



# PJM/TO Relationship

- Purpose
  - Discuss concerns from ongoing Compliance Violation Investigations
  - Get common understanding of how the TOP/TO relationship works in PJM
- Concerns
  - Are the PJM TOs doing TOP work?
  - Perception that PJM may not be fulfilling its obligations as the TOP?

- PEPCO 10<sup>th</sup> Street (June 2008)
  - Perceptions that - during the restoration, it appeared that PEPCO operators were performing the TOP function by leading the restoration without “direction” from PJM
  
- AEP Rockport (August 4, 2007)
  - PJM, despite being required as part of its TOP responsibilities, “*refused*” to provide relay system protection information when requested as part of the CVI process

- What is “directing” operations?
- NERC Certification of the TO operators
- Is writing of switching orders a task that requires NERC certification?
- Local restoration activities – bottom up/top down or both?

- Registration is correct – acknowledgement that RTOs are different and each is different from each other
- Appears to be common understanding of how the relationship should work in PJM – PJM is the centralized authority and some delegation to the TOs for execution
- Doubts persist relative to execution of the TOP requirements, based on the CVI incidents
- PJM and the TOs to report back with a plan to address the concerns within 60 days

- PJM, as the TOP, is involved in all transmission operating decisions
  - Pre-existing procedures can be executed by the TO, but PJM approves any deviations
  - New procedures do not proceed without approval from PJM as the TOP
- All TOP requirements are performed by PJM
  - Tasks can be delegated to the TOs, but only via an agreement, with PJM still holding the responsibility
- PJM has enough knowledge and information, so that it can execute the TOP requirements without information from the TO

- Goal: Eliminate doubt in the minds of the regulators and restore confidence
- Objectives:
  - Reinforce PJM as the TOP
  - Provide more clarity to the TOP/TO interface tasks
    - Voltage control
    - System restoration
    - Protection system information

- Review/rewrite manuals and/or TO matrix
  - How do we document the relationship for compliance?
- System Restoration
  - Reconciliation of bottom up/top down approaches—can we brighten the line between what the TO performs and what PJM performs?
- Review of Certification Issues – NERC and PJM
  - Implications of NERC Certification to TOs
  - Can PJM Certification be accepted by NERC as an alternative process?
- Maintenance of system information
  - What is PJM required to have as the TOP?
- Outage request review
  - Completeness of the requests to facilitate analysis and approval
- Review tariff provisions relative to load shedding authority and execution
  - Ensure no conflicts that will cause compliance issues



- Sponsorship and support --TODO members
- OC Steering Team – PJM and some OC members
  - Review high level issues and make assignments (SOS, DTTF, etc.)
  - Review results and provide direction
  - Report to TODO
- Need for interim measures
  - Stand down review ?
  - Documented refresher training ?