

Is There a Need for Revising Blackstart Measurement G-M3?

NYSRC Executive Committee
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Objective of the Discussion

- Discuss issues with Measurement G-M3
- Review how the NYISO implements G-M3 in its tariff and procedures
- Suggest that the EC request the RRS to review the issues presented and discussed at the EC and propose word changes to G-M3

Note: All highlights have been added for emphasis and are not in the NYSRC Rules nor the NYISO tariffs.

Measurement G-M3

Each *Blackstart Provider* shall complete a successful test of the startup and operation of each of its *Blackstart Facilities included in the NYCA SRP* in each capability year to demonstrate that its *Blackstart Facilities can* perform their intended functions in accordance with the procedures required in Measurement G-M1.

NYSRC Definition of Capability Year (NYSRC Rules Document – Glossary)

Capability Period - Six (6) month periods which are established as follows: (1) from May 1 through October 31 of each year ("Summer Capability Period"); and (2) from November 1 of each year through April 30 of the following year ("Winter Capability Period"); or such other periods as may be determined by the Operating Committee of the NYISO. A summer capability period followed by a winter capability period shall be referred to as a "Capability Year." Each capability period shall consist of on-peak and off-peak periods.

NYISO Tariff: Schedule 5, Appendix I (for Con Edison divested blackstart units)

- The annual test period shall be November 1st to April 30th, and may be reasonably extended by mutual agreement among the plant owner, Consolidated Edison and the ISO, without financial penalty.
- If the annual test is unable to be completed during the test period due to a forced outage or force majeure event, Consolidated Edison and the plant owner will conduct the test outside the test period without a *pro rata* reduction in annual payments.
- If a black start test is not successful, the plant owner will have a reasonable opportunity to reschedule and conduct a subsequent test.

Issues with G-M3

- The term capability year is not capitalized
 - The term Capability Year is defined in the Glossary section of the Rules document as a Summer Capability Period followed by a Winter Capability Period
 - At the very least, G-M3 must use Capability Year for compliance to be more clearly established; but this action alone is not sufficient
 - The NYISO tariff indicates that testing must be done in the period November 1 to April 30, that is, in the Winter Capability period, not in the entire Capability Year; this is to avoid testing during the summer high peak load period
 - NYISO tariff allows for testing to be done beyond its testing period under reasonable situations; is the current wording of G-M3 too rigid since the NYISO tariff in some limited cases allows for testing to be done at the start of the next Capability Year?

Questions Raised by an Example

Case : Con Edison and the NYISO find that it is reasonable to have a unit blackstart test be extended beyond April 30, 2010 in accordance with NYISO tariff

- How is compliance with the NYSRC rules established?
- For how long is it reasonable to extend the test period (fifteen days, one month, two months, six months, one year) and still be in compliance with NYSRC rules?
- From the NYSRC point of view, since the test was conducted after April 30, 2010, has the unit also satisfied testing requirements for the subsequent Capability Year ending on April 30, 2011 and, therefore, does not need to test again until the Capability Year ending on April 30, 2012?

Suggested Action

The EC requests the RRS to review issues related to G-M3, as presented here and discussed at the EC, and propose word changes to the EC.