

To: Philip (Don) Raymond, NYS Reliability Council

From: Rick Gonzales, VP Operations

Date: November 5, 2009

Subject: Request for NYSRC modifications to Exceptions to Reliability Rules

In accordance with NYSRC measurement E-M9:

E-M9 The NYISO shall annually review exceptions to the NYSRC Reliability Rules granted under NYSRC Policy 1, *Procedure for Reviewing, Developing, Modifying, and Disseminating NYSRC Reliability Rules*. This review shall verify that the basis for each exception is still valid. The NYISO shall notify the NYSRC when it has determined that an exception is no longer applicable and document the reasons why. The NYISO shall revise the list of exceptions after the NYISO receives agreement from the NYSRC on the results of its review.

The 2009 annual review of exceptions to the NYSRC Reliability Rules granted under NYSRC Policy 1, *Procedure for Reviewing, Developing, Modifying, and Disseminating NYSRC Reliability Rules* was conducted in October. The following modifications to the exceptions list have been requested.

Exception #9 Post Contingency Flow on Oswego-Volney:

NGrid has reviewed the list of exceptions. National Grid Exception #9 regarding Post Contingency Flows on Oswego - Volney #12 is no longer valid. Since this exception was created Oswego TB#7 was installed. With the addition of TB#7, the Oswego - Volney #12 remains under Summer LTE ratings for the contingency. Therefore NGrid request that this exception be removed from the Exceptions List.

Exception # 13 - Post Contingency Flows on Niagara Project Facilities:

As a means for preventing possible misconceptions on the use of this exception, NYPA is proposing that bullet #3, which specifically addresses the allowance or post-contingency flows up to the STE rating on the Niagara-Robinson Road 230kV Line #64 be ELIMINATED. This bullet entry is redundant since the applicability of this exception to the #64 Line is covered under the second bullet which applies to ALL Lines connected directly to the Niagara Project.

Aside from this change, Exception No.13 is hereby verified as still VALID.

Exception # 19 - Post Contingency Loading on Poletti Feeders Q35L and Q35M:

This exception will remain valid until 23:59h January 31, 2010, when the Charles Poletti Power Project will cease operation. NYPA requests that this exception be rescinded at that time and be classified as no longer valid, and post-contingency loading on Q35L and Q35M shall not, as per Criteria, exceed LTE loading for loss of one of these circuits on the other. NYPA will no longer be amenable to increased loss-of-life on these facilities. There is no adverse reliability impact that would result from the removal of the exception.

As per E-M9, the NYISO shall revise the list of exceptions upon agreement from the NYSRC on the results of its review.

A red line of the proposed "Exceptions to Reliability Rules" is attached.

Respectfully submitted.