Joint Meeting of the New York State Reliability Council, L.L.C. (NYSRC) Reliability Rules Subcommittee (RRS) / Reliability Compliance Monitoring Subcommittee (RCMS) Thursday, May 4, 2017

Minutes of RRS Meeting No. 213

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Larry Hochberg, NYPA (Vice Chairman and Secretary)
Martin Paszek, Con Edison
Matilda Duli, Con Edison
Zoraini Rodriguez, PSEGLI/LIPA
Brian Shanahan, National Grid
Erin Doane, CHGE
Abhilash Gari, NYPA

Non-Voting Participants:

Al Adamson, Consultant Jim Grant, NYISO Ed Schrom, DPS

Guests:

Dan Head, Con Edison Mark Capano, NYISO Sal Spagnolo, NYPA Paul Gioia, NYSRC Counsel Chris Sharp, NYISO Counsel Peter Carney, NYISO

RRS Meeting # 213 was called to order by Mr. Clayton at 9:30 am.

1. Introduction

1.1 Executive Session

None requested.

1.2 Requests for Additional Agenda Items

None requested.

2. Approval of Minutes / Action Items

2.1 Approval of RRS Minutes #212

RRS reviewed the Minutes from the last RRS meeting and they were accepted as final with minor changes.

2.2 RRS 212 Status Report to EC

Mr. Clayton presented to the RRS a copy of the 'RRS #212 Status Report for EC #216' which he develops for the purpose of summarizing at the next NYSRC Executive Committee meeting what RRS has done at its prior meeting.

2.3 RRS 212 Action Items List

Action Item 212-3: This action item is on the agenda for today's meeting. The status is changed to 'Completed'.

Action Item 212-2: The status is changed to 'Completed'.

Action Item 212-1: This action item is on the agenda for today's meeting. The status is changed to 'Completed'.

Action Item 208-3: Mr. Sharp reported that the PRR 133 implementation plan (revisions to the NYISO Tariff and NYISO System Restoration Manual) has received approval from the NYISO Operating Committee (April 12th) and from NYISO Management Committee (April 26th). He said that after approval from the NYISO Board the revised Tariff language will be sent to FERC for approval. The status remains as 'Ongoing'.

Mr. Paszek informed RRS that Con Edison could give a presentation on the subject of "PRR 133 Lessons Learned" at the next RRS meeting; however, due to CEII concerns the presentation would be given under an Executive Session.

Action Item 213-1: Mr. Paszek to give a presentation on the subject of "PRR 133 Lessons Learned" at the next RRS meeting; under Executive Session.

Action Item 208-2: Mr. Sharp reported that the PRR 131C implementation plan would be presented to SOAS, BIC and the MC between May and June. The status remains as 'Ongoing'.

Action Item 83-8: There was nothing new reported. The status remains as 'Ongoing'.

3. NYSRC Reliability Rules Development

3.1 PRR List – Outstanding

Mr. Clayton briefly reviewed the current status of the three PRRs on the list.

- 3.2. PRRs for EC Final Approval after Posting
- 3.2.1 None.
- 3.3. PRRs for EC Approval to Post for Comments
- 3.3.1 None.
- 3.4. PRRs for Discussion
- 3.4.1 PRR 128 Definition of NYS BPS

Mr. Clayton summarized the issues regarding the NYSRC BPS definition. He explained that there is a disconnect between what the NYISO uses as a definition of BPS (NPCC A-10 process) to determine its list of facilities that the NYSRC reliability rules are applied to and the NYSRC definition of BPS which yields a different set of BPS facilities. He also noted that NPCC is in the process of updating its BPS definition but that process could take more than two years which is too long for NYSRC to wait. Mr. Clayton stated that the NYSRC could simply adopt the NPCC definition of BPS to resolve the matter, but Con Edison has stated concerns about the clarity of the NPCC A-10 process as regards radial lines. Mr. Paszek explained that because of this lack of clarity, especially as regards applying N-1-1 testing, a different interpretation of the A-10 process could result in some Con Edison radial lines currently classified as non-BPS to be re-classified as BPS.

Mr. Gioia suggested that the NYSRC adoption of the A-10 definition and the Con Edison radial element concerns are two separate issues and could be handled separately by RRS. First, the NYSRC could adopt A-10 as its definition to immediately bring it in compliance with current NYISO practice; and this could be accomplished relatively quickly. Second, RRS could work on adopting a separate rule to handle the Con Edison radial element issue which would likely take more time. Mr. Clayton suggested that this additional rule could require Con Edison to produce studies to show why certain radial elements should be excluded from the BPS list. Mr. Paszek stated that Con Edison would not be in favor of this approach where studies would be required with a subsequent affirmative vote by NYSRC. He stated that the NERC BES definition already excludes radials and that supports Con Edison's position.

Mr. Clayton observed that the current NPCC A-10 list apparently does not include the Con Edison radial elements of concern and there would be no change to this status unless there was a change to the BPS network that would impact those facilities. For the next RRS meeting, Mr. Clayton requested the NYISO to provide the A-10 list and explain why the Con Edison radials of concern are not on it and furthermore to check whether there is a specific exclusion for these Con Edison radial elements. Also for the next meeting, Mr. Clayton requested Mr. Paszek to consider adopting the A-10 definition in light of the legacy issue (only a system change would result in a change to A-10 list) and provide RRS with an idea of how many radial elements Con Edison would be concerned about if A-10 were to be adopted.

