

### Market Data Confidentiality Clarifications

#### Problem / Opportunity Statement

PJM confidentiality rules set limits on what information may be shared with stakeholders and the public. These rules, contained in the Operating Agreement and PJM Manual 33, combined with historical practice, have defined the boundaries regarding what data may be shared. In some cases, these rules prohibit the sharing of data that would provide a transparency benefit and confidence to the market when it is not truly commercially sensitive and would not pose a risk of competitive harm to the market if released. The current rules have also restricted PJM from providing information that could have been helpful to stakeholders in understanding unusual system events such as the hot weather events of September 2013 and the winter weather events of 2014. The current rules have provided useful general guidance, but PJM believes that greater specificity and certain defined exceptions would provide benefit to all stakeholders in understanding system conditions and market outcomes.

Based on examination of the governing documents, PJM believes that revising the confidentiality rules would require changes to PJM Manual 33, section 3.5. PJM's goal in this process is to achieve stakeholder endorsement on a set of changes to that language.

PJM proposes clarifications around four pieces of information that have been interpreted as confidential by current rules and practices.

- Uplift data: Stakeholders have shown great interest in more granular information regarding uplift and the causes of uplift. PJM believes that more granular information poses little risk of competitive harm and would greatly enhance market participant understanding of market outcomes. More granular information would also create greater possibility of competitive entry in order to reduce uplift in chronic areas.
- Generation outage data: PJM has had a long standing practice of keeping generation outage data confidential, while transmission outage data is made public. PJM believes that clarifying the rules to explicitly allow PJM to share generation outage data after-the-fact when examining a major system event would enhance transparency and stakeholder understanding of such events.
- Demand Response quantities in small areas: The rules in Manual 33 require there to be at least four market participants in an aggregate set of data to be released, and that the area in question be no smaller than a transmission zone. There have been occasions where PJM sought to publish the amount of demand response offered in a smaller area (a set of defined zip codes for instance) but was unable to do so due to the transmission zone requirement. PJM believes there is no market harm in releasing the quantity offered in smaller areas, and indeed generation in an area is available through public data sources. PJM believes an exception to the Manual 33 rules for this case is appropriate.
- Cleared RPM resources: Federal regulations require the posting of network designated resources once the delivery year begins, and this list is published through OASIS. PJM believes it is equally reasonable to publish these resources once the RPM auctions are completed rather than waiting for the delivery year.
- Confidential data made public from another source: PJM's confidentiality rules apply even if the data in question has been made public by another entity. PJM would like to clarify that data already in the public domain is no longer subject to confidentiality provisions.