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December 22, 2017

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

> Re: New York State Reliability Council, L.L.C. Docket No.

Dear Secretary Bose:

Pursuant to Section 3.03 of the New York State Reliability Council Agreement ("NYSRC Agreement"),¹ the New York State Reliability Council, L.L.C. ("NYSRC") hereby submits this filing to advise the Federal Energy Regulatory Commission ("Commission") that the NYSRC has revised the Installed Capacity Requirement ("ICR") for the New York Control Area ("NYCA") for the period beginning on May 1, 2018 and ending on April 30, 2019 ("2018-2019 Capability Year"). The NYSRC respectfully requests that the Commission accept and approve the NYSRC's filing effective no later than February 15, 2018, so that the revised ICR may be in place for the installed capacity

¹ The NYSRC Agreement is available on the NYSRC website, www.nysrc.org, under Documents/Agreements.

and other relevant factors, the NYSRC Executive Committee determined that an IRM of 18.2% would meet the applicable resource adequacy criteria for the 2018-2019 Capability Year. A copy of the Study is attached hereto as Attachment A, and the resolution adopted by the Executive Committee with respect to its IRM determination is attached hereto as Attachment B. The 2018 IRM Study may be found on the NYSRC website, www.nysrc.org, under Documents/Reports.

Since the 18.2% IRM for the 2018-2019 Capability Year adopted by the NYSRC represents a change from the 18.0% IRM approved for the 2017-2018 Capability Year, Commission approval of the filing is required under Section 3.03 of the NYSRC Agreement. The NYSRC requests that the Commission accept and approve this filing and the revised IRM effective no later than February 15, 2018 so that the revised IRM is in place for the installed capacity auction to be conducted by the NYISO on March 30, 2018.

II. Background

The NYSRC was approved by an order issued by the Commission in 1998,² and subsequent Commission orders,³ as part of the restructuring of the electricity market in New York State and the formation of the NYISO. In its orders, the Commission approved the NYSRC Agreement among the members of the New York Power Pool ("NYPP"), which established the NYSRC and described its responsibilities, and the

² Cent. Hudson Gas & Elec. Corp., et al., 83 FERC ¶ 61,352 (1998), order on reh'g, 87 FERC ¶ 61,135 (1999).

³ Cent. Hudson Gas & Elec. Corp., et al., 86 FERC ¶ 61,062 (1999); Cent. Hudson Gas & Elec. Corp., et al., 87 FERC ¶ 61,135 (1999); Cent. Hudson Gas & Elec. Corp., et al., 88 FERC ¶ 61,138 (1999).

auction to be conducted by the New York Independent System Operator, Inc. ("NYISO") on March 30, 2018. The NYISO has informed the NYSRC that it needs the period between February 15, 2018 and March 30, 2018 to: (i) determine, in conjuction with the NYISO's Operating Committee, the Locational Capacity Requirements for the three Localities in the New York Control Area ("NYCA"): New York City (NYISO Zone J), Long Island (NYISO Zone K), and the nested Locality of NYISO Zones G through J; (ii) define capacity import rights for the coming year; (iii) inform load serving entities ("LSEs") of their minimum capacity requirements for the March 30, 2018 capacity auction. The NYSRC also respectfully requests that the Commission grant any and all waivers of its regulations that it deems necessary to accept and approve the filing effective no later than February 15, 2018.

I. Summary

On December 8, 2017, the NYSRC Executive Committee adopted a required Installed Reserve Margin ("IRM") of 18.2% for the NYCA for the 2018-2019 Capability Year. The Executive Committee's decision was based on a technical study, the New York Control Area Installed Capacity Requirement for the Period May 2018 through April 2019, Technical Study Report ("2018 IRM Study" or "Study") dated December 8, 2017, and other relevant factors. The 2018 IRM Study results indicate that, under base case conditions, a NYCA IRM for the 2018-2019 Capability Year of 18.2% would satisfy the NYSRC's resource adequacy criteria, set forth in the NYSRC's Reliability Rule A.1, Requirement R1. After considering the 2018 IRM Study, the results of various sensitivity studies which resulted in IRMs both higher and lower than the base case IRM, NYISO/NYSRC Agreement between the NYISO and the NYSRC,⁴ which established the

relationship between the NYISO and the NYSRC and their respective responsibilities.

One of the responsibilities assigned to the NYSRC is the establishment of the annual statewide ICR for the NYCA.⁵ Section 3.03 of the NYSRC Agreement reads as follows:

The NYSRC shall establish the state-wide annual Installed Capacity requirements for New York State consistent with NERC [North American Electric Reliability Council] and NPCC [Northeast Power Coordinating Council] standards. The NYSRC will initially adopt the Installed Capacity requirement as set forth in the current NYPP Agreement and currently filed with FERC. Any changes to this requirement will require an appropriate filing and FERC approval. In establishing the state-wide annual Installed Capacity requirements, consideration will be given to the configuration of the system, generation outage rates, assistance from neighboring systems and Local Reliability Rules.

The ICR is described generally in terms of an installed reserve margin or IRM.⁶ The NYISO was assigned the responsibility of determining the installed capacity obligations of Load Serving Entities ("LSEs") and establishing locational capacity requirements ("LCRs") needed to ensure that the statewide ICR is met.⁷ The responsibilities assigned by the NYSRC Agreement and the NYISO/NYSRC Agreement are implemented in the NYSRC's Reliability Rules, the NYSRC's Policy No. 5-12,

⁴ The NYISO/NYSRC Agreement is available on the NYSRC website, www.nysrc.org, under Documents/Agreements.

⁵ NYSRC Agreement § 3.03; NYISO/NYSRC Agreement § 4.5.

⁶ The annual statewide ICR is established by implementing NYSRC Reliability Rules for providing the corresponding statewide IRM requirements. The IRM requirements relates to ICR through the following equation: ICR = (1+ IRM Requirement) x Forecasted NYCA Peak Load (NYSRC Reliability Rules, A. Resource Adequacy, Introduction).

⁷ NYISO/NYSRC Agreement § 3.4; NYISO Services Tariff §§ 5.10 and 5.11.4.

Procedure for Establishing New York Control Area Installed Capacity Requirements,⁸ and the NYISO's Market Administration and Control Area Services Tariff ("Services Tariff").

A. NYSRC Reliability Rules

The NYSRC Reliability Rules & Compliance Manual, Section 2.A, Resource Adequacy, Introduction,⁹ provides that among the factors to be considered by the NYSRC in setting the annual statewide IRM are the characteristics of the loads, uncertainty in the load forecast, outages and deratings of generating units, the effects of interconnections to other control areas, and transfer capabilities within the NYCA.

Reliability Rule A.1, Establishing NYCA Installed Reserve Margin Requirements, Requirement R1, is consistent with the NPCC resource adequacy criterion. It provides that:

The NYSRC shall establish the IRM requirement for the NYCA such that the probability (or risk) of disconnecting any firm load due to resource deficiencies shall be, on average, not more than once in ten years. Compliance with this criterion shall be evaluated probabilistically, such that the loss of load expectation (LOLE) of disconnecting firm load due to resource deficiencies shall be, on average, no more than 0.1 day per year. This evaluation shall make due allowance for demand uncertainty, scheduled outages and deratings, forced outages and deratings, assistance over interconnections with neighboring control areas, NYS Transmission System emergency transfer capability, and capacity and/or load relief from available operating procedures. (Italics omitted).

⁸ NYSRC Policy 5-12 is available on the NYSRC website, www.nysrc.org, under Documents/Policies.

⁹ The NYSRC Reliability Rules are available on the NYSRC website, www.nysrc.org, under Documents/NYSRC Reliability Rules & Compliance Monitoring.

Reliability Rule A.2, Establishing Load Serving Entity Installed Capacity Requirements and Deliverable External Area Installed Capacity, Requirement R1, provides that:

> LSEs shall be required to procure sufficient resource capacity for the entire NYISO defined obligation procurement period so as to meet the statewide IRM requirement determined from A.1. Further, this LSE capacity obligation shall be distributed so as to meet locational ICAP [Installed Capacity] requirements, considering the availability and capability of the NYS Transmission System to maintain A(R1) reliability requirements. (Italics omitted).

B. NYSRC Policy No. 5-12, Procedure for Establishing New York Control Area Installed Capacity Requirements

The last paragraph of the Introduction of NYSRC Policy No. 5-12 provides that:

The final NYCA IRM requirement, as approved by the NYSRC Executive Committee, is the basis for various installed capacity analyses conducted by the NYISO. These NYISO analyses include the determination of the capacity obligation of each Load Serving Entity (LSE) on a Transmission District basis, as well as Locational Installed Capacity Requirements, for the following capability year. These NYISO analyses are conducted in accordance with NYSRC Reliability Rules and Procedures.

Section 2.2 of NYSRC Policy No. 5-12, "Timeline," provides a timeline for

establishing the statewide IRM. This timeline is based on the NYSRC providing the NYISO with next year's NYCA IRM requirement in December, when the NYISO, under its installed capacity and procurement process, is required to begin its studies for determining the following summer's LSE capacity obligations.

Section 4.4 of NYSRC Policy No. 5-12, NYSRC Executive Committee, sets forth the process for approval of the annual statewide IRM by the NYSRC Executive Committee as follows: The NYSRC Executive Committee has the responsibility of approving the final IRM requirements for the next capability year.

- Review and approve preliminary and final base case assumptions and models for use in the IRM Study.
- Review preliminary base case IRM results.
- Approve sensitivity studies to be run and their results.
- Review and approve IRM Study prepared by ICS [Installed Capacity Subcommittee].
- Establish and approve the final NYCA IRM requirement for the next capability year (see Section 5).
- To the extent practicable, ensure that the schedule for the above approvals allow that the timeline requirements in Section 2.2 are met.
- Notify the NYISO of the NYCA IRM requirements and meet with NYISO management as required to review IRM Study results.
- Make IRM Study results available to state and federal regulatory agencies and to the general public by posting the study on the NYSRC Web site.

III. Communications

The names, titles, mailing addresses, and telephone numbers of those persons to

whom correspondence and communications concerning this filing should be addressed

are as follows:

Herbert Schrayshuen Executive Secretary New York State Reliability Council, LLC 4408 Jack-in-the Pulpit Circle Manlius, NY 13104

Paul L. Gioia Counsel to the New York State Reliability Council, LLC Whiteman Osterman & Hanna LLP Curt Dahl Chairman New York State Reliability Council, LLC PSEGLI 175 East Old Country Road Hicksville, NY 11801 Email: Curt.dahl@pseg.com One Commerce Plaza, Albany, NY 12260 Telephone: (518) 487-7624 Email: pgioia@woh.com

IV. Adoption of IRM for the 2018-2019 Capability Year

A. 2018 IRM Study

The 2018 IRM Study was conducted by the NYSRC to determine the statewide IRM necessary to meet NYSRC and NPCC reliability criteria within the NYCA during the period from May 1, 2018 through April 30, 2019. The reliability calculation process for determining the NYCA IRM requirement utilizes a probabilistic approach. This technique calculates the probabilities of outages of generating units, in conjunction with load and transmission models, to determine the number of days per year of expected capacity shortages. The General Electric Multi-Area Reliability Simulation ("GE-MARS") is the primary computer program used for this probabilistic analysis. The result of the calculation for loss of load expectation ("LOLE") provides a consistent measure of electric power system reliability. Computer runs for the 2018 IRM Study were performed by NYISO staff at the request and under the guidance of the NYSRC. The GE-MARS model includes a detailed load and generation representation of the eleven NYCA zones as well as the four external control areas ("Outside World Areas") interconnected to the NYCA. The GE-MARS program also uses a transportation model representing transmission that reflects the ability of the system to transfer energy between zones under probabilistic generation and load scenarios. This technique is commonly used in the electric power industry for determining installed reserve requirements.

The 2018 IRM Study continues to implement two study methodologies, the Unified and the IRM Anchoring Methodologies. These methodologies are discussed in

the 2018 IRM Study (at pages 6 and 7) under the heading IRM Study Procedures. These methodologies are discussed in greater detail in Appendices A and B of Policy 5-12.

The 2018 IRM Study also evaluates IRM requirement impacts caused by the updating of key study assumptions and various sensitivity cases.¹⁰ The comparison with the 2017 base case IRM is depicted in Table 6-1 at page 21 of the Study. The results of the sensitivity cases are set forth in Table 7-1 at page 23 of the Study and in Table B-1 at pages 48, 49, and 50 in Appendix B of the Study. The base case results, the sensitivity cases, and other relevant factors provided the basis for the NYSRC Executive Committee determination to adopt an 18.2% NYCA IRM requirement for the 2018-2019 Capability Year.

Definitions of certain terms in the 2018 IRM Study can be found in the Glossary, Appendix D of the Study.

B. 2018 Study Base Case Results

The base case for the 2018 IRM Study calculated the NYCA IRM requirement for the period May 1, 2018 through April 30, 2019 to be 18.2% under base case conditions.¹¹ The 2018 base case result of 18.2% is 1.0 percentage point higher than the 18.1% base case IRM requirement determined by the 2017 IRM Study. There are six parameters drivers that, in combination, increased the 2018 IRM from the 2017 base case. Each of the following parameters increase the IRM by 0.1%: (1) new NYCA generating units; (2)

¹⁰ The NYSRC Executive Committee approved the assumptions used in the 2018 IRM Study base case on July 14, 2017, and approved revised assumptions on October 13, 2017. The sensitivity cases for the 2018 IRM Study were approved by the NYSRC Executive Committee on November 9, 2017. The assumptions used in the Study are set forth in Appendix A of the Study in Table A.3 on page 14, Table A.5 on page 16, Table A.7 on page 22, Table A.9 on page 36, and Table A.11 on page 37.

¹¹ There is a 95% probability that the IRM is within a range from 18.0% to 18.4% based on a standard error of 0.025 per unit at 2,500 simulated years. *See* Appendix A of the Study, A.1.1 Error Analysis, at page 12.

New York topology updates; (3) new wind generation; (4) EFORd on UDR lines; (5) updated load forecast uncertainty; and (6) updated load forecast. One parameter driver, updated external control area models, decreased the IRM by 0.5%.

Table 6-1 on page 21 of the Study, set forth below, shows the IRM impact of individual updated study parameters that result in this change from the 2017 base case IRM.

Parameter	Estimated IRM Change (%)	IRM (%)	Reasons for IRM Changes
2017 IRM Study – Fina	Base Case	18.1	
2018 IRM Study Parameters that increased the IRM			
New NYCA Generating Units	+0.1		New generation has lower availability than zonal average.
NY Topology Updates	+0.1		Cumulative effect of topology changes.
New Wind Generation	+0.1		Wind generation has relativity low availability.
UDR elections and line EFORs	+0.1		Increased EFORs on cable interfaces.
Updated NYCA LFU Models	+0.1		Increased load uncertainty in downstate LFU model.
Updated Load Forecast	+0.1		Upstate/downstate load unbalance.
Total IRM Increase	+0.6		
2018 IRM Study Parameters that decreased the IRM			
Updated External Control Area Models	-0.5		Neighboring area interface availability improvements.
Total IRM Decrease	-0.5		
2018 IRM S	tudy Paramet	ers that did 1	not change the IRM
Updated DMNC Rates	0		
NYPA Sales	0		
Non-SCR/EDRP EOPs	0		
Updated SCRs & EDRPs	0		
Updated Maintenance	0		
Updated Run of River	0		
Updated Generating Unit EFORd's	0		
Updated Cable Outage Rates	0		
New Wind Shapes	0		
Emergency Assistance Limit at 3500 MW	0		
Net Change from 2017 Study		+0.1	
2018 IRM Study – Preliminary Base Case		18.2	

Table 6-1: Parametric IRM Impact Comparison – 2017 IRM vs. 2018 IRM Study

After considering the 2018 IRM Study results, the modeling and assumption changes made to simulate actual operating conditions and system performance, the numerous sensitivity studies, which resulted in IRMs higher and lower than the base case IRM, and based on its experience and expertise, on December 8, 2017, the NYSRC Executive Committee adopted an IRM of 18.2% for the 2018-2019 Capability Year.

V. Effective Date

The NYSRC respectfully requests that the Commission accept and approve this filing effective no later than February 15, 2018, so that the revised statewide ICR may be in place in time for the NYISO installed capacity auction for the summer capability period from May 1, 2018 through October 31, 2019. The auction is scheduled to take place on March 30, 2018. The NYISO has advised the NYSRC that in order for the new ICR to be reflected in the summer capability period auction, both the NYISO and its market participants should be informed of the newly established IRM by no later than February 15, 2018. In order to provide adequate notice to the NYISO, the NYSRC respectfully requests that the Commission act in an expedited manner to accept and approve this filing effective no later than February 15, 2018. The NYSRC also respectfully requests that the Commission grant any and all waivers of its regulations that it deems necessary to allow the Commission's acceptance and approval of the filing to be effective no later than that date.

VI. Contents of the Filing

The following documents are being submitted for filing:

- This transmittal letter;
- A copy of the NYSRC 2018 IRM Study (Attachment A); and

• A copy of the NYSRC resolution adopting the revised IRM for the 2018-2019 Capability Year (Attachment B).

VII. Conclusion

WHEREFORE, in view of the foregoing, the NYSRC respectfully requests that the Commission accept and approve the NYSRC's filing effective no later than February 15, 2018, and grant any and all waivers of its regulations that it deems necessary to accept and approve the filing effective no later than February 15, 2018.

Respectfully submitted,

Isi Paul L. Gioia

Paul L. Gioia Counsel to the New York State Reliability Council, L.L.C.

ATTACHMENT A

NYSRC 2018 IRM Study

Technical Study Report

New York Control Area Installed Capacity Requirement

For the Period May 2018 to April 2019





December 8, 2017

New York State Reliability Council, LLC Installed Capacity Subcommittee

About the New York State Reliability Council

The New York State Reliability Council (NYSRC) is a not-for-profit corporation responsible for promoting and preserving the reliability of the New York State power system by developing, maintaining and, from time to time, updating the reliability rules which must be complied with by the New York Independent System Operator and all entities engaging in electric power transactions on the New York State power system. One of the responsibilities of the NYSRC is the establishment of the annual statewide Installed Capacity Requirement for the New York Control Area.

