2024 PJM TO/TOP Audit Program
TO Audit Preparation Sheet

Provide to PJM before audit

At least 75 days before the audit date: Data Sampling Request
1. List of Alternative Interpersonal Communication test dates initiated by Member TO (COM-001 R9)
2. List of Interpersonal Communication Failures (COM-001 R10)
3. All operator Logs and corresponding voice recordings for PJM Operating Instructions relating to an Emergency (COM-002 R6) and GMD events (EOP-010 R3.2, R3.3)
4. Operator logs and corresponding voice recording (IRO-001 R2, TOP-001 R1, R5,R12, R14):
   a. All PJM Operating Instructions, PJM Operating Instructions for an IROL, and PJM Operating Instructions for an SOL during the following dates and times:
      1. 0600 to 1000, and 1600 to 1800 on April 11, 2023
      2. 0600 to 1000, and 1600 to 1800 on September 18, 2023
5. Correspondence with PJM of relevant Planned and Unplanned data outages for the months of March, June, and November for each audit year (TOP-001 R9, R16)
6. Provide corresponding ratings for the list of facilities identified by PJM (FAC-014 R2) demonstrating that they are the same as the ones sent to PJM
7. List of instances where a SOL difference was discovered (TOP-001 R18)
8. Complete and return attached TOP-001 R21 data sheet
9. List of operators that were on shift since the last PJM TO/TOP audit (or since integration), including PJM certification number, NERC certification number, the date they became an operator and, if applicable, the date they stopped being an operator

At least 60 days before the audit date
1. Main audit location (address) and recommended local hotels (any special rates?)
2. Any special security requirements of the auditors when entering your facility
3. Please let us know if we may visit your facilities or if you wish to do the audit virtually

At least 45 days before the audit date
Submittal of all completed (MTAW/RSAW) packaged evidence

Evidence Cutoff Date

The evidence cutoff date is 120 calendar days before your Audit date. No evidence needs to be addressed after the cutoff date.

On-Site Audit Days

Items to cover in your Opening Presentation
1. Number of customers
2. Approximate peak load last year, all-time peak
3. Number and size of generators (generally) within geographical footprint
4. Transmission voltages in your area under your control
5. Organizational chart for operations, planning and IT/EMS support
6. List and description of operating positions (people communicating with PJM and anyone that supports them with reliability analysis or monitoring)
7. List of interconnections with neighbors
8. List of PJM operations and planning committees, subcommittees or working groups that your employees participate on
9. Any operating issues (high/low voltage, recruitment/retention, supply chain, etc.)

10. Review your Internal Controls program

Items to assist in evidence gathering
1. List of instances where PJM relied on Member TO to perform real-time assessment (TOP-001 R13):
    1. 05/10/2021 02:28 – 03:21
    2. 10/18/2021 22:18 – 23:30
    3. 05/29/2022 01:18 – 01:50
2. TOP-001 R21 data sheet

TOP-001 R21
Evidence.xlsx

In the room for the audit
1. Name tents for PJM auditors and people presenting
2. Projector and appropriate cables for direct connection to a laptop
3. Transmission map of your footprint for casual viewing
4. Voice communication system diagram
5. EMS and data communications diagram
6. Any other complicated diagrams that would be hard to see when projected
7. Wifi connections for the auditors
8. For each audit, PJM will work with the Member TO in determining time schedules and any sustenance needs

The PJM Audit Team will need a small room for private discussions and creating the final presentation

Primary Control Center tour desired review (similar for the back-up)
1. Operator stations
2. Supervisor station, if applicable
3. Documentation (may be printed and/or electronic)
    a. Internal operator manuals
    b. PJM Manuals (M1, M3, M13, M36)
    c. Restoration plan (EOP-005)
    d. Plan for loss of Primary Control Center (EOP-008)
    e. Phone numbers (generators, neighbors, PJM, etc.)
4. Overview of tools (load shedding, reactive control, SVC, RAS/SPS, GMD etc.)
5. Point out all voice communication methods
6. Review of fire detection/suppression systems
7. Grab bag (items to take to the backup control center when evacuating), if applicable
8. Review of building electrical service: redundant feeds, batteries, generators, fuel supplies, etc. (May be done in the meeting space or as part of the opening presentation. No need to tour.)

Provide to PJM after the Audit (within two weeks)
1. Copy of the TO Opening Presentation
2. List of all involved presenters in a format that can be copied and pasted
3. List of titles of evidence presented for each requirement in a format that can be copied and pasted (e.g. EMR-007 – Evacuation Procedures)

Note: Suggested tool for submitting Data Sampling Request and packaged evidence is via the PJM Secure Share Tool https://secureshare.pjm.com/ .

The 2024 TO/TOP Audit Preparation Sheet is applicable to the Member TO audited in 2024.
Questions: PJM NERC Compliance | Regional_Compliance@pjm.com