

- Approach – PJM will continue to follow-up on specific concerns raised by members. Please use your client manager as your point of contact.
- Emissions – PJM will use the Environmental Variance template (PJM Manual 13: Emergency Operations, Attachment M: Procedure for Obtaining a Temporary Environmental Variance) but will be reactive to requests as outlined in the procedure
 - PJM will escalate the general waiver issue to the Electric Subsector Coordinating Council - ESCC (EPA, etc.)
 - United States Environmental Protection Agency - <https://www.epa.gov/newsreleases/epa-announces-enforcement-discretion-policy-covid-19-pandemic>
 - State Government Environmental Relief Information List

State	Additional Information
Pennsylvania	LINK
Virginia	LINK
Maryland	LINK
West Virginia	LINK
Ohio	LINK
Indiana	LINK
Michigan	LINK

- Curfew restrictions – PJM will be reactive if we know a state has announced curfew steps and coordinate with state agencies to provide curfew letter.
 - Letter provided to NJ and MD.
 - PJM will follow-up with other states as needed
- Parts priorities – PJM will rely on ESCC work (national level) for procedures and look to develop local procedures if inadequate from a timing perspective
- Fuel priorities - PJM will rely on ESCC work (national level) for procedures and look to develop local procedures if inadequate from a timing perspective
- Consumables - PJM will rely on ESCC work (national level) for procedures and look to develop local procedures if inadequate from a timing perspective
 - [ESCC Testing and PPE efforts](#)
- Cleaning and safety consumables - PJM will forward to ESCC work (national level) for procedures
- Communications priorities
 - Issue will be raised at ESCC
 - PJM recommends using the Government Emergency Telecommunications Service [GETS](#) process for operational communications priorities
 - Review [NERC COM-002](#) requirement
 - Stakeholder communications will continue to be handled each meeting and on a case by case basis

- Unit Testing Requirements - challenges around black start and reactive testing requirements – please forward specific issues to your testing contacts at PJM
- Training / certification
 - FERC / NERC Communication – FERC is allowing for “...non-compliance with obtaining and maintaining personnel certification, as required in Reliability Standard PER-003-2, for the period of March 1, 2020 to December 31, 2020. Registered entities should notify their Regional Entities and Reliability Coordinators when using system operator personnel that are not NERC-certified.” See <https://www.nerc.com/news/Headlines%20DL/FERC%20NERC%20031820%20final.pdf>
 - For any specific PJM issues, contact PJM State & Member training for PJM CEH / waivers / extensions. (trainingsupport@pjm.com)
 - For the larger MOC generation dispatchers/owner/operators, it is very likely some of the personnel in question (those required to physically go to a unit to start it) will be field personnel (CT Techs/mobile plant operators) and thus not subject to any PJM training and certification requirements. They normally interface with the member MOC dispatcher (who may be responsible for entering RTV) who then interacts with the PJM control room.
 - See the following guidance for smaller companies that play multiple roles:
- For Generation, as it relates to PJM requirements:
 - PJM allows a 6 month grace period for individuals to operate without having met our training/certification requirements so long as they have access to an on-call resource who can help answer questions that may come up in Real-time – that could continue to be exercised here
 - This on-call resource could include former operators who have completed the training/certification exam
 - PJM is considering dedicating a PJM resource to serve as an on-call person for members to help answer questions/provide additional information to free up the real time operator from having to have some of these discussions with members
 - PJM allows for a mitigation plan process for individuals who have exceeded that 6 month grace period – that could be exercised here, as well
 - Online training is available on-demand in the PJM LMS for companies who would like to begin preparing additional staff for this potential scenario by having them complete the online ITP – this would provide them with a base background on PJM emergency procedures, etc. Companies should request that PJM set them up for this to ensure it is documented and proper credit is given.
- For Transmission requirements, it’s a little less certain – would require NERC to relax some of their control room staffing requirements, as Task Verification, Certification and Initial Training are all required by NERC Standards.

