



## 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~~ ~~confidentiality~~ procedures for a Transmission Owner (TO) to obtain real time generator data from PJM.

### 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 Terms & Conditions covering the confidentiality of the data are contained in the PJM Operating Agreement; Section 18.17.7 (Disclosure of Generator Data to Transmission Owners).

The following Generator Data Confidentiality Procedures pertain ~~to~~ only to real time data (real time MW, MVAR, ~~and status and reactive capability data~~ ~~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

~~The Transmission Owner may request PJM may be requested to provide real time data (MW, MVAR, status and reactive capability data), as well future scheduled outage data, 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.~~

#### 11.1.1 Generator Data within a Transmission Owner's Zone

~~For generator data within generators within a Transmission Owner's zone for which that PJM presently receives real time data, a Generation Owner may authorize PJM to release this information to the Transmission Owner. The Transmission Owner who seeks data initiates this process by signing a letter and sending it to the Generation owner. A template letter describing how to start this process can be found in Attachment K of this manual. PJM will release this information to the TO upon receipt of an email.~~

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The Transmission Owner initiates the process by sending an email to PJM's Manager, Generation along with Attachment J "Generator – Data Release Matrix" detailing which generator(s) are included in the request. PJM in-turn, will send the Generator Owner (GO) a copy of the TO's request when the request has been completed. PJM will use the Energy Market Unit owner, or as an alternate, the Market Operations Center (MOC) representative.



### 11.1.2 Generator Data outside a Transmission Owner's Zone

The Generator Data Confidentiality Procedures that follow are applicable when a Transmission Owner seeks generation data from PJM. If a Transmission Owner needs access to generator data outside of its zone, the Transmission Owner uses the following process developed by the PJM Data Confidentiality Working Group to evaluate and authorize PJM to provide all available requested data. The Transmission Owner may request PJM to provide Real-time (MW, MVAR and status) as well as future scheduled generator outage data. For generators outside a Transmission Owner's zone for which PJM presently receives real time data, PJM will review the reason for the request before releasing the information to the TO.

The Transmission Owner initiates the process by sending an email to PJM's Manager, Generation along with Attachment J "Generator – Data Release Matrix" detailing which generator(s) are included in the request. The TO request must also explain why data is being requested for generators outside the TO's zone. PJM in-turn, will send the Generator Owner (GO) a copy of the TO's request when the request has been completed. PJM will use the Energy Market Unit owner, or as an alternate, the Market Operations Center (MOC) representative.

The most common reasons are:

- The Transmission Owner's existing EMS model already includes the generator(s).
- The Transmission Owner is expanding their EMS model and would like to add the new generator(s).
- The Transmission Owners System Restoration plan includes the generator(s).

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### 11.1.3 Dispute Resolution

The process for appeal is to follow the PJM Dispute Resolution Process. Further information about this process may be found in Section 5 of the PJM Manual for Administrative Services for the PJM Interconnection Agreement.

#### Process to Authorize Release of Real-Time Generation Data

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If the transmission owner can answer "Yes" to any of the following decision points about the real time generator data, explained in detail in Exhibit 13, then the Generator Owner will authorize the release of the data. If a Transmission Owner cannot answer "Yes" to any of the conditions, they can request an exception. All requests for exceptions must be documented in an attachment to the Generator – Data Release Matrix.

#### Process to Approve Real-Time Data Request

##### Decision Point 1: Is the Unit 2 Stations or less from the Transmission Owner's Zone?

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If the unit is two stations or less from the Transmission Owner's Zone, then the request for data must be approved and the data confidentiality plan should be implemented.

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##### Decision Point 2: Does Unit Outage affect network line flows by more than 2% line rating?

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If a unit significantly changes line flows (changes by more than 2% line rating), it is important to get information on this unit's availability out to the Transmission Owner. The line rating used should be the ratings at the peak ambient temperature set. If the unit outage affects network line flows by more than 2% line rating, then the request for data must be approved and the data confidentiality plan should be implemented.

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**Decision Point 3: Does Unit Outage affect Transmission Owner facility more than 5% dfax?**

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A dfax lists the units that harm or help a facility and the percentage of harm/relief that each additional megawatt per unit brings. If an outaged unit could significantly harm or help a facility by more than 5%, it behooves the transmission owner to know the status of this unit. If the unit outage does affect the Transmission Owner facility by more than 5% dfax, then the request for data on the unit in question must be approved and the data confidentiality plan will be implemented.

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**Decision Point 4: Does Unit Outage affect Transmission Owner model values by 5%?**

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If an outaged unit could change Transmission Owner model values by 5% or more, it is necessary for the Transmission Owner to know the status of the unit in question. If the unit outage does affect the Transmission Owner model values by 5%, the request for data must be approved and the data confidentiality plan will be implemented.

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**Decision Point 5: Is Plant interconnected at the 230 or above kV system?**

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Higher kV interconnection implies that the status of the unit may impact the Transmission Owner system more, making this particular unit status important information to know. If the plant is interconnected at the 230 or above kV system, the request for data must be approved and the data confidentiality plan will be implemented.

