

NERC TOP-002-5 Compliance Fuel Supply and Inventory Concerns

PJM Electric Gas
Coordination Subcommittee

September 4, 2025

Standard

- TOP-002-5 – Operations Planning

Purpose

- Ensures that Transmission Operators and Balancing Authorities have plans for operating within specified limits.

New Requirement:

- Section R8-8.2.2 Fuel Supply and Inventory Concerns

Effective Date of Standard

- October 1, 2025

R.8 Each Balancing Authority shall have an extreme cold weather Operating Process for its Balancing Authority Area, addressing preparations for and operations during extreme cold weather periods. The extreme cold weather Operating Process shall include, but is not limited to: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

8.1 A methodology for identifying an extreme cold weather period within each Balancing Authority Area;

Cold Weather
Advisory/Alert

8.2 A methodology to determine an adequate reserve margin during the extreme cold weather period considering the generating unit(s) operating limitations in previous extreme cold weather periods that includes, but is not limited to:

8.2.1 Capability and availability;

8.2.2 **Fuel supply and inventory concerns;**

8.2.3 Start-up issues;

8.2.4 Fuel switching capabilities; and

8.2.5 Environmental constraints.

Potential gap in
existing practices

Markets Gateway/eDART

8.3 A methodology to determine a five-day hourly forecast during the identified extreme cold weather periods that includes, but is not limited to:

8.3.1 Expected generation resource commitment and dispatch;

8.3.2 Demand patterns;

8.3.3 Capacity and energy reserve requirements, including deliverability capability; a


8.3.4 Weather forecast.

Load/generation forecasting
tools and multi-day RAC

- **NEW Section 5.13 Fuel Limitations**


- In accordance with NERC Standard TOP-002-5, Section 8.2, along with existing requirements in Manual 13, Section 3.3, PJM as the balancing authority must perform a fuel availability assessment during critical cold periods. As part of this requirement, PJM has added a section in Markets Gateway for gas generation owners to provide indication of natural gas supply availability concerns. When PJM issues a Cold Weather Advisory or Cold Weather Alert, gas generation owners will enter this page in Markets Gateway and respond by indicating whether they are anticipating gas supply concerns during the current or pending cold period. There will also be a free form text box where generation owners can add additional details relative to any supply concerns. This page will be available for update as many times as needed as circumstances change. Additionally, although gas supply availability is most critical during cold weather periods, gas generation owners will have the ability to notify PJM of any gas availability concerns throughout the year by utilizing this page in Markets Gateway for operational awareness. Any responses indicating a gas supply concern should also be followed up with updates to the Markets Gateway Unit Limitations page and/or eDART as necessary.

My Tools ▾

Market Day  6/17/2025

PJMTST ▾

PJM Interconnection ([superuser](#)) | [Sign Out](#) | [Contact](#) | [Help](#)


Markets Gateway

Bilaterals

Demand

▸ Demand Response

▾ Generator

Unit

Schedules

Dispatch Lambda

Market Results

Regulation Market

Synchronized Reserve Market

Non-Synchronized Reserve Market

Secondary Reserve Market

Unit Limitations

Interface Pricing

Opportunity Cost Calculator

Parameter Limits

Price Responsive Demand

Portfolio

Portfolio_GAS ▾

Portfolio_Reg

Location

All ▾

Unit1

Unit2

Limitations

Gas Procurement

Note that this display always shows the latest status.

Based on the currently forecasted cold temperature period, do you anticipate any difficulties in procuring natural gas for the next electric operating day?

If your response is yes, and you anticipate gas supply concerns to continue over multiple electric operating days, please specify the anticipated date range in the comments field.

If the answer is Uncertain - Please update as you gain more clarity.

PJMTST >> Portfolio_GAS

Unit Name	Procurement Status	Comment	last updated time
Unit1			
Unit2	Uncertain	Need to wait until Gas market cleared.	6/17/2025 04:40
Unit3	Yes	Procured until end of 6/17/2025.	6/17/2025 04:40
Unit4	No	Cannot procured as of start of 6/17/2025.	6/17/2025 04:40
Unit5	<null> ▾		

Yes

No

Uncertain

1	2	3
<ul style="list-style-type: none"> PJM is subject to enforcement of TOP-002-5 R8 as of October 1, 2025 	<ul style="list-style-type: none"> PJM in the process of updating Markets Gateway Unit Limitations page Targeting in production prior to start of Winter 25/26 	<ul style="list-style-type: none"> If delays in Markets Gateway implementation are encountered, PJM will conduct manual outreach to gas generation operators to assess gas availability during identified cold weather periods

Facilitator:

Andrew Gledhill,
Andrew.Gledhill@pjm.com

Secretary:

Shanna Hartung,
Shanna.Hartung@pjm.com

SME/Presenter:

Brian Fitzpatrick,
brian.fitzpatrick@pjm.com

EGC Subcommittee

A green speech bubble containing a white question mark, positioned above a blue speech bubble containing three horizontal lines, both pointing towards the contact information.

Member Hotline

(610) 666-8980

(866) 400-8980

custsvc@pjm.com

**PROTECT THE
POWER GRID**
**THINK BEFORE
YOU CLICK!**



**BE ALERT TO
MALICIOUS PHISHING
EMAILS**



Report suspicious email activity to PJM.
Call (610) 666-2244 or email it_ops_ctr_shift@pjm.com