

Draft –For discussion purposes only  
Generator Testing - Penalty Exemption Functional Process  
MSWG 8/7/06

The process would utilize a variation of the startup/shutdown exemption process. It would work as follows:

- The unit would notify Operations of a scheduled test for the following day. (Not required at the present time.)
- The unit would bid in self scheduled fixed at the output levels it intends to maintain during the test period.
- The unit would notify operations when it began testing and operations would log it.
- The unit would notify operations when it had completed testing and operations would log it. (Operations would therefore be aware of any operating units that are in a potentially vulnerable testing condition)
- If the unit encountered periods when it was unavoidably in a penalty condition during the test (more than 3% above or below its basepoint) it would follow-up the following day with an e-mail (similar to the SU/SD email) defining the period in question. ISO staff would check it against the operations log and if the request period falls within a defined test period for the unit it would be placed in an OOM status similar to the SU/SD status for the requested period.
- Units for whom no substantive schedule variations occur would have no need to submit an exemption request.

This process addresses the requirements of all tests listed in the IPPNY Testing Information memo of Nov.2004 except for the gas system interruption test which is defined as not schedulable. As such it may not be possible for the unit to have scheduled himself appropriately to meet the requirements of this as yet undefined test.