



# PJM NERC Data Requests

November 17, 2023

Reliability & Standards Compliance  
Subcommittee



## Cold Weather Preparation Guideline and Checklist

## Seasonal Fuel & Emissions

## eDART Black Start Critical Load Validation

As announced at recent PJM stakeholder meetings, PJM has issued a new eDART GO Data Request on **November 1, 2023**, in accordance with PJM Manual 14-D Generator Operational Requirements Section 7.5.2 Generation Resource Cold Weather Checklist, with a focus on generator cold weather preparation and winter operation for upcoming 2023/2024 winter season.

This annual verification that the represented generation resources have prepared for winter operations and completed the items on the checklist, or a substantially equivalent one developed by the Generation Owner, is **mandatory**, and is required for reliable operations planning purposes and enhanced PJM situational awareness.

PJM requires that Generation Owners complete the Data Request no later than **23:59 EPT on December 15, 2023**. Failure to comply with this GO Cold Weather Preparation Checklist may result in potential referral to FERC Office of Enforcement, and is potentially actionable as a violation of the Tariff, the applicable ISA, and/or Operating Agreement section 11.3.1.

As noted above, the data request is mandatory for all Generation Owners and Market Participants, and the obligation to respond is not excused even if a third party asset manager or other third party contractor is responsible for eDART functions associated with a generation resource.

Please note that PJM will share all data request responses with its independent market monitor, Monitoring Analytics, LLC. In addition, regulators could request data responses and PJM would share with member notice only in accordance with the PJM Operating Agreement, section 18.17.

This data request must be submitted through the eDART web forms or via eDART TXT file upload, and cannot be submitted via email. Where possible, the data request has been pre-populated with member responses from last year, except in a few instances where there was a change in unit ownership or modeling. All Generation Owners must fill in responses to required questions that were not pre-populated and review the responses that were pre-populated to ensure that they are still accurate. A copy of the questions and PJM Manual 14-D Attachment N Cold Weather Preparation Guideline and Checklist are attached for quick reference.

Questions pertaining to the eDART 2023 GO Cold Weather Preparation Checklist Data Request can be sent via email to [edartgosurvey@pjm.com](mailto:edartgosurvey@pjm.com) or by phone at (610) 666-2282.

In anticipation of winter 2023/24, PJM and PJM stakeholders are taking various steps to prepare for reliable operations. PJM recommends that resource owners have sufficient fuel, supplies, and winterization steps to be ready to operate for several weeks under adverse winter conditions.

**As announced at recent PJM stakeholder meetings, PJM issued a new eDART Generation Owner data request on October 28, 2023**, in accordance with PJM Manual 14-D, Generator Operational Requirements, Section 7.3.5 Fuel and Emissions Reporting, with a focus on Generator Fuel Inventory and Emissions updates for the upcoming 2023/2024 winter season. This is in addition to the Generation Resource Cold Weather Checklist data request issued today, 11/1.

This annual fuel inventory and emissions data request for all fossil-fueled resources data request is **mandatory**, and is required for reliable operations planning purposes and enhanced PJM situational awareness. This data request is different from the weekly fuel inventory and supply data request which has not been implemented at this time.

PJM requires that Generation Owners and/or Market Participants complete the data request no later than **23:59 EPT on December 1, 2023**. Failure to comply with this Seasonal Fuel Inventory and Emissions Data Request may result in potential referral to FERC Office of Enforcement, and is potentially actionable as a violation of the Tariff, the applicable ISA, and/or Operating Agreement section 11.3.1.

As noted above, the data request is mandatory for all Generation Owners and Market Participants, and the obligation to respond is not excused even if a third party asset manager or other third party contractor is responsible for fuel procurement.

Please note that PJM will share all data request responses with its independent market monitor, Monitoring Analytics, LLC. In addition, data responses could be requested by regulators and PJM would share with member notice only in accordance with the PJM Operating Agreement, section 18.17.

This data request must be submitted through the eDART web forms or via eDART TXT file upload, and cannot be submitted via email. Where possible, the data request has been pre-populated with member responses from last year, except in a few instances where there was a change in unit ownership or modeling. All Generation Owners must fill in responses to questions that were not pre-populated and review the responses that were pre-populated to ensure that they are still accurate. A copy of the questions and instructions are attached for quick reference.

Questions pertaining to the eDART GO Fuel Inventory and Emissions Data Request can be sent via email to [edartgosurvey@pjm.com](mailto:edartgosurvey@pjm.com) or by phone at (610) 666-2282.

As communicated at the August 10, 2023 Operating Committee and October 27, 2023 System Operations Subcommittee, PJM is requesting a review and validation of data in the eDART Black Start Calculator tool for system restoration planning purposes. The data will be used in steady state and dynamic analyses to comply with NERC standard EOP-005-3. Please refer to the August 10, 2023 OC [presentation](#) for additional background.

