

IEP Program Amendment by Generation Bridge Connecticut Holdings LLC

NEPOOL Markets Committee
February 7-9, 2023

Generation Bridge Background

**Owns and operates power facilities in CA,
NYISO and ISO-New England**

Connecticut facilities include:

Station Name	Capacity	Maximum Storage Capacity (Bbl)	3-Day IEP Inventory Level	5-Day IEP Inventory Level
Middletown	762	683,528	101,970	169,950
Montville	481	504,633	64,116	106,860
Bridgeport	515	132,571	39,897	66,494
New Haven Harbor	455	515,000	49,249	82,082
CT Jets	175	10,440	10,440	10,440
Devon	175	31,333	23,233	31,333

Concern

ISO was looking at increasing the maximum amount of stored fuel to be counted in the program from 72 hours (3 days) to 120 hours (5 days). The current proposal reverts to the original 72-hour limit. Generation Bridge believes that changing to 120 hours will enhance reliability and program effectiveness:

- Increases incentives to fill large tanks or arrange more LNG in preparation for extended cold snaps or multiple cold snaps within a season
 - Current incentive is only to fill to 3 days
- Improves likelihood that units with oil capability but no CSO (e.g., Middletown in FCAs 14&16) will be available for the next two winters.

Amendment – Change #1 of 2

III.K.1 Submission of Election Information

- (d) → If electing to participate in both the forward and spot components of the program, the total MWh value for which the Market Participant elects to be compensated at the forward rate (the “Forward Energy Inventory Election”). This MWh value must be less than or equal to the combined MW output that the assets listed by the Market Participant (adjusted to account for Ownership Share) could provide over a period of 72120 hours, as limited by the maximum amount of each fuel type that can be stored on site ~~(and in upstream ponds)~~ for each asset and as limited by the terms of any natural gas contracts submitted pursuant to Section III.K.1(a)(iii). If the Market Participant is submitting one

Amendment - Change #2 of 2

III.K.3.2.1.1 Asset-Level Real-Time Energy Inventory

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(f) in determining final Real-Time Energy Inventory amounts for each asset, the ISO will:

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(ii) limit each asset's Real-Time Energy Inventory to the asset's average available outage-adjusted output on the Inventoried Energy Day for a maximum duration of **72120** hours.¶