

**Joint Meeting of the
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Rules Subcommittee (RRS)/
Reliability Compliance Monitoring Subcommittee (RCMS)**

**RRS/RCMS Meeting at the NYSERDA Offices
17 Columbia Circle, Albany, NY
Thursday, November 3, 2011**

Final Minutes of RCMS Meeting No. 142

RCMS/RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Dean Ellis, Dyegy
Larry Hochberg, NYPA
Zoraini Rodriguez, LIPA (Phone)
Roy Pfleiderer, National Grid
Henry Wysocki, Con Edison

Non-Voting Participants:

Alan Adamson, NYSRC Consultant
Jim Grant, NYISO
Paul Kiernan, NYISO
Edward Schrom, NYS DPS

Guests:

John Adams, NYISO
Jim D'Andrea, Trans Canada-Ravenswood
Paul Gioia, Dewey & LeBoeuf (Part-Time)
Chris LaRoe, IPPNY
Martin Paszek, Con Edison (Phone, Part-Time)
Paul Savage, Con Edison (Part-Time)
Jim Orosz, Con Edison (Part-Time)
Mayer Sasson, Con Edison (Phone, Part-Time)
Carl Patka, NYISO (Part-Time)

1. Introduction

Roger Clayton broke into the RRS meeting at 10:13 a.m. in order to cover certain RCMS agenda items early in the day for the convenience of some guests. He also announced that National Grid representative Mark Stanbro will be leaving the committee and will be replaced by Joe Farella. Mr. Adamson was requested to take the minutes because of Mr. Head's absence.

These sequence of these minutes reflect the order of the agenda.

1.1. Executive Session

None Requested.

1.2. Requests for Additional Agenda Items

None requested.

2. Approval of Minutes/Action Items

2.1. Approval of RCMS Minutes #141

The minutes for meeting #141 were approved with no changes.

2.2. RCMS Action Items List

- Action Item 139-1. Mr. Grant reported that the demand response data during the July peak is expected to be available for the November 29 meeting. This item remains open.
- Action Item 141-1. This item is covered on today's agenda.
- Action Item 141-2. Mr. Grant reported that the term "pre-seasonal" fault duty study has always been the term referenced by the NYISO.
- Action Item 141-3. Mr. May is not present at today's meeting to review this item.
- Action Item 141-4. This item is on today's agenda.

3. NYSRC 2011 Reliability Compliance Monitoring Program

3.1. 2011 Reliability Compliance Monitoring Program Summary

Mr. Adamson gave a brief report on the updates to the compliance monitoring program.

3.2. NYISO Monthly Operations Report

Mr. Grant will submit the October Operations report to RCMS as soon as it becomes available.

3.3. NYISO Certification: LSE ICAP Obligations (A-M3)

Mr. Grant presented a Certification documenting that each LSE has procured sufficient capacity from Installed Capacity Suppliers to meet its ICAP requirement. After reviewing supporting documentation, RCMS found the NYISO in Full Compliance with A-M3.

3.4. List of NYS Bulk Power System Facilities (B-M4)

Mr. Grant presented a Self-Certification certifying that the NYISO is in full compliance with B-M4 and supplemental documentation showing that the NYISO has established a required procedure for developing a list of NYS BPS facilities and published this list. NYISO documentation included the NPCC A-10 procedure and a BPS list. After reviewing this documentation, *RCMS found the NYISO in Full Compliance with B-M4*. Because it is a CEII document, the 2010 CATR Appendix P will be removed from the November 3 RCMS meeting materials on the NYSRC website [AI 142-1].

3.5. NYCA Load Forecast (C-M8)

Mr. Grant presented a Self-Certification documenting that the NYISO is in full compliance with C-M8 and it has provided required load forecasts to ICS for its 2012 IRM Study. After reviewing the NYISO's self-certification documentation, *RCMS found the NYISO in Full Compliance with C-M8*.

3.6. NYISO Certification: Transmission Owner Restoration Requirements (G-M2)

Jim Grant presented a Certification certifying that the all TOs are in full compliance with G-M2 and documenting that each TO is in compliance with TO emergency restoration requirements in G-M2. A discussion ensued as to whether this rule can be interpreted as to requiring the TOs to have the responsibility that their blackstart units satisfactorily complete required blackstart tests, concluded that G-M2 does not include this TO requirement. *RCMS found the NYISO in Full Compliance with G-M2*, pending a correction under the "Comments" section – the Certification is applicable to G-M2 instead of G-R1 [AI #142-2].

3.7. NYISO Certification: Blackstart Provider Requirements (G-M3)

Mr. Grant presented a Certification certifying that all Blackstart Providers are in full compliance G-M3 except that one Provider that was found by the NYISO to be noncompliant with G-M3 for failing to perform a timely black start test for the 2011-2012 Capability Year. However, Mr. Patka asked to withdraw the G-M3 Certification because discussions with the generator are still continuing. In accordance with the NYSRC policy on lateness – to avoid a non-compliance finding – by November 28, 2011, the NYISO must submit a revised G-M3 certification [AI #142-3].

