT

**September 1
prior to BRA**

Preliminary notice to seek removal from Capacity Resource Status

(Not applicable for 2022/23 DY BRA)

BRA

(Opens May 19, 2021 for 2022/2023 DY BRA)

120 days prior to 3rd IA

Final notice to seek removal from Capacity Resource Status

(End of October 2021 for 2022/2023 DY 3rd IA)

**May 1
(no sooner than
Mar. 15) prior**



Notification deadline for Capacity Resource Election in OATT, Attachment O, Appendix 2, Section 2.5

**December 1
prior to BRA**

Final notice to seek removal from Capacity Resource Status

(December 8, 2020 for 2022/23 DY BRA)

240 days prior to 3rd IA

Preliminary notice to seek removal from Capacity Resource Status

(Not applicable for the 2022/23 DY 3rd IA)

3rd IA

(Opens end of February 2022 for 2022/2023 DY 3rd IA)

June 1, 2022

Effective date of status change from Capacity Resource to BTMG



Conflicts with deadlines to seek removal from Capacity Resource status

- Delete entirety of Section 2.5 of OATT, Attachment O, Appendix 2
 - Provision to change status from Generation Capacity Resource to BTMG status or vice versa with notice just prior to Delivery Year cannot be exercised with RPM Must Offer Requirement and Removal of Generation Capacity Resource Status business rules
 - Section 2.5 would not be included in future service agreements
- Update Section 36.1A.6 in Part IV, Subpart A to remove reference to Section 2.5

- **8/10 PC** – M14G first read, informational update (OATT changes)
- **8/12 OC**- M14D first read
- **8/31 PC** – M14G endorsement

- **10/20 MRC** – OATT, M14G, & M14D endorsement

July 2021

Aug. 2021

Sept. 2021

Oct. 2021

Nov. 2021

- **7/14 MIC** – Information Update (OATT, M14G, & M14D changes)
- **7/29 TOA-AC** – Informational update (OATT changes)

- **9/10 OC** – M14D endorsement
- **9/29 MRC** – OATT, M14G, & M14D first read

- **11/17 MC** – OATT endorsement

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