

# PJM Compliance Bulletin

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*CB010 PJM Data Submittal to satisfy PJM LSE's requirements under NERC Standards MOD-017-0.1, MOD-018-0, MOD-019-0.1, MOD-020-0, and MOD-021-1*

## Purpose

This Compliance Bulletin is retired. It was written specifically for the Load Serving Entities in PJM, and LSEs were removed from the functional model in October of 2015.

The purpose of this Compliance Bulletin is to Provide Load Serving Entities (LSEs) in the PJM RTO with guidance for their compliance with the following NERC Standards:

- MOD-017-0.1  
Aggregated Actual and Forecast Demands and Net Energy for Load
- MOD-018-0  
Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load
- MOD-019-0.1  
Reporting of Interruptible Demands and Direct Control Load Management
- MOD\_020-0  
Providing Interruptible Demands and Direct Control Load Management Data to System Operators and Reliability Coordinators
- MOD-021-1  
Documentation of the Accounting Methodology for the Effects of Demand-Side Management in Demand and Energy Forecasts.

PJM has issued this compliance bulletin in order to clarify actions required of Load Serving Entities, (LSEs) to provide information related to these standards to PJM. This document has been provided at the request of the PJM Reliability Standards and Compliance Subcommittee (RSCS), and is for informational purposes only; **no action is required**.

## Background

Retail Choice in PJM brings an unusual twist to an LSE's proof-of-compliance in the area of load responsibility. PJM's markets allow the load responsibility for each LSE to change daily (while the sum of all the LSE loads is constant). Additionally, new LSEs can enter the market at any time, and existing LSEs always have the option of withdrawing from PJM. This obligation does not lock in for these LSEs until shortly before the operating day.

This constantly shifting responsibility makes it impossible for any LSEs to know (with any degree of certainty) what their load share will be in the future, thus making compliance to several of the above referenced standards impossible.

However, PJM is the registered Resource Planner, Planning Authority, and Transmission Planner. As such, PJM assumes the responsibility for the load analysis both by transmission zone, and the entire PJM footprint. Allowing PJM to supply the data required under MOD-017 through MOD-021, ensures that all of the load (historical and future) is accounted for one and only one time.

Note that approved MOD-031-1 (MOD-C) eliminates the necessity for this Compliance Bulletin after July 1, 2016, as the responsibility for this data falls to the Planning Coordinator or Balancing Authority.

## Compliance in the Reliability First region:

The PJM Load Report is published annually, and is publicly available on the PJM website at: <http://www.pjm.com/documents/reports.aspx>

The PJM Load Report contains the vast majority of the data required by NERC Standards MOD-017 through MOD-021, including:

1. Integrated hourly demands in megawatts (MW) for the prior year. (MOD-017-0.1, R1.1)
2. Monthly and annual peak hour actual demands in MW and Net Energy for Load in gigawatthours (GWh) for the prior year. (MOD-017-0.1, R1.2)
3. Monthly peak hour forecast demands in MW and Net Energy for Load in GWh for the next two years. (MOD-017-0.1, R1.3)
4. Annual Peak hour forecast demands (summer and winter) in MW and annual Net Energy for load in GWh for at least five years and up to ten years into the future, as requested. (MOD-017-0.1, R1.4).
5. Forecasts of interruptible demands and DCLM data . (MOD-019-0.1, R1)

PJM Manual 19 is publicly available on the PJM website at <http://www.pjm.com/~media/documents/manuals/m19.ashx>

Manual 19, Load Forecasting and Analysis is the guiding document behind the PJM Load Report. It contains the information that says how PJM created the forecasts. Manual 19 clearly documents how the demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible demands, and Direct Control Load Management) are addressed. Manual 19 further goes on to provide information detailing how Demand-Side Management



measures are addressed in the forecasts of Peak Demand and annual Net Energy for Load are included in the data reporting procedures.

The names of all of the LSEs covered by the effort described above are taken directly from the list of PJM members that incur a capacity obligation. Representatives from ReliabilityFirst choose a day at random (typically early in the year) and PJM supplies them with the list of members serving load on that day.

ReliabilityFirst has collectively accepted the PJM Load Report, Manual 19, and the LSE list from PJM as evidence of compliance to MOD-017 through MOD-021. Any LSE on that list may use this Compliance Bulletin to augment their proof-of-compliance to NERC Standards MOD-017 through MOD-021.

### Compliance in the SERC region:

Obtaining proof of compliance is dramatically simplified in the SERC region. As members of SERC’s Data Coordinators Task Force (DCTF), PJM annually enters all of the required load and Demand-Side Management values into the SERC portal for each LSE in the PJM portion of the SERC region. Each LSE then has the ability to enter the portal to review and print reports confirming evidence of their compliance.

### Conclusion

NERC Standards MOD-017 and MOD-019 have annual requirements for various types of load data. All of these annual requirements will be fulfilled by PJM. No additional information, data submittal, or actions will be required of any LSE within PJM’s footprint.

Additionally, NERC Standards MOD-018, MOD-020, and MOD-021 have provisions in them that would require the LSEs to produce data within 30 days of request. All of these “on demand” requirements will be fulfilled within the prescribed time requirements by PJM. No additional information, data, or actions will be required of LSEs within PJM’s footprint.

### Development History

Revision: 3	Date: 01/24/2017
Author:	Thomas M. Moleski, Senior Compliance Specialist NERC and Regional Coordination Dept.
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Approver:	Rob Eckenrod, Chief Compliance Officer
Reason for Change:	<b>This Compliance Bulletin is retired. It was written specifically for the Load Serving Entities in PJM, and LSEs were removed from the functional model in October of 2015.</b>

Revision: 2	Date: 09/10/2015
Author:	Thomas M. Moleski, Senior Compliance Specialist NERC and Regional Coordination Dept.
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Approver:	Tom Bowe, Executive Director Reliability & Compliance Division
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Revision: 1	Date: 04/25/2014
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Approver:	Tom Bowe, Executive Director Reliability Integration Division
Reason for Change:	Annual Review, inclusion of future considerations for MOD-031-1 (MOD C)

Revision: 0	Date: 12/01/2012
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Reviewers:	Stephanie Monzon, Manager NERC and Regional Coordination Dept.
Approver:	Tom Bowe, Executive Director Reliability Integration Division
Reason for Change:	This is a newly developed document.