The data validation process will be open from November 1, 2023 through January 1, 2024. Please refer to the following instructional documents for details on the validation process:

[GO eDART Black Start Calculator Data Validation Instructions 11.1.2023](#)

[TO eDART Black Start Calculator Validation Instructions 11.1.2023](#)

Generation Owners:

1. PJM will notify generators that are required to validate data via an email to the eDART gen contacts. Inverter based resources and a small subset of thermal resources are not included in the validation effort.
2. Generation owners will need to submit new data and/or update/validate the accuracy of existing data.

Transmission Owners:

1. Review resources in the Black Start Calculator tool
2. Request any Critical Load Exceptions in the Black Start Calculator.

Please contact the Generation Department at [generation@pjm.com](mailto:generation@pjm.com) with any questions.



# Cold Weather Preparation Guideline and Checklist

- Provides generation resources with a guide to prepare units for cold weather operation
- All generation resources must be prepared for winter and respond accordingly to the data request
- Based on Manual 14-D, Attachment “N”
- Data Request in eDART
  - Open November 1st to December 15th
  - Option of using the PJM or equivalent GO developed checklist
  - GOs requested to identify any improvements or changes to preparation activities made since Winter Storm Elliott
  - GOs requested to share best practices not already documented in M-14D, Attachment “N”
- Results published at appropriate stakeholder and regulatory levels

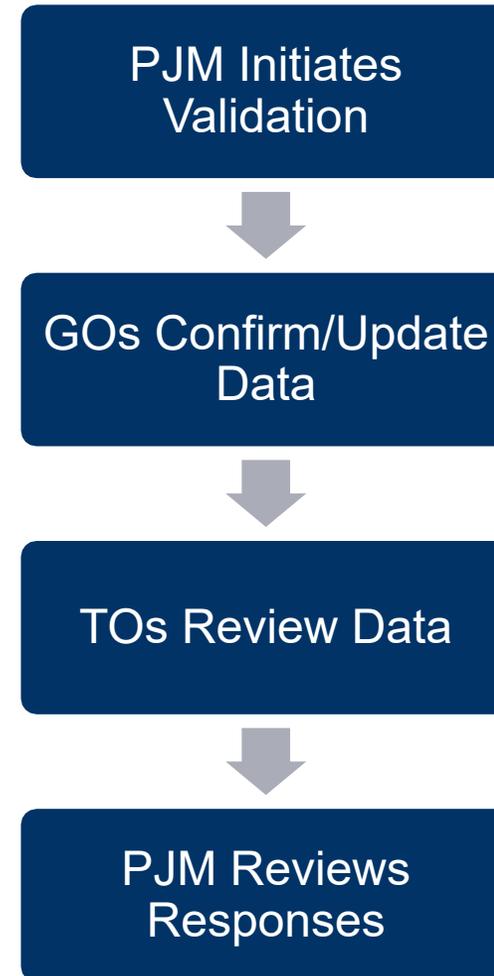
- Focused on fuel supply and delivery details, emissions limitations and gas supply/delivery information
- Required for reliable operations planning purposes
- Enhance PJM situational awareness in preparation for severe cold weather
- Data Request open in eDART mid-October through mid-November
- Data will be pre-populated where possible

*Link to OC presentation on Cold Weather Preparation: <https://www.pjm.com/-/media/committees-groups/committees/oc/2023/20231005/20231005-item-14---cold-weather-preparation.ashx>*



# Black Start Calculator Data Validation Process

- Data validation started on November 1<sup>st</sup>, 2023 and will close on January 1<sup>st</sup>, 2024 in eDART
- All identified units need to respond. Data validation is not limited to just Black Start units
- Previously submitted data is pre-populated. GOs need to confirm it is still accurate or update it accordingly
  - New units (added after the 2018 BS RFP) will need to submit data
- PJM to work with Generation Owners and TOs to reconcile differences and update accordingly



[Link to OC presentation: https://www.pjm.com/-/media/committees-groups/committees/oc/2023/20230810/20230810-item-11---black-start-rfp-critical-load-validation.ashx](https://www.pjm.com/-/media/committees-groups/committees/oc/2023/20230810/20230810-item-11---black-start-rfp-critical-load-validation.ashx)



*PJM provides this standing update to the Reliability & Standards Compliance Subcommittee to provide guidance to Registered Entities regarding PJM-related data requests applicable to certain NERC Reliability Standards, and to provide a forum through which such Registered Entities can ask questions of PJM staff. This standing update is not intended to serve as complete or definitive guidance regarding how to comply with a PJM-related data request, how to otherwise comply with specific NERC Reliability Standards, or how to otherwise carry out the obligations of Registered Entities.*

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