



Generator Data Confidentiality Procedures

Transmission Owner Data Feed Meeting
Conference Call
May 27, 2014



Generator Data Confidentiality Procedures

- Procedures currently documented in PJM Manual M14D
 - Section 11 – Describes the procedures – the process is different for data internal to a TO zone versus data external to a TO zone
 - Attachment I: Generator Data Confidentiality Agreement (CA)
 - Attachment J: Generator – Data Release Matrix
 - Attachment K: Template Letter for a Transmission Owner Seeking Generator Data Within its Zone to be Released by PJM
- Governed by PJM OA, Section 18.17 - Confidentiality

Section 11: Generator Data Confidentiality Procedures

Welcome to the Generator Data Confidentiality Procedures section of the PJM Manual for Generator Operational Requirements. In this section you will find the following information:

- Description of the PJM generator data confidentiality procedures.

11.1 Generator Data Confidentiality Procedures

In order for PJM to perform reliability assessment and analyses, generators are required to provide real time and scheduled outage data to PJM. While PJM has the overall reliability responsibility for the PJM RTO, local Transmission Owners have a similar responsibility to monitor and assess the reliability of their transmission systems and distribution systems. In order for the Transmission Owners to perform their local reliability functions, Transmission Owners need certain data about the generators to formulate a realistic basis for the analysis. The following Generator Data Confidentiality Procedures pertain to only real time data (real time MW, MVAR, and unit status) and scheduled outage data (start date/time, return date/time, and derate). Scheduled outage data includes both planned and maintenance outage data.

Transmission Owners require both real time and generator data to perform their reliability and planning functions. These transmission owner functions include, but are not limited to:

1. Real time EMS applications: state estimator and security analysis
2. Transmission owner's real time role
3. Transmission outage scheduling process
4. Reliability study and training

PJM may be requested to provide a Transmission Owner with generator data. The Transmission Owner's responsibilities are different for generators located inside or outside of their transmission zone. To see the list of Transmission Owner's Rights and Responsibilities for generator data outside of its zone, reference the Generator Data Confidentiality Agreement in Attachment I of this manual.



Excerpt from Attachment I

Attachment I: Generator Data Confidentiality Agreement

GENERATOR DATA CONFIDENTIALITY AGREEMENT

This GENERATOR DATA CONFIDENTIALITY AGREEMENT ("Agreement") is made and entered into by _____ a (state of organization) (type of organization) (hereinafter "Transmission Owner"), _____ a (state of organization) (type of organization) (hereinafter "Generator"), and PJM Interconnection, L.L.C. a Delaware Limited Liability Company (hereinafter "PJM") (each may be referred to herein as "Party" or collectively as "Parties").

WITNESSETH

WHEREAS, Transmission Owner and Generator recognize that, while PJM has the overall power system reliability responsibility in the PJM region, owners of transmission facilities within the PJM region perform certain reliability functions with respect to their individual transmission systems and distribution systems.



Excerpt from Attachment K

Attachment K: Template Letter for a Transmission Owner Seeking Generator Data Within its Zone to be Released by PJM

[TO Company Name]
[TO's Street Address]
[TO's City, State, and Zip Code]
[Date]

[GO Representative Name]
[GO Company Name]
[GO's Street Address]
[GO's City, State and Zip Code]

To [GO Representative Name]:

In order for [TO Company Name] to perform reliability analysis, we require PJM to provide us generator data that your company provides to PJM. Your generator lies within our transmission zone and this information is integral to the reliability analysis that we must perform to ensure the transmission grid remains reliable.

Please authorize PJM Interconnection to release to [TO Company Name] the generator data that is within our transmission zone. We request this data for each of the following units: [List generator units here]. Please sign three copies of this letter and send two of them to PJM, addressed to the Manager of the Generation Department. PJM will retain one of the data release authorization forms and send the other form to the initiating transmission owner. PJM's Law Department will keep a record of this data release authorization form

