

**NEW YORK STATE
RELIABILITY
COUNCIL**

*2009 Reliability
Compliance Program*

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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Introduction

The New York State Reliability Council (NYSRC) Reliability Compliance Program is designed to measure and ensure compliance with NYSRC Reliability Rules in order to provide for a reliable bulk electric supply and delivery system in New York State. The NYSRC Reliability Compliance Monitoring Subcommittee (RCMS) manages the compliance program, which includes conducting reviews to ensure that the NYISO is in compliance with all NYSRC Reliability Rules, even those identified in the Rules as requiring actions by Market Participants. The NYISO has the responsibility of ensuring Market Participant compliance through its procedures and Market Services Tariff. The objective of the compliance program is to encourage compliance to the NYSRC Reliability Rules necessary to preserve the reliability of the New York Control Area. This report presents the highlights of results of the NYSRC 2009 Reliability Compliance Program.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-4, *Procedure for Monitoring Compliance with the NYSRC Reliability Rules*.

Another major reference document for the reliability compliance monitoring process is the NYSRC *Compliance Template Manual*. The *Compliance Template Manual* includes a compliance template for each measurement. These templates cover reporting and compliance monitoring responsibilities, reporting frequencies, and statements of requirements for full compliance and levels of non-compliance. The Compliance Template Manual also describes the types of non-compliance notification letters that must be issued for various levels of non-compliance. The *Compliance Template Manual* was updated four times during 2009 (Versions 17-20), reflecting adoption of seven modified measurements.

In 2009, the NYSRC maintained a total of 57 NYSRC measurements. Generally, each year's Reliability Compliance Program includes compliance reviews of most NYSRC measurements. Factors used for selecting the group of measurements to be reviewed each year include: (1) Measurements that require annual or monthly review, (2) Measurements in which compliance have not been reviewed in the past three years, (3) Measurements that have been adopted or modified over the previous year, (4) all Market participant measurements, and (5) Measurements that were found in non-compliance during the previous year or if other issues associated with NYISO compliance require a follow-up review. The annual Reliability Compliance Program is approved by the NYSRC Executive Committee every February.

2009 Reliability Compliance Program Measurements

As shown in Table 1, the 2009 Reliability Compliance Program included 20 NYSRC measurements having NYISO reporting responsibility and 12 measurements having Market Participant reporting responsibility. This number of measurements, for which NYISO and Market Participant compliance was assessed, represents 56% of the total NYSRC measurements. The Appendix is a summary of the NYSRC 2009 Reliability Compliance Program that depicts the measurements that were assessed, compliance documentation requirements, milestone dates, and compliance results.

Table 1 – NYSRC 2009 Reliability Compliance Program Summary

	Measurements Requiring Actions by the NYISO	Measurements Requiring Actions by Market Participants	Total Measurements
Total NYSRC Measurements	45	12	57
Total Measurements in 2009 NYSRC Compliance Program	20	12	32
2009 Program Measurements – Compliance level not declared	2	0	2
2009 Program Measurements – Full Compliance	18	12	30
2009 Program Measurements – Non-Compliance	0	0	0

Table 1 shows that the NYISO and market participants were in full compliance with all but two measurements that were assessed as part of the 2009 Reliability Compliance Program. RCMS did not declare compliance levels for two measurements (see Item 2 below).

Highlights of the NYSRC 2009 Reliability Compliance Program

1. Special Compliance Review: Market Participant Non-Compliance with Measurement C-M5, Outage Date Reporting Requirements – An Update

In October 2009, RCMS prepared a report to the Executive Committee, *Reliability Compliance Review of 2004 Outage Data Misreporting Event*, that described the implementation status and outcomes of seven recommendations from a previous RCMS report, *Reliability Compliance Review of 2004 NERC-GADS Outage Data Misreporting Event (C-M5 Report)*, dated November 26, 2008. These reports can be found at <http://www.nysrc.org/reports3.asp>. The 2008 C-M5 report provided RCMS findings and recommendations relative to its review of a 2004 outage data reporting NYSRC rule violation and related compliance concerns that were raised. The October status report reported that five of the seven C-M5 Report recommendations (Recommendations #1-3, 5, and 7) had been fully implemented. Since this report was issued, Recommendation #6 was also fully implemented. NYISO work to implement the remaining recommendation, Recommendation #4 – development of software for a new NYISO generating unit GADS outage data screening process – began in early 2009. Completion of the software and initial GADS data review analysis using the new screening software, is expected during the Spring of 2010. In September 2009, the NYISO presented an overview of the new data screening process to RCMS and the Installed Capacity Subcommittee, who were requested to provide comments.

