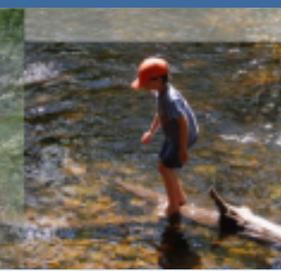
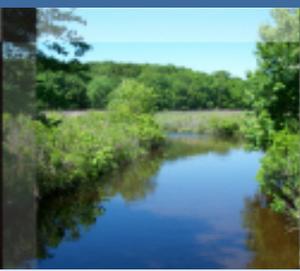


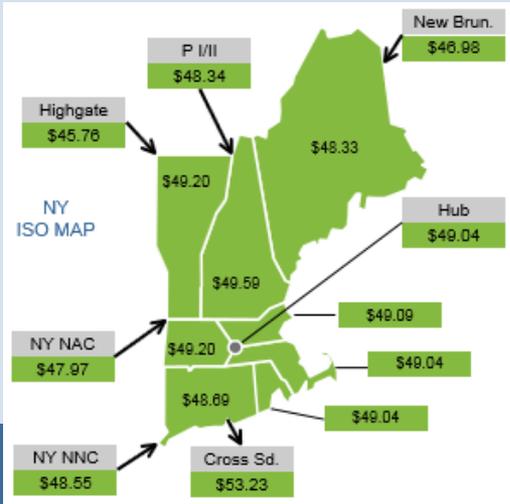


Connecticut Department of Energy and Environmental Protection



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

Regulatory Provision Wearing the Red Shirt



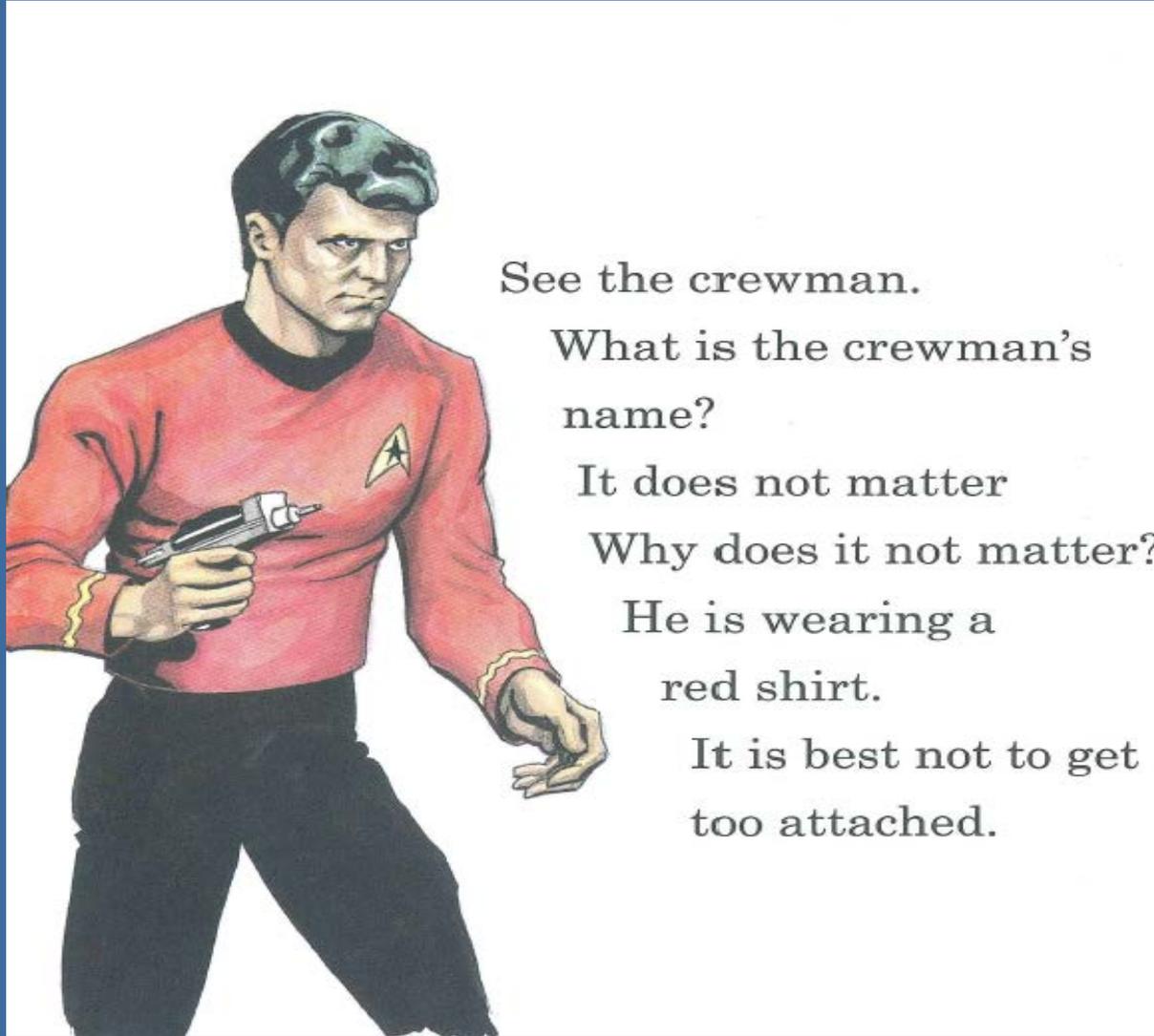
12 April 2018
Merrily A. Gere
SIPRAC



Courtesy: Cummins Power Generation



The Red Shirt Phenomenon



See the crewman.

What is the crewman's name?

It does not matter

Why does it not matter?

He is wearing a red shirt.

It is best not to get too attached.



The One-Slide Explanation

- **Simple regulation change.**
 - From the definition of “emergency,” delete operation under “ISO-NE’s Operating Procedure No. 4” as acceptable emergency operation.
- **Need for change results from actions by EPA /U.S. Court of Appeals (DC cir.) and the New England Independent System Operator (ISO-NE).**
- **Without a regulatory action, we will:**
 - **Confuse and mislead** users of the definition; and
 - Possibly allow for **increased emissions** on HEDD.



No person will be harmed by adopting this amendment.

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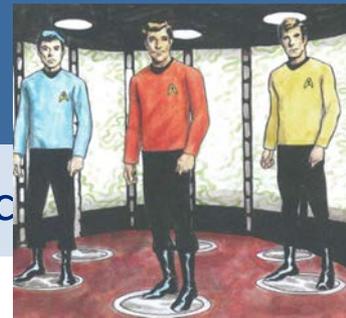
Regulating Emergency Engines (EEs)

- Since 1994, DEEP has given special treatment (*i.e.*, less stringent emissions requirements) to emergency engines.
 - Electric system reliability.
