

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

PJM Electric Gas Coordination Subcommittee

September 4, 2025

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#### **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



## Compliance

**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



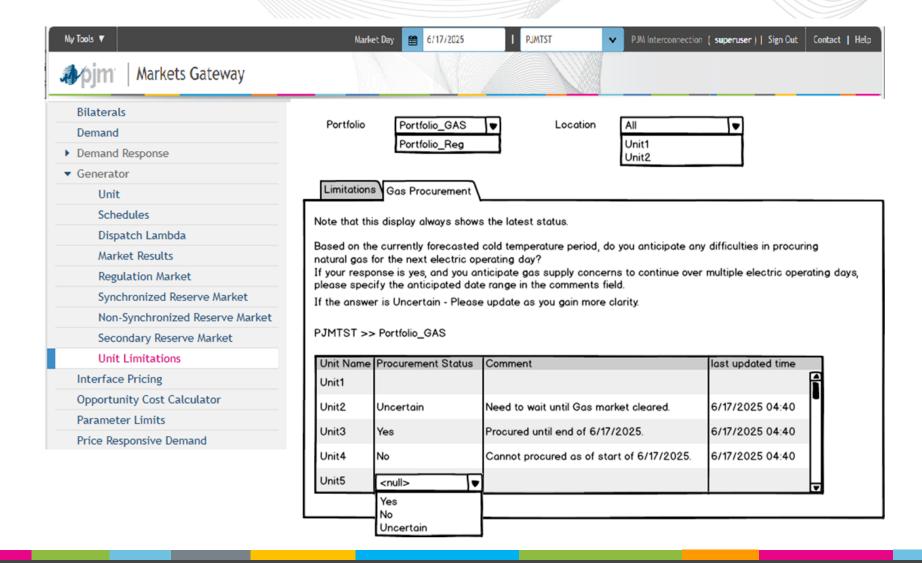
## Markets Gateway User Guide Update

#### 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.



## Markets Gateway Screen Mock Up







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PJM is subject to enforcement of TOP- 002-5 R8 as of October 1, 2025	<ul> <li>PJM in the process of updating Markets Gateway Unit Limitations page</li> <li>Targeting in production prior to start of Winter 25/26</li> </ul>	<ul> <li>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</li> </ul>





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