

RCMS PAPER

RCMS C-M5 REPORT RECOMMENDATION 3 - TASK 3

Background

The RCMS report, *Reliability Compliance Review of 2004 NERC-GADS Outage Data Misreporting Event* (RCMS C-M5 Report), dated November 26, 2008, included seven recommendations to the Executive Committee (EC). Recommendation 3 included four tasks. Task 1, which requested RRS to interpret Measurement C-M5, has been completed and approved by the EC. The Appendix provides this interpretation. Task 2, which has also been completed by RRS, concluded that the definition of C-M5 that the NYISO has been using to measure market participant compliance with C-M5 (see Issue #1 in RCMS C-M5 Report) is inconsistent with the RRS C-M5 interpretation.

Task 3, the subject of this paper, reads: “Depending on the outcomes of Tasks 1 and 2, RCMS shall recommend to the Executive Committee whether a compliance review of previous cases of outage data misreporting is warranted.” Following review of the Tasks 1 and 2 outcomes and a NYISO data request, RCMS developed a Task 3 recommendation. This recommendation is included in this paper.

Task 4, to develop revised reliability rule and measurement requirements for outage data reporting and data review, is underway via PRR 101.

RCMS Review

The RCMS C-M5 Report states under Issue #1 that the NYISO reported to RCMS that several audits conducted by the NYISO MMU since 2001 uncovered generating unit outage data misreporting events. Recognizing the RRS C-M5 interpretation, some of these outage data misreporting events have the potential of violating NYSRC rules. To further examine this compliance issue, on February 12, 2009, RCMS requested the NYISO to provide preliminary information on the number of instances between 2006 and 2008 that EFOR_d data had to be restated because outage data reported to the NYISO was found to be to be incorrectly reported. A summary of the NYISO response¹ is as follows:

- During 2006 to 2008, seven different market participants² were requested to restate their GADS outage data because incorrect data was found by the NYISO. For some of these market participants, the GADS outage data for more than one generating unit was restated. In all cases, the incorrect outage data was submitted to the NYISO during 2004 and 2005.
- The GADS outage data for all seven market participants above were restated after the EFOR_d data had been used in IRM studies. Base case IRMs for the 2006 through 2009 capability years may have been affected. Under the C-M5 interpretation shown in the Appendix, this could have constituted a violation of C-M5. It should be noted, however, that in March 2006 a modification to C-M5 was adopted by the EC to include the

¹ Letter from Henry Chow, Vice President, Resource Planning, to A. Adamson, dated April 13, 2009.

² Five in 2006, one in 2007, and one in 2008.

requirement that “accurate resource outage data” shall be reported. Therefore, submission of incorrect outage data prior to March 2006 should not constitute a NYSRC Reliability Rules violation.

Conclusions

Although there were several cases wherein incorrect outage data from several market participants had to be restated during 2006-2008 after the data was used in IRM studies, in all cases this data was initially submitted to the NYISO prior to 2006 when C-M5 did not require the reporting of “accurate resource outage data.” Therefore, there were no rule violations for the seven market participants for which outage data had been restated during 2006-2008. However, to the extent the NYISO finds in the future that incorrect outage data were used in IRM studies which was submitted to the NYISO after March 2006, C-M5 non-compliance could be assessed by RCMS in accordance with NYSRC Policy 4 procedures.

Because of the generating unit outage data accuracy compliance concerns that have been raised by the NYSRC, the NYISO has made an effort towards improving its outage data reporting and screening processes. We believe that substantial progress have been made in these areas. Mitigation efforts have included a program to improve the NYISO outage data screening process and conduct of a NERC-GADS workshop in early April. Further, the NYISO has cooperated in the implementation of many other RCMS C-M5 Report recommendations. Several are now complete, with substantial progress made in the remaining recommendations.

In addition, the development of revised outage data reporting and review requirements as defined in PRR 101 should lead to more accurate EFOR_d data for use in NYSRC and NYISO reliability studies. The NYISO has offered many positive suggestions in the preparation of this PRR

Appendix

RRS INTERPRETATION OF C-M5

Reliability Rule C-R2

Resource availability data required for the analysis of the reliability of the *NYCA* shall be collected and maintained. Data shall include forced, partial, and maintenance outage and load response statistics for resources located in/or serving the *NYCA*, covering an appropriate historical period.

Measurement C-M5

Owners of resources located in or serving the *NYCA* shall provide to the NYISO accurate resource outage and load response data on a timely basis for their units in accordance with NYISO procedures, tariffs and schedules.

RRS Interpretation of C-M5

The following interpretation of the meaning of the term “accurate resource outage data” in C-M5 was developed by RRS:

The intent of this term is that outage data reported by market participants to the NYISO shall be accurate (correct) prior to being used for IRM studies or other NYSRC or NYISO study or market applications; and that any misreported data that is submitted by market participants shall be identified by the NYISO using due diligence procedures for data screening and scrubbing to ensure the outage data is correct when it is used for these applications. A reportable violation of Measurement C-M5 arises when erroneous outage data is not identified and corrected by due diligence procedures before it is used in NYSRC or NYISO study applications.