 - Nature of emergencies effectively limit overall hours of operation.
- Units that operate during emergencies and other times \neq EE.
- Beginning in 2004, circumstances defining an emergency were increased to recognize EE in ISO-New England, Inc.'s Real-Time Emergency Generation (RTEG) program.
 - Units operated only during a certain level of capacity deficiency.
 - Level of capacity deficiency made it a true emergency.

Beaming down . . .



Connecticut Department of Energy and Environmental Protection



“Emergency” per 22a-174-22e(a)(12)(E)

An unforeseeable condition that is beyond the control of the owner or operator of an EE that:

- (A)-(D) *(No changes here)*
- (E) Requires operation of the EE under an agreement with ISO-NE during the period of time ISO-NE is implementing voltage reductions or involuntary load interruptions within the Connecticut load zone under Action 6 of ISO-NE Operating Procedure No. 4 – Action During a Capacity Deficiency.



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Beaming up . . .



RICE NESHAP Activity

- EPA amends the RICE NESHAP. (January 30, 2013, *corrections* March 6, 2013)
- Three petitions result in a reconsideration of the final amendments. (September 5, 2013)
- EPA did not change the rule as a result of the petitions. (August 15, 2014)
- State of Delaware challenges certain provisions in D.C. Circuit Court. D.C. Circuit vacates 100-hour/year exemption for emergency generators. (May 1, 2015)



