

Elements of Fuel Security Attestation

The owner or operator of a gas generation unit that is offering to be designated a Capacity Resource shall provide the following attestation.

In providing the attestation below, the unit owner confirms that its responses and documentation are consistent with OATT Attachment K Appendix Section 6.6 ('Minimum Generator Operating Parameters') . That section provides:

*'The operational limitations referenced in this section 6.6 shall be (a) physical operational limitations based on the operating design characteristics of the unit or (b) other actual physical constraints, including those based on contractual limits, that are not based on the characteristics of the unit. In order for a contractual or other actual constraint to be deemed a physical constraint that can be reflected in its unit-specific parameter limits for a Generation Capacity Resource, the Capacity Market Seller must demonstrate that contractual or other actual constraint is not simply an economic decision but a physical restriction that could not be rectified among any commercial alternatives actually available to it.'*

**Gas generator attests that the unit has or will have the following fuel security arrangements in place at the beginning of the first capacity market delivery year with such arrangements in place during the November 1 through March 31 period. (Check All Sections that Apply):**

Box A: Dual Fuel (check if applicable):

(A)(1) (check if applicable): I attest that the unit has, or it is our intention to have in place for the delivery year, duly permitted dual fuel capability through the installation of oil tanks sized to meet PJM's requirements outlined in Section (A)(2) below (and oil delivery arrangements) that would allow the unit to operate at its accredited output for a minimum duration of 72 hours upon dispatch by PJM; **AND**

(A)(2) (check if applicable): I attest that the unit will ensure that its oil tank(s) are filled and that contractual arrangements are in place to obtain replenishment of oil supplies so as to maintain the ability to operate at full output for a minimum duration of 72 hours upon dispatch by PJM

Box B: Firm Natural Gas Transportation Arrangements (check if applicable):

I attest that the unit will have in place for the delivery year, firm natural gas transportation arrangements through one of the following means (check applicable boxes):

(B)(1) (check if applicable): The unit will have in place, firm transportation arrangements that will allow the unit to operate at its accredited capacity upon dispatch by PJM. Firm transportation arrangements are those contractual arrangements that provide for a level of firm transportation service from a firm liquid

receipt point to a firm delivery point that is not subject to interruption for any reason other than a Force Majeure event; OR

\_\_\_\_\_ (B)(2)(check if applicable) I am not able to obtain such fuel secure transportation arrangements described above. **(Please provide an explanation to support your response).**

\_\_\_\_\_ **Box D: Other Arrangements for Fuel Security**

\_\_\_\_\_ (D) (check if applicable) I will have in place for the delivery year and have provided documentation of alternative firm fuel security arrangements that will allow the unit to operate at full output upon dispatch by PJM. Alternative firm arrangements could include, but are not limited to, physical access to gas storage, LNG availability, no-notice service, etc.

\_\_\_\_\_ **Box E: No Fuel Security Arrangements**

\_\_\_\_\_ (E) (check if applicable) I am unable to attest that the unit has in place or will have in place for the delivery year one or more of the above fuel security arrangements. **(Please provide an explanation to support your response).**

Attested to this \_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
(s) Jane or Joe Unit Owner Officer