There was discussion on the NYISO Blackstart Program and Ravenswood's desire to cease providing blackstart service for this program. This issue is not related to G-M3 compliance in 2011, and is covered under Agenda Item 5.0.

Mr. Adamson asked why it took more than six months after the potential violation of G-M3 for the NYISO to notify the NYSRC, recognizing that NYSRC procedures require the NYISO to immediately notify the NYSRC when a non-compliance finding is found by the NYISO. Mr. Patka explained that all this time was taken by NYISO reviewing whether the testing had been unsuccessful, as well as related discussions with the Blackstart Provider.

3.8. Compliance Reviews Scheduled for Next Meeting

- C-M2
- C-M3
- I-M5
- I-M6

6. Policy 4-5 Draft

The NYISO staff has provided comments on the latest Policy 4-5 draft. RCMS reviewed these comments along with Mr. Adamson's suggested modifications recognizing these comments. Following discussion, RCMS agreed on a final draft that will be forwarded to the Executive Committee for approval [AI #142-4].

5. Ravenswood Blackstart Status – NYISO Blackstart Program

TC Ravenswood has informed the NYISO that it wishes to cease providing black start service for three of its units on September 30, 2011. However, the NYPSC recently ruled that Ravenswood has an obligation to continue providing this service. Ravenswood objects to the NYPSC ruling.

As a result, a compliance question emerges: If the three Ravenswood units were to drop out of the Blackstart Program, would that constitute a violation of the NYSRC Rules and NYISO procedures? There was extended RCMS discussion on this question, a summary of which follows: The NYSRC RRs require that the NYCA system shall be restored in a prompt manner following a blackout and that there shall be adequate blackstart facilities necessary for meeting NYISO system restoration requirements. Therefore, it appears that the ability of a blackstart provider to withdraw from the NYISO blackstart program may pose a threat to NYCA reliability. In order to establish if there would be a rule violation, one fact that RCMS must know is how the NYISO and Con Ed define "prompt restoration" and "adequate blackstart facilities". How do the NYISO and Con Ed determine what constitutes adequate blackstart capability? Blackstart service is a wholesale service under a NYISO tariff. Therefore, there are market incentives that determine a generator's desire to be a part of the blackstart program. How can this market issue be satisfactorily resolved so as to avoid compromising reliability?

RCMS agreed that in order for it to be able to properly assess whether there is adequate NYCA blackstart capability to meet NYSRC rules, or whether there is a rule violation if a Blackstart Provider elects to cease providing blackstart service, it needs to have a better understanding of the above issues and questions. To accomplish this objective, RCMS agreed to request the NYISO and Con Edison to make a presentation to RCMS on January 5, 2012, based on questions provided in advance by RCMS. Mr. Adamson was requested to draft a letter to the NYISO and Con Edison stating the scope of the presentation with specific questions. The draft will be reviewed at the November 29 RCMS meeting [AI #142-5].

6. Plan for Preparing 2012 Reliability Compliance Program

Mr. Adamson reviewed the schedule for developing the 2012 Reliability Compliance Program, as follows:

- Mr. Adamson will draft a recommended list of measurements to be included in the 2012 Program, to be reviewed by RCMS at its next meeting [AI #142-6].
- A partial “2012 Scorecard” (without dates and compliance documentation requirements) will be prepared for review at the January 5 RCMS meeting – submit to the EC.
- Prepare preliminary dates and required compliance documentation in January.
- Meet with NYISO staff to review preliminary dates and compliance documentation requirements and consider NYISO comments (before February RCMS meeting).
- Complete “2012 Scorecard” at February 2 meeting and submit to the EC for approval.

7. Self-Certification/Certification Form Modification

Mr. Adamson was requested at the last RCMS meeting to prepare a suggested change in the subject forms that would add compliance documentation requirements applicable to the measurement, similar to that shown in the Scorecard. Mr. Adamson reviewed an example of a suggested form revision with this change that he had prepared. RCMS accepted Mr. Adamson’s suggested form revision and requested the NYISO to utilize this change in future self-certification/certification forms [AI #142-7].

8. NYISO/NPCC/NERC Activities

8.1. NYISO 2011 NERC/NPCC Compliance Program Status

Mr. Grant reviewed the latest NYISO’s compliance tracker and noted that the NYISO is up to date.

8.2. NPCC Standards/Criteria Development Update

This was covered during the RRS portion of the joint meeting.

8.3. NERC Standards Development Update

This was covered during the RRS portion of the joint meeting.

8.4. NPCC Compliance Committee Report

No report.

8.5. Other NYISO, NPCC, and NERC Activities

None

9. Reports

9.1. NYSRC EC Meeting Report

This was covered during the RRS portion of the joint meeting.

9.2. NYSRC ICS Report

This was covered during the RRS portion of the joint meeting.

10. Additional Agenda Items

None.

11. Next Meeting #143: Tuesday, November 29, 2011, 9:30 am @ NYSERDA, 17 Columbia Circle, Albany, NY.

The meeting unexpectedly closed at 2:00 pm when the NYSERDA fire alarm rang.