

Request to Develop or Modify Reliability Rules (NYSRC Policy No. 1-4)
 Submit request to raymond40@aol.com via the NYSRC site www.nysrc.org

Item	Response
1. Respondent	
Name	Mayer Sasson
Organization	Con Edison
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2. Title of proposed rule change & PRR No.	Change to Blackstart Measurement G-M3:(PRR-106)
3. New rule or modification of NYSRC RR?	Modification
If a new rule is proposed, provide any relevant citation to existing standards	
If a modification to an existing rule is proposed, provide NYSRC RR reference	Measurement G-M3
4. Wording of proposed rule change	<p>G-M3. Each <i>Blackstart Provider</i> shall develop appropriate test procedures in accordance with G-M2 requirements to ensure those <i>blackstart facilities</i> that are included in the <i>transmission owner's SRP</i> are able to perform their intended functions. Each <i>Blackstart Provider</i> shall complete a successful test of the startup and operation of each of its <i>Blackstart Facilities</i> included in the NYCA SRP for each annual test period capability year in accordance with the NYISO tariff and procedures to demonstrate that its <i>Blackstart Facilities</i> can perform their intended functions in accordance with the procedures required in Measurement G-M1. A test performed within one month beyond an annual test period, or longer in force majeure cases, shall only be considered a valid test for that annual test period. Each <i>Blackstart Provider</i> shall provide documentation of these test results to the appropriate entity in accordance with <i>NYISO</i> and <i>transmission owner</i> procedures.</p> <p>In addition, each <i>Blackstart Provider</i> shall annually provide a letter to the <i>NYISO</i> confirming that it identifies and maintains a list of critical components in its facilities (i.e., batteries, diesel back-up generators, inverters etc.) and performs tests to verify the condition of these critical components in accordance with good industry practice. Test results will be provided to the <i>NYISO</i> upon request. <i>Blackstart Providers</i> shall attend <i>NYISO</i> and <i>transmission owner</i> restoration training as required. (G-R1&2)</p>
5. Rationale for proposed rule change	

Identify advantages	Makes it possible to determine compliance with G-M3 and resolves incompatibilities with NYISO tariff and procedures. The current measurement is deficient in that it: 1. Uses the term “capability year” which is undefined in lower case in the Rules document. Further, for the Con Edison area the test period should not be for an entire year because no blackstart testing is contemplated during the critical summer months. The NYISO tariff currently establishes a 6-month testing period from November 1 to April 30 for black start units in the Con Edison area. In the rest of NYCA the tariff and procedures allow for testing at any time during the Capability Year. 2. Does not contemplate the concept of an extension of the annual testing period for reasonable cases as the NYISO tariff and procedures do. 3. Does not define how long an extension can be for it to still be a valid extension, which the NYISO tariff and procedures also does not define. A one month extension period was selected to place a reasonable bound on the testing period and so that if the limit of April 30 is reasonably extended it does not go beyond May 31 to avoid scheduling blackstart tests during the critical summer period (in the Con Edison area).
Identify disadvantages	None
6. Measurement(s)	G-M3
7. Full Compliance Statement	No change proposed
8. Levels of Non-Compliance	No change proposed
Level 1	
Level 2	
Level 3	
Level 4	
9. Responsible Entity	Blackstart providers
10. Compliance Monitoring Entity	The NYISO
11. Implementation Plan	Until this PRR is approved the NYSRC will not find a blackstart provider in non-compliance with measurement G-M3 if they tested for blackstart beyond April 30 in accordance with the proposed measurement change.
12. Comments	
13. Date Rule/Measurement Adopted	
14. PRR Revision Dates	7/27/10