Action Item 213-2: Mr. Grant to provide the list of A-10 facilities NYISO uses and explain how Con Edison radial elements are handled.

Action Item 213-3: Mr. Paszek to be prepared to address the A-10 legacy issue and provide RRS with the scope of Con Edison's radial element concern.

3.4.2 PRR 137 - D.2 (R1) Under-frequency Load Shedding

Mr. Clayton reviewed previous RRS discussions on this topic. Originally, PRR 137 was developed by Mr. Paszek to align the NYSRC Reliability Rules with NPCC Directories on manual generator shedding for underfrequency conditions. At the last RRS meeting the NYISO suggested that none of the NYSRC D.2 Underfrequency Load Shedding Requirements R.1, R.2 and R.3 were needed since they are covered by NERC Standards and NPCC Directories. Mr. Grant was tasked with developing an NYSRC/NPCC/NERC rules comparison chart to prove that point which RRS began reviewing at this meeting. After some discussion, RRS agreed that it would be more efficient to review the chart in detail off-line. Mr. Clayton suggested a meeting be held between himself, Mr. Adamson and Mr. Grant prior to the next RRS meeting to go over the comparison chart and reference documents in fine detail. It will then be decided whether RRS should address just the underfrequency generator shedding aspect or all of the D.2 rules. The follow-up discussion will be delayed until the meeting after next when Messrs. Clayton and Grant are expected to be present.

Action Item 213-4: Messrs. Clayton, Grant and Adamson to meet and review in detail the D.2 NYSRC,NPCC,NERC comparison chart prior to the next RRS meeting.

4. NPCC Directories

Mr. Paszek reported that NPCC expects to have A-10 alternatives developed by the end of this year. The alternatives will then be evaluated by the appropriate NPCC task forces.

5. NERC SARS/Organization Standards

5.1 NERC Standard Tracking

Mr. Adamson reviewed the NERC Reliability Standard Development Tracking Summary that was included with the meeting materials. He reported that the NYSRC voted "yes" on the revisions to the NERC Standard Process Manual.

Mr. Paszek reported that a draft revision of the TPL-001 standard was out for comments and that significant changes were made to the standard, including possible corrective action requirements for certain extreme contingencies. Comments on the draft are due by May 24. Mr. Grant was requested to send a link to the TPL-001 revision to RRS.

Action Item 213-5: Mr. Grant to send link on NERC TPL-001 revision to RRS.

6. Additional Agenda Items

6.1 REV Potential Impact on NYS BPS Reliability

Mr. Clayton reported that he had sent RRS a copy of the report "Joint Utilities Supplemental Distributed System Implementation Plan" in response to AI 212-2. He noted that the report does not contain any language on impacts to the reliability of the BPS. Mr. Clayton stated he has some concerns about the reliability impact of behind the meter wind and solar which may eventually require consideration in the rules.

6.2 NYISO Clean Power Plan presentation

In response to AI 212-3, Mr. Carney made a presentation on the NYISO's assessment of the EPA's Clean Power Plan (CPP) and how it could impact NY as regards meeting environmental and reliability goals under the current NY regulations including the Regional Greenhouse Gas Initiative (RGGI). He noted that CPP is currently stayed by the U.S. Supreme Court. Following are some salient points of the presentation:

- During the 2022-2030 time frame of CPP, the existing RGGI regulations require greater CO₂ reductions than CPP therefore NY should be in compliance with CPP; most of these reductions are the result of natural gas fired generation replacing other CO₂ emitters;
- There are different MW level and types of units impacted by CPP as compared with RGGI;
- The study looked at mass and rate based measurements for NY compliance with CPP;
- The study did not include consideration of the NY Clean Energy Standard;

- The study employed production simulations for energy and emissions and MARS analysis for capacity requirements;
- The study incorporated existing NYISO wind, solar, reliability planning studies assumptions and results;
- The study did not consider the potential deliverability/transmission requirements of significant additional solar and wind resources;
- Over the study time frame and given the mix of resources, it was found there
 would be sufficient energy resources to meet load requirements while meeting the
 emissions requirements of CPP and RGGI, but, due to the intermittency of solar
 and wind, additional capacity would be needed.

Mr. Carney also noted that the NYISO is currently looking at the potential impacts of NY's Clean Energy Standard on the system. Mr. Clayton stated that RRS will need to keep abreast of these NYISO studies for potential reliability rule changes. He also said that the EC is looking at the impact of the increasing use of renewables on NY operating reserve requirements.

7. Reports

7.1 NYSRC EC Meeting Report

Mr. Clayton reported that he met with the NY DEC group on April 20 and will distribute the notes of the meeting to RRS when they become available.

7.2 NYSRC ICS Meeting Report

Mr. Adamson reported that the ICS met yesterday and is working on the models and assumptions for the 2018 IRM study. Mr. Adamson also reported that ICS received a report that examined the amount of emergency assistance from external areas that is relied upon in the IRM studies. The report recommends a 3500 MW cap on emergency assistance into NY. The report will be presented for approval at the EC meeting next week.

The meeting ended at 12:01 PM.

8. Next Meeting #214

Thursday, June 1, 2017; 9:30 am @ NYSERDA, 17 Columbia Circle, Albany