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NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

EXECUTIVE SUMMARY

A New York Control Area (NYCA) Installed Reserve Margin (IRM) Study is conducted annually by the New York State Reliability Council (NYSRC) Installed Capacity Subcommittee (ICS). ICS has the overall responsibility of managing studies for establishing NYCA IRM requirements for the following Capability Year,¹ including the development and approval of all modeling and database assumptions to be used in the reliability calculation process. This year's report covers the period May 2018 through April 2019 (2018 Capability Year).

Results of the NYSRC technical study show that the required NYCA IRM for the 2018 Capability Year is 18.2% under base case conditions. This IRM satisfies the NYSRC and Northeast Power Coordinating Council (NPCC) reliability criteria of a Loss of Load Expectation (LOLE) of no greater than 0.1 days per year.

This study also determined corresponding *preliminary* Locational Capacity Requirements (LCRs) of 80.7% and 103.2% for New York City and Long Island, respectively. In accordance with its responsibility of setting the final LCRs, the New York Independent System Operator, Inc. (NYISO) will later determine the applicable LCRs for the New York City and Long Island localities using a separate process in accordance with NYISO tariffs and procedures, while adhering to NYSRC Reliability Rules and policies.

The 18.2% IRM base case value for the 2018 Capability Year represents a *0.1% increase* from the 2017 base case IRM of 18.1%. Table 6-1 shows the IRM impacts of individual updated study parameters that result in this change. There are six parameter drivers that in combination *increased* the 2018 IRM from the 2017 base case. Each of the following parameters increase the IRM by 0.1%; (1) new NYCA generating units; (2) NY topology updates; (3) new wind generation; (4) EFORd on UDR lines; (5) updated load forecast uncertainty; and (6) updated load forecast. One parameter driver—updated external control area models—*decreased* the IRM by 0.5%.

This study also evaluated IRM impacts of several sensitivity cases. The results of these sensitivity cases are summarized in Table 7-1, and in greater detail in Appendix B, Table B.1. In addition, a confidence interval analysis was conducted to demonstrate that there is a high confidence that the base case 18.2% IRM will fully meet NYSRC and NPCC resource adequacy criteria that require a Loss of Load Expectation (LOLE) of no greater than 0.1 days per year.

A new Emergency Assistance Model was introduced for the 2018 IRM Study. This model limits the amount of emergency capacity support that NYCA can receive from the four external control

¹ A Capability Year begins on May 1 and ends on April 30 of the following year.

NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

areas neighboring the NYCA. The value of this emergency assistance (EA) limit was based on an analysis of the total amount of excess ten-minute reserve above required operating reserve that has been historically available from the four external control areas. The analysis concluded that the appropriate value of the EA limit for the 2018 IRM Study is 3,500 MW.

The base case and sensitivity case IRM results, along with other relevant factors, will be considered by the NYSRC Executive Committee in adopting the Final NYCA IRM requirement for 2018. The 2018 IRM Study also evaluated Unforced Capacity (UCAP) trends. UCAP is the manner by which the NYISO values installed capacity – considering the forced outage ratings of individual generating units. This analysis shows (see Table 8-1) that required UCAP margins, which steadily decreased over the 2006-2012 period to 5%, have gradually increased to approximately 9% in the 2018 Capability Year.

NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

1. Introduction

This report describes a technical study, conducted by the NYSRC Installed Capacity Subcommittee (ICS), for establishing the NYCA Installed Reserve Margin (IRM) for the period of May 1, 2018 through April 30, 2019 (2018 Capability Year). This study is conducted each year in compliance with Section 3.03 of the NYSRC Agreement which states that the NYSRC shall establish the annual statewide Installed Capacity Requirement (ICR) for the NYCA. The ICR relates to the IRM through the following equation:

 $ICR = \left(1 + \frac{IRM \text{ Requirement (\%)}}{100}\right) * \text{ Forecasted NYCA Peak Load}$

The base case and sensitivity case study results, along with other relevant factors, will be considered by the NYSRC Executive Committee for its adoption of the Final NYCA IRM requirement for the 2018 Capability Year.

The NYISO will implement the Final NYCA IRM as determined by the NYSRC, in accordance with the NYSRC Reliability Rules;² NYSRC Policy 5-12, *Procedure for Establishing New York Control Area Installed Capacity Requirement*;³ the NYISO Market Administration and Control Area Services Tariff; and the NYISO Installed Capacity (ICAP) Manual.⁴ The NYISO translates the required IRM to a UCAP basis. These values are also used in a Spot Market Auction based on FERC-approved Demand Curves. The schedule for conducting the 2018 IRM Study was based on meeting the NYISO's timetable for conducting this auction.

The study criteria, procedures, and types of assumptions used for the study for establishing the NYCA IRM for the 2018 Capability Year (2018 IRM Study) are set forth in NYSRC Policy 5-12. The primary reliability criterion used in the IRM study requires a Loss of Load Expectation (LOLE) of no greater than 0.1 days per year for the NYCA. This NYSRC resource adequacy criterion is consistent with the Northeast Power Coordinating Council (NPCC) resource adequacy criterion. IRM study procedures include the use of two study methodologies: the *Unified Methodology* and the *IRM Anchoring Methodology*. The NYSRC reliability criterion and IRM study methodologies are described in Policy 5-12 and discussed in detail later in this report.

In addition to calculating the NYCA IRM requirement, the above methodologies identify corresponding preliminary LCRs for New York City (NYC) and Long Island (LI). In its role of

² http://www.nysrc.org/NYSRCReliabilityRulesComplianceMonitoring.asp

³ http://www.nysrc.org/policies.asp

⁴ http://www.nyiso.com/public/markets_operations/market_data/icap/index.jsp

NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

setting the final LCRs for the 2018 Capability Year, the NYISO will utilize the 2018 IRM value approved by the NYSRC. The LCR values determined in this NYSRC study are considered *preliminary* because the NYISO, using a separate process – in accordance with NYISO tariff and procedures, while adhering to NYSRC Reliability Rules and NYSRC Policy 5-12– is responsible for setting the final LCRs.

The 2018 IRM Study was managed and conducted by the NYSRC Installed Capacity Subcommittee (ICS) and supported by technical assistance from NYISO staff.

Previous IRM Study reports, from year 2000 to year 2017, can be found on the NYSRC website.⁵ Appendix C, Table C.1 provides a record of previous NYCA base case and final IRMs for the 2000 through 2017 Capability Years. Figure 8-1 and Appendix C, Table C.2, show UCAP reserve margin trends over previous years. Definitions of certain terms in this report can be found in the Glossary (Appendix D).

2. NYSRC Resource Adequacy Reliability Criterion

The acceptable LOLE reliability level used for establishing NYCA IRM Requirements is dictated by Requirement 1 of NYSRC Reliability Rule A.1, *Establishing NYCA Statewide Installed Reserve Margin Requirements,* which states:

The NYSRC shall establish the IRM requirement for the NYCA such that the probability (or risk) of disconnecting any firm load due to resource deficiencies shall be, on average, not more than once in ten years. Compliance with this criterion shall be evaluated probabilistically, such that the Loss of Load Expectation (LOLE) of disconnecting firm load due to resource deficiencies shall be, on average, no more than 0.1 days per year. This evaluation shall make due allowance for demand uncertainty, scheduled outages and deratings, forced outages and deratings, assistance over interconnections with neighboring control areas, NYS Transmission System emergency transfer capability, and capacity and/or load relief from available operating procedures.

This NYSRC Reliability Rule is consistent with NPCC Resource Adequacy Requirement 4 in Section 3.0 of NPCC Directory 1, *Design and Operation of the Bulk Power System*.

In accordance with NYSRC Reliability Rule A.2, *Establishing Load Serving Entity (LSE) Installed Capacity Requirements and Deliverable External Area Installed Capacity*, the NYISO is required to establish LSE installed capacity requirements, including LCRs, for

⁵ http://www.nysrc.org/reports3.asp

NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

meeting the statewide IRM requirement established by the NYSRC for complying with NYSRC Reliability Rule A.1 above.

3. IRM Study Procedures

The study procedures used for the 2018 IRM Study are described in detail in NYSRC Policy 5-12, *Procedure for Establishing New York Control Area Installed Capacity Requirements*. Policy 5-12 also describes the computer program used for reliability calculations and the types of input data and models used for the IRM Study.

This study utilizes a *probabilistic approach* for determining NYCA IRM requirements. This technique calculates the probabilities of generator unit outages, in conjunction with load and transmission representations, to determine the days per year of expected resource capacity shortages.

General Electric's Multi-Area Reliability Simulation (GE-MARS) is the primary computer program used for this probabilistic analysis. This program includes detailed load, generation, and transmission representation for eleven NYCA load zones — plus four external Control Areas (Outside World Areas) directly interconnected to the NYCA. The external Control Areas are: Ontario, New England, Quebec, and the PJM Interconnection. The eleven NYCA zones are depicted in Figure 3-1.⁶ GE-MARS calculates LOLE, expressed in days per year, to provide a consistent measure of system reliability. The GE-MARS program is described in detail in Appendix A, Section A.1.

Prior to the 2016 IRM Study, IRM, base case, and sensitivity analyses were simulated using only weekday peak loads rather than evaluating all 8,760 hours per year in order to reduce computational run times. However, the 2016 IRM Study determined that the difference between study results using the daily peak hour versus the 8,760 hour methodologies would be significant. Therefore, the base case and sensitivity cases in the 2016 IRM Study and all later studies, were simulated using all hours in the year.

Using the GE-MARS program, a procedure is utilized for establishing NYCA IRM requirements (termed the *Unified Methodology*) which establishes a relationship between NYCA IRM and preliminary LCRs, as illustrated in Figure 3-2. All points on these curves meet the NYSRC 0.1 days/year LOLE reliability criterion described above. Note that the area

NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

⁶ The Federal Energy Regulatory Commission has ordered the creation of a new capacity zone (NCZ) within the NYISO's ICAP market encompassing Load Zones G, H, I, and J (the "G-J Locality"). The creation of the G-J Locality did not impact the current Unified and IRM Anchoring Methodologies and NYSRC's calculation of the NYCA IRM that is discussed in this report. The NYISO establishes the LCR for the G-J Locality.

above the curve is more reliable than the criterion, and the area below the curve is less reliable. This methodology develops a pair of curves for two zones with locational capacity requirements, New York City (NYC), Zone J; and Long Island (LI), Zone K. Appendix A of NYSRC Policy 5-12 provides a more detailed description of the Unified Methodology.



Figure 3-1 NYCA Load Zones

Base case NYCA IRM requirements and related preliminary LCRs for Zones J and K are established by a supplemental procedure (termed the *IRM Anchoring Methodology*), which is used to define an *inflection point* on each of these curves. These inflection points are selected by applying a tangent of 45 degrees (Tan 45) analysis at the bend (or "knee") of each curve. Mathematically, each curve is fitted using a second order polynomial regression analysis. Setting the derivative of the resulting set of equations to minus one yields the points at which the curves achieve the Tan 45 degree inflection point. Appendix B of NYSRC Policy 5-12 provides a more detailed description of the methodology for computing the Tan 45 inflection point.

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Figure 3-2 Locational Requirements vs. Statewide Requirements

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4. Study Results – Base Case

Results of the NYSRC technical study show that the required NYCA IRM is 18.2% for the 2018 Capability Year under base case conditions. Figure 3-2 depicts the relationship between NYCA IRM requirements and resource capacity in NYC and LI.

The tangent points on these curves were evaluated using the Tan 45 analysis. Accordingly, it can be concluded that maintaining a NYCA IRM of 18.2% for the 2018 Capability Year, together with corresponding preliminary LCRs of 80.7% and 103.2% for NYC and LI, respectively, will achieve applicable NYSRC and NPCC reliability criteria for the base case study assumptions shown in Appendix A.3.

Comparing the preliminary LCRs in this 2018 IRM Study to 2017 IRM Study results (NYC LCR=81.6%, LI LCR=103.5%), the preliminary NYC LCR decreased by 0.9%, while the preliminary LI LCR decreased by 0.3%.

In accordance with NYSRC Reliability Rule A.2, *Load Serving Entity ICAP Requirements,* the NYISO is required to separately calculate and establish final LCRs. The most recent NYISO LCR study,⁷ dated January 13, 2017, determined that for the 2017 Capability Year, the final LCRs for NYC and LI were 81.5% and 103.5%, respectively. An LCR Study for the 2018 Capability Year is scheduled to be completed by the NYISO in January 2018.

A Monte Carlo simulation error analysis shows that there is a 95% probability that the above base case result is within a range of 18.0% and 18.4% (see Appendix A.1.1) when obtaining a standard error of 0.025 per unit at 2,500 simulated years. This analysis demonstrates that there is a high level of confidence that the base case IRM value of 18.2% is in full compliance with the one day in 10 year LOLE criterion in NYSRC Reliability Rule A.1.

5. Models and Key Input Assumptions

This section describes the models and related input assumptions for the 2018 IRM Study. The models represented in the GE-MARS analysis include a *Load Model, Capacity Model, Transmission Model, and Outside World Model*. Potential IRM impacts of pending *Environmental Initiatives* and *Database Quality Assurance Review* are also addressed in this section. The input assumptions for the final base case were approved by the Executive Committee on October 13, 2017. Appendix A, Section A.3 provides more details of these

⁷ Locational Installed Capacity Requirements Study, http://www.nyiso.com/public/markets_operations/services/planning/planning_studies

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models and assumptions and comparisons of several key assumptions with those used for the 2018 IRM Study.

5.1 Load Model

5.1.1 Peak Load Forecast

A 2018 NYCA summer peak load forecast of 32,868 MW was assumed in the 2018 IRM Study, a decrease of 405 MW from the 2017 summer peak forecast used in the 2017 IRM Study. This "Fall 2018 load forecast" – completed by the NYISO staff in collaboration with the NYISO Load Forecasting Task Force, and presented to ICS on October 4, 2017 – considered actual 2017 summer load conditions. After accounting for the peak load impacts of weather and demand response programs, the weather/demand response adjusted or normalized peak load during the 2017 summer was determined to be 32,857 MW.

Use of the 2018 peak load forecast in the 2018 IRM Study increased the IRM by 0.1% compared to the 2017 IRM Study due to the distribution of load (Table 6-1); whereby upstate load decreased more than downstate. The NYISO will prepare a final 2018 summer peak forecast by the end of 2017 for use in the NYISO's calculation of the 2018 LCRs.

5.1.2 Load Forecast Uncertainty (LFU)

Some uncertainty exists relative to forecasting NYCA loads for any given year. This uncertainty is incorporated in the base case model by using a load forecast probability distribution that is sensitive to different weather conditions. Recognizing the unique LFU of individual NYCA areas, separate LFU models are prepared for four areas: New York City (Zone J), Long Island (Zone K), Westchester (Zones H and I), and the rest of New York State (Zones A-G).

The LFU model for the 2018 IRM study was updated due to new extreme weather data becoming available. Appendix A, Section A.3.1 describes these models in more detail. Modeling of load forecast uncertainty in the 2018 IRM Study has an effect of increasing IRM requirements by 7.2% as demonstrated by a sensitivity case (Table 7-1, Case 3).

5.1.3 Load Shape Model

A feature in GE-MARS that allows for the representation of multiple load shapes was utilized for the 2018 IRM Study. This multiple load shape feature

enables a different load shape to be assigned to each of seven load forecast uncertainty bins. ICS has established criteria for selecting the appropriate historical load shapes to use for each of these load forecast uncertainty bins. For this purpose, a combination of load shape years 2002, 2006, and 2007 were selected as representative years. The load shape for the year 2007 was selected to represent a typical system load shape over the 1999 to 2017 period. The load shape for 2002 represents a flatter load shape, *i.e.*, a shape that has numerous daily peaks that are close to the annual peak. The load shape for 2006 represents a load shape with a small number of days with peaks that are significantly above the remaining daily peak loads. The combination of these load shapes on a weighted basis represents an expected probabilistic LOLE result.

5.2 Capacity Model

5.2.1 Planned New Non-Wind Generation, Reratings, and Retirements

Planned new non-wind facilities and retirements that are represented in the 2018 IRM Study are shown in Appendix A, Section A.3.2. The rating for each existing and planned resource facility in the capacity model is based on its Dependable Maximum Net Capability (DMNC). In circumstances where the ability to deliver power to the grid is restricted, the value of the resource is limited to its Capacity Resource Interconnection Service (CRIS) value. The source of DMNC ratings for existing facilities is seasonal tests required by procedures in the NYISO Installed Capacity Manual.

Two planned new generating units, having a total capacity of 784 MW, are included in the 2018 IRM Study: Greenidge Unit No. 4 and CPV Valley Energy Center. In addition, an increase of the rating of the existing Bethlehem Energy Center by 52 MW is included. Since the publication of the NYISO's 2017 Load and Capacity Report, three existing generators that noticed their intent to retire subsequently rescinded their notices to retire, and continue to be active in the New York markets.

The NYISO has identified several state and federal environmental regulatory programs that could potentially impact operation of NYS Bulk Power System. An analysis concluded that these environmental initiatives would not result in

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NYCA capacity reductions or retirements that would impact IRM requirements during the 2018 Capability Year. For more details see Appendix A, Section A.3.2.

A former net generator located in Long Island delivering 9.6 MW of net capacity has become a new Behind-the-Meter Net Generation Resource (BTM:NG) facility. A BTM:NG resource, for this study's purpose, contributes its full capacity while its entire host load is exposed to the electric system. The 47 MW generating capacity of this BTM:NG Resource facility is included in the NYCA capacity model, while its host load of 39 MW is included in the NYCA 2018 summer peak load forecast used for this study.

5.2.2 Wind Generation

It is projected that during the 2018 summer period there will be a total wind capacity of 1,733 MW participating in the capacity market in New York State. All wind farms are located in upstate New York in Zones A-E. This includes 78 MW of planned new wind capacity.

GE-MARS includes a feature that allows input of multiple years of wind data. This multiple wind shape model randomly draws wind shapes from historical wind production data. The 2018 IRM Study used available wind production data covering the years 2012 through 2016. For new wind facilities, zonal hourly wind shape averages or the wind shapes of nearby wind units are modeled.

The 2018 IRM Study base case assumes that the projected 1,733 MW of wind capacity will operate at a 15.7% capacity factor during the summer peak period. This assumed capacity factor is based on an analysis of actual hourly wind generation data collected for wind facilities in New York State during the 2012 – 2016 summer month (June through August) period between the hours of 2:00 p.m. and 6:00 p.m.

This test period was chosen because it covers the time period during which virtually all of the annual NYCA LOLE occurrences are distributed.

