



## **New York State Reliability Council Comments on Directory 1**

The New York State Reliability Council (NYSRC) respectfully submits comments on the subject draft Directory 1 revision which was posted on December 11, 2013 for review and comment.

The NYSRC generally supports the posted version of Directory 1, and submits the following comments for consideration:

### General Comment

Our review of the Directory 1 draft would have been made easier if a redline version had been made available along with a clean version. Changes were not only made in the reliability criteria section of the Directory, but also in its many appendices. Comparing this 50-page draft with the most recently posted December 1, 2009 version was very difficult without having a redline version available. We strongly suggest that the next Directory 1 draft include a redline version.

### Specific Comments

1. The *NPCC Directory Development and Revision Manual* indicates in its Introduction that each directory identifies NERC ERO Standards that are associated with the directory. This Directory 1 draft does not include such a list of associated NERC Standards. We also note that other NPCC directories include a lead in sentence to the criteria, such as: "These criteria are in addition to, more stringent than, and more specific than NERC or any Regional reliability standard requirements." A similar sentence is not included in the Directory 1 draft.
2. A new sentence has been added to the Resource Adequacy Criterion Requirement R4.1 in this Directory 1 draft as follows: "In the calculation of available resources, supply-side purchases from neighbouring systems are limited to firm capacity backed purchases." We understand that this sentence was taken from an earlier version of the Introduction of Appendix D – *Guidelines for Area Review of Resource Adequacy*. The paragraph from

which this sentence was taken describes types of supply and demand-side facilities that contribute to resource capacity. There is no indication as to why this particular type of supply-side measure was singled out for inclusion in R4.1 when many other important types of supply-side and demand-side components included in resource adequacy reviews were not also incorporated in the Resource Adequacy Criterion draft revision. Notwithstanding this, the NYSRC maintains that the *Guidelines for Area Review of Resource Adequacy* – not the reliability criterion – continues to be the appropriate document for describing requirements for load and capacity models and assumptions that are incorporated in Area resource adequacy assessments. We note that the above referenced paragraph describing supply-side and demand-side facilities in the 12/1/2009 version of Appendix D was removed in this Directory 1 draft. It should be restored – it has not been demonstrated that this information is no longer needed in Appendix D.

3. Requirement R8 requires that credible combinations of certain specified system conditions that stress the system be modeled. However, R8 does not specify the objective or use of this modeling requirement, e.g., whether it is intended by R8 that the system shall be designed to meet such combinations of system conditions.
4. The following note appears in Tables 1-3: “Compliance with Directory #1 shall be demonstrated for all requirements listed in the table below that are not required for compliance with the NERC Reliability Standards.” This note suggests that some requirements in these tables are NERC Standard requirements. Without specifying which requirements in these tables are associated with NERC Standards, how can compliance with Directory 1 be demonstrated?