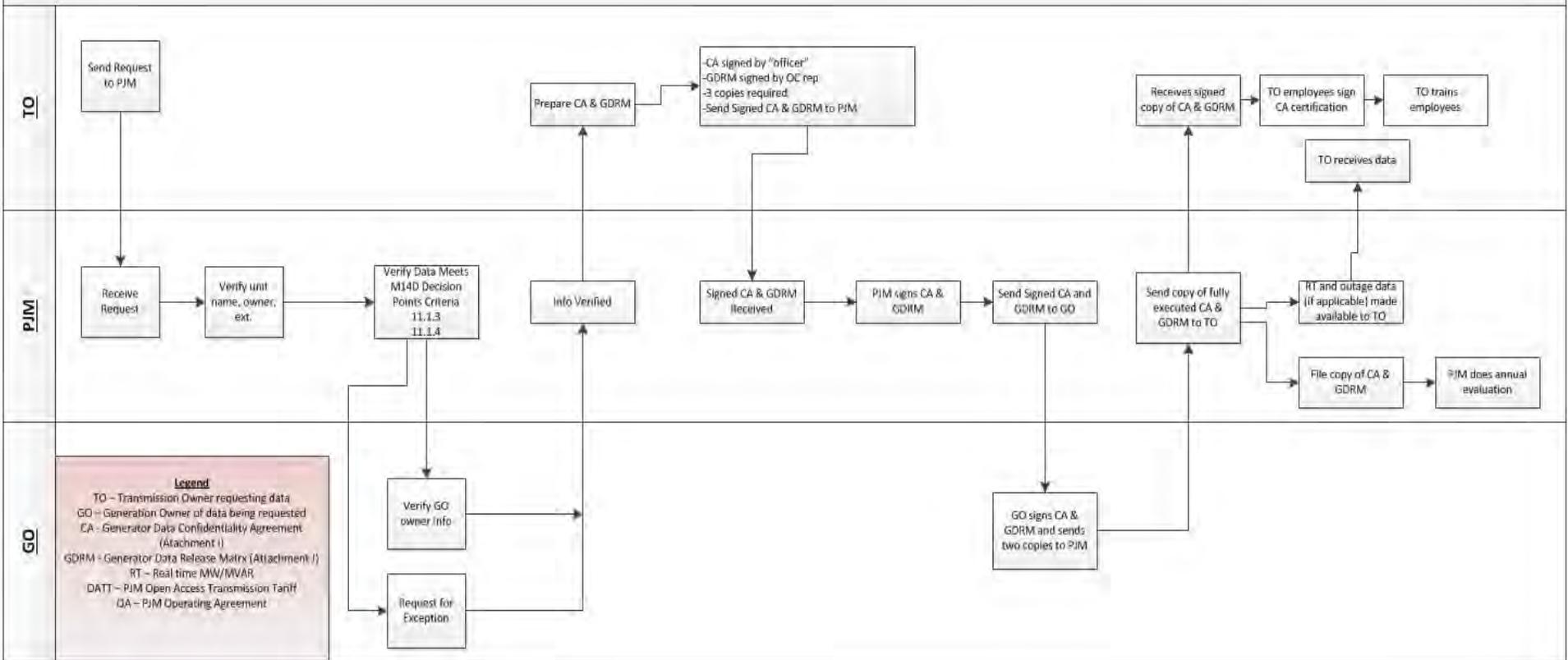


- Existing process issues
 - Drivers not same today as original
 - Continued need for TOs to obtain real time data from GOs
 - Current process administratively cumbersome, difficult to implement
- Identify options to streamline
 - Administrative
 - Real Time Data
 - Outages

- M14D, Section 11.1.1
 - TO initiates request to GO using Attachment K of M14D
 - GO approves request and sends approval to PJM
 - PJM Initiates data transfer to TO
 - Is this process is required? Interconnection Agreements between the TO & GO typically include these requirements.

- The process for obtaining generator data external to a TO zone is described in M14D, Sections 11.1.2, 11.1.3, 11.1.4, & 11.1.5 and diagrammed in the following slide 10.
 - Slides 11, 12, & 13 present options for potential changes.

Generator Data Confidentiality Procedures – Reference Manual M14D, Section 11 and Attachments I, J & K
 Process for data external to TO zone



Legend
 TO – Transmission Owner requesting data
 GO – Generation Owner of data being requested
 CA - Generator Data Confidentiality Agreement (Attachment I)
 GDRM - Generator Data Release Matrix (Attachment J)
 RT – Real time MW/WVAR
 DATT – PJM Open Access Transmission Tariff
 OA – PJM Operating Agreement

- **Option 1 - Potential Manual Only Changes**
 - Reduce level of approval authority from Officer to OC Representative (Section 11.1.5)
 - Eliminate “three copy” requirement – use scanned copies of signature documents (Section 11.1.5)
 - Eliminate PJM’s annual requirement to send GO listing of what data is being sent to what TO (Section 11.1.6)
 - Add a column to the Generator Data Release Matrix to include which decision point under 11.1.3 & 11.1.4 is being used to justify data request

- Option 2 – Includes Option 1 plus Potential Confidentiality Agreement and Related Manual Changes
 - Allow multi-party CA for joint owned units
 - Eliminate Confidentiality Agreement Certification (Section 2.c.9 and last page of CA)
 - Eliminate TO providing to GO list of individuals who have access to the data (Section 2.c.9 of CA)



Data External to TO Zone

- Option 3 - Potential Significant Process changes

- For Real Time data that meets M14D, Section 11.1.3 Decision Points, allow “blanket” CA between GO and TOs. Allow multiple TOs to “sign on” an existing CA. GO would be informed as additional TOs “sign on”
Note that most requests are for RT data only. (CA and Manual revisions required)
- Follow the Attachment K process (currently used for data within a TO zone) – require only a “letter agreement” if meet M14D, Section 11.1.3 Decision Points (CA and Manual revision required, also potentially Tariff/OA changes)
- Tariff/OA changes to “automatically” include provision of all reliability related generator data to TOs that meet the M14D, Section 11.1.3/11.1.4 Decision Points (Tariff/OA changes required)