Overall, inclusion of the projected 1,733 MW of wind capacity in the 2018 IRM Study accounts for 3.7% of the 2018 IRM requirement (Table 7-1, Case 4). This relatively high IRM impact is a direct result of the very low capacity factor of wind facilities during the summer peak period. The impact of wind capacity on *unforced capacity* is discussed in Appendix C.3, "Wind Resource Impact on the

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NYCA IRM and UCAP Markets." A detailed summary of existing and planned wind resources is shown in Appendix A, Table A.6.

5.2.3 Generating Unit Availability

Generating unit forced and partial outages are modeled in GE-MARS by inputting a multi-state outage model that represents an equivalent forced outage rate during demand periods (EFORd) for each unit represented. Outage data used to determine the EFORd is received by the NYISO from generator owners based on outage data reporting requirements established by the NYISO. Capacity unavailability is modeled by considering the average forced and partial outages for each generating unit that have occurred over the most recent fiveyear time period. The time span considered for the 2018 IRM Study covered the 2012-2016 period.

Although the weighted average five-year EFORd for NYCA thermal and large hydro generating units calculated for this period is slightly lower than the 2011-2015 value used for the 2017 IRM Study, this decrease in forced outage rates had a negligible impact on the 2018 IRM (Table 6-1). Appendix A, Figure A.4 depicts NYCA EFORd trends from 2003 to 2016.

5.2.4 Emergency Operating Procedures (EOPs)

(1) Special Case Resources (SCRs)

SCRs are loads capable of being interrupted, and distributed generators that are rated at 100 kW or higher. SCRs are ICAP resources that provide load curtailment only when activated when as needed in accordance with NYISO emergency operating procedures. GE-MARS represents SCRs as an EOP step, which is activated to avoid or to minimize expected loss of load. SCRs are modeled with monthly values based on July 2017 registration. For the month of July, the forecast SCR value for the 2018 IRM Study base case assumes that 1,219 MW will be registered, with varying amounts during other months based on historical experience. The 2017 IRM Study had assumed a registered amount of 1,192 MW, 27 MW lower than that assumed for this 2018 IRM Study.

The SCR performance model is based on discounting registered SCR values to reflect historical availability. The SCR model used for the 2018 IRM Study is based on July 2017 performance data. SCR performance factors were determined from one-hour performance tests. The 2018 IRM Study used an

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Effective Capacity Value of 0.90 which resulted in a SCR model value of 867.6 MW with an overall effective performance of 71.2%. (refer to Appendix A, Section A.3.7 for more details). The number of SCR calls in the 2018 Capability Year for the 2018 IRM base case was limited to five (5) calls per month.

While the performance of the SCR program slightly increased from 70.6% in the 2017 IRM Study to 71.2% in this study, the amount of registered SCRs also increased. Downward pressure on the IRM, resulting from increased SCR performance, was outweighed by the upward IRM pressure caused by the increase in registrations. As a result, the updated SCR model had no impact on the IRM (Table 6-1).

The 2018 IRM Study determined that for the base case, approximately 8.6 SCR calls would be expected during the 2018 Capability Period.

(2) Emergency Demand Response Program (EDRP)

The EDRP is a separate EOP step from the SCR Program that allows registered interruptible loads and standby generators to participate on a voluntary basis, and be paid for their ability to restore operating reserves after major emergencies have been declared. The 2018 IRM Study assumes that 16 MW of EDRP resources will be registered in 2018, 59 MW lower than the amount assumed in the 2017 IRM Study. The 2018 EDRP capacity was discounted to a base case value of only 3 MW to reflect past performance. This value is implemented in the study in July 2018 and proportional to monthly peaks loads in other months, while being limited to a maximum of five EDRP calls per month. Both SCRs and EDRP are included in the Emergency Operating Procedure (EOP) model. Unlike SCRs, EDRP resources are not ICAP suppliers and, therefore, are not required to respond when called upon to operate.

Incorporation of SCR and EDRP resources in the NYCA capacity model has the effect of increasing the IRM by 2.9% (Table 7-1, Case 5). This increase is because the overall availability of SCRs and EDRP is lower than the average statewide resource fleet availability.

(3) Other Emergency Operating Procedures

In addition to SCRs and the EDRP, the NYISO will implement several other types of EOPs, such as voltage reductions, as required, to avoid or minimize customer disconnections. Projected 2018 EOP capacity values are based on recent actual

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data and NYISO forecasts. Refer to Appendix B, Table B.2 for projected EOP frequencies for the 2017 Capability Year assuming the 18.2% base case IRM.

5.2.5 Unforced Capacity Deliverability Rights (UDRs)

The capacity model includes UDRs which are capacity rights that allow the owner of an incremental controllable transmission project to provide locational capacity benefits. Non-locational capacity, when coupled with a UDR to deliver capacity to a Locality, can be used to satisfy locational capacity requirements. The owners of the UDRs elect whether they will utilize their capacity deliverability rights. This decision determines how this transfer capability will be represented in the MARS model. The IRM modeling accounts for both the availability of the resource that is identified for each UDR line as well as the availability of the UDR facility itself.

LIPA's 330 MW High Voltage Direct Current (HVDC) Cross Sound Cable, LIPA's 660 MW HVDC Neptune Cable, Hudson Transmission Partners 660 MW HVDC Cable, and the 315 MW Linden Variable Frequency Transformer are facilities that are represented in the 2018 IRM Study as having UDR capacity rights. The owners of these facilities have the option, on an annual basis, of selecting the MW quantity of UDRs they plan on utilizing for capacity contracts over these facilities. Any remaining capability on the cable can be used to support emergency assistance, which may reduce locational and IRM requirements. The 2018 IRM Study incorporates the confidential elections that these facility owners made for the 2018 Capability Year.

Updated UDR cable outage rates in the 2018 IRM Study increased the IRM by 0.1% compared to the 2017 IRM Study (Table 6-1).

5.3 Transmission Model

A detailed NYCA transmission system model is represented in the GE-MARS topology. The transmission system topology, which includes eleven NYCA zones and four Outside World Areas, along with transfer limits, is shown in Appendix A, Figure A.12. The transfer limits employed for the 2018 IRM Study were developed from emergency transfer limit analysis included in various studies performed by the NYISO, and from input from Transmission Owners and neighboring regions. The transfer limits are further refined by additional assessments conducted specifically for this cycle of the development of the topology. The assumptions for the transmission model included in the 2018 IRM Study are listed in the Appendix

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A, Tables A.7 and A.8 and Figure A.13, and described in detail in Appendix Section A.3.3.

Forced outages based on historic performance are represented in the GE-MARS model for the IRM study for the underground cables that connect New York City and Long Island to surrounding zones. The GE-MARS model uses transition rates between operating states for each interface, which are calculated based on the probability of occurrence from the failure rate and the time to repair. Transition rates into the different operating states for each interface were calculated based on the circuits comprising each interface, which includes failure rates and repair times for the individual cables, and for any transformer and/or phase angle regulator associated with that particular cable. Updated cable outage rates in the 2018 IRM Study had no impact on the IRM compared to the 2017 IRM Study (Table 6-1).

As in all previous IRM studies, forced outage rates for overhead transmission lines were not represented in the 2018 IRM Study. This was confirmed by a study conducted by ICS in 2015, *Evaluation of the Representation of Overhead Transmission Outages in IRM Studies*, which concluded that representing overhead transmission outages in IRM studies would have no material impact on the IRM (see www.nysrc.org/reports).

The impact of NYCA transmission constraints on NYCA IRM requirements depends on the level of resource capacity in any of the downstream zones from a constraining interface, especially in the NYC and LI zones J and K. To illustrate the impact of transmission constraints on IRM, if there were no NYCA transmission constraints, the required 2018 IRM could decrease by 2.0% (Table 7-1, Case 2).

The topology for the 2018 IRM Study features several changes from the topology used in the 2017 IRM Study. These changes fit into the following three general categories:

- 1. Changes to support the CPV Valley Energy Center.
- 2. Changes to support the NYISO-PJM Joint Operating Agreement.
- 3. Updates to certain interface limits throughout the Long Island Zone K.

These changes are described in detail in Appendix A, Section A.3.3.

5.4 Outside World Model

The Outside World Model consists of four interconnected external control areas contiguous with NYCA: Ontario, Quebec, New England, and the PJM Interconnection (PJM). NYCA reliability is improved and IRM requirements reduced by recognizing available emergency capacity assistance support from these neighboring interconnected control areas, in accordance with control area agreements governing emergency operating conditions. Representing all such external interconnection support arrangements in the 2018 IRM Study base case for permitting emergency assistance to NYCA reduces the NYCA IRM requirements by 8.0% (Table 7-1, Case 1). This "reserve value of NYCA interconnections" compares to 8.3% in the 2017 IRM Study. The representation of neighboring control areas in the 2018 IRM Study was similar to the representation used in previous IRM studies. Further, this study incorporates a new model that limits emergency assistance, which is discussed later in this section. The assumptions for the Outside World Model included in the 2018 IRM Study are listed in Appendix A, Tables A.9 and A.10.

The primary consideration for developing the base case load and capacity assumptions for the Outside World Areas is to avoid overdependence on these Areas for emergency assistance support. For this purpose, a rule from NYSRC Policy 5-12 is applied whereby an Outside World Area's LOLE cannot be lower than its own LOLE criterion. Therefore, for each of the Ontario, Quebec and New England control areas, a minimum LOLE of 0.1 days/year is modeled in accordance with NPCC requirements and the Areas' own individual resource adequacy criteria. For PJM, the 2018 IRM Study assumed a minimum LOLE of 0.14 day/year, which PJM uses for its planning studies. This is based on PJM's LOLE or resource adequacy criterion of 0.10 days/year, plus a PJM internal transmission constraint risk adder of 0.04 days/year. Also, each of these control areas' IRM can be no higher than that Area's minimum requirement.

In addition, NYSRC Policy 5-12 does not allow EOPs to be represented in Outside World Area models for providing emergency assistance to NYCA because of the uncertainties associated with the performance and availability of these resources.

Another consideration for developing models for the Outside World Areas is to recognize internal transmission constraints within those Areas that may limit emergency assistance into the NYCA. This recognition can be explicitly considered through direct multi-area modeling of well-defined external area bubbles and

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their internal interface constraints. The model representation explicitly requires adequate data to accurately model transmission interfaces, load areas, resource and demand balances, load shape, and coincidence of peaks among the load zones within these Outside World Areas. If adequate data is unavailable, the area can also be modeled implicitly either by aggregating bubbles and associated interfaces and reflecting the constraint limits at the interfaces between aggregated bubbles and at the NYCA border, or by increasing the LOLE of the Outside World Areas.

For this study, two Outside World Areas, New England and PJM, are each represented as multi-area models—i.e., 13 zones for New England and five zones for the PJM Interconnection. These zonal representations align with these Control Areas' own models that they use for their reserve margin studies.

The existing PJM-SENY group transfer limit is imposed to reflect internal constraints in both the PJM and NYCA systems. The transmission model in IRM studies up through and including the 2016 IRM Study allowed for the contractual delivery of 1,000 MW at Waldwick and PJM re-delivery of 1,000 MW at the Hudson and Linden interface ("PJM wheel"). The PJM wheel was discontinued in 2017 and has been replaced with changes in the NYISO-PJM Joint Operating Agreement for the 2018 IRM study.

As earlier discussed, excess generation capacity is delivered as emergency assistance from neighboring control areas to NYCA, recognizing interconnection limits, to avoid load shedding. As a result, the modeling of emergency assistance permits NYCA to operate at an IRM lower than otherwise required. In 2016, a concern was raised that calculated emergency transfer levels from neighboring control areas in prior GE-MARS studies may have been overstated compared to actual operating conditions. The concern is that a portion of the excess generation in the neighboring control areas, as identified by MARS as available to potentially provide emergency assistance, could actually be unavailable at the time when emergency assistance is needed by NYCA. In consideration of this concern, a study to examine issues related to the amount of emergency assistance that can be reasonably relied on was conducted by the NYISO in 2016. Building on the results of this study, ICS reviewed alternate models for representing emergency assistance. ICS determined that limiting total emergency assistance to a maximum of 3,500 MW (EA Limit), based on an analysis of total actual excess ten-minute operating reserves above required operating reserves in the four neighboring

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external areas, is appropriate.⁸ Use of the EA Limit increased the IRM by 0.4% (Table 7-1, Case 8).

5.5 Database Quality Assurance Review

It is critical that the data base used for IRM studies undergo sufficient review in order to verify its accuracy. The NYISO, General Electric (GE), and two New York Transmission Owners (TOs) conducted independent data quality assurance reviews after the preliminary base case assumptions were developed and prior to preparation of the final base case. Masked and encrypted input data was provided by the NYISO to the two TOs for their review. Also, certain confidential data are reviewed by two independent NYSRC consultants as required.

The NYISO, GE, and TO reviews found several minor data errors, none of which affected IRM requirements in the preliminary base case. The data found to be in error by these reviews were corrected before being used in the final base case studies. A summary of these quality assurance reviews for the 2018 IRM Study input data is shown in Appendix A, Section A.4.

6. Parametric Comparison with 2017 IRM Study Results

The results of this 2018 IRM Study show that the base case IRM result represents a 0.1% increase from the 2017 IRM Study base case value. Table 6-1 compares the estimated IRM impacts of updating several key study assumptions and revising models from those used in the 2017 IRM Study. The estimated percent IRM change for each parameter was calculated from the results of a parametric analysis in which a series of IRM studies were conducted to test the IRM impact of individual parameters. The IRM impact of each parameter in this analysis was normalized such that the net sum of the -/+ % parameter changes total the 0.1% IRM increase from the 2017 IRM Study. Table 6-1 also provides the reason for the IRM change for each study parameter from the 2017 IRM Study.

There are six parameter drivers shown in Table 6-1 that *increased* the 2018 IRM from the 2017 base case. Each of the following parameters increase the IRM by 0.1%; (1) new NYCA

⁸ For more information about this analysis, refer to the NYSRC white paper, "MARS Emergency Assistance Modeling" at http://www.nysrc.org/reports3.html.

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generating units; (2) NY topology updates; (3) new wind generation; (4) EFORd on UDR lines; (5) updated load forecast uncertainty; and, (6) updated load forecast.

One parameter driver—updated external control area models—*decreased* the IRM by 0.5%. The parameters in Table 6-1 are discussed under *Models and Key Input Assumptions*.

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Table 6-1: Parametric IRM Impact Compariso	on – 2017 IRM vs. 2018 IRM Study
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Parameter	Estimated IRM Change	IRM (%)	Reasons for IRM Changes			
2017 IRM Study – Final E	l (10) Base Case	18.1				
2018 IRM Study Parameters that increased the IRM						
New NYCA Generating Units	+0.1		New generation has lower availability			
NY Topology Updates	+0.1	Cumulative effect of topology chang				
New Wind Generation	+0.1		Wind generation has relativity low availability.			
UDR elections and line EFORs	+0.1		Increased EFORs on cable interfaces.			
Updated NYCA LFU Models	+0.1		Increased load uncertainty in downstate LFU model.			
Updated Load Forecast	+0.1		Upstate/downstate load unbalance.			
Total IRM Increase	+0.6					
2018	RM Study Para	meters that dec	reased the IRM			
Updated External Control Area Models	-0.5		Neighboring area interface availability improvements.			
Total IRM Decrease	Total IRM Decrease -0.5					
2018 IRM Study Parameters that did not change the IRM						
Updated DMNC Rates	0					
NYPA Sales	0					
Non-SCR/EDRP EOPs	0					
Updated SCRs & EDRPs	0					
Updated Maintenance	0					
Updated Run of River	0					
Updated Generating Unit EFORd's	0					
Updated Cable Outage Rates	0					
New Wind Shapes	0					
Emergency Assistance Limit at 3500 MW	0					
Net Change from 2017 Study		+0.1				
2018 IRM Study – Preliminary Base Case		18.2				

7. Sensitivity Case Study

Determining the appropriate IRM requirement to meet NYSRC reliability criteria depends upon many factors. Variations from base case assumptions will, of course, yield different results. Table 7-1 shows IRM requirement results for selected sensitivity cases.

Sensitivity Cases 1 through 5 in Table 7-1 illustrate how the IRM would be impacted if certain major IRM study parameters were not represented in the IRM base case. The remaining group of cases – Cases 6 through 9 – show IRM impacts assuming selected base case assumptions are changed to reasonable alternative levels, some of which are referenced in Section 5. NYSRC Executive Committee members will consider one or more of these latter sensitivity case results, in addition to the base case IRM and other factors, when the Committee develops the Final IRM for 2018 Capability Year⁹ on December 8, 2017. Appendix B, Table B-1 includes a more detailed description and explanation of each sensitivity case.

Generally, the methodology used to conduct the sensitivity cases starts with the preliminary base case IRM results, and adds or removes capacity from all NYCA zones¹⁰ until the NYCA LOLE approaches 0.1 days/year. In Cases 4 and 9 however, the changes occur in the upstate zones (Zones A-F) and a better sensitivity method is to add or remove capacity in zones A-F in order to return the LOLE back to 0.1 days/year. Because of the lengthy computer run time and manpower needed to perform a Tan 45 analysis in IRM studies,¹¹ this method was applied for only Case 6 in Table 7-1 and Case F in Table 7-2. It should be recognized, therefore, that some accuracy is sacrificed when a Tan 45 analysis is not utilized. Also, Cases 1, 6, and 8 started with the final base case instead of the preliminary base case. The reason for this base case change is that there were significant changes made in the Outside World topology models in the final base case that would affect the sensitivity case results for these cases. Due to the uncertainties surrounding the status if the CPV Valley Energy Center, a Tan 45 analysis was performed on the resource not being in service.

⁹ See Section 5 of Policy 5-12 for a description of the process the NYSRC Executive Committee uses to establish the Final IRM.

¹⁰ With the following exceptions: (1) the "No Wind or Solar Capacity" sensitivity in Table 7-2 in which wind replacement capacity only occurs in Zones A-F.,

¹¹ See Section 3 for a description of a Tan 45 analysis.

