GenConn Energy LLC **Witness: Devang Patel**

Docket No. 26-06-02

Date Submitted: September 10, 2026

RWA-001 Q:

(ISO-NE Market Participation) Application, Prefiled Testimony (PFT), p. 50. What is the fuel inventory level sufficient to meet the non-energy limited thermal resource accreditation requirement (at the plant's full generating capacity) under ISO-NE's Capacity Auction Reforms Seasonal/Accreditation (CAR-SA) proposal? Provide the source documents from which the Company determined the accreditation requirements.

RWA-001 A:

Under ISO-NE's CAR-SA proposal an oil, jet fuel, kerosene, or dual-fuel resource is considered **non-energy-limited** (and therefore accredited under the Non-Energy-Limited Thermal Resource framework) if its seasonal **Qualified Inventory** is sufficient for the unit to operate at its **Maximum Capability (MCap)** for **at least 24 continuous hours**.

Resources with less than 24 hours of inventory at MCap are classified as **energy-limited** and are accredited under the Energy-Limited Resource framework instead.

Please refer to source documents included in RWA-001 Attachment 1.

For the GenConn Units, the PURA-approved fuel strategy is 40 hours of equivalent fuel available on site in the summer months and 70 hours of equivalent fuel in winter months. GenConn therefore would meet the non-energy limited thermal resource accreditation requirement (at the plant's full generating capacity).