

**Joint Meeting of the
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Rules Subcommittee (RRS) /
Reliability Compliance Monitoring Subcommittee (RCMS)
Thursday, June 29, 2017**

Minutes of RRS Meeting No. 215

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

Non-Voting Participants:

Al Adamson, Consultant
Jim Grant, NYISO
Humayun Kabir, DPS

Guests:

Dan Head, Con Edison
Chris Sharp, NYISO Counsel
Kevin DePugh, NYISO-part time

RRS Meeting # 215 was called to order by Mr. Clayton at 9:35 AM.

1. Introduction

1.1 Executive Session

Mr. Paszek made a presentation which addressed AI 213-1. The presentation was made in executive session due to CEII concerns. The presentation covered a review of the Con Edison System Restoration Plan (SRP) and included a discussion of how the SRP and black start testing procedures were modified to comply with the NERC EOP-005 standard requirements. Selected black start test results using the new procedures also were presented.

Mr. Clayton asked whether a redacted version of the presentation could be made to the full RRS in open session. Mr. Paszek agreed to look into it.

Action Item 215-1: Mr. Paszek will look into making a redacted version of the PRR 133 lessons learned presentation in RRS open session.

1.2 Requests for Additional Agenda Items

Messrs. Adamson and Clayton requested additional agenda item 6.2 to discuss an email distributed to the EC regarding a recent NYC Council proposal to advance the date of banning the use of No. 4 oil in power plants from 2030 to 2025. Mr. Clayton requested additional agenda item 6.3 to discuss the June 22 FERC Technical Conference.

2. Approval of Minutes / Action Items

2.1 Approval of RRS Minutes #214

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

2.2 RRS 214 Status Report to EC

Mr. Clayton presented to the RRS a copy of the 'RRS #214 Status Report for EC #218' 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 214 Action Items List

Action Item 213-4: Mr. Clayton reported that the meeting was held and a discussion is on the agenda. The status is changed to 'Completed'.

Action Item 213-2: On agenda. The status is changed to 'Completed'.

Action Item 213-1: On agenda. The status is changed to 'Completed'.

Action Item 208-3: PRR 133 Implementation Plan (revision of system restoration plan and restoration training): Mr. Sharp reported that the revised Tariff language was approved by the NYISO Board and will be filed for approval at FERC in July. The status remains as 'Ongoing'.

Action Item 208-2: PRR 131C (dual fuel unit testing requirements): Mr. Sharp reported that the implementation plan was approved by the NYISO Management Committee and will be going to the NYISO Board for approval in July. After Board approval the Tariff language changes will be filed at FERC. 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

3.1.1 PRR List Outstanding

Mr. Clayton briefly reviewed the current status of the two PRRs on the list. He also reported that Mr. Grant identified corrections that were needed to the PRR template.

3.1.2 PRR Template Review

Mr. Grant reviewed the draft updated PRR template. He noted that Mr. Schrayschuen's email address replaces Mr. Raymond's and Policy 1-11 replaces Policy 1-4 on the form. RRS agreed to these changes.

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 reviewed the status of RRS discussions on PRR 128. The primary concern is that the NYISO is using the NPCC A-10 list of BPS facilities for compliance with the NYSRC rules, however there is a disconnect between that list and the list that would derive from using the NYSRC's definition of NYS BPS. RRS had discussed the possibility of adopting the NPCC A-10 definition in place of its current one but there were objections from Con Edison regarding the clarity of the A-10 process as regards radial lines. In those discussions it was noted that the Con Edison radials are excluded from the NYISO BPS list and an explanation as to why they are excluded was requested from the NYISO. Mr. Clayton reminded RRS that NPCC was currently in the process of reviewing the A-10 methodology and he had heard that the schedule for completion had been accelerated and might be completed sooner than the anticipated two-year schedule. Mr. DePugh from the NYISO was invited to this meeting to report on how the NYISO handles radial elements in developing its list of A-10 facilities and on recent discussions at NPCC about the A-10 review process.

Mr. DePugh explained aspects of how the NYISO performs the A-10 testing to develop its list of BPS elements and in particular why certain radial lines are excluded. He said that the A-10 methodology is a bus-based performance test and that if a bus is determined to be BPS then any elements connected to that bus are BPS elements. However, he added, that the rules permit loss of radial load under contingency analysis.

Mr. DePugh also said that NPCC CP-11, the group conducting the A-10 review, is developing a list of new test methodologies some of which may clarify the handling of

radials. Once a new test method is agreed on by CP-11 and approved at NPCC, testing to develop a revised list of BPS elements could be completed late in 2018. Mr. Clayton suggested that, due to the accelerated NPCC schedule and the possibility of a new test methodology that could clarify the handling of radials, further work on PRR 128 should be postponed pending approval of the revised NPCC A-10 testing methodology. RRS agreed to this proposal. Mr. Clayton will report on this discussion at the next EC meeting.