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Case	Description	IRM (%)	% Change from Base Case
0	2018 IRM Base Case	18.2	0
1	NYCA isolated	26.2	+8.0
2	No internal NYCA transmission constraints	16.2	-2.0
3	No load forecast uncertainty	11.0	-7.2
4	No wind capacity	14.5	-3.7
5	No SCRs and EDRP	15.3	-2.9
6	Without CPV Valley Energy Center (tan 45)	18.3	+0.1
7	Limit Emergency Assistance from PJM to NYCA to 1500 MW	18.2	0
8	Remove 3,500 MW Emergency Assistance Limit into NYCA	17.8	-0.4
9	Retire Selkirk and Binghamton BOP	18.3	+0.1

Table 7-1: Sensitivity Cases – 2018 IRM Study¹²

7.1 Impact of Increases of Renewable Resource Capacity on IRM Requirements

A study was conducted by ICS as part of the 2018 IRM Study to analyze the effect of a range of renewable resource penetrations on NYCA IRM requirements. Initiatives such as the state's Clean Energy Standard call for significant increases in renewable resources. Wind and solar generation would likely make up a majority of these future renewable capacity additions. The average performance or availability of these options is lower that of the present fleet of NYCA generating units and, therefore, would likely increase the IRM requirement. Questions have arisen as to the extent of the increases on the IRM as more and more wind and solar capacity enters into service in the NYCA.

Several cases that evaluate the effect on the IRM requirement for a range of wind and solar penetration levels are examined in this analysis. The analysis starts with the 2018 IRM Study base case (Case B) and hypothetically adds or subtracts different levels of wind and solar capacity in the 2018 Capability Year on top of existing base case generating capacity.

Table 7-2 depicts the results of the study.

¹² Table 7-2 shows additional sensitivity cases.

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	Total Wind	Total Solar	Total Wind	Total Wind	Wind & Solar as a	
Case	Capacity	Capacity	and Solar	and Solar	% of Total	
	MW	MW	MW	UCAP MW ¹³	Required Capacity	IRM %
A – No wind or solar	0	0	0	0	0	14.5
B – 2018 IRM Study	4 722	22	4 705	200		10.2
base case wind and	1,733	32	1,765	280	4.5	18.2
solar capacity						
C Add 2,000 MW of	3,733	32	3,765	594	9.3	22.7
wind						
D – Add 2,000 MW of	1,733	2,032	3,765	754	9.3	22.8
solar						
E – Add 2,000 MW of	2 722	2 022	F 76F	1000	42.7	20.2
wind and 2,000 Mw	3,733	2,032	5,765	1068	13.7	28.2
of solar						
F – Add 2,000 MW of	2 7 2 2	2 0 2 2	F 76F	1069	12.0	26.2
wind and 2,000 Mw	3,/33	2,032	5,765	1068	13.9	20.3
of solar (tan 45)						

Table 7-2: NYCA IRM for a Range of Renewable Resource Penetration Levels

Study assumptions for this analysis relative to assumed wind and solar performance and location are shown on the NYSRC web site at:

http://www.nysrc.org/pdf/MeetingMaterial/ICSMeetingMaterial/ICS_Agenda%20195/ICS_mtg195_windsolar_final.pdf.

7.2 Indian Point Reliability Assessment

The NYISO is presently conducting an assessment that will determine whether there is a reliability need as a result of the currently planned retirement of Indian Point Energy Center Units 2 and 3 in 2020 and 2021, respectively. It is expected that the results of this assessment will be available by the end of December 2017.

8. NYISO Implementation of the NYCA Capacity Requirement

The NYISO values capacity sold and purchased in the market in a manner that considers the forced outage ratings (UCAP) of individual units. To maintain consistency between the DMNC rating of a unit translated to UCAP and the statewide ICR, the ICR must also be translated to an unforced capacity basis. In the NYCA, these translations occur twice during

¹³ See Section 8 for UCAP discussion.

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the course of each capability year, prior to the start of the summer and winter capability periods.

Additionally, any LCRs in place are also translated to equivalent UCAP values during these periods. The conversion to UCAP essentially translates from one index to another; it is not a reduction of actual installed resources. Therefore, no degradation in reliability is expected. The NYISO employs a translation methodology that converts ICAP requirements to UCAP in a manner that ensures compliance with NYSRC Resource Adequacy Rule A.1 (R1). The conversion to UCAP provides financial incentives to decrease the forced outage rates while improving reliability.

The increase in wind resources increases the IRM because wind capacity has a much lower peak period capacity factor than traditional resources. On the other hand, there is a negligible impact on the need for UCAP. Figure 8-1 below illustrates that required UCAP margins, which steadily decreased over the 2006-2012 period to 5%, have gradually increased to approximately 7% since then. Appendix C provides details of the ICAP to UCAP conversion process used for this analysis.



Figure 8-1 NYCA Reserve Margins

Appendices

New York Control Area Installed Capacity Requirement

For the Period May 2017 To April 2018

December 8, 2017

New York State Reliability Council, LLC Installed Capacity Subcommittee

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Appendices

Appendix A

NYCA Installed Capacity Requirement Reliability Calculation Models and Assumptions

Description of the GE MARS Program: Load, Capacity, Transmission, Outside World Model, and Assumptions

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A. Reliability Calculation Models and Assumptions

The reliability calculation process for determining the NYCA IRM requirement utilizes a probabilistic approach. This technique calculates the probabilities of outages of generating units, in conjunction with load and transmission models, to determine the number of days per year of expected capacity shortages. The General Electric Multi-Area Reliability Simulation (GE-MARS) is the primary computer program used for this probabilistic analysis. The result of the calculation for "Loss of Load Expectation" (LOLE) provides a consistent measure of system reliability. The various models used in the NYCA IRM calculation process are depicted in Figure A.1 below.

Table A.1 lists the study parameters, the source for the study assumptions, and where the assumptions are described in Appendix A. Finally, section A.3 compares the assumptions used in the 2017 and 2018 IRM reports.



Figure A.1 NYCA ICAP Modeling

Table A.1 Modeling Details

#	Parameter	Description	Source	Reference		
	Internal NYCA Modeling					
1	GE MARS	General Electric Multi-Area Reliability Simulation Program		Section A.1		
2	11 Zones	Load Areas	Fig A.1	NYISO Accounting & Billing Manual		
3	Zone Capacity Models	Generator models for each generating in Zone Generator availability Unit ratings	GADS data 2017 Gold Book ¹	Section A.3.2		
4	Emergency Operating Procedures	Reduces load during emergency conditions to maintain operating reserves	NYISO	Section A.3.5		
5	Zone Load Models	Hourly loads	NYCA load shape and peak forecasts	Section A.3.1		
6	Load Uncertainty Model	Account for forecast uncertainty due to weather conditions	Historical data	Section A.3.1		
7	Transmission Capacity Model	Emergency transfer limits of transmission interfaces between Zones	NYISO Transmission Studies	Section A.3.3		
		External Control Area Mod	eling			
8	Ontario, Quebec, ISONE, PJM Control Area Parameters	See items 9-12 in this table	Supplied by External Control Area			
9	External Control Area Capacity models	Generator models in neighboring Control Areas	Supplied by External Control Area	Section A.3.4		
10	External Control Area Load Models	Hourly loads	Supplied by External Control Area	Section A.3.4		
11	External Control Area Load Uncertainty Models	Account for forecast uncertainty due to economic conditions	Supplied by External Control Area	Section A.3.4		
12	Interconnection Capacity Models	Emergency transfer limits of transmission interfaces between control areas.	Supplied by External Control Area	Section A.3.3		

¹ 2017 Load and Capacity Data Report,

http://www.nyiso.com/public/markets_operations/services/planning/documents/index.jsp

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A.1 GE MARS

As the primary probabilistic analysis tool used for establishing NYCA IRM requirements, the GE-MARS program includes a detailed load, generation, and transmission representation for 11 NYCA Zones, as well as the four external Control Areas (Outside World Areas) interconnected to the NYCA (see Section A.3 for a description of these Zones and Outside World Areas).

A sequential Monte Carlo simulation forms the basis for GE-MARS. The Monte Carlo method provides a fast, versatile, and easily expandable program that can be used to fully model many different types of generation, transmission, and demand-side options. GE-MARS calculates the standard reliability indices of daily and hourly LOLE (days/year and hours/year) and Loss of Energy Expectation (LOEE in MWh/year). The use of sequential Monte Carlo simulation allows for the calculation of time-correlated measures such as frequency (outages/year) and duration (hours/outage). The program also calculates the need for initiating Emergency Operating Procedures (EOPs), expressed in days/year (see Section A.3.5).

In addition to calculating the expected values for the reliability indices, GE-MARS also produces probability distributions that show the actual yearly variations in reliability that the NYCA could be expected to experience. In determining NYCA reliability, there are several types of randomly occurring events that must be taken into consideration. Among these are the forced outages of generating units and transmission capacity. Monte Carlo simulation models the effects of such random events. Deviations from the forecasted loads are captured using a load forecast uncertainty model.

Monte Carlo simulation approaches can be categorized as "non-sequential" and "sequential". A non-sequential simulation process does not move through time chronologically or sequentially, but rather considers each hour independent of every other hour. Because of this, non-sequential simulation cannot accurately model issues that involve time correlations, such as maintenance outages, and cannot be used to calculate time-related indices such as frequency and duration.

Sequential Monte Carlo simulation (used by GE-MARS) steps through the year chronologically, recognizing the status of equipment is not independent of its status in adjacent hours. Equipment forced outages are modeled by taking the equipment out of service for contiguous hours, with the length of the outage period being

determined from the equipment's mean time to repair. Sequential simulation can model issues of concern that involve time correlations, and can be used to calculate indices such as frequency and duration. It also models transfer limitations between individual areas.

Because the GE-MARS Program is based on a sequential Monte Carlo simulation, it uses state transition rates, rather than state probabilities, to describe the random forced outages of the thermal units. State probabilities give the probability of a unit being in a given capacity state at any particular time, and can be used if one assumes that the unit's capacity state for a given hour is independent of its state at any other hour. Sequential Monte Carlo simulation recognizes the fact that a unit's capacity state in any given hour is dependent on a given state in previous hours and influences its state in future hours. It thus requires additional information that is contained in the transition rate data.

For each unit, a transition rate matrix is input that shows the transition rates to go from each capacity state to each other capacity state. The transition rate from state A to state B is defined as the number of transitions from A to B per unit of time in state A (Equation A.1).

Equation A.1 Transition Rate Definition

 $Transition (A to B) = \frac{Number of Transitions from A to B}{Total Time in State A}$

Table A.2 shows the calculation of the state transition rates from historic data for one year. The Time-in-State Data shows the amount of time that the unit spent in each of the available capacity states during the year; the unit was on planned outage for the remaining 760 hours. The Transition Data shows the number of times that the unit transitioned from each state to each other state during the year. The State Transition Rates can be calculated from this data. For example, the transition rate from state 1 to state 2 equals the number of transitions from 1 to 2 divided by the total time spent in state 1 (Equation A.2).

Equation A.2 Transition Rate Calculation Example

 $Transition (1 to 2) = \frac{(10 Transitions)}{5,000 Hours} = 0.0002$

Table A.2 State Transition Rate Example

Tim	ne in State D	ata		Transition Data				
State	N // N /	Hours		From	To State	To State	To State	
State		HOUIS		State	1	2	3	
1	200	5000		1	0	10	5	
2	100	2000		2	6	0	12	
3	0	1000		3	9	8	0	
	State Transition Rates							
From	State	To St	ate 1	To St	ate 2	To St	ate 3	
	1	0.000		0.000 0.002		02	0.001	
	2	0.0	03	0.0	000	0.0	006	
	3	0.009		0.009 0.008		800	0.000	

From the state transition rates for a unit, the program calculates the two important quantities that are needed to model the random forced outages on the unit: the average time that the unit resides in each capacity state, and the probability of the unit transitioning from each state to each other state.

Whenever a unit changes capacity states, two random numbers are generated. The first is used to calculate the amount of time that the unit will spend in the current state; it is assumed that the time in a state is exponentially distributed, with a mean as computed from the transition rates. This time in state is added to the current simulation time to calculate when the next random state change will occur. The second random number is combined with the state transition probabilities to determine the state to which the unit will transition when it leaves its current state. The program thus knows for every unit on the system, its current state, when it will be leaving that state, and the state to which it will go next.

Each time a unit changes state, because of random state changes, the beginning or ending of planned outages, or mid-year installations or retirements, the total capacity available in the unit's area is updated to reflect the change in the unit's available capacity. This total capacity is then used in computing the area margins each hour.

A.1.1 Error Analysis

An important issue in using Monte Carlo simulation programs such as GE-MARS is the number of years of artificial history (or replications) that must be created to

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achieve an acceptable level of statistical convergence in the expected value of the reliability index of interest. The degree of statistical convergence is measured by the standard deviation of the estimate of the reliability index that is calculated from the simulation data.

The standard deviation has the same physical units (e.g., days/year) as the index being estimated, and thus its magnitude is a function of the type of index being estimated. Because the standard deviation can assume a wide range of values, the degree of convergence is often measured by the standard error, which is the standard deviation of the estimated mean expressed as a per unit of the mean.

Convergence can also be expressed in terms of a confidence interval that defines the range in which you can state, with a given level of confidence that the actual value falls within the interval. For example, a range centered on the mean of two standard deviations in each direction (plus and minus) defines a confidence interval of 95%.

For this analysis, the Base Case required 531 replications to converge to a standard error of 0.05 and required 2455 replications to converge to a standard error of 0.025. For our cases, the model was run to 2500 replications at which point the daily LOLE of 0.100 days/year for NYCA was met with a standard error of 0.025. The confidence interval at this point ranges from 18.0% to 18.4%. It should be recognized that an 18.2% IRM is in full compliance with the NYSRC Resource Adequacy rules and criteria (see Base Case Study Results section).

A.1.2 Conduct of the GE-MARS analysis

The study was performed using Version 3.21 of the GE-MARS software program. This version has been benchmark tested by the NYISO.

The current base case is the culmination of the individual changes made to last year's base case. Each change, however, is evaluated individually against last year's base case. The LOLE results of each of these pre-base case simulations are reviewed to confirm that the reliability impact of the change is reasonable and explainable.

General Electric was asked to review the input data for errors. They have developed a program called "Data Scrub" which processes the input files and flags data that appears to be out of the ordinary. For example, it can identify a unit with a forced outage rate significantly higher than all the others in that size and type category. If something is found, the ISO reviews the data and either confirms that it is correct as is, or institutes a correction. The results of this data scrub are shown in Section A.4.

The top three summer peak loads of all Areas external to NYCA are aligned to be on the same days as that of NYCA, even though they may have historically occurred at different times. This is a conservative approach, using the assumption that peak conditions could be the result of a wide spread heat wave. This would result in reducing the amount of assistance that NYCA could receive from the other Areas.

A.2 Methodology

The 2018 IRM study continues to use the Unified Methodology that simultaneously provides a basis for the NYCA installed reserve requirements and the preliminary locational installed capacity requirements. The IRM/preliminary LCR characteristic consists of a curve function, "a knee of the curve" and straight-line segments at the asymptotes. The curve function is represented by a quadratic (second order) curve which is the basis for the Tan 45 inflection point calculation. Inclusion of IRM/preliminary LCR point pairs remote to the "knee of the curve" may impact the calculation of the quadratic curve function used for the Tan 45 calculation.

The procedure for determining the best fit curve function used for the calculation of the Tan 45 inflection point to define the base case requirement is based on the following methodology:

- 1) Start with all points on IRM/preliminary LCR Characteristic.
- 2) Develop regression curve equations for all different point to point segments consisting of at least four consecutive points.
- 3) Rank all the regression curve equations based on the following:
 - Sort regression equations with highest R2.
 - Remove any equations which show a negative coefficient in the first term. This is the constant labeled 'a' in the quadratic equation: ax2+bx+c
 - Ensure calculated IRM is within the selected point pair range, i.e., if the curve fit was developed between 14% and 18% and the calculated IRM is 13.9%, the calculation is invalid.
 - In addition, there must be at least one statewide reserve margin point to the left and right of the calculated tan 45 point
 - Ensure the calculated IRM and corresponding preliminary LCR do not violate the 0.1 LOLE criteria.
 - Check results to ensure they are consistent with visual inspection methodology used in past years' studies.

This approach identifies the quadratic curve functions with highest R² correlations as the basis for the Tan 45 calculation. The final IRM is obtained by averaging the Tan 45 IRM points of the NYC and LI curves. The Tan 45 points are determined by solving for the first derivatives of each of the "best fit" quadratic functions as a slope of -1. Lastly, the resulting preliminary LCR values are identified.

A.3 Base Case Modeling Assumptions

A.3.1 Load Model

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
Peak Load	October 1, 2016 forecast NYCA: 33,273 MW NYC: 11,670 MW LI: 5,450 MW GHIJ: 16,073	October 1, 2017 NYCA: 32,868 MW NYC: 11,541 MW LI: 5,445 MW G-J: 15,890 MW	Forecast based on examination of 2017 weather normalized peaks. Top three external Area peak days aligned with NYCA
Load Shape Model	Multiple Load Shapes Model using years 2002 (Bin 2), 2006 (Bin 1), and 2007 (Bin 3-7)	Multiple Load Shapes Model using years 2002 (Bin 2), 2006 (Bin 1), and 2007 (Bin 3-7)	No Change
Load Uncertainty Model	Statewide and zonal model updated to reflect current data	Statewide and zonal model updated to reflect current data	Based on TO and NYISO data and analyses.

Table A.3 Load Model

(1) Peak Load Forecast Methodology

The procedure for preparing the IRM forecast is very similar to that detailed in the NYISO Load Forecasting Manual for the ICAP forecast. The NYISO's Load Forecasting Task Force had two meetings in September 2017 to review weather-adjusted peaks for the summer of 2017 prepared by the NYISO and the Transmission Owners. Regional load growth factors (RLGFs) for 2018 were updated by most Transmission Owners; otherwise the same RLGFs that were used for the 2017 ICAP forecast were maintained. The 2018 forecast was produced by applying the RLGFs to each TO's weathernormalized peak for the summer of 2017. The results of the analysis are shown in Table A-4. The 2017 peak forecast was 33,178 MW. The actual peak of 29,643 MW (col. 2) occurred on July 19, 2017. After accounting for the impacts of weather, the weather-adjusted peak load was determined to be 32,857 MW (col. 6), 321 MW (1.0%) below the forecast. The Regional Load Growth Factors are shown in column 9. The 2018 forecast for the NYCA is 32,868 MW (col. 12). The Locality forecasts are also reported in the second table below.

The LFTF recommended this forecast to the NYSRC for its use in the 2018 IRM study.