2. RCMS Compliance Review of Reliability Rules and Measurements Modified in 2009

During 2009, RCMS participated with the Reliability Rules Subcommittee in the development of major modifications to two groups of NYSRC Reliability Rules and related measurements – *System Restoration* and *Generating Unit Availability*. Later in the year, following adoption by the Executive Committee, RCMS assessed NYISO compliance with these modified reliability rules.

- System Restoration Rules – Modifications to Reliability Rules G-R1 and G-M2 and related Measurements G-M1 to G-M4 (PRR #99) were adopted in August 2009. RCMS assessed compliance with these rules in November 2009. RCMS determined that several required NYISO procedures for complying with G-M1 (NYISO procedures for maintaining a NYCA System Restoration Plan) and G-M4 (system restoration training requirements) had not been fully implemented as required. However, RCMS did not find the NYISO in non-compliance for these rule violations because of the limited time for the NYISO to establish these new procedures and the need for an interpretation of rule requirements. At the same time, RCMS approved NYISO's certification that market participants were full compliance with Measurements G-M2 (Transmission Owner responsibilities) and G-M3 (Blackstart Provider responsibilities). RCMS will work with the NYISO in early 2010 to ensure that compliant procedures are implemented. RCMS will again review compliance of Reliability Rules G-R1 and G-R2 in late 2010 as part of the 2010 Compliance Program.
- Generating Unit Availability Rule

Modifications to Reliability Rule C-R2 and related Measurements C-M4 to M6 were adopted in October 2009 (PRR #101). These rule modifications were recommended in the RCMS C-M5 Report, described in Section 1 above. RCMS assessed NYISO compliance of Measurements C-M4 (NYISO procedures for reporting GADS generating unit availability data) and C-M5 (Generation Owner reporting of GADS generating unit outage data to the NYISO) in December 2009. For this compliance review, RCMS recognized that the NYISO's GADS outage data screening process, which is required by C-M4.5, would not be completed until 2010 (see Section 1 above). RCMS found the NYISO in full compliance with Measurements C-M4.1 to C-M4.4 and C-M5. Another compliance review of Reliability Rule C-R2 is scheduled as part of the 2010 Compliance Program, after the GADS data screening process is completed.

3. NYCA Transmission and Resource Adequacy Assessments

The NYSRC Reliability Rules require that the NYISO provide NYCA transmission and resource adequacy assessments to demonstrate that the NYISO complies with NYSRC Reliability Rules. The timing of annual transmission assessments to the NYSRC is coordinated with that of similar submissions required by NPCC.

To demonstrate compliance with NYSRC transmission design criteria in Reliability Rules B-R1, B-R2, B-R3, and B-R4 (thermal, voltage, stability, extreme contingency, and fault duty assessments), a NYISO transmission assessment, *2008 Intermediate NYCA Transmission Review Through 2013* was submitted to RCMS in early 2009). The primary conclusion of the 2008 review was that the New York State Bulk Power Transmission System, as planned through the year 2013, is in conformance with the above Reliability Rules, as well as NPCC criteria. The same report was submitted to NPCC.

The NYSRC also requires that the NYISO provide an Addendum to its annual transmission assessment report, that includes: (1) (N-1)-1 assessments; (2) identification of the impacts of the planned transmission system on the NYCA System Restoration Plan in accordance with B-M3; (3) an assessment showing local rules have been considered in accordance with I-M4; (4) an extreme contingency assessment for the loss of gas delivery system; and (5) an extreme contingency condition assessment assuming generating unit loss of gas supply. RCMS accepted the NYISO transmission assessment report, including the Addendum, and concluded

that the NYISO was in full compliance with all NYSRC transmission assessment rule requirements.

To demonstrate compliance with NYSRC resource adequacy assessment requirements, the NYISO prepared the report *Annual Assessment of Resource Adequacy covering the NYCA for 2009-2012*. The study concluded that the 2009 NYCA IRM requirement of 16.5 % could be met throughout the 2008-2011 study period, assuming all planned resources were completed on schedule. RCMS accepted the report and concluded that the NYISO was in full compliance with NYSRC resource adequacy assessment rule requirements.

