

**Third Draft Meeting Minutes**  
**New York State Reliability Council, L.L.C. (NYSRC)**  
**Reliability Compliance Monitoring Subcommittee**  
**Meeting No. 119 – December 3, 2009**  
**NYSERDA Offices – Albany, NY**

**Members and Alternates:**

|                         |                                       |
|-------------------------|---------------------------------------|
| Steve Fanning, Chairman | National Grid                         |
| Jeff May                | Central Hudson Gas & Electric         |
| Joharath Kutty          | New York Power Authority              |
| Anie Philip, Secretary  | LIPA                                  |
| Jonathan Appelbaum      | LIPA                                  |
| Leyvi Gelman            | Consolidated Edison Co. of NY - Phone |

**Others:**

|              |                       |
|--------------|-----------------------|
| Al Adamson   | NYSRC/RCMS Consultant |
| Paul Kiernan | NYISO                 |
| Greg Campoli | NYISO                 |

**Guests:**

|                  |                                 |
|------------------|---------------------------------|
| Edward C. Schrom | NY Department of Public Service |
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**1. Introduction & Request for Additional Agenda Items**

Mr. Fanning opened the meeting with introductions. Two more agenda items were added based on the request from NYISO. The first one was added under “5.8 – NYISO Communications under Emergency Conditions (J-R2 and J-M3)”. The second agenda item was added under item #9 to discuss NYISO issued non-compliance letters due to the misreporting of GADS data.

**2. Approval of Minutes for Meeting #118**

The Minutes (2<sup>nd</sup> draft) of RCMS Meeting #118 held on November 12, 2009 were approved with no comments. The approved minutes will be distributed to RCMS members and sent to Carol Lynch for posting on the NYSRC Web site, with a copy to Don Raymond.

**3. Review of Action Items List**

The following open action items were mentioned:

- Action Item #103-3: remains open; PRR not yet drafted
- Action Item #108-4: remains open
- Action Item # 117-9: remains open; due in April 2010; reassigned to P. Kiernan
- Action Item # 118-1: complete, to be discussed in Agenda item # 4.41.
- Action Item # 118-2: complete, to be discussed in Agenda Item #6
- Action Item # 118-3: dismissed

## **4. NERC/NPCC/NYISO Activities**

### **4.1 NYISO 2008/2009 NERC/NPCC Compliance Program Status**

Mr. Kiernan reviewed the latest NPCC & NYSRC requirements for which the NYISO has submitted data and is in full compliance.

### **4.2 NERC Standards Development Update**

Mr. Appelbaum discussed issues related to NERC standard COM-003 and updated RCMS regarding the upcoming balloting for the NPCC Regional Standard PRC-002-NPCC-1.

### **4.3 NPCC Compliance Committee Report**

Mr. Appelbaum discussed the NPCC Compliance workshop that was held from December 2 to December 3, 2009 at Albany.

### **4.4 Other NERC, NPCC and NYISO Activities**

Mr. Kiernan updated RCMS regarding the development of GADS screening tool and reported that significant progress is underway.

#### **4.4.1 NYISO Audit Results**

Mr. Adamson submitted a letter to Mr. Rick Gonzales at the NYISO requesting the non-public version of the NYISO audit report be made available to RCMS for its review. Mr. Adamson updated RCMS that he was informed by Mr. Paul Gioia that Mr. Adamson should be able to review the non-public version of the audit based on the existence of a confidentiality agreement. Mr. Gioia will discuss the issue with Mr. Patka, NYISO counsel. RCMS members believe that all RCMS members have the right to obtain confidential information from the NYISO related to the fulfillment of the RCMS compliance monitoring function. Mr. Fanning agreed to raise this issue at December 4<sup>th</sup> Executive Committee meeting. Mr. Campoli said he would notify Mr. Patka concerning this issue.

## **5. NYSRC 2009 Reliability Compliance Monitoring Program**

### **5.1 2009 Compliance Monitoring Program Summary Update**

Mr. Adamson reviewed an update of the 2009 Compliance Monitoring Program summary. The compliance review of 2009 Transmission Assessment (B-M1, B-M2, B-M3, I-M4, K-M2a and K-M3) is scheduled to be discussed in January 2010. Mr. Adamson also noted that compliance reviews related to the 2008 transmission assessment were completed in early 2009. For consistency and clarity purposes, it was agreed to indicate the study year and compliance assessment year clearly in the NYSRC reliability compliance program. Mr. Adamson agreed to update the 2009 scorecard with a footnote reflecting the compliance review of 2008 transmission

assessment in 2009 calendar year *(AI# 119-1)*. Mr. Adamson will also update the 2010 scorecard with the corresponding footnote reflecting the compliance review of 2009 transmission assessment in 2010 calendar year *(AI# 119-2)*.