Table A.4 20	18 Final N	YCA Peak	Load Forecast
--------------	------------	----------	---------------

(1)	(2)	(3)	(4)	(5)	(6)=(2+3+4+5)	(7)	(8)	(9)	(10)=(8)*(9)	(11)	(12)=(10)+(11)
Transmission District	2017 Actual MW	2017 Estimated SCR & Muni Self-Gen	SCR/EDRP Estimate MW	Weather Adjustment MW	2017 Weather Normalized MW	No Loss Reallocation	2017 Weather Normalized MW	Regional Load Growth Factors	2018 ICAP Forecast, Before Adjustments	BTM:NG and Other Adjustments to Load	2018 IRM Final Forecast
Con Edison	11,864	0	0	1,245	13,109		13,109.0	1.0022	13,138		13,138
Cen Hudson	1,000	0	0	96	1,096		1,096.0	0.9820	1,076		1,076
LIPA	4,989	10	0	374	5,373		5,373.0	0.9952	5,347	39	5,386
Nat. Grid	6,202	56	0	749	7,007		7,007.0	1.0030	7,028		7,028
NYPA	322	0	0	4	326		326.0	0.9603	313		313
NYSEG	2,878	0	0	354	3,232		3,232.0	0.9980	3,226		3,226
O&R	975	0	0	152	1,127		1,127.0	1.0017	1,129		1,129
RG&E	1,413	0	0	174	1,587		1,587.0	0.9905	1,572		1,572
Grand Total	29,643	66	0	3,148	32,857	0	32,857	0.9991	32,829	39	32,868
2018 Forecast from 2017 Gold Book								33,078			
								Change from	Gold book		-210

2018 IRM Locality Peak Forecast by Transmission District for NYSRC

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)=(8)*(9)	(11)	(12)=(10)+(11)
Locality	2017 Actual MW	2017 Estimated Muni Self- Gen	SCR/EDRP Estimate MW	Weather Adjustment MW	2017 Weather Normalized MW	No Loss Reallocation	2017 Weather Normalized MW	Regional Load Growth Factors	2018 ICAP Forecast, Before Adjustments	BTM:NG and Other Adjustments to Load	2018 IRM Final Forecast
Zone J - NYC	10,668	0	0	848	11,516		11,516	1.0022	11,541	0	11,541
Zone K - LI	5,137	10	0	285	5,432		5,432	0.9952	5,406	39	5,445
Zone GHIJ	14,704	0	0	1,176	15,880		15,880	1.0007	15,890	0	15,890

(2) Zonal Load Forecast Uncertainty

For 2018, new load forecast uncertainty (LFU) models were prepared. LFU models were provided by Con-Ed and LIPA for Zones H&I, J and K. The NYISO developed models for Zones A through G and reviewed the models for the other zones. The results of these models are presented in Table A-5. Each row represents the probability that a given range of load levels will occur, on a per-unit basis, by zone. These results are presented graphically in Figure A-2.

2018 Load Forecast Uncertainty Models									
Bin	Probability	A-E	F&G	H&I	J	К			
B7	0.62%	84.31%	80.67%	79.78%	83.88%	76.59%			
B6	6.06%	89.44%	86.74%	86.24%	88.87%	83.51%			
B5	24.17%	94.74%	93.03%	92.49%	93.71%	91.75%			
B4	38.30%	100.00%	99.33%	98.17%	98.21%	100.00%			
B3	24.17%	105.02%	105.41%	102.93%	102.19%	106.95%			
B2	6.06%	109.59%	111.07%	106.39%	105.47%	112.06%			
B1	0.62%	113.51%	116.08%	108.22%	107.86%	115.86%			

Table A.5 2018 Load Forecast Uncertainty Models

Delta	A-E	F&G	H&I	J	К
Bin 4 - Bin 7	15.69%	18.66%	18.39%	14.34%	23.41%
Bin 1 - Bin 4	13.51%	16.76%	10.04%	9.65%	15.86%
Total Range	29.19%	35.42%	28.43%	23.99%	39.27%

Figure A.2 LFU Distributions



The Consolidated Edison models for Zones H, I & J are based on a peak demand with a 1-in-3 probability of occurrence (67th percentile). All other zones are designed at a 1-in-2 probability of occurrence of the peak demand (50th percentile). The methodology and results for determining the 2018 LFU models have been reviewed by the NYISO Load Forecasting Task Force.

(3) Zonal Load Shape Models for Load Bins

Beginning with the 2014 IRM Study, multiple load shapes were used in the load forecast uncertainty bins. Three historic years were selected from those available, as discussed in the NYISO's 2013 report, 'Modeling Multiple Load Shapes in Resource Adequacy Studies'. The year 2007 was assigned to the first five bins (from cumulative probability 0% to 93.32%). The year 2002 was assigned to the next highest bin, with a probability of 6.06%. The year 2006 was assigned to the highest bin, with a probability of 0.62%. The three load shapes for the NYCA as a whole are shown on a per-unit basis for the highest one hundred hours in Figure A.3. The year 2007 represents the load duration pattern of a typical year. The year 2002 represents the load duration pattern of a heat wave, with a small number of

hours at high load levels followed by a sharper decrease in per-unit values than the other two profiles.





A.3.2 Capacity Model

The capacity model includes all NYCA generating units, including new and planned units, as well as units that are physically outside New York State that have met specific criteria to offer capacity in the New York Control Area. The 2017 Load and Capacity Data Report is the primary data source for these resources. Table A.6 provides a summary of the capacity resource assumptions in the 2018 IRM study.

Table A.6 Capacity Resources

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
Generating Unit Capacities	2016 Gold Book values. Use min (DMNC vs. CRIS) capacity value	2017 Gold Book values. Use min (DMNC vs. CRIS) capacity value	2017 Gold Book publication
Planned Generator Units	0 MW of new non- wind resources. 66.9 MW of project related re-ratings	784 MW of new non- wind resources, plus 52 MW of project related re-ratings.	New resources + Unit rerate
Wind Resources	221.1 MW of Wind Capacity additions totaling 1676.2 MW of qualifying wind	77.7 MW of Wind Capacity additions totaling 1733.4 MW of qualifying wind	Renewable units based on RPS agreements, interconnection queue, and ICS input.
Wind Shape	Actual hourly plant output over the period 2011-2015. New units will use zonal hourly averages or nearby units.	Actual hourly plant output over the period 2012-2016. New units will use zonal hourly averages or nearby units.	Program randomly selects a wind shape of hourly production over the years 2012- 2016 for each model iteration.
Solar Resources (Grid connected)	31.5 MW Solar Capacity. Model chooses from 4 years of production data covering the period 2012-2015.	Total of 31.5 MW of qualifying Solar Capacity. (Attachment B3)	ICAP Resources connected to Bulk Electric System
Solar Shape	Actual hourly plant output over the period 2011-2015. New units will use zonal hourly averages or nearby units.	Actual hourly plant output over the period 2012-2016. New units will use zonal hourly averages or nearby units.	Program randomly selects a solar shape of hourly production over the years 2012- 2016 for each model iteration.

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
BTM- NG Program	N/A	Model these units at their full CRIS adjusted output value Added 47.0 MW generator Added Load (MW TBD during 2018 load forecast) Removed Stony Brook (9.6 MW CRIS) from the generator list value	Both the load and generation of the single resource BTM:NG Resources. One resource is modeled as participating in the BTM:NG program is modeled during the 2018 Capability Year. Former load modifiers to sell capacity into the ICAP market. Subsequently, the Load forecast will be increased (no resources in PBC)
Retirements, Mothballed units, and ICAP ineligible units	260.7MW retirements or mothballs reported or Units in IIFO and IR	0 MW retirements	2017 Gold Book publication and generator notifications
Forced and Partial Outage Rates	Five-year (2011-2015) GADS data for each unit represented. Those units with less than five years – use representative data. (Attachments C and C1)	Five-year (2012-2016) GADS data for each unit represented. Those units with less than five years – use representative data. (Attachments C and C1)	Transition Rates representing the Equivalent Forced Outage Rates (EFORd) during demand periods over the most recent five-year period (2012-2016)
Planned Outages	Based on schedules received by the NYISO	Based on schedules received by the NYISO	Updated schedules

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
Summer Maintenance	Nominal 50 MWs – divided equally between upstate and downstate	Nominal 50 MWs – divided equally between Zones J & K	Review of most recent data
Gas Turbine Ambient Derate	Derate based on provided temperature correction curves.	Derate based on provided temperature correction curves.	Operational history indicates derates in line with manufacturer's curves
Small Hydro Resources	Derate by 46%	Actual hourly plant output over the period 2012-2016.	Program randomly selects a Hydro shape of hourly production over the years 2012-2016 for each model iteration.
Large Hydro	Probabilistic Model based on 5 years of GADS data	Probabilistic Model based on 5 years of GADS data	Transition Rates representing the Equivalent Forced Outage Rates (EFORd) during demand periods over the most recent five-year period (2012-2016)

(1) Generating Unit Capacities

The capacity rating for each thermal generating unit is based on its Dependable Maximum Net Capability (DMNC). The source of DMNC ratings are seasonal tests required by procedures in the NYISO Installed Capacity Manual. Additionally, each generating resource has an associated capacity CRIS (Capacity Resource Interconnection Service) value. When the associated CRIS value is less than the DMNC rating, the CRIS value is modeled. (2) Wind units are rated at the lower of their CRIS value or their nameplate value in the model. The 2017 NYCA Load and Capacity Report, issued by the NYISO, is the source of those generating units and their ratings included on the capacity model. Planned Generator Units

Two planned new non-wind generating units, having a total capacity of 784 MW, are included in the 2018 IRM Study: Greenidge 4 and Competitive Power Ventures. In addition, an increase of the rating of the existing Bethlehem Energy Center by 52 MW is included.

(3) Wind Modeling

Wind generators are modeled as hourly load modifiers using hourly production data over the period 2012-2016. Each calendar production year represents an hourly wind shape for each wind facility from which the GE MARS program will randomly select. New units will use the zonal hourly averages of current units within the same zone. Characteristics of this data indicate a capacity factor of approximately 15.7% during the summer peak hours. As shown in table A.7, a total of 1733.4 MW of installed capacity associated with wind generators is included in this study including 78 MW of planned new wind capacity.

B3 - Wind Resources									
Wind Resouce	Zone	CRIS (MW)	Summer Capability (MW)	CRIS adusted value from 2017 Gold Book (MW)					
ICAP Participating Wind Units									
Altona Wind Power	D	97.5	97.5	97.5					
Bliss Wind Power	Α	100.5	100.5	100.5					
Canandaigua Wind Power	С	125.0	125.0	125.0					
Chateaugay Wind Power	D	106.5	106.5	106.5					
Clinton Wind Power	D	100.5	100.5	100.5					
Ellenburg Wind Power	D	81.0	81.0	81.0					
Hardscrabble Wind	E	74.0	74.0	74.0					
High Sheldon Wind Farm	С	112.5	118.1	112.5					
Howard Wind	С	57.4	55.4	55.4					
Madison Wind Power	E	11.5	11.6	11.5					
Maple Ridge Wind 1	E	231.0	231.0	231.0					
Maple Ridge Wind 2	E	90.7	90.8	90.7					
Munnsville Wind Power	E	34.5	34.5	34.5					
Orangeville Wind Farm	С	94.4	93.9	93.9					
Wethersfield Wind Power	С	126.0	126.0	126.0					
Marble River	D	215.2	215.5	215.2					
		1658.2	1661.8	1655.7					
	0.000 200	d Proposed IP	M Study Wind Unit						
Loriche Dise									
Jencho Rise	U	77.7	77.7	77.7					
		//./	//./	//./					
	Non	- ICAP Particip	ating Wind Units						
	Zone	CRIS (MW)	Nameplate Capability (MW)	CRIS adusted value from 2017 Gold Book (MW)					
Erie Wind	Α	0.0	15.0	0.0					
Fenner Wind Farm	С	0.0	30.0	0.0					
Steel Wind	Α	0.0	20.0	0.0					
Western NY Wind Power	С	0.0	6.6	0.0					
		0.0	71.6	0.0					
Total Wind Resources		1735.9	1811.1	1733.4					

Table A.7 Wind Generation

(4) Solar Modeling

Solar generators are modeled as hourly load modifiers using hourly production data over the period 2012-2016. Each calendar production year represents an hourly solar shape for each solar facility which the GE MARS program will randomly select from. A total of 31.5 MW of solar capacity was modeled in Zone K.

(5) <u>Retirements</u>

Three units in Zone K totaling 137 MW were slated to retire before the summer of 2018. All three units have rescinded their notice of retirement and are expected to remain fully operational through the 2018 capability year.

(6) <u>Forced Outages</u>

Performance data for thermal generating units in the model includes forced and partial outages, which are modeled by inputting a multi-state outage model that is representative of the "equivalent demand forced outage rate" (EFORd) for each unit represented. Generation owners provide outage data to the NYISO using Generating Availability Data System (GADS) data in accordance with the NYISO Installed Capacity Manual. The NYSRC is continuing to use a five-year historical period for the 2018 IRM Study.

Figure A.4 shows the trend of EFORd for various regions within NYCA.

Figure A.5 shows a rolling 5-year average of the same data.

Figures A.6 and A.7 show the availability trends of the NYCA broken out by fuel type.

The multi-state model for each unit is derived from five years of historic events if it is available. For units with less than five years of historic events, the available years of event data for the unit is used if it appears to be reasonable. For the remaining years, the unit NERC class-average data is used.

The unit forced outage states for the most of the NYCA units were obtained from the five-year NERC GADS outage data collected by the NYISO for the years 2012 through 2016. This hourly data represents the availability of the units for all hours. From this, full and partial outage states and the frequency of occurrence were calculated and put in the required format for input to the GE-MARS program. Where the NYISO had suspect data for a unit that could not be resolved prior to this study, NERC class average data was substituted for the year(s) of suspect data.

Figures A.8 and A.9 show the unit availabilities of the entire NERC fleet on an annual and 5-year historical basis.

Figure A.4 NYCA Annual Zonal EFORds



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Figure A.6 NYCA Annual Availability by Fuel



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Figure A.7 NYCA Five-Year Availability by Fuel



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Figure A.8 NERC Annual Availability by Fuel

NERC EQUIVALENT AVAILABILITY BASED ON NERC-GADS DATA FROM 1982 – 2016 ANNUAL WEIGHTED AVERAGES FOR NUCLEAR, COAL, OIL, GAS, AND COMBUSTION TURBINES



Figure A.9 NERC Five-Year Availability by Fuel



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(7) Outages and Summer Maintenance

A second performance parameter to be modeled for each unit is scheduled maintenance. This parameter includes both planned and maintenance outage components. The planned outage (PO) component is obtained from the generator owners. When this information is not available, the unit's historic average planned outage duration is used. Figure A.10 provides a graph of scheduled outage trends over the 1992 through 2016 period for the NYCA generators.

Typically, generator owners do not schedule maintenance during the summer peak period. However, it is highly probable that some units will need to schedule maintenance during this period. Each year, the previous summer capability period is reviewed to determine the scheduled maintenance MW during the previous peak period. An assumption is determined as to how much to model in the current study. For the 2018 IRM Study, a nominal 50 MW of summer maintenance is modeled. The amount is nominally divided equally between Zone J and Zone K. Figure A.11 shows the weekly scheduled maintenance for the 2016 IRM Study compared to this study.

(8) Gas Turbine Ambient Derate

Operation of combustion turbine units at temperatures above DMNC test temperature results in reduction in output. These reductions in gas turbine and combined cycle capacity output are captured in the GE-MARS model using deratings based on ambient temperature correction curves. Based on its review of historical data, the NYISO staff has concluded that the existing combined cycle temperature correction curves are still valid and appropriate. These temperature corrections curves, provided by the Market Monitoring Unit of the NYISO, show unit output versus ambient temperature conditions over a range starting at 60 degrees F to over 100 degrees F. Because generating units are required to report their DMNC output at peak or "design" conditions (an average of temperatures obtained at the time of the transmission district previous four like capability period load peaks), the temperatures above transmission district peak loads.

(9) <u>Large Hydro Derates</u>

Hydroelectric projects are modeled as are thermal units, with a probability capacity model based on five years of unit performance. See Capacity Models item 6 above.


Figure A.10 Planned and Maintenance Outage Rates

Figure A.11 Scheduled Maintenance



A.3.3 Transmission System Model

A detailed transmission system model is represented in the GE-MARS topology. The transmission system topology, which includes eleven NYCA Zones and four External Control Areas, along with transfer limits, is shown in Figure A.12. The transfer limits employed for the 2018 IRM Study were developed from emergency transfer limit analyses included in various studies performed by the NYISO and based upon input from Transmission Owners and neighboring regions. The transfer limits are further refined by other assessments conducted by the NYISO. The assumptions for the transmission model included in the 2018 IRM Study are listed in Table A.8.

Forced transmission outages are included in the GE-MARS model for the underground cables that connect New York City and Long Island to surrounding Zones. The GE-MARS model uses transition rates between operating states for each interface, which were calculated based on the probability of occurrence from the historic failure rates and the time to repair. Transition rates into the different operating states for each interface were calculated based on the circuits comprising each interface, including failure rates and repair times for the individual cables, and for any transformer and/or phase angle regulator associated with that cable. The TOs provided updated transition rates for their associated cable interfaces.

The interface transfer limits were updated for the 2018 IRM Study model based on transfer limit analysis performed for the 2016 Reliability Needs Assessment.

Parameter	2017 Model Assumptions	2018 Model Assumptions Recommended	Basis for Recommendation
Interface Limits	All changes reviewed and commented on by TPAS	All changes reviewed and commented on by TPAS	Based on 2017 Operating Study, 2016 Operations Engineering Voltage Studies, 2016 Reliability Planning Process, and additional analysis including interregional planning initiatives
Cable Forced Outage Rates	All existing Cable EFORs updated for NYC and LI to reflect most recent five- year history	All existing Cable EFORs updated for NYC and LI to reflect most recent five-year history	Based on TO analysis or NYISO analysis where applicable
UDR line Unavailability	Five year history of forced outages	Five year history of forced outages	NYISO/TO review

Table A.8 Transmission System Model

Figure A.12 shows the transmission system representation for this year's study. Figure A.13 shows the dynamic limits used in the topology.



