

PJM Training and Certification Requirements Non-Compliance

Problem / Opportunity Statement

PJM Manual M-40 details PJM Training and Certification requirements that are placed on PJM Members. These requirements have been established to ensure that members are aware of their responsibilities and are competent in the tasks that PJM assigns them in order to preserve reliability and participate in PJM markets. These requirements fall into the following categories:

- Transmission Owners – PJM Transmission Certification, NERC Certification and Training requirements
- MOC Generation Dispatchers – PJM Generation Certification and Training requirements
- Small Generation Dispatchers (operate a total of 75 MW or less) – Initial training and reduced continuing training requirements
- Demand Response (Curtailment Service Providers) – Initial training, continuing training requirement
- Energy Storage Devices (ESD) – Initial training, continuing training requirement

PJM has been tracking non-compliance with these requirements by MOC Generation Dispatchers, Small Generation Dispatchers, Demand Response and Energy Storage Devices. Transmission Owners are usually in compliance with these requirements.

This non-compliance has been continuing for many months and in many cases has increased or become chronic in nature. Currently a company in non-compliance with training or certification requirements must submit to PJM a “mitigation plan” which details how the company will meet these requirements. Many of the non-compliant companies do not have a mitigation plan on file with PJM. Others are not meeting the requirements of their mitigation plan.

PJM is concerned that companies with non-certified or inadequately trained operators may lead to operational or reliability problems.

PJM is requesting stakeholders address this issue and investigate options to increase the level of operator compliance with these training and certification requirements. Changing the existing training and certification requirements will *not* be included in the scope of this problem.

Issue Source

PJM is bringing this issue forward for consideration by stakeholders. PJM has been tracking this issue for months and is not seeing significant improvement.

Stakeholder Group Assignment

PJM recommends that the Operating Committee work this issue during its regularly scheduled meetings. As an alternative, the OC could assign this issue to the System Operations Subcommittee or the Dispatcher Training Subcommittee.

Key Work Activities

- 1) Education on Member Training and Certification requirements
- 2) Education on current process for non-compliance with Training and Certification requirements
- 3) Development of options to increase compliance with current Training and Certification requirements
- 4) Reduce options
- 5) Achieve consensus to solution options
- 6) Make any required changes to M-40 or other documents

Expected Deliverables

Changes to section 3.3 of Manual M-40.

Expected Overall Duration of Work

This effort is expected to take about 3 months.

Decision-Making Method

Tier 1 consensus.