## **5.2 Operating Report for November 2009**

Mr. Campoli requested that review of the operating report for November 2009 be delayed to the January meeting due to the early date of the RCMS meeting, and the operating report for November 2009 was not yet available. RCMS agreed and postponed compliance ruling discussion of the operating report for November 2009 to the January 2010 RCMS meeting.

## **5.3 Procedures for Reporting Generation Unit Availability Data (C-M4)**

Mr. Adamson reported that some comments were provided to the original C-M4 self certification form sent by NYISO and NYISO amended the C-M4 self certification form. Mr. Adamson also requested that the NYISO include compliance documentation references in the self certification forms in the future as a good practice. NYISO submitted corporate procedure TRG-2 on the Generator Availability Data System (GADS) training as supporting documentation for the C-M4 self certification form. RCMS discussed the issue of promoting GADS training offered by NYISO to market participants. Currently the GADS training is mentioned in the above NYISO corporate procedure which is not available to the public. Mr. Adamson mentioned that the C-M5 report recommended providing strong encouragement to market participants to attend GADS workshops. However, Mr. Campoli stated that the NYISO does not have the authority to mandate training due to the tariffs. In addition, Mr. Campoli also stated that the NYSRC Rule does not explicitly require NYISO to strongly promote the training. Since the goal here is to have correct outage reporting, RCMS agreed that making the notifications about the training in the ICAP Manual, a public document, would meet the encouragement and notification issues. RCMS requested to Mr. Campoli to research whether there is a statement regarding the GADS training in the NYISO ICAP manual and if there is not, NYISO needs to incorporate this requirement in the ICAP Manual or investigate other methods to identify GADS training to market participants *(AI# 119-3)*. RCMS also agreed that TRG-2 could be expanded to include notifying MPs about GADS training workshops. Mr. Campoli suggested extending the time frame for rule change approvals over one cycle of implementation plan in future to identify issues that are not explicitly stated in the rule. Mr. Adamson reminded Mr. Campoli that the NYISO approved a C-M4 Implementation Plan in PRR 101, which required a procedure on training programs (C-M4.3) be available by 12/1/09. RCMS also agreed that there could be unforeseen gaps in the Reliability Rules, but concluded that this is not the preferred approach. Based on the discussions, RCMS identified the need to consider the lessons learned in future rule revisions. Mr. Adamson indicated that the requirement for identifying GADS training to market participants will be reflected in the scorecard. RCMS reviewed the self certification form with the supporting document and found the NYISO to be in full compliance with Measurement C-M4 for 2009.

## **5.4 Reporting of Generating Unit Outage Data to the NYISO (C-M5)**

NYISO submitted the amended C-M5 self-certification form based on Mr. Adamson's recommendation on the "comments" section of the form. RCMS reviewed the amended C-M5

self certification form and found the NYISO to be in full compliance with Measurement C-M5 for 2009.

### **5.5 Certification that Disturbance Monitoring Recording Devices Have Been Installed and Data Reported (C-M13)**

RCMS reviewed the C-M13 self certification form and found the NYISO to be in full compliance with Measurement C-M13 for 2009. Going forward, RCMS recommended to change the sentence in the self-certification form from “The NYISO hereby certifies the Market Participants have met the requirement defined by the level of compliance as certified below” to “The NYISO hereby certifies the Market Participants have met the level of compliance as indicated below”.

### **5.6 NYISO Annual Exception Review (E-M9)**

Mr. Campoli provided the background regarding the amended E-M9 self certification. The original E-M9 incorrectly indicated that the EC approved the exceptions changes. Since EC did not approve the exceptions, the E-M9 was amended reflecting the change. Mr. Campoli reported that the NYISO will consider re-issuing the letter to NYSRC EC with the exception changes, stating that the corresponding exception changes did not adversely impact the reliability of the NYS system. RRS supported the changes and this will be discussed at the December 4<sup>th</sup> EC meeting. As a future recommendation, RCMS recommended to change the sentence in page 2 of E-M9 self certification form from “Each Transmission owner has confirmed the exceptions remain valid with the following modifications” to “Each Transmission owner has confirmed the exceptions remain valid with the following recommended changes”. RCMS reviewed the self-certification form and found the NYISO to be in full compliance with Measurement E-M9 for 2009.