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**Decision Point 6: Is Plant 500 MW or greater?**

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A higher MW aggregate output of the plant implies that the status of the unit may impact a Transmission Owner's system. If the plant is 500 MW or higher, the request for data must be approved and the data confidentiality plan will be implemented.

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**Exhibit 13: Process to Approve Real Time Data Request — Decision Points with Definitions**

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#### 11.1.4 Process to Authorize Release of Scheduled Generation Outage Data

If the transmission owner can answer "Yes" to any of the following decision points about the scheduled generation outage data, explained in detail in Exhibit 14, then the Generator Owner will authorize the release of the data. If a Transmission Owner cannot answer "Yes" to any of the conditions, they can request an exception. All requests for exceptions must be documented in an attachment to the Generator — Data Release Matrix.

#### Process to Approve Scheduled Outage Data Request

**Decision Point 1: Is the Unit 2 Stations or less from the Transmission Owner's Zone?**

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If the unit is two stations or less from the Transmission Owner's Zone, then the request for data must be approved and the data confidentiality plan should be implemented.

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Decision Point 2: Does Unit Outage affect Transmission Owner facility more than 5% dfax? ←

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A dfax lists the units that harm or help a facility and the percentage of harm/relief that each additional megawatt per unit brings. If an outaged unit could significantly harm or help a facility by more than 5%, it behooves the transmission owner to know the status of this unit. If the unit outage does affect the Transmission Owner facility by more than 5% dfax, then the request for data on the unit in question must be approved and the data confidentiality plan will be implemented.

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Exhibit 14: Process to Approve Scheduled Outage Data Request—Decision Points with Definitions ←

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#### 11.1.5 Executing a Data Confidentiality Agreement

After evaluating the applicability of the data request with the above decision points, the Transmission Owner initiates a Data Confidentiality Agreement with each Generator Owner. An officer of the Transmission Owner signs three copies of the Generator Data Confidentiality Agreement and submits them to the Manager of the PJM Generation Department. When initiating the Agreement, the PJM Generator Member Company name on record with PJM needs to be inserted into the beginning of the Agreement by the Transmission Owner. Any questions about the official Member Company name should be directed to the Manager of the PJM Generation Department. The Agreement can be found in Attachment I of this manual. (An electronic version of the Generator Data Confidentiality agreement is also available from the Manager of the PJM Generation Department.)

The agreement (all three copies) must also contain a Generator—Data Release Matrix. This Matrix lists all the generator units that a Transmission Owner requests data from a Generator Owner. Note that if the Transmission Owner wants to execute Agreements with several Generator Owners, an Agreement and accompanying Matrix must be filed for each Generator Owner. The Generator—Data Release Matrix (three copies) must be signed by the Transmission Owner's Operating Committee Member before it is sent to PJM. If a Transmission Owner does not have an Operating Committee Member, the PJM Member Committee Representative will sign the Matrix. A sample Generator—Data Release Matrix can be found in Attachment J. (An electronic version of the Generator—Data Release Matrix is also available from the Manager of the PJM Generation Department.) The Transmission Owner should train the employees that will be working with this data (certificate signers) so they understand the confidential nature of the data.

An officer at PJM signs the Agreement and the PJM OC Representative signs the Generator—Data Release Matrix. The PJM Generation Department will send all three copies of the Agreement (with Matrix included) to the appropriate Generator Owner for a signature from an officer of the company. At this time, the Operating Committee Representative (or PJM Member Representative) of the Generator Owner signs the copies of the Generator—Data Release Matrix. The Generator Owner then returns two copies of the Agreement (with Matrix included) back to the PJM Generation Department. PJM retains a copy of the executed agreement and matrix and sends a copy to the Transmission Owner for their records. After



~~the Agreement has been executed, the Transmission Owner will be authorized to have the generator data.~~

~~If a Data Confidentiality Agreement has been executed between a Transmission Owner and Generator Owner, and the Transmission Owner wishes additional generator data, another Matrix (3 copies) should be filed requesting the new units. This Matrix should be initiated and authorized by the Transmission Owner's Operating Committee Representative (or PJM Member Committee Representative) and sent to the Manager of the PJM Generation Department. PJM's Operating Committee Representative will sign the Matrix and forward it to the Generator Owner's Operating Committee Representative. The Generator Owner's Operating Committee Representative will keep one copy of the newly executed Matrix and return the other two to the PJM Generation Department. PJM will retain one for its records and send the other back to the Transmission Owner. After the Generator Owner's Operating Committee Representative (or PJM Member Committee Representative) returns the signed Matrix to PJM, the Transmission Owner is authorized to receive the additional generator data.~~

#### ~~11.1.6 PJM Evaluation of Data Request~~

~~Annually, PJM will send a list to the Generator Owners stating their data that is being sent to each Transmission Owner. The Generator Owner may challenge this data release by using the dispute resolution process.~~