Figure A.13 Dynamic Interface Ratings Information

2018 MARS Topology - Dynamic Limits and Grouping Information

September 28, 2017

Interface Group	Limit	Flow Equation
UPNYSENY	5,500	F_to_G +E_to_G - HUDV_NE +1.5*ATHENS_G +0.3*CPVVEC_G
E2G_CPV	2,275	E_to_G +0.9*CPVVEC_G
LI_WEST	18	K_to_l&J - 0.13*K_NEPT

Central East Voltage Limits, Oswego Complex Units

Depends On:	9MILP1, 9MILP2, FPNUC1, STHIND, OS05, OS06					
Units	E_t	0_F	E_to	_FG		
Available	Fwd	Rev	Fwd	Rev		
6	3,100	1,999	5,000	3,400		
5	3,050	1,999	4,925	3,400		
4	2,990	1,999	4,840	3,400		
3	2,885	1,999	4,685	3,400		
2	2,770	1,999	4,510	3,400		
Otherwise:	2,645	1,999	4,310	3,400		

Staten Island Import Limits, AK and Linden CoGen Units

	Unit Ava	J_to	5_J3		
AK02	AK03	LINCOG1	LINCOG2	Fwd	Rev
А	А	А	А	315	200
U	А	А	А	315	500
А	U	А	А	315	700
А	А	U	А	315	500
А	A	А	U	315	500
	Otherwise:				815

Long Island Import Limits, Northport

Depends On:	NPRTG1, NPRTS1-4			
Units	LI_NE			
Available	Norwalk to K K to Norwalk			
5	260	414		
Otherwise:	404	414		

PJM-NY JOA	RECO	PJM-NY	
Flow Distribution	Load	Emergency	
(Jan 31, 2017 filing)	Deliveries	Assistance	
PJM-NY Western Ties	20%	32%	
5018 Line	80%	32%	
JK Lines	0%	15%	
A Line	0%	7%	
BC Lines	0%	14%	

Long Island Import Limits, Barret Steam Units

Depends On:	BARS01, BARS02				
Units	Jamaica Ties		ConEc	d-LIPA	
Available	J to K	K to J	IJ to K	K to IJ	
2	235	505	1,528	104	
1	235	390	1,528	74	
0	235	236	1,528	0	

As can be seen from the figures, the following changes were made to NYCA interface limits:

	2017		2018		[Delta
Interface	Forward	Reverse	Forward	Reverse	Forward	Reverse
UPNY-Con						
Ed	5600		5750		+150	
I to J & K	5400		5600		+200	
LI Sum	1528	120/91/0	1528	104/74/0		-16/-17/0
LI West	99999	34		18		-16
Figure A.12 above shows details surrounding changes related to the RECO						
agreement as	well as the A, B,	C, J, K, and 5018	lines.			

Table A.9 Interface Limits Updates

The topology for the 2018 IRM Study features several changes from the topology used in the 2017 IRM Study. These changes fit into the following three categories:

1. Changes to support the CPV Valley Energy Center("VEC")

A number of changes were made to the MARS topology to incorporate the CPV VEC project for the 2018 IRM Study. An interface to connect the CPV VEC area to the Zone G area (CPV_TO_G) was modeled, and a new interface group (Marcy/CPV Group) comprised of CPV_TO_G and the Marcy South interface was added.

The UPNY-Con Ed and the I to J & K interface limits increased from the 2017 IRM to the 2018 IRM limits: The UPNY-Con Ed interface limit was increased by 150 MW and the I to J & K interface limit was increased by 200 MW. The primary reasons for the increase were the addition of the CPV VEC plant and a reduction in load growth in Zones G through I.

2. <u>Changes to support the NYISO-PJM Joint Operating Agreement (e.g. A, B, C, J and K PARs,</u> <u>RECO delivery</u>)

Several changes to the topology were made based on the final JOA amendment between the NYISO and the PJM Interconnections. Structurally these changes included (i) the relocation of PJM_RECO, (ii) the separation of AREA_J2 from PJM_EAST, (iii) the separation of the VFT from AREA_J3, and (iv) the separation of the A and B/C Lines. This agreement formalized flow percentages for transactions between the two markets and these percentages were applied to a base emergency assistance value of 1,500 MW to arrive at interface group limits of 315 and 705 MW respectively for the ABC and PJM-G groups. The latter group limit includes an additional 340 MW allocation (for a total limit of 1,045 MW) to reflect the RECO flow delivery of 425 MW, of which 80% is delivered over the PJM_5018 interface. The RECO delivery is modeled as a firm contract that allocates flow on the PJM Western ties (20%), on the NY upstate ties (prorated 20%), and the 5018 Line (80%). The topology was changed for the 2018 IRM Study to allow the flow from PJM to NY to align with the distributions described in the JOA, as shown in the table below.

PJM-NY JOA Flow Distribution	RECO Load Deliveries	PJM-NY Emergency
(Jan 31, 2017 Filing)		Assistance
PJM-NY Western Ties	20%	32%
5018 Line	80%	32%
JK Lines	0%	15%
A Line	0%	7%
BC Lines	0%	14%

Table A.10 Distribution of Power Transfers between PJM and NY

3. Other Modeling Changes

PSEG-LIPA provided updates to certain interface limits around Long Island, mainly because of changes to the load. The J to K, LI Sum, and LI West in the reverse direction (flow out of Long Island) were reduced slightly compared to the 2017 IRM Study.

A summary of the above described changes can be found on table A.11 below.

Areas of Focus	Topology Proposal
Modeling of CPV Valley	Similar to 2016 RNA:
	 CPV MW in a new dummy bubble 0.3 factor - Impact on UPNY-SENY flow: simulates a 30% of CPV Valley reduction on UPNY-SENY capacity 0.9 factor - impact on Marcy South flow: simulates a 90% of CPV Valley flow reduction on Marcy South capacity
Modeling of RECO	• Explicit Modeling of 5018 Line
Deliveries	 Constant RECO load of 425 MW
	 Firm contract from PJM_EAST
	\circ 80% of EA Limit on 5018 Line = 320 MW
	\circ 20% of EA Limit on Western Ties = 85 MW
Modeling of A/B/C & J/K	 Reinstate J2 dummy bubble
Lines	 Redefine VFT & HTP interfaces
	 Restore Line Ratings

Table A.11 Summary of major changes from 2017 to 2018 IRM topology:

Additional topology changes were made to the external area models in accordance with information received through NPCC's CP-8 working group.

A.3.4 External Area Representations

NYCA reliability largely depends on emergency assistance from its interconnected Control Area neighbors (New England, Ontario, Quebec and PJM) based on reserve sharing agreements with these external Control Areas. Load and capacity models of these Areas are therefore represented in the GE-MARS analyses with data received directly from the Areas and through NPCC sources.

The primary consideration for developing the final load and capacity models for the external Control Areas is to avoid over-dependence on the external Control Areas for emergency capacity support.

For this reason, a limit is placed on the amount of emergency capacity support that the NYISO can receive from external Control Areas in the IRM study. The value of this limit (3,500 MW for this IRM study) is based on a recommendation from the ICS and the NYSIO that considers the amount of ten-minute reserves that are available in the external Control Areas above an Area's required reserve, along with other factors.

In addition, an external Control Area's LOLE assumed in the IRM Study cannot be lower than its LOLE criteria and its Reserve Margin can be no higher than its minimum requirement. If the Area's reserve margin is lower than its requirement and its LOLE is higher than its criterion, pre-emergency Demand Response can be represented. In other words, the neighboring Areas are assumed to be equally or less reliable than NYCA.

Another consideration for developing models for the external Control Areas is to recognize internal transmission constraints within the external Control Areas that may limit emergency assistance to the NYCA. This recognition is considered implicitly for those Areas that have not supplied internal transmission constraint data. Additionally, EOPs are removed from the external Control Area models.

Finally, the top three summer peak load days of an external Control Area should be specified in the load model to be coincident with the NYCA top three peak load days. The purpose of this is to capture the higher likelihood that there will be

considerably less load diversity between the NYCA and external Control Areas on very hot summer days.

For this study, both New England and PJM continue to be represented as multi-area models, based on data provided by these Control Areas. Ontario and Quebec are represented as single area models. The load forecast uncertainty model for the outside world model was supplied from the external Control Areas.

Modeling of the neighboring Control Areas in the base case in accordance with Policy 5-10 is as follows:

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
	Grandfathered amounts:	Grandfathered amounts:	
	PJM – 1080 MW	PJM – 1080 MW	Grandfathered Rights,
Capacity	HQ – 1110 MW	HQ – 1110 MW	ETCNL, and other FERC
Purchases	All contracts model as	All contracts model as	identified rights.
	equivalent contracts	equivalent contracts	
	Long term firm sales of	Long term firm sales of	These are long term
Capacity Sales	284.9 MW	283.8 MW	federally monitored
		Single Area representations	
	Single Area representations	for Optorio and Ouchoo	The load and capacity data
External Area	for Ontario and Quebec.		is provided by the
External Area	Four areas modeled for	Five areas modeled for	neighboring Areas. This
Modeling	PJM. Thirteen zones	PJM. Thirteen zones	updated data may then be
	modeled for New England	modeled for New England	Policy 5
	All NPCC Control Areas have	All NPCC Control Areas	
Reserve Sharing	indicated that they will	have indicated that they	Per NPCC CP-8 working
	share reserves equally	will share reserves equally	group assumption
	among all	among all	

Table A.12 External Area Representations

Table A.13, below, shows the final reserve margins and LOLEs for the Control Areas external to NYCA. The 2018 external area model also includes a 3,500 MW limit for emergency assistance (EA) imports during any given hour. However, as per Table 6.1 of the IRM study report, the amount EA available to the NYCA decreased the IRM VS. the 2017 study. This can be most likely attributed to increased transfer capability on some external ties and a lower LOLE for New England.

Table A.13 Outside World Reserve Margins

Area	2017 Study Reserve Margin	2018 Study Reserve Margin	2017 Study LOLE (Days/Year)	2018 Study LOLE (Days/Year)
Quebec	38.5%*	44.1%*	0.113	0.110
Ontario	21.8%**	34.0%	0.110	0.105
PJM	15.2%	16.1%	0.141	0.146
New England	15.0%	13.8%	0.134	0.108

*This is the summer margin.

**This includes 4,347 MW full capacity of wind units.

A.3.5 Emergency Operating Procedures (EOPs)

There are many steps that the system operator can take in an emergency to avoid disconnecting load. EOP steps 2 through 10 listed in Table A.15 were provided by the NYISO based on operator experience. Table A.14 lists the assumptions modeled.

The values in Table A.15 are based on a NYISO forecast that incorporates 2017 (summer) operating results. This forecast is applied against a 2018 peak load forecast of 32,868 MW. The table shows the most likely order that these steps will be initiated. The actual order will depend on the type of the emergency. The amount of assistance that is provided by EOPs related to load, such as voltage reduction, will vary with the load level.

Parameter	2017 Study Assumption	2018 Study Assumption	Explanation
Special Case Resources	July 2016 –1192 MW based on registrations and modeled as 841 MW of effective capacity. Monthly variation based on historical experience (no Limit on number of calls) *	July 2017 –1219.1 MW based on registrations and modeled as 867.6 MW of effective capacity. Monthly variation based on historical experience (no Limit on number of calls) *	MW registered in the program, discounted to historic availability.
EDRP Resources	July 2016 75 MW registered modeled as 13 MW in July and proportional to monthly peak load in other months. Limit to five calls per month	July 2017 16 MW registered modeled as 3 MW in July and proportional to monthly peak load in other months. Limit to five calls per month	Those registered for the program, discounted to historic availability. Summer values calculated from July 2017 registrations.
EOP Procedures	665 MW of non-SCR/non-EDRP resources	609.6 MW of non-SCR/non- EDRP resources	Based on TO information, measured data, and NYISO forecasts

Table A.14 Assumptions for Emergency Operating Procedures

• The number of SCR calls is limited to 5/month when calculating LOLE based on all 8760 hours.

Parameter	Procedure	Effect	MW Value
1	Special Case Resources (SCRs)	Load relief	1,219 MW Enrolled/ 868 MW modeled
2	Emergency Demand Response Programs (EDRPs).	Load relief	16 MW Enrolled/3 MW Modeled
3	5% manual voltage reduction***	Load relief	66 MW
4	Thirty-minute reserve to zero	Allow operating reserve to decrease to largest unit capacity (10-minute reserve)	655 MW
5	5% remote voltage reduction***	Load relief	341 MW
6	Voluntary industrial curtailment***	Load relief	121.8 MW
7	General public appeals***	Load relief	80.8 MW
8	Emergency Purchases	Load relief	Varies
9	Ten-minute reserve to zero	Allow 10-minute reserve to decrease to zero	1,310 MW
10	Customer disconnections	Load relief	As needed

Table A.15 Emergency Operating Procedures Values

* The SCR's are modeled as monthly values. The value for July is 1219 MW.

** The EDRPs are modeled as 16 MW discounted to 3 MW in July and August and further discounted in other months. They are limited to 5 calls a month.

*** These EOPs are modeled in the program as a percentage of the hourly peak. The associated MW value is based on a forecast 2018 peak load of 32,868 MW.

A.3.6 Locational Capacity Requirements

The GE-MARS model used in the IRM study provides an assessment of the adequacy of the NYCA transmission system to deliver assistance from one Zone to another for meeting load requirements. Previous studies have identified transmission constraints into certain Zones that could impact the LOLE of these Zones, as well as the statewide LOLE. To minimize these potential LOLE impacts, these Zones require a minimum portion of their NYCA ICAP requirement, i.e., locational ICAP, which shall be electrically located within the Zone to ensure that sufficient energy and capacity are available in that Zone and that NYSRC Reliability Rules are met. For the purposes of the IRM study, Locational ICAP requirements are applicable to two transmission-constrained Zones, New York City and Long Island, and are normally expressed as a percentage of each Zone's annual peak load.

These locational ICAP requirements, recognized by NYSRC Reliability Rule A.R2 and monitored by the NYISO, supplement the statewide IRM requirement. This report using the unified methodology determines the minimum locational requirements for different levels of installed reserve. The NYSRC chooses the IRM to be used for the coming year and the NYISO chooses the final value of the locational requirements to be met by the LSEs.

A.3.7 Special Case Resources and Emergency Demand Response Program

Special Case Resources (SCRs) are loads capable of being interrupted, and distributed generators, rated at 100 kW or higher, that are not directly telemetered. SCRs are ICAP resources that only provide energy/load curtailment when activated in accordance with the NYISO Emergency Operating Manual. Performance factors for SCRs are shown below:

Zones	Forecast SCRs (MW)	Overall Performance (%)
A - F	538.1	77.3%
G - I	52.8	63.8%
J	247.6	63.1%
К	29.1	60.5%
NYCA	867.6	71.2%

Table A.16 SCR Performance

The Emergency Demand Response Program (EDRP) is a separate program that allows registered interruptible loads and standby generators to participate on a voluntary basis and be paid for their ability to restore operating reserves.

GE-MARS model accounts for SCRs and EDRPs as EOP steps and will activate these steps to minimize the probability of customer load disconnection. Both GE-MARS and NYISO operations only activate EOPs in zones where they are capable of being delivered.

SCRs are modeled with monthly values. For the month of July, the value is 1219 MW. This value is the result of applying historic growth rates to the latest participation numbers.

EDRPs are modeled as a 3 MW EOP step in July and August (and they are also further discounted in other months) with a limit of five calls per month. This EOP is discounted from the forecast registered amount of 16 MW based on actual experience.

A.4 MARS Data Scrub

A.4.1 GE Data Scrub

General Electric (GE) was asked to review the input data for errors. GE has developed a program called "Data Scrub" which processes the input files and flags data that appears to be out of the ordinary. For example, it can identify a unit with a forced outage rate significantly higher than all the others in that size and type category. If something is found, the NYISO reviews the data and either confirms that it is the right value as is, or institutes an update. The results of this data scrub are shown in Table A.17 for the preliminary base case.

Item	Description	Disposition	Data Change	Post PBC* Affect
1	Some Dynamic Limits – condition set #8 is missing.	Updated before PBC	No	N/A
2	Update Federal Power contract sales to western PJM to 2018 values (~2 MW) (left out of D series)	Updated for FBC	Yes	negligible

Table A.17 GE MARS Data Scrub

Item	Description	Disposition	Data Change	Post PBC* Affect
3	Update Federal Power contract sales to NE to 2018 values (~1 MW)	Updated for FBC	Yes	negligible
4	Generation: Zonal MWs fell moderately in zone C, D, and K, while moderate increases were seen in zones A, F, and J	All units changes were identified with DNMC test values.	No	0
5	Bethlehem Energy Center re- rating is off	Updated for FBC	Yes	negligible
6	Six zones saw decreases in EFORd rates while four showed increases	Data was examined and determined valid.	No	0
7	Ten Units had EFORds that changed more than 10 percentage points from previous year.	Data was examined and determined valid.	No	0
8	Load shape energies were generally higher than those predicted in Gold Book.	The forecast captures recent trends toward more peaked shapes which have lower energies. This warrants future examination	No	0
9	Two interfaces were defined not using the naming convention.	Interfaces were reversed to follow convention	No	0
10	Masked data not usable by TO	Created version 3.19.10 to enable use	No	0

*Preliminary Base Case

A.4.2 NYISO Data Scrub

The NYISO also performs a review of the MARS data independently from GE. Table A.18 shows the results of this review for the preliminary base case.