2009 NPCC and NERC Reliability Compliance Programs

In addition to complying with NYSRC Rules, the NYISO must also comply with all NPCC and NERC standards and criteria. RCMS has oversight responsibility concerning NYISO compliance with these NPCC and NERC criteria. NPCC has the responsibility and authority to implement a compliance monitoring and enforcement program for NERC and Regional Standards, as well as monitoring compliance with NPCC-specific reliability criteria. During 2009, NPCC reviewed NYISO compliance relative to 12 NPCC and 36 NERC criteria and standards, respectively, that were included in the 2009 NPCC and NERC Reliability Compliance Programs. Compliance with NERC standards is mandatory. NPCC concluded that the NYISO was in full compliance with all 48 NPCC and NERC criteria and standards that were included in these reliability compliance programs.

Conclusions

The following conclusions were reached by RCMS based on its experience with the 2009 Reliability Compliance Program:

1. As in past years, the NYISO staff – especially Greg Campoli and Tony Elacqua – provided valued assistance during the RCMS compliance review process.
2. RCMS is pleased that for the seventh year in a row, the NYISO and market participants were found to be in full compliance with all NYSRC measurements that were assessed as part of the annual NYSRC Compliance Program. In addition, NPCC found the NYISO in full compliance for all NPCC criteria and NERC standards that were assessed in 2009.
3. Compliance documentation for four assessments in 2009 were received on-time by RCMS but were found to be incomplete. This was due to a combination of misunderstandings by NYISO staff of compliance documentation requirements, or for other reasons. In all cases, extensions were granted by RCMS without non-compliance action in order to provide complete documentation for these assessments. RCMS has set a goal for the NYISO to provide complete on-time documentation for all compliance assessments in 2010. RCMS will support the NYISO staff to achieve this goal.

APPENDIX

2009 NYSRC RELIABILITY COMPLIANCE PROGRAM

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED 1	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL 2
Resource Adequacy							
A-M2	A-R2,3	Establishing LSE ICAP/LCR requirements	A	3/1/09	3/11/09	3/12/09	FC
A-M3	A-R2,3	Certifying LSE ICAP obligations are met*	B	11/1/09	11/1/09	11/12/09	FC
Transmission Capability – Planning							
B-M1	B-R1 to B-R3, B-R7	Thermal, voltage, stability, and fault duty assessments for the planned NYCA system	C	3/1/09	3/11/09	3/12/09	FC
B-M2	B-R4	Extreme contingency assessment for the planned NYCA system	D	3/1/09	3/11/09	3/12/09	FC
B-M3	B-R5	Demonstration that system is planned considering ease of restoration	E	3/1/09	3/11/09	3/12/09	FC
B-M4	B-R6	List of NYS Bulk Power System Facilities	F	10/1/09	9/28/09	10/8/09	FC
Resource, System & Demand Data Requirements							
C-M1	C-R1	Procedures for resource testing requirements	G	3/1/09	3/10/09	3/12/09	FC
C-M2	C-R1	Reporting resource DMNC test results to the NYISO*	H	2/1/09	1/30/09	2/12/09	FC
C-M3	C-R1	Reporting generator reactive power capacity test results to the NYISO*	I	2/1/09	1/30/09	2/12/09	FC
C-M4	C-R2	Procedures for reporting resource availability data	J	12/1/09	12/1/09	12/3/09 9	FC 9
C-M5	C-R2	Reporting of resource outage data to the NYISO*	K	12/1/09	12/1/09	12/3/09	FC

