

Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-7)

Submit request to raymond40@aol.com via the NYSRC site www.nysrc.org

Item	Information
1. PRR No. & Title of Reliability Rule or Requirement change	PRR 135 G.4: Defined 'relevant system conditions' in R1.1 and R2.1, and revised Compliance Elements for R2
2. Rule Change Requester Information	
Name	RRS
Organization	
3. New rule or revision to existing rule?	Defined 'relevant system conditions' in G.4 (R1.1 and R2.1); G.4 (R2) compliance element revisions
4. Need for rule change, including advantages and disadvantages	<p>Requirements R1.1 and R2.1 were modified in order to define the utilized term 'relevant system conditions'.</p> <p>Measure 2, which specifies the evidence needed to demonstrate Con Edison compliance with R2, needs to be revised to clarify – when a study for identifying <i>Eligible Black Start Resources</i> has not been performed – that Con Edison must certify that the study is not required because there were no changes to relevant system conditions that would have affected the results of the previous study. Other M2 and related levels of non-compliance changes were made to be more specific with regard to R2 compliance requirements.</p>
5. Related NYSRC rules	None
6. Section A – Reliability Rule Elements	
1. Reliability Rule	G.4 No changes
2. Associated NERC & NPCC Standards and Criteria	No changes
3. Applicability	No changes
7. Section B – Requirements	
Requirements	<p>R1. The NYISO shall have procedures and implement actions to provide for the inclusion or continued inclusion of any Eligible Black Start Resource in the Con Edison SRP, as follows:</p> <p>R1.1. Con Edison shall perform and document studies to identify any Eligible Black Start Resource that would provide a Material Benefit to its SRP if included. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.</p> <p><u>For this requirement, relevant system conditions are defined as:</u></p> <p><u>An existing Black Start Resource leaves the NYISO Black Start and System Restoration Services Program, or the cranking path utilized in the SRP has been permanently altered.</u></p>

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R1.2. If Con Edison identifies an Eligible Black Start Resource that would provide a Material Benefit to its SRP if included based on a study pursuant to R1.1, Con Edison shall designate the resource for participation in its SRP. Con Edison shall notify the NYISO and the applicable generator owner that the resource has been designated for participation or continued participation as a black start resource in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. The NYISO may request additional documentation, as required, from Con Edison.

R1.3. If the owner of the Eligible Black Start Resource designated by Con Edison pursuant to R1.2 does not want to participate or continue to participate in the Con Edison SRP, it must seek an exemption from the NYISO for good cause.

R1.3.1. The NYISO shall require the owner of the Eligible Black Start Resource seeking an exemption to provide to the NYISO and Con Edison a study and/or other documentation to support its contention that good cause exists for the exemption. Good cause may include engineering, technical, financial, environmental, or other reasons that would render the provision or continued provision of black start service by the resource unduly burdensome or unreasonable.

R1.3.2. After reviewing the documentation pursuant to R1.3.1, the NYISO may request additional documentation from the Eligible Black Start Resource requesting the exemption or from Con Edison.

R1.3.3. The NYISO shall determine whether good cause for an exemption has been demonstrated after considering: (1) the supporting documentation submitted by the resource owner seeking the exemption, and (2) information developed by the NYISO or provided by Con Edison. If the NYISO determines that good cause has been demonstrated for an exemption, it shall grant the exemption. If the NYISO determines that good cause has not been demonstrated, it shall deny the exemption and direct the black start resource to participate or continue to participate in the Con Edison SRP.

R1.3.4. The NYISO shall inform the NYSRC that an exemption request has been made and submit a report to the NYSRC regarding its determination, subject to appropriate confidentiality protections.

R2. Con Edison shall have procedures and implement actions for the identification of *Eligible Black Start Resources* in accordance with R1 and NYISO procedures, as follows:

R2.1. Con Edison shall perform and document studies to identify *Eligible Black Start Resources* that would provide a *Material Benefit* to its SRP if included. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.