Table A.18 NYISO MARS Data Scrub

ltem	Description	Disposition	Data Change	Post PBC* Affect
1	When adding a small unit, the LOLE went up, not down as expected. After investigation, it was learned that any unit additions or interface additions changed the seeding order of the model making parametric results incomparable.	GE developed a new MARS executable version 3.21.9 to allow the seeding to have multiple blank spaces with which to add units without changing seeding order	No	N/A**

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ltem	Description	Disposition	Data Change	Post PBC* Affect
2	Limit from Quebec to Central map had a contract but was derated in the mif	Left contract but restored limit to correct value of 1400 MW	Yes	Low (-)
3	PBC tan 45 curve's regression analysis revealed a valid section of the curve with the highest R2 value that should not be acceptable because the parabola opened downward over those points.	The regression curve was rejected, and the next highest matching equation used. A draft Policy 5, appendix B was introduced containing language to not allow these downward sloping equations (negative coefficients of the first term)	No	N/A**
4	The limit from Ontario to NYCA was found at as 1300 MW, which should be corrected to 1900 MW	Updated for FBC	Yes	negligible
5	PJMW_SW reverse limit was input as 3478 MW, which should be corrected to 3748 MW	Updated for FBC	Yes	negligible
6	CPV high temperature derate needs to be reinstated.	Updated and re-run. Results shown here.	Yes	Low (+)
7	PBC has full (78 MW) uprate added to BEC. Reduce uprate to reflect 2 of 3 phases completed by 6/2018.	Updated for FBC	Yes	negligible
8	UPNY/Con Ed (g to h) from 5600 to 5750 MW	Combined with next finding and run.	Yes	Combined
9	Grouping of Y49Y50 and Dunwoodie S from 5400 to 5600 MW	Updated and re-run. Results shown here.	Yes	Low (-)
10	Athens derate mistakenly put in F1 bubble.	Updated for FBC	Yes	negligible
11	The K to J rating in the dynamic rating table needed to be updated from 380 to 390 MW. The K to IJ (LISUM) changed from 64 to 74 MW.	Updated for FBC	Yes	negligible
12	Missing the last dynamic rating on Central East grouping for PBC.	Updated for FBC	Yes	negligible

*Preliminary Base Case

** N/A because changes were made prior to the PBC

A.4.3 Transmission Owner Data Scrub

In addition to the above reviews, two transmission owners scrub the data and assumptions from a masked database provided. Many of their findings reiterated

the previous findings. Table A.19 shows their unique results. These findings are based on a review of the preliminary base case not the final base case.

ltem	Description	Disposition	Data Change	Post PBC* Affect
1	Model shows 1850 MW export limit from Zone A while topology map shows 1800 MW	Map was not updated to reflect current topology. Model is correct.	No	N/A
2	NE topology shows values differently in model versus latest published map.	Map was not updated to reflect current topology. Model is correct.	No	N/A
3	nomogram numbers missing from the topology diagram	Added in Appendix A	No	No
4	Why is there a 1300MW emergency assistance import limit from IESO to NYCA	IESO to NYCA has been updated from 1300 MW in the PBC mif to 1900 MW according to the NPCC topology	Yes	**
5	OH – HQ: 1912/1850 vs 2040/2710	Updated in FBC	Yes	**
6	SWCT-IMP: 2500/9999 vs 3200/9999	PBC value is correct	N/A	N/A
7	PJMC_E: 8493/0 vs 8493/8493	PBC value is correct	N/A	N/A
8	PJMW_C: 3199/0 vs 5700/0	PBC value is correct	N/A	N/A
9	UPNY-Coned: 5600 vs 5750	Updated in FBC	Yes	**
10	A-Ontario :1300/1700 vs 1500/1700	Updated in FBC	Yes	* *
11	A East grp: 1850/9999 vs 1900/1650	PBC value is correct	N/A	N/A
12	Why is AREA_J2 part of GRP_G_J	Updated in FBC	No	No
13	Should AREA_J2 be part of PJM_RTO	Updated d in FBC	No	No
14	Missing topology diagram names	Names added for report	No	No

Table A.19 Transmission Owner Data Scrub

*Preliminary Base Case

**These results discussed as the parametric changes from the PBC to the FBC

Appendix B

Details of Study Results

B. Details for Study Results B.1 Sensitivity Results

Table B.1 summarizes the 2018 Capability Year IRM requirements under a range of assumption changes from those used for the base case. The base case utilized the computer simulation, reliability model, and assumptions described in Appendix A. The sensitivity cases determined the extent of how the base case required IRM would change for assumption modifications, either one at a time, or in combination. The methodology used to conduct the sensitivity cases was to start with the preliminary base case 18.7% IRM results then add or remove capacity from all zones in NYCA until the NYCA LOLE approached criterion. The values in Table B.1 are the sensitivity results adjusted to the 18.2% final base except for cases 1, 6, and 8 which started with the final base case instead of the preliminary base case.

Case	Description	IRM (%)	NYC (%)	LI (%)	
0	Final Base Case	18.2	80.7	103.2	
	This is the Base Case technical results derived from knee of the IRM-LCR curve.				
1	NYCA Isolated	26.2	86.4	110.4	
	This case examines a scenario where the NYCA system is isolated and receives no emergency assistance from neighboring control areas (New England, Ontario, Quebec, and PJM). UDRs are allowed.				
2	No Internal NYCA Transmission Constraints (Free Flow System)	16.2	NA	NA	
	This case represents the "Free-Flow" NYCA case where internal transmission constraints are eliminated and measures the impact of transmission constraints on statewide IRM requirements.				
3	No Load Forecast Uncertainty	11.0	75.6	96.7	
	This scenario represents "perfect vision" for 2017 peak loads as if the forecast peak loads for NYCA have a 100% probability of occurring. The results of this evaluation help to quantify the effects of weather on IRM requirements.				

Table B.1 Sensitivity Case Results

Case	Description	IRM (%)	NYC (%)	LI (%)
4	Remove all wind generation	14.5	80.7	103.2
	Freeze J & K at base levels and adjust capacity in t that the wind generation has on the IRM requirer	he upstate zones. nent.	This shows t	he impact
5	No SCRs & no EDRPs	15.3	77.9	103.0
	Shows the impact of SCRs and EDRPs on IRM.			
6	Remove CPV Valley Energy Center	18.3	81.5	103.7
	A full tan 45 curve case based on removing the ad base case.	ldition of CPV-VEC	C (678 MW) fr	rom the final
7	Limit Emergency Assistance from PJM to all NYCA to 1500 MW	18.2	80.7	103.2
	This case uses a grouped interface of all PJM to N to a limit of 1500 MW	YCA import ties ar	nd restricts th	ne grouping
8	Model 2,000 MW of additional Wind resources (adjusted back to 0.100 LOLE by using zones A-F only).	22.7	80.7	103.2
	Add hypothetical Wind capacity to the existing fle 2,000 MW. This would increase the NYCA particip	et of wind genera pating wind fleet t	tion to the o o 3,733 MW.	rder of
9	Model 2,000 MW of additional bulk Solar resources	22.8	79.7	105.6
	Add hypothetical Solar capacity to the existing fleet of bulk Solar generations to the order of 2,000 MW. This would increase the NYCA participating bulk Solar fleet to 2,032 MW.			
10	Model 2,000 MW of Wind and 2,000 MW of Solar additions (4,000 MW total). Perform tan 45.	26.3	80.8	105.6
	Add hypothetical resources totaling 4,000 MW from the above cases 9 and 10. Perform a tan 45 curve and analysis.			
	intentionally left blank			

Case	Description	IRM (%)	NYC (%)	LI (%)
11	Model 2,000 MW of Wind and 2,000 MW of Solar additions (4,000 MW total).	28.2	79.3	105.0
	Add hypothetical resources totaling 4,000 MW fro case using the standard sensitivity methodology.	om the above case	es 9 and 10. F	erform this
12	Remove the 3500 MW EA Limit into NYCA	17.8	80.4	102.8
	Remove the 3500 MW Emergency Assistance grouped limit entering NYCA from its neighbors. UDRs remain in New York.			
13	Model a 500 MW Locality export to New England	N/A	N/A	N/A
	Given time, model a capacity sale of 500 MW from zone G to NY's Western Mass and Connecticut zones.			
14	Retire the Selkirk Units	18.3	80.7	103.2
	Retire the two Selkirk units and return to a 0.100 LOLE by adjusting capacity in zones A-F.			
15	Retire the Binghamton BOP Unit	18.2	80.7	103.2
	Retire the Binghamton BOP unit and return to a 0 F.	.100 LOLE by adju	sting capacit	y in zones A-

B.2 Impacts of Environmental Regulations

B.2.1 Regulations Reviewed for Impacts on NYCA Generators

The NYISO monitors numerous environmental regulatory programs that could impact the operation of NYS Bulk Power System facilities. These state and federal regulatory programs include:

NO_X RACT: Reasonably Available Control Technology (Effective July 2014).

BART: Best Available Retrofit Technology for regional haze (Effective January 2014).

MATS: Mercury and Air Toxics Standard for hazardous air pollutants (Effective April 2015).

MRP: Mercury Reduction Program for Coal-Fired Electric Utility Steam Generating Units – Phase II reduces Mercury emissions from coal fired power plants in New York (Effective January 2015).

CSAPR: Cross-State Air Pollution Rule for the reduction of SO_2 and NO_x emissions in 27 Eastern States. Additional Phase 2 ozone season NO_x emissions reductions promulgated in the CSAPR Update Rule became effective in May 2017.

RGGI: Regional Greenhouse Gas Initiative Phase II cap reductions started January 2014. The program design is undergoing review by the RGGI states in 2016 for design changes to take effect post-2020.

New Source CO₂ Emission Standards: Federal New Source Performance Standards would have become effective October 2015, however, these standards are under judicial review by the courts and administrative review by the Trump administration.

Existing Source CO₂ Emission Standards: Federal emissions limits for existing units under the Clean Power Plan (CPP) would begin in 2022. However, the Supreme Court of the United States stayed the effectiveness of the CPP. EPA has proposed to repeal of the CPP and has solicited for comments on a replacement.

RICE: NSPS and NESHAP/MACT – New Source Performance Standards and Maximum Achievable Control Technology for Reciprocating Internal Combustion Engines (Effective July 2016, however, the exemption for use of non-compliant engines in energy markets has been removed from the regulatory text to address judicial remand).

BTA: Best Technology Available for cooling water intake structures (Effective upon SPDES Permit Renewal).

NYC Residual Oil Elimination: Phase out of residual oil usage in New York City (NYC) utility boilers post-2020.

DG (Distributed Generation) Rule: New York State Department of Environmental Conservation (NYSDEC) published a final rule on November 1, 2016 affecting small generators. On March 1, 2017, the NYSDEC's final rule was challenged in the Supreme Court of the County of Albany. As part of that litigation, the parties have agreed to stay the implementation and enforcement of 6 NYCRR Part 222, pending the Court's decision on Petitioners-Plaintiffs' request for a preliminary injunction.

The NYISO has determined that as much as 28,000 MW in the modeled fleet will have some level of exposure to environmental regulations. However, the NYISO does not have any information that would indicate that these initiatives may result in NYCA capacity reductions or retirements that would increase LOLE or IRM requirements during the 2018 Capability Year. For additional detail please refer to the 2016 Reliability Needs Assessment (RNA) Report.²

² NYISO's "2016 Reliability Needs Assessment" report, dated 10/18/2016, at: <u>http://www.nyiso.com/public/webdocs/markets_operations/services/planning/Planning_Studies/Reliability_Planning_</u>

NYSRC: NYCA Installed Capacity Requirement for the Period May 2018 through April 2019

B.3 Frequency of Implementing Emergency Operating Procedures

In all cases, it was assumed that the EOPs are implemented as required to meet the 0.1 days/year criterion. For the base case, the study shows that approximately 4.2 remote controlled voltage reductions per year would be implemented to meet the once in 10 years disconnection criterion. The expected frequency for each of the EOPs for the base case is provided in Table B.2.

Step	EOP	Expected Implementation (Days/Year)
1	Require SCRs	8.6
2	Require EDRPs	6.3
3	5% manual voltage reduction	6.1
4	30-minute reserve to zero	6.0
5	5% remote controlled voltage reduction	5.9
6	Voluntary load curtailment	4.2
7	Public appeals	3.5
8	Emergency purchases	3.3
9	10-minute reserve to zero	3.2
10	Customer disconnections	0.1

Table B.2 Implementation of EOP steps

Appendix C

ICAP to UCAP Translations

C. ICAP to UCAP Translation

The NYISO administers the capacity requirements to all loads in the NYCA. In 2002, the NYISO adopted the Unforced Capacity (UCAP) methodology for determining system requirements, unit ratings and market settlements. The UCAP methodology uses individual generating unit data for output and availability to determine an expected level of resources that can be considered for system planning, operation and marketing purposes. EFORd is developed from this process for each generating unit and applied to the units Dependable Maximum Net Capability (DMNC) test value to determine the resulting level of UCAP.

Individual unit EFORd factors are taken in aggregate on both a Statewide and Locational basis and used to effectively "translate" the IRM and LCRs previously determined in the GE-MARS Analysis in terms of ICAP, into an equivalent UCAP basis.

Table C.1 summarizes historical values (since 2000) for NYCA capacity parameters including Base Case IRMs, approved IRMs, UCAP requirements, and NYISO Approved LCRs (for NYC, LI and G-J).

Capability Year	Base Case IRM (%)	EC Approved IRM (%)	NYCA Equivalent UCAP Requirement (%)	NYISO Approved NYC LCR (%)	NYISO Approved LI LCR (%)	NYISO Approved LHV LCR (%)
2000	15.5	18.0		80.0	107.0	
2001	17.1	18.0		80.0	98.0	
2002	18.0	18.0		80.0	93.0	
2003	17.5	18.0		80.0	95.0	
2004	17.1	18.0	11.9	80.0	99.0	
2005	17.6	18.0	12.0	80.0	99.0	
2006	18.0	18.0	11.6	80.0	99.0	
2007	16.0	16.5	11.3	80.0	99.0	
2008	15.0	15.0	8.4	80.0	94.0	
2009	16.2	16.5	7.2	80.0	97.5	
2010	17.9	18.0	6.1	80.0	104.5	
2011	15.5	15.5	6.0	81.0	101.5	
2012	16.1	16.0	5.4	83.0	99.0	
2013	17.1	17.0	6.6	86.0	105.0	
2014	17.0	17.0	6.4	85.0	107.0	88.0
2015	17.3	17.0	7.0	83.5	103.5	90.5
2016	17.4	17.5	6.2	80.5	102.5	90.0
2017	18.1	18.0	7.0	81.5	103.5	91.5

Table C.1 Historical NYCA Capacity Parameters

C.1 NYCA and NYC and LI Locational Translations

In the "Installed Capacity" section of the NYISO Web site3, NYISO Staff regularly post summer and winter Capability Period ICAP and UCAP calculations for NYCA Locational Areas and Transmission District Loads. This information has been compiled and posted since 2006.

Locational ICAP/UCAP calculations are produced for NYC, LI, G-J and the entire NYCA. Exhibits C.1.1 through C.1.4 summarizes the translation of ICAP requirements to UCAP requirements for these areas. The charts and tables included in these exhibits utilize data from the 2006 through 2017 summer capability periods.

This data reflects the interaction and relationships between the capacity parameters used this study, including Forecast Peak Load, ICAP Requirements, Derating Factors, UCAP Requirements, IRMs, and LCRs. Since these parameters are so inextricably linked to each other, the graphical representation also helps one more easily visualize the annual changes in capacity requirements.

C.1.1 New York Control Area ICAP to UCAP Translation

Year	Forecast Peak Load (MW)	Installed Capacity Requirement (%)	Derate Factor	ICAP Requirement (MW)	UCAP Requirement (MW)	Effective UCAP (%)
2006	33,295	118.0	0.0543	39,288	37,154	111.6
2007	33,447	116.5	0.0446	38,966	37,228	111.3
2008	33,809	115.0	0.0578	38,880	36,633	108.4
2009	33,930	116.5	0.0801	39,529	36,362	107.2
2010	33,025	118.0	0.1007	38,970	35,045	106.1
2011	32,712	115.5	0.0820	37,783	34,684	106.0
2012	33,295	116.0	0.0918	38,622	35,076	105.4
2013	33,279	117.0	0.0891	38,936	35,467	106.6
2014	33,666	117.0	0.0908	39,389	35,812	106.4
2015	33,567	117.0	0.0854	39,274	35,920	107.0
2016	33,359	117.5	0.0961	39,197	35,430	106.2
2017	33,178	118.0	0.0929	39,150	35,513	107.0

Table C.2 NYCA ICAP to UCAP Translation



C.1.2 New York City ICAP to UCAP Translation

Year	Forecast Peak Load (MW)	Locational Capacity Requirement (%)	Derate Factor	ICAP Requirement (MW)	UCAP Requirement (MW)	Effective UCAP (%)
2006	11,628	80.0	0.0542	9,302	8,798	75.7
2007	11,780	80.0	0.0388	9,424	9,058	76.9
2008	11,964	80.0	0.0690	9,571	8,911	74.5
2009	12,050	80.0	0.0814	9,640	8,855	73.5
2010	11,725	80.0	0.1113	9,380	8,336	71.1
2011	11,514	81.0	0.0530	9,326	8,832	76.7
2012	11,500	83.0	0.0679	9,545	8,897	77.4
2013	11,485	86.0	0.0559	9,877	9,325	81.2
2014	11,783	85.0	0.0544	10,015	9,471	80.4
2015	11,929	83.5	0.0692	9,961	9,272	77.7
2016	11,794	80.5	0.0953	9,494	8,589	72.8
2017	11,670	81.5	0.0437	9,511	9,095	77.9

Table C.3 New York City ICAP to UCAP Translation

C.1.3 Long Island ICAP to UCAP Translation

Year	Forecast Peak Load (MW)	Locational Capacity Requirement (%)	Derate Factor	ICAP Requirement (MW)	UCAP Requirement (MW)	Effective UCAP (%)
2006	5,348	99.0	0.0348	5,295	5,110	95.6
2007	5,422	99.0	0.0580	5,368	5,056	93.3
2008	5,424	94.0	0.0811	5,098	4,685	86.4
2009	5,474	97.5	0.1103	5,337	4,748	86.7
2010	5,368	104.5	0.1049	5,610	5,021	93.5
2011	5,434	101.5	0.0841	5,516	5,052	93.0
2012	5,526	99.0	0.0931	5,470	4,961	89.8
2013	5,515	105.0	0.0684	5,790	5,394	97.8
2014	5,496	107.0	0.0765	5,880	5,431	98.8
2015	5,539	103.5	0.0783	5,733	5,284	95.4
2016	5,479	102.5	0.0727	5,615	5,207	95.0
2017	5,427	103.5	0.0560	5,617	5,302	97.7

Table C.4 Long Island ICAP to UCAP Translation

C.1.4 GHIJ ICAP to UCAP Translation

Year	Forecast Peak Load (MW)	Locational Capacity Requirement (%)	Derate Factor	ICAP Requirement (MW)	UCAP Requirement (MW)	Effective UCAP (%)
2014	16,291	88.0	0.0587	14,336	13,495	82.8
2015	16,340	90.5	0.0577	14,788	13,934	85.3
2016	16,309	90.0	0.0793	14,678	13,514	82.9
2017	16,061	91.5	0.0731	14,696	13,622	84.8