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED 1	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL 2
C-M9	C-R4	Procedure for maintenance of load flow, short-circuit and stability data	L	4/1/09	4/1/09	4/16/09	FC
C-M11	C-R4	Reporting of load flow, short-circuit and stability data to the NYISO*	M	4/1/09 7/1/09 5	4/1/09 7/9/09 8/13/09	4/16/09 7/9/09 5 8/13/09	FC
C-M13	C-R5	Certification that disturbance recording devices have been installed and data reported as required*	N	12/1/09	12/1/09	12/3/09	FC
Transmission Capability – Operating							
E-M6	E-R8	Pre-seasonal fault duty assessments	O	[A] 6/1/09 [B] 10/1/09	[A] 6/4/09 7/9/09 8/13/09 9/28/09	6/11/09 7/9/09 6 8/13/09 10/8/09	[A] FC [B] FC
E-M7	E-R8	MP evaluation of NYISO fault duty assessments*	P	10/1/09	9/28/09	10/8/09	FC
E-M8	E-R9	Application of Reliability Rules requirements	Q	9/1/09	9/10/09	9/10/09	FC
E-M9	E-R10	NYISO annual review of exceptions	R	12/1/09	12/1/09	12/1/09	FC
Operation During Major Emergencies							
F-M4	F-R8	TO load shedding capability*	S	7/1/09	7/9/09	7/9/09	FC
F-M6	F-R5	Voltage reduction testing	T	8/1/09	7/9/09	7/9/09	FC
System Restoration							
G-M1	G-R1	NYISO procedures for maintaining a NYCA System Restoration Plan	U	11/1/08 7	11/1/09	11/12/09 12/03/09 8	8
G-M2	G-R1	Transmission Owner Restoration Plan requirements*	V	11/1/09 7	11/1/09	11/12/09	FC
G-M3	G-R1	Blackstart Provider requirements*	W	11/1/09 7	11/1/09	11/12/09	FC
G-M4	G-R2	System restoration training requirements	X	11/1/09 7	11/1/09	11/12/09 12/03/09 8	8

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED 1	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL 2
Local Reliability Rules							
I-M4	I-R1 to I-R5	Consideration of local rules in transmission planning and establishment of operating limits	Y	3/1/09	3/11/09	3/12/09	FC
I-M5	I-R1, I-R3, I-R4	Con Ed Local Rules I-R1, R2 and R4 Procedures	Z	12/1/09	11/1/09	11/12/09	FC
I-M6	I-R5	LIPA Local Rule I-R5 Procedures	AA	12/1/09	11/1/09	11/12/09	FC
Reliability Assessment							
K-M2a 10	K-R2	2008 transmission assessment	BB	3/1/09	1/07/09 2/12/09 3/11/09	2/12/09 4 3/12/09 4	FC
K-M2b	K-R2	2009 resource adequacy assessment	CC	6/1/09	6/11/09	6/11/09 7/9/09	FC
K-M2c	K-R2	Interregional reliability assessment	DD	6/1/09	6/04/09	6/11/09	FC
K-M2d	K-R2	Monthly operations reports			11/12/09 3	11/12/09 3	FC 3
K-M3	K-R2	Extreme system condition assessment	EE	3/1/09	3/11/09	3/12/09	FC

* Market Participant requirements.

Footnotes

1. NYISO Compliance Documentation Requirements:

- A. **A-M2.** The NYISO Locational Capacity Requirement Report for the 2009-10 capability period. In addition, provide either in the LCR report or in a separate report, required 2009 LSE capacity and IRM requirements for meeting the 2009 NYCA IRM requirement of 16.5%. and locational requirements; and whether any intra-zonal transmission constraints caused by deliverability issues or “bottled” generation have been considered by the NYISO.
- B. **A-M3.** Certification that each LSE has demonstrated that it has procured sufficient capacity for the November 2008 to October 2009 period to meet its ICAP requirement in accordance with NYISO procedures and A-M3.
- C. **B-M1.** Evaluations of the thermal, voltage, short-circuit, and stability performance of the NYS BPS that shows that the system, as planned, is in conformance with the criteria described in NYSRC Rules B-R1 to B-R3, and B-R7. These evaluations shall be included in the 2009 Transmission Assessment required by K-M2a (see Note BB).

