



# Critical Natural Gas Infrastructure as DR in the PJM markets

MIC

September 7, 2022

- Problem Statement and Issue Charged endorsed by MIC at March 2022 meeting
- Feb. 2021 cold weather event in Texas and South Central U.S.
- NERC/FERC report published on 11/16/21
  - <https://www.ferc.gov/media/february-2021-cold-weather-outages-texas-and-south-central-united-states-ferc-nerc-and>
- Key Recommendation 1h: To require Balancing Authorities' operating plans (for contingency reserves and to mitigate capacity and energy emergencies) to prohibit use for demand response of critical natural gas infrastructure loads. (Winter 2023-2024)
- Critical Natural Gas Infrastructure loads participation in PJM markets will be impacted (starting winter 2023/24)
- NERC standards are a work in progress

- OATT & OA
  - Definitions
  - Attachment K, Appendix Section 8.2 - Participant Qualifications
  - Attachment K, Appendix Section 1.5A – Economic DR Participation
- OATT & RAA
  - Attachment DD-1 – Officer Certification
  - Schedule 6.1.B – PRD shall not include CNGI
- Manual 11
  - Section 10.2.2 – registrations shall not include CNGI
- Manual 18
  - Attachment C – DR Sell Offer Plan shall not include CNGI
  - Section 3A.3 – PRD shall not include CNGI
- MOPR cleanup item
  - Unrelated MOPR cleanup item in same document that we are revising

- Curtailment of electric load that will have significant impact on delivery of gas to gas-fired generation may not participate as DR. The definition also provides for any forth coming NERC/FERC definition.
- CSPs with reliance on this type of load can use the 3IA to adjust their position.

- Seek endorsement of manual language changes from MIC and MRC (October and November)
- Seek endorsement of governing documents changes from MC (November or December)
- File governing document revisions with FERC (January)
- Anticipate FERC approval by March, in time for (2023/2024 3IA)

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## Critical Natural Gas Infrastructure



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