



Data Confidentiality Proposed Manual Language Stakeholder Feedback

Confidential Data Clarifications	Redline Manual Language	Stakeholder Feedback
Individual generation outages:	PJM may release information on specific generation outages if PJM deems them to be relevant, provided that the outage has already concluded. While PJM will not systematically release data on all individual generation outages, it may disseminate information on specific outages if relevant to an event on the electric grid (for example, a severe weather event or a transmission system event).	<ul style="list-style-type: none"> • Concerns around release of capacity data, and outages allowing competitors to calculate RPM penalties • Member company knows a competitor is short • Remove first sentence • Make paragraph more concise • Vague on specific outages; define outages and causes, opportunity to clean up definitions and scope of what's revealed • Members consider data confidential • Release of confidential data violates the OA and OATT • Relation to MMU vs. PJM • PJM needs to respect appropriate temporal boundaries to avoid impairing the generator's ability especially to transact for fuel. Releasing information too soon may subject the generators to increased credit requirements, which may be difficult to meet on a short deadline
Demand Response:	PJM may release information on the amount of DR supply available in localized areas (i.e. the amount of MW in a defined area). This information shall not contain specific offers or suppliers.	<ul style="list-style-type: none"> • As needed or regularly reported? • Change to Demand Response only • Change suppliers to individual participants
Cleared Capacity Resources:	PJM may release the identities of resources committed in an RPM Capacity Market auction at the close of the auction. This information shall not contain specific offers.	<ul style="list-style-type: none"> • Concerns around release of capacity data, and outages allowing competitors to calculate RPM penalties • Member company knows a competitor is short • Cleared capacity resources should exclude Demand resources • Sensitive to regulatory reporting requirements • HR concerns about the disclosure of capacity positions • Members consider data confidential • Release of confidential data violates the OA and OATT • PJM needs to respect appropriate temporal boundaries to avoid releasing information without giving the generator to make appropriate regulatory filings
Uplift:	Information regarding uplift payments may be posted provided that such information represents generation in an area no smaller than a transmission zone, and	<ul style="list-style-type: none"> • Consider posting smaller than transmission zone data in limited circumstances • Reveal the identity of units that are receiving uplift • Too vague, define scope of what is revealed



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	a time period no shorter than a single operating day.	
Three Pivotal Supplier Test Results:	PJM may release aggregated statistics related to the execution and results of the Three Pivotal Supplier Test. Such statistics may not identify individual resource owners.	<ul style="list-style-type: none">• Change statistics to releases that include more granular data• May release zonal statistics instead of aggregate
Public Data:	Data that is already in the public domain posted by the party responsible shall not be considered confidential by PJM.	<ul style="list-style-type: none">• What type of data? Is it information?• Change party responsible to subject market participant or state/federal authority• Delete from another source and party responsible considering it's public• Validity of data in the public domain