~~The Transmission Owner must provide the decision point under which they believe their request qualifies, and if requested, provide supporting information to PJM and the Generator Owner. If requested by a Generator Owner, PJM will evaluate the technical merits of the request using the PJM EMS model.~~

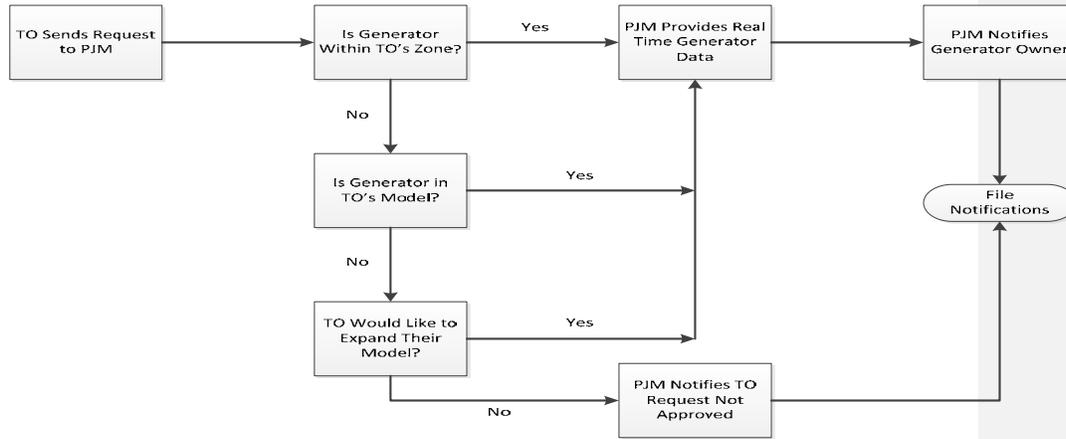
#### ~~11.1.7 Dispute Resolution~~

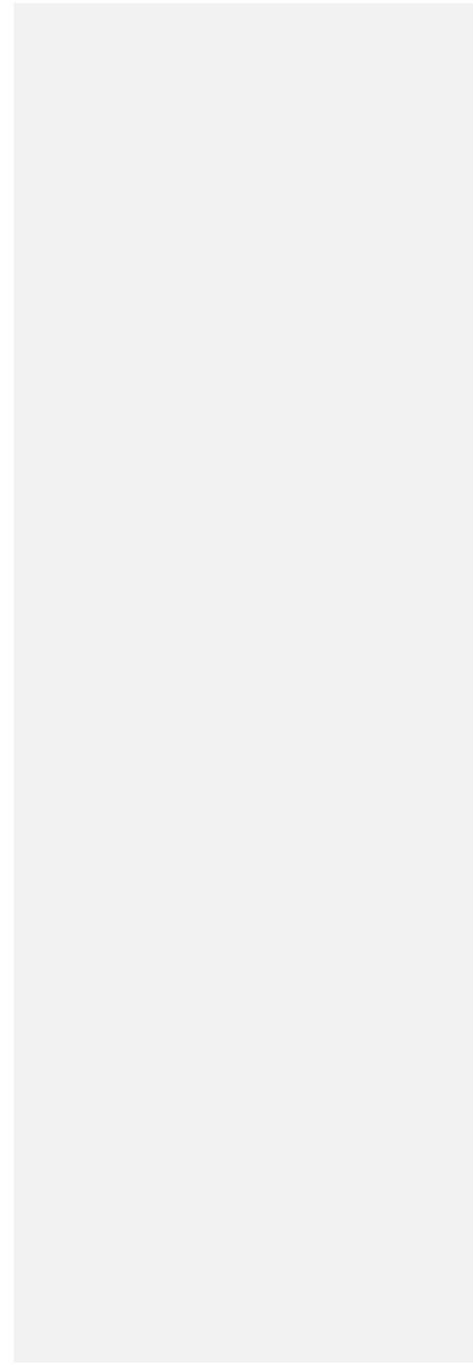
~~The process for appeal is to follow the PJM Dispute Resolution Process. Further information about this process may be found in Section 5 of the PJM Manual for Administrative Services for the PJM Interconnection Agreement.~~



Manual 14D: Generator Operational Requirements  
Section 11: Generator Data Confidentiality Procedures

REVISED MANUAL 14D SECTION 11







**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.—~~

~~WHEREAS, Generator acknowledges that PJM historically has provided certain confidential data regarding Generator’s generating facilities to Transmission Owner, and that the Confidential Information specified in the Generator Data Release Matrix incorporated herein by reference may be needed to allow the Transmission Owner to perform security analysis and to carry out the reliability functions described above, Generator agrees that PJM may provide such Confidential Information to Transmission Owner pursuant to the terms and conditions of this Agreement.~~





**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.

Sincerely,

*TO Officer Signature*  
*[TO Officer Name]*  
*[TO Company Name]*

**Generator Owner Authorization**

I authorize PJM to provide the above requested generation data to *[TO Name]*.

*GO Officer Signature*  
*[GO Officer Name]*  
*[GO Company Name]*