- Finally, per the request of operations, we were planning to do a refresh of real-time value (“RTV”) during the Generation Break Out session at the seminar. Based on any additional direction/information that is developed in response to this situation, we could create and push out a JIT (“Just In Time”) training module to Generation dispatchers and support personnel through the LMS and track its completion.
- Planning waivers
 - Planning waiver - <https://www.pjm.com/-/media/documents/ferc/filings/2020/20200325-er20-1392-000.ashx>
 - Members will need to initiate
 - PJM anticipates being more supportive when project’s compliance deadline or milestone was made impossible or commercially unreasonable due to the COVID-19 (and may in fact support such waivers for a limited period)
- Filing deadline extension – PJM will handle filing on a case by case basis (such as proposing a longer timeframe for comments on the MOPR compliance filing)
- NERC Reliability Standards –
 - FERC published “[FERC, NERC Provide Industry Guidance to Ensure Grid Reliability Amid Potential Coronavirus Impacts](#)” on March 18, 2020. FERC & NERC are using regulatory discretion to advise all registered entities that they will consider the impact of the coronavirus outbreak in complying with Reliability Standards. FERC is allowing for
 - non-compliance with obtaining and maintaining personnel certification, as required in Reliability Standard PER-003-2, for the period of March 1, 2020 to December 31, 2020. Registered entities should notify their Regional Entities and Reliability Coordinators when using system operator personnel that are not NERC-certified.”
 - “case-by-case non-compliance with Reliability Standard requirements involving periodic actions that would have been taken between March 1, 2020 and July 31, 2020. Registered entities should notify their Regional Entities of any periodic actions that will be missed during this period.
 - ReliabilityFirst published “[Regulatory Discretion for COVID-19 Impacts](#)” on March 24, 2020.
 - In a case of delay in compliance activities under either of the two scenarios above (PER-003-2 or Standards involving periodic actions), entities must notify ReliabilityFirst of their exception request using ReliabilityFirst's Exception Request Form.
 - PJM Compliance published “[PJM Member Company Compliance](#)” on March 30, 2020 advising Transmission Owners to contact the PJM Reliability Compliance Department if they have any concerns about completing shared or assigned tasks according to the requirements in the TO/TOP Matrix.
- FERC audit extensions – currently working to fulfil pending FERC data request in a timely manner
- Market issues:

- member should request waiver
- PJM support is issue dependent – PJM’s primary objective is safe and reliable operations
- Tariff provisions to accommodate cost payments for other emergency requisitions
 - Discussing Internally at PJM and with IRC
- Generators who are developing contingency plans to consolidate staff in the event of numerous coronavirus effects on staff – PJM will be able to provide limited outage based analysis specific to your fleet.
- PJM has provided market participants guidance for MOC remote operations in [PJM Manual 1](#) in a new Attachment F which was posted and effective on April 24, 2020.
- Some members have posed questions about situations where a unit has a forced outage but cannot get repairs completed for some extended period of time due to pandemic issues (travel bans, supply chain issues, etc.). In addition, similar questions have been raised regarding Planned and Maintenance outages that were unable to complete and may extend into the PJM Peak Maintenance Period beginning 6/8/2020 due to pandemic issues.
 - COVID-19 related work slowdowns or any stoppage should be recorded as forced outages with a cause code of 9015 (Pandemic). This cause code is an OMC cause code as it pertains to NERC GADs reporting and was appended to the NERC Data Reporting Instructions on 4/29/2020.
 - [NERC Pandemic Cause Code and Examples for GADs Reporters](#)
 - As stated in RAA, Schedule 5, paragraph B, PJM RPM rules do not allow the exclusion of NERC OMC (Outside Management Control) outages from the calculation of the Equivalent Demand Forced Outage Rate (EFORD)
 - Given these two previous NERC and PJM requirements, unit owners seeking to have pandemic related work delays under NERC OMC cause code 9015 removed from the PJM eFORd calculation should submit a waiver request to FERC.
- April 2, 2020 FERC Guidance:
 - On April 2, 2020, FERC issued a number of orders relevant to jurisdictional requirements during the COVID-19 pandemic:
 - [Policy Statement Regarding Business Continuity of Energy Infrastructure](#)
 - [Order Temporarily Delegating Further Authority](#)
 - [Supplemental Notice Granting Extension of Time for Non-Statutory Deadlines, Waiving Regulations, and Shortening Answer Period](#)
 - [Order Granting Blanket Waiver of In-Person Meeting and Document Notarization Requirements](#)
 - [Order Extending Time for Posting Required Reports](#)
 - [Notice Related to FERC Form No. 552 and FERC-730](#)
 - [Notice Related to FERC Form Nos. 60, 61, 552, and EQR Form-920](#)