Table C.5 GHIJ ICAP to UCAP Translation

C.2 Transmission Districts ICAP to UCAP Translation

C.2.1 Central Hudson Gas & Electric

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	%ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	1,163	1,372	1,297	118.0%	111.6%
2007	1,205	1,404	1,341	116.5%	111.3%
2008	1,214	1,396	1,316	115.0%	108.4%
2009	1,196	1,394	1,282	116.5%	107.2%
2010	1,172	1,383	1,244	118.0%	106.1%
2011	1,177	1,359	1,248	115.5%	106.0%
2012	1,133	1,315	1,194	116.0%	105.3%
2013	1,098	1,284	1,170	117.0%	106.6%
2014	1,089	1,274	1,159	117.0%	106.4%
2015	1,084	1,268	1,160	117.0%	107.0%
2016	1,104	1,297	1,173	117.5%	106.2%
2017	1,043	1,231	1,117	118.0%	107.0%

Table C.6 Central Hudson Gas & Electric ICAP to UCAP Translation

C.2.2 Consolidated Edison (Con Ed)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	13,400	15,812	14,953	118.0%	111.6%
2007	13,634	15,883	15,175	116.5%	111.3%
2008	13,911	15,998	15,073	115.0%	108.4%
2009	14,043	16,360	15,050	116.5%	107.2%
2010	13,655	16,113	14,490	118.0%	106.1%
2011	13,451	15,535	14,261	115.5%	106.0%
2012	13,431	15,579	14,149	116.0%	105.4%
2013	13,371	15,644	14,250	117.0%	106.6%
2014	13,719	16,051	14,594	117.0%	106.4%
2015	13,793	16,138	14,760	117.0%	107.0%
2016	13,705	16,103	14,555	117.5%	106.2%
2017	13,534	15,970	14,487	118.0%	107.0%

Table C.7 Con Ed ICAP to UCAP Translation

C.2.3 Long Island Power Authority (LIPA)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	5,406	6,379	6,033	118.0%	111.6%
2007	5,322	6,200	5,923	116.5%	111.3%
2008	5,359	6,163	5,807	115.0%	108.4%
2009	5,432	6,328	5,821	116.5%	107.2%
2010	5,286	6,238	5,609	118.0%	106.1%
2011	5,404	6,242	5,730	115.5%	106.0%
2012	5,508	6,390	5,803	116.0%	105.4%
2013	5,449	6,375	5,807	117.0%	106.6%
2014	5,470	6,400	5,819	117.0%	106.4%
2015	5,541	6,483	5,930	117.0%	107.0%
2016	5,491	6,452	5,832	117.5%	106.2%
2017	5,427	6,404	5,809	118.0%	107.0%

Table C.8 LIPA ICAP to UCAP Translation

C.2.4 National Grid (NGRID)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	7,052	8,321	7,869	118.0%	111.6%
2007	6,719	7,827	7,478	116.5%	111.3%
2008	6,763	7,777	7,327	115.0%	108.4%
2009	6,728	7,839	7,211	116.5%	107.2%
2010	6,732	7,944	7,144	118.0%	106.1%
2011	6,575	7,594	6,971	115.5%	106.0%
2012	6,749	7,829	7,110	116.0%	105.4%
2013	6,821	7,981	7,270	117.0%	106.6%
2014	6,862	8,028	7,299	117.0%	106.4%
2015	6,880	8,050	7,363	117.0%	107.0%
2016	6,776	7,962	7,197	117.5%	106.2%
2017	6,891	8,132	7,376	118.0%	107.0%

Table C.9 NGRID ICAP to UCAP Translation

C.2.5 New York Power Authority (NYPA)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	584	689	652	118.0%	111.6%
2007	588	685	655	116.5%	111.3%
2008	579	666	628	115.0%	108.4%
2009	587	684	629	116.5%	107.2%
2010	318	375	337	118.0%	106.1%
2011	320	369	339	115.5%	106.0%
2012	576	668	607	116.0%	105.3%
2013	589	690	628	117.0%	106.6%
2014	506	592	539	117.0%	106.4%
2015	326	381	349	117.0%	107.0%
2016	336	395	357	117.5%	106.2%
2017	305	360	327	118.0%	107.0%

Table C.10 NYPA ICAP to UCAP Translation

C.2.6 New York State Electric & Gas (NYSEG)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	2,932	3,459	3,271	118.0%	111.6%
2007	3,217	3,748	3,581	116.5%	111.3%
2008	3,141	3,612	3,404	115.0%	108.4%
2009	3,112	3,625	3,335	116.5%	107.2%
2010	3,075	3,629	3,263	118.0%	106.1%
2011	3,037	3,508	3,220	115.5%	106.0%
2012	3,127	3,627	3,294	116.0%	105.4%
2013	3,113	3,643	3,318	117.0%	106.6%
2014	3,229	3,778	3,435	117.0%	106.4%
2015	3,180	3,720	3,403	117.0%	107.0%
2016	3,192	3,750	3,390	117.5%	106.2%
2017	3,223	3,803	3,450	118.0%	107.0%

Table C.11 NYSEG ICAP to UCAP Translation

C.2.7 Orange & Rockland (O & R)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	1,130	1,333	1,261	118.0%	111.6%
2007	1,132	1,318	1,259	116.5%	111.3%
2008	1,192	1,371	1,292	115.0%	108.4%
2009	1,180	1,374	1,264	116.5%	107.2%
2010	1,157	1,366	1,228	118.0%	106.1%
2011	1,173	1,355	1,243	115.5%	106.0%
2012	1,158	1,344	1,220	116.0%	105.4%
2013	1,172	1,371	1,249	117.0%	106.6%
2014	1,191	1,393	1,267	117.0%	106.4%
2015	1,162	1,360	1,244	117.0%	107.0%
2016	1,164	1,368	1,237	117.5%	106.2%
2017	1,177	1,389	1,260	118.0%	107.0%

Table C.12 O & R ICAP to UCAP Translation

C.2.8 Rochester Gas & Electric (RGE)

Year	Forecast Peak Load (MW)	ICAP Requirement (MW)	UCAP Requirement (MW)	% ICAP of Forecast Peak	% UCAP of Forecast Peak
2006	1,629	1,922	1,817	118.0%	111.6%
2007	1,632	1,901	1,816	116.5%	111.3%
2008	1,649	1,897	1,787	115.0%	108.4%
2009	1,652	1,925	1,771	116.5%	107.2%
2010	1,630	1,923	1,729	118.0%	106.1%
2011	1,576	1,821	1,671	115.5%	106.0%
2012	1,612	1,870	1,699	116.0%	105.4%
2013	1,666	1,949	1,775	117.0%	106.6%
2014	1,600	1,872	1,702	117.0%	106.4%
2015	1,601	1,874	1,714	117.0%	107.0%
2016	1,591	1,869	1,690	117.5%	106.2%
2017	1,577	1,861	1,688	118.0%	107.0%

Table C.13 RGE ICAP to UCAP Translation



C.3 Wind Resource Impact on the NYCA IRM and UCAP Markets

Wind generation is generally classified as an "intermittent" or "variable generation" resource with a limited ability to be dispatched. The effective capacity of wind generation can be quantified and modeled using the GE-MARS program similar to conventional fossil-fired power plants. There are various modeling techniques to model wind generation in GE-MARS; the method that ICS has adopted uses historical New York hourly wind farm generation outputs for the previous five calendar years. This data can be scaled to create wind profiles for new wind generation facilities.

For a wind farm or turbine, the nameplate capacity is the ICAP while the effective capacity is equal to the UCAP value. Seasonal variability and geographic location are factors that also affect wind resource availability. The effective capacity of wind generation can be either calculated statistically directly from historical hourly wind generation outputs, and/or by using the following information:

- Production hourly wind data.
- Maintenance cycle and duration
- EFOR (not related to fuel)

In general, effective wind capacity depends primarily on the availability of the wind. Wind farms in New York on average have annual capacity factors that are based on their nameplate ratings. A wind plant's output can range from close to nameplate under favorable wind conditions to zero when the wind doesn't blow. On average, a wind plant's output is higher at night, and has higher output on average in the winter versus the summer.

Another measure of a wind generator's contribution to resource adequacy is its effective capacity which is its expected output during the summer peak hours of 2 PM to 6 PM for the months of June through August. The effective capacity value for wind generation in New York is based on actual hourly plant output over the previous 5-year period – 2012 through 2016 for this year's study, for new units the zonal hourly averages or averages for nearby units will be used. Wind shapes years are selected randomly from those years for each simulation year

Appendix D

Glossary of Terms

D. Glossary

Term	Definition
Availability	A measure of time a generating unit, transmission line, or other facility can provide service, whether or not it actually is in service. Typically, this measure is expressed as a percent available for the period under consideration.
Bubble	A symbolic representation introduced for certain purposes in the GE-MARS model as an area that may be an actual zone, multiple areas or a virtual area without actual load.
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.
Capacity	The rated continuous load-carrying ability, expressed in megawatts ("MW") or megavolt-amperes ("MVA") of generation, transmission or other electrical equipment.
Contingency	An actual or potential unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch, or other electrical element. A contingency also may include multiple components, which are related by situations leading to simultaneous component outages.
Control Area (CA)	An electric system or systems, bounded by interconnection metering and telemetry, capable of controlling generation to maintain its interchange schedule with other control areas and contributing to frequency regulation of the interconnection.
Demand	The rate at which energy must be generated or otherwise provided to supply an electric power system.
Emergency	Any abnormal system condition that requires automatic or immediate, manual action to prevent or limit loss of transmission facilities or generation resources that could adversely affect the reliability of an electric system.
External Installed Capacity (External ICAP)	Installed capacity from resources located in control areas outside the NYCA that must meet certain NYISO requirements and criteria in order to qualify to supply New York LSEs.
Firm Load	The load of a Market Participant that is not contractually interruptible. Interruptible Load – The load of a Market Participant that is contractually interruptible.
Generation	The process of producing electrical energy from other forms of energy; also, the amount of electric energy produced, usually expressed in kilowatt-hours (kWh) or megawatt-hours (MWh).
Installed Capacity (ICAP)	Capacity of a facility accessible to the NYS Bulk Power System, that is capable of supplying and/or reducing the demand for energy in the NYCA for the purpose of ensuring that sufficient energy and capacity is available to meet the reliability rules.

Term	Definition
Installed Capacity Requirement (ICR)	The annual statewide requirement established by the NYSRC in order to ensure resource adequacy in the NYCA.
Installed Reserve Margin (IRM)	That capacity above firm system demand required to provide for equipment forced and scheduled outages and transmission capability limitations.
Interface	The specific set of transmission elements between two areas or between two areas comprising one or more electrical systems.
Load	The electric power used by devices connected to an electrical generating system. (IEEE Power Engineering)
Load Relief	Load reduction accomplished by voltage reduction or load shedding or both. Voltage reduction and load shedding, as defined in this document, are measures by order of the NYISO.
Load Shedding	The process of disconnecting (either manually or automatically) pre-selected customers' load from a power system in response to an abnormal condition to maintain the integrity of the system and minimize overall customer outages. Load shedding is a measure undertaken by order of the NYISO. If ordered to shed load, transmission owner system dispatchers shall immediately comply with that order. Load shall normally all be shed within 5 minutes of the order.
Load Serving Entity (LSE)	In a wholesale competitive market, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Long Island Power Authority ("LIPA"), New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation, Orange & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation, the current forty-six (46) members of the Municipal Electric Utilities Association of New York State, the City of Jamestown, Rural Electric Cooperatives, the New York Power Authority ("NYPA"), any of their successors, or any entity through regulatory requirement, tariff, or contractual obligation that is responsible for supplying energy, capacity and/or ancillary services to retail customers within New York State.
Locational Capacity Requirement (LCR)	Due to transmission constraints, that portion of the NYCA ICAP requirement that must be electrically located within a zone, in order to ensure that sufficient energy and capacity are available in that zone and that NYSRC Reliability Rules are met. Locational ICAP requirements are currently applicable to three transmission constrained zones, New York City, Long Island, and the Lower Hudson Valley, and are normally expressed as a percentage of each zone's annual peak load.
New York Control Area (NYCA)	The control area located within New York State which is under the control of the NYISO. See Control Area.
New York Independent System Operator (NYISO)	The NYISO is a not-for-profit organization formed in 1998 as part of the restructuring of New York State's electric power industry. Its mission is to ensure the reliable, safe and efficient operation of the State's major transmission system and to administer an open, competitive and nondiscriminatory wholesale market for electricity in New York State.

Term	Definition
New York State Bulk Power System (NYS Bulk Power System or BPS)	The portion of the bulk power system within the New York Control Area, generally comprising generating units 300 MW and larger, and generally comprising transmission facilities 230 kV and above. However, smaller generating units and lower voltage transmission facilities on which faults and disturbances can have a significant adverse impact outside of the local area are also part of the NYS Bulk Power System.
New York State Reliability Council, LLC (NYSRC)	An organization established by agreement (the "NYSRC Agreement") by and among Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., LIPA, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation, Orange & Rockland Utilities, Inc., Rochester Gas and Electric Corporation, and the New York Power Authority, to promote and maintain the reliability of the Bulk Power System, and which provides for participation by Representatives of Transmission Owners, sellers in the wholesale electric market, large commercial and industrial consumers of electricity in the NYCA, and municipal systems or cooperatively-owned systems in the NYCA, and by unaffiliated individuals.
New York State (NYS) Transmission System	The entire New York State electric transmission system, which includes: (1) the transmission facilities under NYISO operational control; (2) the transmission facilities requiring NYISO notification, and; (3) all remaining facilities within the NYCA.
Operating Limit	The maximum value of the most critical system operation parameter(s) which meet(s): (a) pre-contingency criteria as determined by equipment loading capability and acceptable voltage conditions; (b) stability criteria; (c) post-contingency loading and voltage criteria.
Operating Procedures	A set of policies, practices, or system adjustments that may be automatically or manually implemented by the system operator within a specified time frame to maintain the operational integrity of the interconnected electric systems.
Operating Reserves	Resource capacity that is available to supply energy, or curtailable load that is willing to stop using energy, in the event of emergency conditions or increased system load, and can do so within a specified time period.
Reserves	In normal usage, reserve is the amount of capacity available in excess of the demand.
Resource	The total contributions provided by supply-side and demand-side facilities and/or actions.
Stability	The ability of an electric system to maintain a state of equilibrium during normal and abnormal system conditions or disturbances.
Thermal Limit	The maximum power flow through a particular transmission element or interface, considering the application of thermal assessment criteria.
Transfer Capability	The measure of the ability of interconnected electrical systems to reliably move or transfer power from one area to another over all transmission lines (or paths) between those areas under specified system conditions.
Transmission District	The geographic area served by the NYCA investor-owned transmission owners and LIPA, as well as customers directly interconnected with the transmission facilities of NYPA.

Term	Definition	
Transmission Owner	Those parties who own, control and operate facilities in New York State used for the transmission of electric energy in interstate commerce. Transmission owners are those who own, individually or jointly, at least 100 circuit miles of 115 kV or above in New York State and have become a signatory to the TO/NYISO Agreement.	
Unforced Capacity:	The measure by which Installed Capacity Suppliers will be rated, in accordance with formulae set forth in the ISO Procedures, to quantify the extent of their contribution to satisfy the NYCA Installed Capacity Requirement, and which will be used to measure the portion of that NYCA Installed Capacity Requirement for which each LSE is responsible.	
Voltage Limit	The maximum power flow through some particular point in the system considering the application of voltage assessment criteria.	
Voltage Reduction	 A means of achieving load reduction by reducing customer supply voltage, usually by 3, 5, or 8 percent. If ordered by the NYISO to go into voltage reduction, Transmission Owner system dispatchers shall immediately comply with that order. Quick response voltage reduction shall normally be accomplished within ten (10) minutes of the order. 	
Zone	A defined portion of the NYCA area that encompasses a set of load and generation buses. Each zone has an associated zonal price that is calculated as a weighted average price based on generator LBMPs and generator bus load distribution factors. A "zone" outside the NY control area is referred to as an external zone. Currently New York State is divided into eleven zones, corresponding to ten major transmission interfaces that can become congested.	

ATTACHMENT B

NYSRC RESOLUTION

NEW YORK STATE RELIABILITY COUNCIL, L.L.C. APPROVAL OF NEW YORK CONTROL AREA INSTALLED CAPACITY REQUIREMENT FOR THE PERIOD MAY 1, 2018 THROUGH APRIL 30, 2019

- 1. WHEREAS, reliable electric service is critical to the economic and social welfare of the millions of residents and businesses in the State of New York; and
- 2. WHEREAS, the reliable and efficient operation of the New York State Power System is fundamental to achieving and maintaining reliability of power supply; and
- 3. WHEREAS, The New York State Reliability Council, L.L.C.'s (NYSRC) principal mission is to establish Reliability Rules for use by the New York Independent System Operator (NYISO) to maintain the integrity and reliability of the NYS Power System; and
- 4. WHEREAS, the NYSRC is responsible for determining the New York Control Area (NYCA) annual Installed Capacity Requirement (ICR); and
- 5. WHEREAS, the NYSRC Technical Study Report: NYCA Installed Capacity Requirement for the Period May 2018 through April 2019, dated December 8, 2017 (Technical Study Report), prepared by the NYSRC Installed Capacity Subcommittee, concludes that, under base case conditions, the required NYCA installed reserve margin (IRM) for the May 1, 2018 through April 30, 2019 Capability Year is 18.2%; and
- 6. WHEREAS, in light of the Technical Study Report results, the modeling and assumption changes made to simulate actual operating conditions and system performance as set forth in Table 6-1 of the Technical Study Report, the numerous sensitivity studies evaluated as set forth in Table 7-1 of the same report, and other relevant factors;
- 7. NOW, THEREFORE BE IT RESOLVED, that in consideration of the factors described above, the NYSRC finds that an IRM requirement at 18.2%, which equates to an ICR of 1.182 times the forecasted NYCA 2018 peak load, will satisfy the criteria for resource adequacy set forth in the NYSRC's Reliability Rule A.1; and hereby sets the NYCA IRM requirement for the May 1, 2018 to April 30, 2019 Capability Year at 18.2%.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Washington, D.C. this 22nd day of December, 2017.

<u>/s/ Carlos L. Sisco</u> Carlos L. Sisco Senior Paralegal Winston & Strawn LLP 1700 K Street, N.W. Washington, DC 20006-3817 202-282-5000