

RRS Interpretation Request

Measurement G-M1 Requirements for NYISO Procedures that Require MP Actions

On November 12, RCMS evaluated NYISO compliance with recently revised G-M1. G-M1 specifies NYISO responsibilities for complying with System Restoration Rule G-R1, and includes several requirements that specifically require the NYISO to prepare procedures for requiring Market Participants (MPs) to take certain actions (as for example, G-M1.6, G-M1.10, and G-M1.11). The RCMS review concluded that the NYISO does not have specific procedures in place in their manuals or tech bulletins for complying with this group of G-M1 requirements. Dave Mahlmann of the NYISO stated his position that the NYISO complies with these NYSRC requirements by stating in its manuals that the NYISO and MPs must comply with all NYSRC Reliability Rules, and that therefore explicitly stating procedures that describe required MP actions, as required by G-M1, would unnecessarily be repeating rule requirements. There is such a reference to the NYSRC Rules in the NYISO *System Restoration Manual* in Section 1.1, as follows: “This Manual was written to adhere to and support the following standards...” The “NYSRC Reliability Rules – Section G – System Restoration” is listed as one standard reference.

RCMS’ view is that, when required to do so by those NYSRC measurements that state NYISO responsibilities (such as in G-M1), NYISO procedures must explicitly state MP requirements as required by these measurements, and that only referencing NYSRC Rules in NYISO manuals and tech bulletins is not sufficient to fully comply with NYSRC Reliability Rules.

Measurements G-M2 and G-M3 state TO and Blackstart Provider system restoration responsibilities, respectively, for meeting Rule G-R1. RCMS agrees that NYISO manuals are not required to explicitly state these MP requirements, and that stating that restoration plans must be consistent with NYSRC Rules, such as for example in Section 2.2 of the *System Restoration Manual*, is sufficient.

Therefore, RCMS requests that RRS provide an interpretation as to whether: (1) stating in NYISO manuals and tech bulletins that MPs must comply with NYSRC Reliability Rules is sufficient to comply with those NYSRC rules and measurements that require the NYISO to prepare procedures requiring MPs to perform specific actions (such as in G-M1); or (2) NYISO manuals and tech bulletins must include specific procedures when required to do in measurements providing NYISO responsibilities (as in G-M1) that state that the NYISO is required to prepare procedures for MP-required actions.