Vacatur of Provisions in RICE NESHAP

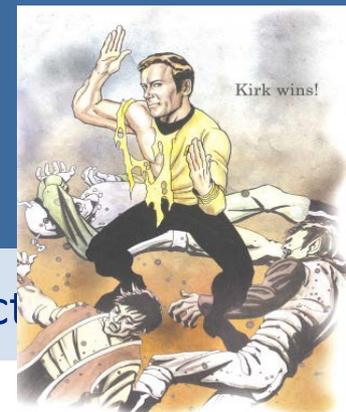
- April 15, 2016. EPA releases [guidance](#) on the vacatur of 100-hour exemption in the RICE NESHAP.
 - After May 2, 2016, an EE may not operate
 - » for OP4 Action 6 events or
 - » for certain voltage reduction criteriafor any number of hours unless it complies with the emissions standards in the RICE NESHAP for non-emergency engines.





ISO-NE Abolishes RTEG Resources

- Demand Response (DR) Resources to be fully integrated into the wholesale energy, reserves and capacity markets.
- ISO-NE removes Real-Time Emergency Generation (RTEG) from the wholesale markets.
 - Engine may participate in ISO-NE programs if the owner converts the unit to a DR Capacity Resource (DRCR).
 - A DRCR operates at times that DEEP does not traditionally consider as emergency operation.
 - ISO-NE is making conforming changes to OP4, Action 6 to be effective 6/1/2018. No draft has been released.



Time to Remove OP-4 from the Regulations

- ISO Tariff and related documents are changing this year so that the reference to OP-4 in the emergency definition will be:
 - Misleading and confusing to staff and regulated community, and
 - Could result in more frequent dispatch of DRCR units.
- Leaving the OP-4 reference in the regulation invites DRCR units to operate as emergency units, possibly increasing emissions on HEDD. Some DRCR units may mistakenly operate under Section 22a-174-3b.
- OP-4 referenced in many regulations (sections 22a-174-22e, -22f, -3b, -42, -18.)



What are the Proposed Changes?

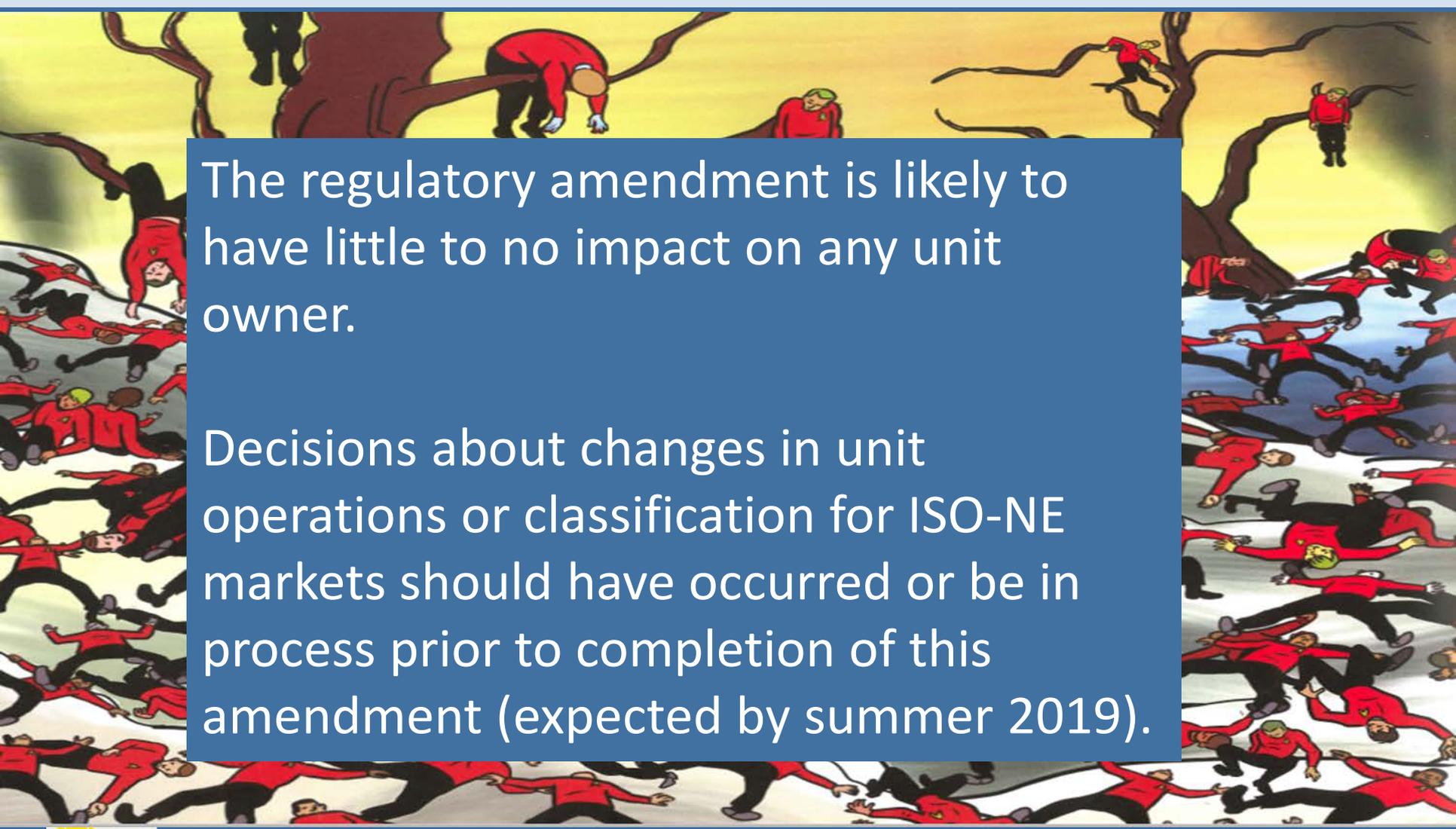
- Remove all references to operating per Operating Procedure No. 4.
 - Remove subparagraph (E) in definition of “emergency” in RCSA section 22a-174-22e(a)(12).
 - Minor revision to definition of “emergency engine.” Section 22e-174-22e(a)(13).
 - Delete compliance option in section 22a-174-22e(g)(4)(E).
 - Delete compliance option in section 22a-174-22e(g)(6)(D).
 - Definitions of “emergency” and “emergency engine” in sections 22a-174-22f, -3b, and -42 revised as above.
 - And a few others.

