

Carol Lynch

From: Philip Raymond [p.raymond40@gmail.com]
Sent: Thursday, August 06, 2009 3:06 PM
To: 'Hippius, Joseph J.'; roger.clayton@electricpowerresources.com
Cc: 'Pfleiderer, Roy'
Subject: RE: NYSRC Proposed Wording changes to NYSRC Rule Exceptions Policy

Guys,

I agree with Joe's comments.

Thanks,
Don

From: Hippius, Joseph J. [mailto:Joseph.Hippius@us.ngrid.com]
Sent: Thursday, August 06, 2009 11:28 AM
To: Philip Raymond; roger.clayton@electricpowerresources.com
Cc: Pfleiderer, Roy
Subject: RE: NYSRC Proposed Wording changes to NYSRC Rule Exceptions Policy

RRS is meeting right now as I write this, so it may be too late for Don's comments to be considered by them this month. Anyway, here are my thoughts:

- 1) I'm neutral to this. As a practical matter, I don't consider it likely that a full review of the entire list would be done more than once a year, but if you think adding "at least" is helpful, I'm okay with it.
- 2) I agree, but will leave it to RRS to clarify the wording.
- 3) Interesting point, and it would need some discussion by RRS. I'm not sure if the original intent of the annual review was just to weed out any exceptions that are just irrelevant due to changing system configuration or conditions, or to re-open a debate over whether the reliability impacts and economic benefits of each are in balance. But if that's what we want the review to be, the current draft will not do the job.
- 4) Probably a good idea. The second sentence of the second paragraph could be revised to read, "Within x days, the NYISO shall notify . . ." I'm open to what x should be and we should let the NYISO suggest a reasonable value for x.

Joe

From: Philip Raymond [mailto:p.raymond40@gmail.com]
Sent: Thursday, August 06, 2009 11:03 AM
To: Hippius, Joseph J.; roger.clayton@electricpowerresources.com
Subject: RE: NYSRC Proposed Wording changes to NYSRC Rule Exceptions Policy

Gentlemen,

I have a few comments for your consideration.

8/28/2009

- 1) Add "at least" in line#1.
- 2) 2nd sentence – I don't think "or required" is meant to apply to "the basis", but instead the "exception".
- 3) What does "required" mean, i.e. for reliability, economics, etc? I think we need to be careful that the NYISO does not end up with the ability to pass over removing an exception because of their views on economics.
- 4) Should a time limit be specified for NYISO response to a TO's request?

Thanks,
Don

From: Hipius, Joseph J. [mailto:Joseph.Hipius@us.ngrid.com]
Sent: Tuesday, August 04, 2009 12:45 PM
To: roger.clayton@electricpowerresources.com
Cc: rufano.r@nypa.gov; Rick Gonzales; Pfleiderer, Roy; Philip Raymond; George Loehr
Subject: NYSRC Proposed Wording changes to NYSRC Rule Exceptions Policy

Roger,

At the last NYSRC EC meeting, I agreed to suggest some language for the NYISO Review of Exceptions.

Here is my suggestion; attached is a Word document that is redlined to indicate where I've made changes.

NYISO Review of Exceptions

The list of exceptions to the NYSRC Reliability Rules shall be reviewed by the NYISO annually. The scope of the review is to verify that the basis for each exception is still valid or required, but not to question the original justification for the exception. The NYISO shall notify the NYSRC when it has determined that an exception is no longer valid or required and document the reasons for its determination. If the NYSRC concurs with the NYISO's determination, the exception will be removed and the NYISO and NYSRC will revise their list of exceptions accordingly.

In addition, a Transmission Owner may request at any time a review by the NYISO for removal of any of its current exceptions. The NYISO shall notify the NYSRC of any adverse reliability impacts that would result from the removal of the exception. The NYSRC shall determine whether the exception should be removed, giving due consideration to any reliability impacts identified by the NYISO. The NYISO and NYSRC will then revise their list of exceptions accordingly.

I made my changes against the version that was under discussion at the EC meeting. There may have been other changes suggested that I did not pick up in this draft, so please check to

be sure that if there were any, they are not forgotten.

Please review this with RRS at your next meeting.

Joe

Joseph J. Hipius

Manager, Transmission Planning - NY

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