

# Operationalizing Gas Contingency Follow-up Items from First Education Session

Rich Brown  
Manager, Emerging Markets  
MIC Special Session  
April 6, 2018

Provide additional information regarding 'Pipeline Force Majeure' events, as a trigger for Gas Contingency Assessments.

- The term force majeure means an event that creates an inability to serve that could not be prevented or overcome by the due diligence of the party claiming force majeure.
- Examples include
  - acts of sabotage
  - freezing of wells or pipelines
  - electronic failure (SCADA or electronic measurement equipment)
  - failure affecting the ability to transport gas or operate storage facilities

- Columbia Gas Transmission – Section 15
  - <http://www.hostedtariffs.com/tco/pdf/tariff.pdf>
- Dominion Energy Transmission – Section 10
  - <http://dekaflow.dominionenergy.com/jsp/dtiTariffEntireTariff.jsp?&company=dti>
- Tennessee Gas Pipeline – Article XII
  - [https://pipeline2.kindermorgan.com/Documents/TGP/TGP\\_EntireTariff.pdf](https://pipeline2.kindermorgan.com/Documents/TGP/TGP_EntireTariff.pdf)
- Texas Eastern Transmission – Section 17
  - <https://infopost.spectraenergy.com/regulatory/tariff/TETLPVolumeNo1.pdf>
- Transco – Section 11
  - <http://www.1line.williams.com/Shared/files/redirect.html?/Transco/files/Tariff/TranscoTariff.pdf#nameddest=CoverPage>

What communication enhancements did PJM implement post Polar Vortex?

- Annual PJM Operator Training
  - Greater specificity on communication details
    - Ability to meet parameters in Markets Gateway vs. ‘do you have enough gas’
    - Provide estimated run profile vs. ‘buy gas’
- FERC Order 787
- Gas / Electric Coordination

## References related to PJM's authority to issue operating instructions

- [PJM Operating Agreement](#)
  - Section 1 (Definitions), Emergency
  - Section 11.3 (Member Responsibilities)
  - Section 10.4 (Duties and Responsibilities)
  - Schedule 1, Section 1.6.2 (Office of the Interconnection, Scope of Services)
  - Schedule 1, Section 1.7.4 (General Obligations of the Market Participants)
  - Schedule 1, Section 1.7.11 (Emergencies)



- [PJM OATT](#)
  - Attachment K-Appendix
- [Manual 03: Transmission Operations](#)
  - Section 5 'Gas-Pipeline Contingency Analysis Procedure'
- [Manual 13: Emergency Operations](#)
  - Section 3.8 'Assessing Gas Infrastructure Contingency Impacts on the Electric System'
- NERC Operating Procedure [EOP-011-1 Emergency Operations](#)

[PJM Operating Agreement](#), Schedule 1, Section 1.6.2 (Office of the Interconnection, Scope of Services) and Parallel Provisions in [PJM OATT](#), Attachment K-Appendix

- (v) Determine and declare that an Emergency is expected to exist, exists, or has ceased....;
- (vii) Coordinate the curtailment or shedding of load, **or other measures appropriate to alleviate an Emergency, in order to preserve reliability in accordance with NERC**...to ensure the operation of the PJM Region in accordance with Good Utility Practice and this Agreement....” (Emphasis added.)

## NERC Operating Procedure [EOP-011-1 Emergency Operations](#)

- “Each Balancing Authority shall develop, maintain, and implement one or more ...Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable:
  - 2.2. Processes to prepare for and mitigate Emergencies including:
  - 2.3.2. fuel supply and inventory concerns;
  - 2.2.3.3. fuel switching capabilities; and...”

- How are these operating instructions considered in the DA market, if they're known early enough to be considered in the DA market solution?