Action Item 215-2: Mr. Clayton to report to EC that work on PRR 128 has been tabled by RRS until the NPCC A-10 review is completed and a new test methodology is approved.

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. The NYISO then 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 prepared a NYSRC/NPCC/NERC rules comparison chart for review by RRS. Messrs. Clayton and Adamson met with Mr. Grant and NYISO staff on June 20 to review the chart and reference documents in detail. As a result of the meeting, it was concluded that all NYSRC requirements were covered by NPCC and NERC rules and that none of NYSRC rules were more stringent or specific and that NYSRC reliability rule D.2 could be retired. Mr. Adamson suggested adding Policy 1 guidelines on rule redundancies to item 4 of the PRR before sending it to the EC. RRS agreed to recommend PRR 137 to EC for posting for comments. Mr. Clayton will make the recommendation at the next EC meeting.

Action Item 215-3: Mr. Clayton to recommend to EC at its next meeting that PRR 137 be posted for comments.

4. NPCC Directories

4.1 ISO-NE request to review need for NPCC regional criteria

Mr. Clayton summarized the letter from Mr. Brandien of ISO-NE to Mr. Schwerdt of NPCC. In essence, the letter is requesting NPCC to evaluate whether the NPCC regional criteria are still needed in light of the existence of the comprehensive, stringent, mandatory and enforceable NERC standards. The letter indicates that if gaps are identified between NERC and NPCC standards, that a SAR could be submitted to NERC to create a regional standard to fill those gaps. RRS noted, as examples of gaps, that only NPCC has a performance based test to identify BPS elements and the requirement for two redundant protection schemes for BPS facilities.

Also, NERC standards do not address resource adequacy requirements like NPCC's one day in ten years. Mr. Sharp indicated that the NYISO has not developed a position on

this issue, but it did not appear to have an immediate impact on the NYISO due to the existence of the NYSRC rules. Mr. Clayton stated that a discussion of the ISO-NE letter is on the agenda for the next EC meeting and he will keep RRS posted on developments.

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 CIP-005 and submitted comments on TPL-001.

6. Additional Agenda Items

6.1 REV Potential Impact on NYS BPS Reliability

Mr. Clayton reported that there were no new developments on this topic and he continues to believe that there will be impacts such as properly representing load due to behind the meter generation. Mr. Paszek reported that NERC is developing a guideline on how to model distributed generation. Mr. Adamson said he was aware of a NYISO presentation to ICS on the treatment of behind the meter generation in IRM studies and he will send it to Mr. Clayton for distribution to RRS.

Action Item 215-4: Mr. Clayton to distribute NYISO behind the meter generation presentation to RRS after receiving from Mr. Adamson.

6.2 NYC Council Proposal on the use of No. 4 Oil

Mr. Clayton reviewed the letter received from EC member Mr. Sasson of Con Edison on this topic. According to the letter, current NYC law has banned the use of No. 6 oil by the year 2020 and No. 4 oil by 2030 in power plants, buildings, etc. To comply with the current law, many actions have been planned and taken by facility owners to switch to permissible fuels. A new proposal in the NYC Council is to advance the ban of No. 4 oil from the year 2030 to 2025. Considering the NYSRC’s minimum oil burn rule, and the need for power plant dual fuel capability, this No. 4 oil usage proposal has the potential to impact electric reliability. The City Council and some affected Generators have requested NYSRC input on the proposal and it is to be discussed at the next EC meeting. Mr. Clayton will keep RRS posted on the EC discussions.

6.3 FERC Technical Conference on June 22

Mr. Clayton reported that there were some interesting panel discussions on the reliability implications of the expansion of distributed resources on the grid. He noted of particular interest was the discussion on the need for low-voltage ride-through capability for solar inverter connected generation. Mr. Clayton will keep RRS posted of developments on this issue.

7. Reports

7.1 NYSRC EC Meeting Report

There were no additional RRS items to report.

7.2 NYSRC ICS Meeting Report

Mr. Adamson reported that the ICS met yesterday and approved the 2018 IRM study assumptions. The assumptions will go to the EC for approval at its next meeting. Mr. Adamson also reported that the NYISO is reviewing the methodology for determining locational based capacity requirements (LCR). The NYISO provided an updated presentation on the status of its review at the meeting. Mr. Adamson noted that the review includes consideration of both economics and reliability. The ICS will be requested to comment on the NYISO's findings and recommendations.

Mr. Clayton asked Mr. Grant whether the NYISO could make a presentation at the August RRS meeting on the reasons for the recent increase in the number of ETC declarations.

Action Item 215-5: Mr. Grant to arrange for NYISO presentation at RRS on reasons for recent increase in the number of ETC declarations.

The meeting ended at 12:07 PM.

8. Next Meeting #216

Thursday, August 3, 2017; 9:30 AM @ NYSERDA, 17 Columbia Circle, Albany