### **5.7 Review of January 2010 Compliance Assessments: 2009 Transmission Assessment (includes B-M1-M3, I-M4, K-M2a, and K-M3)**

Mr. Adamson reviewed the January 2010 compliance assessments. Mr. Campoli indicated that the reports are due by the end of December 2009.

### **5.8 NYISO Communications under Emergency Conditions (J-R2 & J-M3)**

RCMS reviewed the NYISO report of two EMS outages that occurred at Central Hudson and LIPA. These notifications are based on the NYSRC Rule J-R2 and measurement J-M3. RCMS was satisfied with the level of submittals and the agreed with the NYISO approach.

## **6. RRS Interpretation of G-M1 Requirements – A. Adamson**

### **6.1 RRS Interpretation**

Mr. Adamson sent a letter with G-M1 interpretation request to RRS. Mr. Adamson reported that the issue was discussed in the December 2 RRS meeting and RRS agreed with the RCMS

interpretation of the NYSRC rules. In the case of rule G-M1, the NYISO needs to incorporate procedures which specify the requirements for market participants instead of stating that Market Participants must comply with NYSRC, NPCC, & NERC rules & standards in a general statement.

## **6.2 Next Steps**

RCMS requested Mr. Adamson to perform a complete compliance documentation review of the NYISO's November 2009 G-M1 and G-M4 compliance submission, recognizing the incomplete compliance documentation tentatively identified by RCMS on November 12. Following his review, Mr. Adamson will coordinate with Mr. Dave Mahlmann to jointly identify missing documentation/procedures in the NYISO submittals (*AI #119-4*). Based on this assessment, the NYISO will then prepare any necessary supplemental compliance documentation/procedures that are required for full compliance, which will be included in the 2010 Reliability Compliance Program review of G-M1 and G-M4. RCMS concluded that there will not be any compliance actions for G-M1 and G-M4 in 2009.

## **7. 2010 Reliability Compliance Program – Preliminary List of Measurements**

Mr. Adamson created a list of 2006 – 2010 NYSRC Reliability Compliance program assessments & reasons for 2010 program selections. RCMS reviewed the list and discussed whether to keep the original numbering of the rules and measurements that were retired based on approved rule revisions. RCMS recommended retaining the original numbering for consistency and indicate “retired” for the rules and measurements that became obsolete. In the NYSRC manual, the corresponding language under the retired rules will be removed and instead will indicate “retired” in their place to ensure consistency. Depending on EC's approval of PRR 102, the current five separate measurements will be consolidated under K-M2d. These changes will be reflected in the updated NYSRC manual and the 2010 scorecard.

Mr. May inquired whether provisions can be done to store archived NYSRC manuals on the NYSRC website. Mr. Adamson agreed to archive the retired versions of the NYSRC manual on the NYSRC website to the extent they are still available (*AI# 119-5*). Mr. Appelbaum requested to Mr. Adamson to revise the references to NPCC A-5 in the H-R1 and H-M1 sections of the NYSRC manual (*AI# 119-6*). Mr. Adamson will send the revised list of 2010 Reliability Compliance Program to EC for approval, by January 2010. Mr. Adamson agreed to create the updated 2010 scorecard (*AI# 119-7*).

## **8. Review of November 13, 2009 Executive Committee Meeting**

Mr. Adamson reported on the November 13 EC meeting. The EC meeting approved a base case IRM of 17.9% for the 2010 capability year. The final IRM report is scheduled to go to EC for December EC meeting.

## **9. Discussion of NYISO Non-Compliance Letters**

Mr. Campoli discussed with RCMS regarding the two C-M5 non-compliance letters issued by NYISO for the misreporting of the outage data in the calendar year 2003 and 2004. NYISO was notified of mitigation actions from the corresponding market participants, which includes the installation of the electronic reporting tool with the review process and the validity checks. RCMS agreed that that the NYISO will not be found in non-compliance for these two cases because a C-M5 rule change requiring submission of accurate data was implemented after 2004.

## **10. Other Business**

None

## **11. Next RCMS Meeting**

The next monthly RCMS Meeting is scheduled for Thursday, January 7, 2010. The meeting will be held in the NYC conference room in the basement of the NYSERDA offices at 17 Columbia Circle starting at 09:30.

Anie Philip prepared the minutes of meeting #119.