

### REVISION OF THE DEFINITION OF “TRANSMISSION OWNERS” in the NYSRC Glossary

Recently the Executive Committee asked if it would be appropriate for the Transco’s, recently authorized in the NYISO’s competitive Transmission Planning Process to build transmission lines in New York State, to be eligible to be represented as Transmission Owners in the NYSRC’s governance process.

I informed the Executive Committee that a similar question was raised with respect to the NYISO’s governance process in which the traditional transmission owners (i.e., the members of the former New York Power Pool) have a 20% voting share. The definition of Transmission Owners under the NYISO tariff, which has been adopted by the NYSRC, reads as follows:

**Transmission Owners** - 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 ISO/TO Agreement.** The Transmission Owners currently consist of Central Hudson Gas and Electric Corporation, Consolidated Edison Company of New York, Inc., LIPA, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation, Rochester Gas and Electric Corporation, and the New York Power Authority.

At the NYISO, it was decided that a fundamental difference between a Transco and the traditional transmission owners is that each of the traditional transmission owners has a Transmission District and retail customers, and is expected to represent the interests of its customers in the NYISO’s governance process. Consequently, it was determined that allowing a Transco, that has no Transmission District and no retail customers, to participate in the Transmission Owner Sector would be inconsistent with the intent of the NYISO’s governance process. As a result, the Transcos were not permitted to become signatories to the ISO/TO Agreement, to allow them to meet the definition of a Transmission Owner under the NYISO’s tariff. The NYISO and the Transcos signed comparable but different transmission agreements. The Transcos currently participate in the NYISO’s governance process in the Other Supplier Sector, which includes companies that transmit electric power.

With respect to the NYSRC, I think that a similar analysis applies. Because the members of the former New York Power Pool have Transmission Districts and have a legal obligation to maintain reliability in their Transmission District, their concerns regarding system reliability are very different and much more extensive than a Transco, which simply owns a specific transmission line. For example, it does not appear to me that a Transco would have the same interest as the traditional transmission owners in the great majority of the Reliability Rules adopted by the NYSRC or in the annual IRM.

I was asked to suggest a way to clarify the NYSRC’s position on this question should it be raised in the future. I believe that the best way to do that is to revise the definition of “Transmission Owners” to include having a Transmission District as a requirement. The term “Transmission District” is defined in both the NYISO tariff and the NYSRC glossary as follows:

**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.

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I recommend that the definition of “Transmission Owners” in the NYSRC glossary be revised follows:

**Transmission Owners** - 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 [that have a Transmission District](#), ~~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/ISO Agreement. The Transmission Owners currently consist of Central Hudson Gas and Electric Corporation, Consolidated Edison Company of New York, Inc., LIPA, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation, Rochester Gas and Electric Corporation, and the New York Power Authority.