



Manual 19: Attachment B Discussion

Load Analysis Subcommittee
July 19, 2023

Molly Mooney
Resource Adequacy Planning

- Manual 19: Load Forecasting and Analysis

Cover to cover review

Attachment B: Load Forecast Adjustment Guidelines

Attachment A: Load Drop Estimate Guidelines
Attachment C: Residential Non-Interval Metered Guidelines
Attachment D: Peak Shaving Adjustment Plan and Performance Rating

- PJM reviewed proposed redline changes to Manual 19: Attachment B at the June 26, 2023 LAS meeting.
- Motivation for changes:
 - The number of requests PJM has received has increased
 - The magnitude of requests has increased
 - The pace these load adjustments plan to materialize is rapid
 - Load adjustments have become consequential to future load growth

- Stakeholders were asked to review proposed changes and provide feedback.
- PJM received feedback. Additional redlines are still pending but following slides provide topics for discussion.
 - Topic 1 : Retain independent consultant
 - Topic 2 : Add Load Serving Entity (location) of where load change is occurring
 - Topic 3 : Add language for more general load changes and remove locational specifics
 - Topic 4 : Confidentiality concerns
 - Topic 5 : More clarity on responsibility – PJM or requesting EDC

- No changes are needed to Manual 19: Attachment B section. Instead, PJM should hire a consultant to provide load adjustment forecast.
 - A consultant would work with EDCs and be able to oversee any overlap of potential data center expansion across EDCs.
- Use of word adjustment should be more clear.
 - Suggest using word “shift” for total amount of load change and word “adjustment” for the amount of load change above/below what is already embedded in history.

- Under the Issue Verification section add the following:
 - The EDC shall identify to PJM the Load Serving Entity (LSE) where the addition will occur.

- Add more general language to Attachment B regarding load changes not incorporated in the load model.
- Remove the specific locational aspect by removing bullet:
 - Ascertain that the load shift is related to a single site or a limited number of related sites (not a systemic cause).
- Inclusion of load change in EDC forecast – note that the EDC has or will adjust their own financial and planning forecasts.

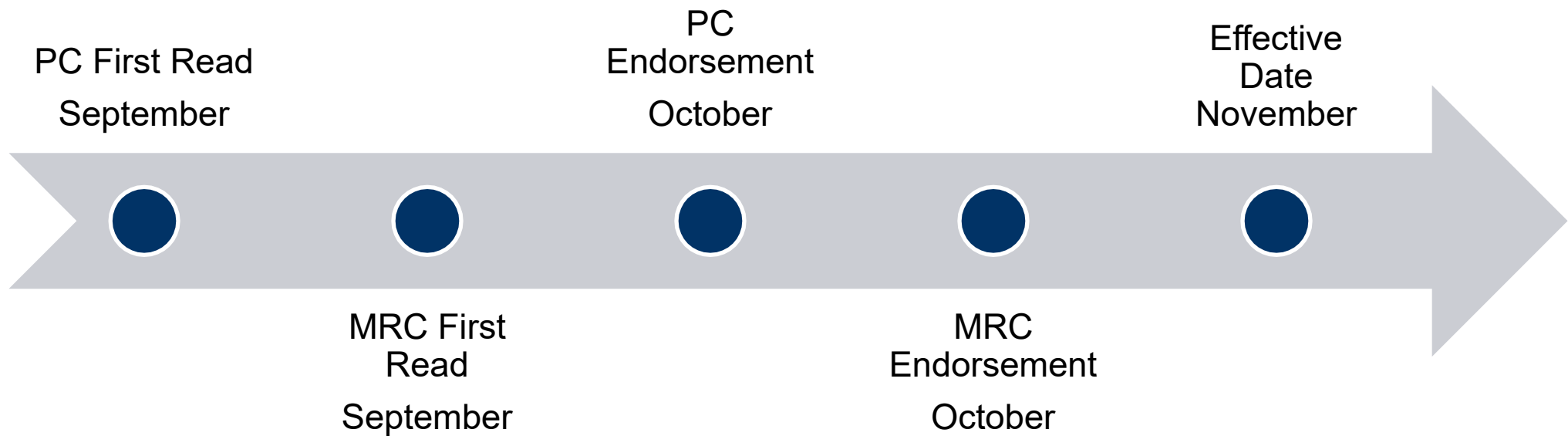
- Confidentiality concerns including:
 - Letter of Agreement and/or Electric Service Agreement (LOA/ESA)
 - EDC sponsors independent consultant reviews shared with PJM

- Clarity on responsibility on items in the issue verification section being PJM's or the requesting EDC.
 - Recommendation: specify using “PJM shall” or “Requesting EDC shall” for each task. If the task is not required, use “may” instead of “shall.”
- Clarity needed on requirements of the requesting EDC regarding contracts.
 - Recommendation: The requesting EDC shall confirm the existence of contracts.

- Clarity around requirement of independent analysis from requesting EDC:
 - Recommendation: The requesting EDC may provide PJM with any available industry independent analysis associated with the anticipated load shift and forecast adjustment request.
- Feedback from PJM to requesting EDC on accepted/rejected load adjustment request.
 - Recommendation: PJM provides to requesting EDC a public document regarding final decision.

- Additional clarity within Example 2:
 - Specific contracts in addition to LOA/ESAs need to be listed if necessary.
 - Locational aspect of adjustment:
 - Recommendation: “The load in question is confined to a ~~cluster of sites in one small area of the zone~~ single industry.”

- PJM will incorporate feedback as appropriate.



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