	<p style="text-align: center;"><u>For this requirement, relevant system conditions are defined as:</u></p> <p style="text-align: center;"><u>An existing Black Start Resource leaves the NYISO Black Start and System Restoration Services Program, or the cranking path utilized in the SRP has been permanently altered.</u></p> <p>R2.2. If Con Edison identifies an <i>Eligible Black Start Resource</i> that would provide a <i>Material Benefit</i> to its SRP if included based on a study pursuant to R2.1, it shall designate the <i>resource</i> for participation or continued participation in its SRP. Con Edison shall notify the <i>NYISO</i> and the applicable generator owner that the <i>resource</i> has been designated for participation or continued participation as a black start <i>resource</i> in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. If requested, Con Edison shall provide additional documentation to the <i>NYISO</i>.</p> <p>R2.3 If, after being notified that it has been designated as a <i>Eligible Black Start Resource</i> for participation or continued participation in the Con Edison SRP, the owner of the <i>resource</i> does not want to participate or continue to participate, Con Edison shall prepare supplemental information, if requested by the <i>NYISO</i>, for use in a <i>NYISO</i> review to determine whether an exemption for the <i>resource</i> from participation or continued participation in the Con Edison SRP shall be granted or denied pursuant to R1.3.3.</p>
<p>8. Section C – Compliance Elements</p>	
<p>1. Measures</p>	<p>M1 No Change</p> <p>M2 (Applicable to Con Edison)</p> <p>Con Edison has procedures and has implemented actions for the identification of Eligible Black Start Resources for participation or continued participation in its SRP, in accordance with R2.1. In accordance with R2.2, Con Edison has submitted its methodology and/or study for identifying Eligible Black Start Resources that provide a Material Benefit to its SRP to the NYISO and/or NYSRC when requested.</p> <p><u>Con Edison provided evidence that: (1) Con Edison has prepared procedures for identifying Eligible Black Start Resources, in accordance with R2; (2) Con Edison performed and documented a study for identifying Eligible Black Start Resources conducted during the past 12 months, or certified that a study was not required because there were no changes to relevant system conditions that would have affected the results of the previous study, in accordance with R2.1; (3) Con Edison submitted to the NYISO its methodology and/or study that identified a Eligible Black Start Resource that would provide a Material Benefit to its SRP, in accordance with R2.2; and (4) when a Eligible Black Start Resource that was designated to participate in the Con Edison SRP did not want to participate or continue to participate, Con Edison prepared supplemental information requested by the NYISO, in accordance with R2.3.</u></p>
<p>2. Levels of Non-Compliance</p>	<p>For M1: No Change</p>

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	<p>For M2:</p> <p>Level 1: Not applicable</p> <p>Level 2: <u>Con Edison has procedures for identifying <i>Eligible Black Start Resources</i> for inclusion or continued inclusion in its SRP, but the procedures were incomplete.</u></p> <p>Level 3: <u>Con Edison did not submit its black start <i>resource</i> identification methodology _____ or study <u>or other information</u> to the NYISO or NYSRC when requested, <u>in accordance _____ with R2.2 and R2.3.</u></u></p> <p>Level 4: <u>Con Edison failed to conduct a study for determining the need to include or _____ continue to include any <i>Eligible Black Start Resources</i> in its SRP when _____ required <u>and did not certify that the study was not needed because there _____ were no changes to relevant system conditions that would have affected the _____ results of the previous study,</u> as required by R2.1.</u></p>
3. Compliance Monitoring Process (See Policy 4):	
3.1 Compliance Monitoring Responsibility	No changes.
3.2 Reporting Frequency	No changes
3.3 Compliance Reporting Requirements	No changes
9. Implementation Plan	<u>The NYISO procedures are to be updated no later than 90 days following Rule approval. In addition, the revised compliance elements in PRR 135 will be implemented for the 2017 NYSRC Reliability Compliance Program.</u>
10. Comments	
11. Date Rule Adopted	
12. PRR Revision Dates	8/7/16; 10/27/2016