- D. **B-M2.** An evaluation of performance of the NYS BPS for extreme contingencies as defined in NYSRC Rule B-R4 and B-M2. This evaluation shall be included in the 2009 Transmission Assessment required by K-M2a (see Note BB).
- E. **B-M3.** As required by B-M3, provide either the required procedures, or reference to the required procedures, for assessing the impact of the system expansion plan on the NYCA Restoration Plan. This assessment shall be included in the 2009 Transmission Assessment required by K-M2a (see Note BB).
- F. **B-M4.** Documentation shall include: (1) NYISO procedure for developing the list of NYS Bulk Power System facilities, and (2) a BPS Facilities List. These documentation requirements shall be defined by a modification of B-M4 (PRR 97, expected to be adopted during the first half of 2009).
- G. **C-M1.** As required by C-M1, NYISO procedures for verification testing of resource capacity testing. The NYISO shall also demonstrate that these procedures include C-M1 modifications and implementation plan addressed in PRR 96 (adopted on 1/9/09).
- H. **C-M2.** Certification that all applicable generation owners responsible for providing ICAP verified the net dependable capacity of their equipment and reported these results to the NYISO for the previous testing period, in accordance with NYISO procedures. This certification shall assure that these test results incorporate required procedural changes defined in revised C-M2 (PRR 96 adopted on 1/9/09).
- I. **C-M3.** Certification that all applicable generation owners performed tests to verify the reactive power capacity for their generators, and reported these test results to the NYISO for the previous testing period, in accordance with NYISO procedures.
- J. **C-M4.** As required by C-M4, NYISO procedures for reporting outage and load response data to the NYISO. This documentation shall be based on requirements defined in a modified version of C-M4, expected to be adopted later in 2009.
- K. **C-M5.** Certification that ICAP providers submitted outage data to the NYISO as required by NYISO procedures and C-M4. This certification shall be based on requirements defined in a modified version of C-M5, expected to be adopted later in 2009. In addition to the above certification, RCMS may require that the NYISO provide RCMS with certain data to satisfy new C-M5 requirements.
- L. **C-M9.** NYISO procedures that are in place for the development of load flow, short-circuit, and stability data bases in accordance with C-M9, including a NYISO procedure (or Tech Bulletin) for ensuring that MPs report to the NYISO and transmission owner changes to equipment parameters, including time requirements, in accordance with C-M9. In addition, the NYISO will provide an implementation plan to resolve issues raised in the NPCC TFSS-38 UFLS report.
- M. **C-M11.** Certification that market participants have provided load flow, short-circuit, and stability data bases to the NYISO in accordance with C-M11.
- N. **C-M13.** Certification that market participants have installed disturbance recording devices and reported data in accordance with NYISO procedures.
- O. **E-M6.** [A] A NYISO report covering a 2009 pre-seasonal assessment evaluating fault duty at each BPS station.
[B] If the above report shows fault duty levels exceed equipment ratings, provide mitigation plans jointly approved by the NYISO and equipment owners.
- P. **E-M7.** Certification that applicable equipment owners have evaluated NYISO fault duty assessments in accordance with E-M7.

- Q. **E-M8.** Self-certification that the NYISO has established and maintained a procedure for Applications of the Reliability Rules, posted the list on the NYISO Web site, and that the list is up to date. Also, provide a summary of any Applications changes made over the past 12 months.
- R. **E-M9.** A summary of this year's NYISO exception review in accordance with NYSRC Policy 1 and E-M9 requirements. Provide details of any exception additions, removals, or revisions.
- S. **F-M4.** Certification that transmission owners have reported to the NYISO load shedding documentation in accordance with NYISO procedures and F-M4. (Associated NERC Standard EOP-003)
- T. **F-M6.** A report of the results of statewide voltage reduction tests for the 2009 summer period, in accordance with F-M6. The results of these tests shall be available in time for use in the NYSRC 2010 IRM Study. (Associated NERC Standard EOP-002)
- U. **G-M1.** Applicable documentation and references showing that the NYISO has developed system restoration procedures addressing all of the requirements specified in G-M1. This documentation shall include a matrix showing G-M1 requirements and related procedure references. The documentation shall comply with a modified version of G-M1 (PRR 99), expected to be adopted by May 2009. (Associated NERC Standard EOP-005)
- V. **G-M2.** Certification that all TOs have established restoration plans and if required, blackstart capability plans, in accordance with NYISO procedures and G-M2 requirements. This documentation shall comply with a modified version of G-M2 (PRR 99) expected to be adopted by May 2009. (Associated NERC Standard EOP-005)
- W. **G-M3.** Certification that blackstart providers are in compliance with NYISO procedures and G-M3 requirements. This documentation shall comply with a modified version of G-M3 (PRR 99) expected to be adopted by May 2009. (Associated NERC Standard EOP-005)
- X. **G-M4.** Self-Certification that the NYISO maintains restoration training programs in accordance with G-M4 requirements. This certification shall comply with a modified version of G-M4 (PRR 99) expected to be adopted by May 2009. (Associated NERC Standard EOP-005)
- Y. **I-M4.** [A] Self-Assessment that I-M4 requirements have been met for transmission planning, including application examples.
[B] Self-Assessment that I-M4 requirements have been met for operating limits, including application examples.
These self-assessments shall be included in the 2009 NYCA Transmission Assessment (K-M2a).
- Z. **I-M5.** Certification that Con Edison maintains procedures and has properly notified the NYISO when actions have been taken in accordance with I-R1, I-R3, and I-R4 requirements. Specific references to these notifications shall be provided to RCMS for the previous 12 month period.
- AA. **I-M6.** Certification that LIPA maintains procedures and has properly notified the NYISO when actions have been taken in accordance with I-R5 requirements. Specific references to these notifications shall be provided to RCMS for the previous 12 month period.
- BB. **K-M2a.** NYCA 2009 Transmission Assessment Report, including (1) (N-1) -1 assessments; (2) identification of the impacts of the planned transmission system on the NYCA System Restoration Plan (B-M3); (3) an assessment showing that local rules have been considered (I-M4); (4) an extreme contingency assessment for the loss of gas delivery system (K-M3); and (5) an extreme contingency condition assessment assuming generating unit loss of gas supply (K-M3). Submission of the assessment report to the NYSRC should be coordinated with its submission to NPCC.
- CC. **K-M2b.** NYCA Resource Adequacy Report for the 2009-2012 period.
- DD. **K-M2c.** A report on a RFC-NPCC interregional transmission assessment, planned for 2009.