From 22a-174-22e(a)(12)(E):

- ~~— Requires operation of the EE under an agreement with ISO-NE during the period of time ISO-NE is implementing voltage reductions or involuntary load interruptions within the Connecticut load zone under Action 6 of ISO-NE Operating Procedure No. 4 – Action During a Capacity Deficiency. [RESERVED]~~



Impact



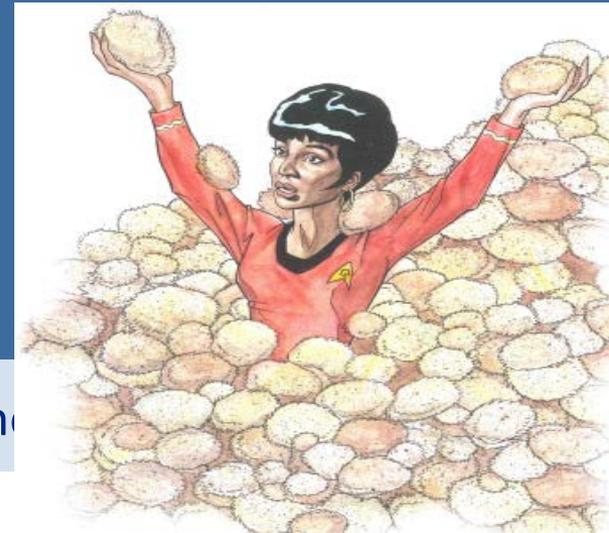
The regulatory amendment is likely to have little to no impact on any unit owner.

Decisions about changes in unit operations or classification for ISO-NE markets should have occurred or be in process prior to completion of this amendment (expected by summer 2019).



Next Steps

- Draft of proposal to be distributed to SIPRAC electronic mail list.
- Currently under review by the Office of Policy and Management (OPM).
- Once OPM and the Governor's Office approve the proposal, a notice of hearing and comment will be published.



Questions?

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Trek Illustrations from

- Pearlman, Robb. 2014. *Fun with Kirk and Spock*. Cider Mill Press Book Publishers LLC.
- Pearlman, Robb. 2017. *Search for Spock*. Cider Mill Press Book Publishers LLC.