EE. **K-M3.** A report on simulation testing to assess the impact of Extreme System Contingency Conditions on the NYS BPS in accordance with K-M3. The report shall cover studies of those Extreme Contingency Events required by NPCC, including an event resulting the loss of gas supply to multiple NYCA generating units. The latter study shall recognize current environmental initiatives.

2. Levels of Non-Compliance

- L1 – Non-Compliance Level 1
- L2 – Non-Compliance Level 2
- L3 – Non-Compliance Level 3
- L4 – Non-Compliance Level 4

3. This information is for the October 2009 operations report. All previous reports were in full compliance. The November report will be reviewed in January 2010.
4. The NYCA 2008 Transmission Assessment was provided to RCMS on 1/7/09 and NYSRC-required supplemental documentation (see Note BB) was provided on 2/12/09. RCMS comments on these reports will be submitted to the NYISO by 2/27/09. A third draft was reviewed on 3/12/09 by RCMS and further modifications requested, with K-M2a full compliance action pending receipt of these changes (received 3/30/09).
5. Review of C-M11 compliance rescheduled to July RCMS meeting pending NYISO receipt of a governor response survey from market participants as discussed at a 2/23/09 meeting with NYISO staff. An additional extension to 8/13/09 was approved to reflect discussion of survey results.
6. NYISO Fault Duty Assessment report was revised per RCMS 6/11/09 discussion; revised report was submitted to RCMS for review at July 9 meeting. However, RCMS found this report to be inadequate on July 9. An acceptable report was required to be submitted within 30 days to avoid a non-compliance finding. An acceptable report was later received within the 30-day period.
7. This date was changed to accommodate future NYSRC adoption of revised NYSRC System Restoration rules and measurements per PRR 99.
8. RCMS found that compliance documentation for those G-M1-required NYISO procedures requiring certain MP actions was not provided. On 12/2/09 RRS confirmed that the NYISO had misinterpreted these G-M1 requirements. RCMS also found that certain required documentation for G-M4 compliance was not provided. Non-compliance action was not found by RCMS because G-M1 and G-M4 were recently modified (August 2009), and that there was a misunderstanding by the NYISO of certain NYSRC requirements. Therefore, no 2009 compliance findings for G-M1 and G-M4 were designated by RCMS. RCMS will work with NYISO staff in 2010 to ensure that the necessary NYISO procedures are implemented to fully comply with G-M1 and G-M4 requirements. Further compliance review of Measurements G-M1 and G-M4 has been scheduled for 2010.
9. The NYISO is in full compliance with C-M4.1, C-M4.2, and C-M4.4. However, required procedures and processes to satisfy C-M1.3 (training) and C-M1.5 (data screening) requirements were not fully implemented because of insufficient time to prepare this documentation since PRR 101 was approved in October 2009. After the 12/3/09 RCMS meeting, the NYISO revised its GADS Training Procedure to include notification of MPs of the training schedule. This addition satisfies C-M4.3 requirements.

10. Compliance review of the 2009 Transmission Assessment, originally scheduled for 2009, was rescheduled for January 2010 as part of the 2010 Reliability Compliance Program.