

**Joint Meeting of the  
New York State Reliability Council, L.L.C. (NYSRC)  
Reliability Rules Subcommittee (RRS) /  
Reliability Compliance Monitoring Subcommittee (RCMS)  
Thursday, November 29, 2018**

**Minutes of RRS Meeting No. 232**

**RRS Members and Alternates:**

Roger Clayton, Electric Power Resources (Chairman)  
Larry Hochberg, NYPA (Vice Chairman)  
Zoraini Rodriguez, PSEGLI/LIPA (Secretary)  
Rahul Pandit, PSEGLI/LIPA  
Brian Shanahan, National Grid  
Brian Gordon, NYSEG  
Dan Head, Con Edison  
Martin Paszek, Con Edison  
Michael Roszkowski, Con Edison  
Sal Spagnolo, NYPA

**Non-Voting Participants:**

Al Adamson, Consultant  
Jim Grant, NYISO  
Chris Sharp, NYISO  
Mark Capano, NYISO

**Guests:**

Paul Gioia, NYSRC Counsel  
Kevin DePugh, NYISO  
Humi Kabir, DPS

RRS Meeting No. 232 was called to order by Mr. Clayton at 9:30 AM. This meeting was held via a conference call.

**1. Introduction**

1.1 Executive Session

None requested.

## 1.2 Requests for Additional Agenda Items

Mr. Clayton announced that he has two additional agenda items to discuss at today's meeting. The items are as follows:

3.4.5 Public Appeal Issue

3.4.6 Monitor Load Shape Issue for Energy Limited Resources

## 2. Approval of Minutes / Action Items

### 2.1 Approval of RRS Minutes No. 231

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

### 2.2 RRS 231 Status Report to EC

Mr. Clayton presented to the RRS, a copy of the 'RRS 231 Status Report' which he developed for the purpose of summarizing what RRS has done at its prior meeting, at the next Executive Committee (EC) meeting.

### 2.3 RRS 231 Action Items List

Action Item 231-1: Mr. Clayton forwarded the NYSRC/DEC meeting notes to RRS on Nov 29 2018. This action item is completed.

Action Item 230-4: This action item is delayed to the next meeting.

Action Item 230-2: Ms. Rodriguez reported that she has no new information on this action item. Mr. Adamson mentioned that there was an email circulated to ICS from a PSEGLI employee about the origin of the LIPA's 80MW Public Appeal. Mr. Clayton asked Mr. Adamson to forward the email to RRS (AI 232-1). Mr. Clayton asked Ms. Rodriguez to keep RRS in the loop of the status of LIPA's Public Appeal number. This action item is delayed to the next meeting.

Action Item 228-1: This action item 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 Outstanding List

No changes. PRR-128 is being tabled, still awaiting NPCC's A-10 definition.

### 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 NPCC A-10 Method 1, NYCA Impact

Mr. Depugh informed RRS that the NPCC CP-11 working group has come up with a common way of performing testing based on the load forecast, historical type transfer etc. He gave a quick overview of the results, which concludes that, no addition to the current BPS list, but potentially the removal of some of the 230kV busses. He pointed out that these results would have been the same if the test was performed using the current methodology anyway. He also added that every BPS element will be subjected to the more rigorous NPCC Directory 4 (Bulk Power System Protection Criteria) testing, excluding radial-feed elements feeding local networks.

Mr. Paszek stated that Con Edison is very happy with the results. He was also pleased that the CP-11 group revised the BPS definition which removes any radial element from the BPS list. On the other hand, there was still some discussion on the classification “network” depending on the high side connections. The CP-11 group is working on how to retest this in order to provide exclusion for the “network” as well. Mr. Paszek also thanked the NYISO for being vocal in CP-11, TFSS and TFCP working groups, and for helping Con Edison with this “radial” issue.

Mr. Clayton voiced his concerns about the definition of “Local Area”. From his understanding, in New York, when a stability test was applied and the results cause an adverse impact outside of its control area; and/or there is a loss of generation greater than 1310 MW (reserve margin) within NYCA, then the bus will be in the BPS list. He thought that it seems the tests look at the adverse impact within and outside of Local Area.

Mr. Clayton then explained that the ISONE performed similar tests but looked at a loss of ISONE generation greater than 1200MW based upon potential adverse impact within NYCA. Mr. Depugh said that in New York, a similar concept was adopted but using different reasons. Mr. Clayton said that it seems like ISONE and NYISO have different definitions of what a “Local Area” is. However both ISOs are being consistent in the way they apply the criteria to “Local Area” and “local area” testing. Mr. Depugh pointed out that there is an exception that if the test shows a bus tripped due to 50 MW of generation, then the NYISO will work with ISONE to see if that bus should be on the BPS list or not.

Mr. Paszek also informed RRS that the CP-11 group is proposing to remove the “Local Area” term from the criteria, while working on making the “local area” definition clearer.

### 3.4.2 C3 Outage Coordination

This item is delayed to the next meeting. NYISO will present a PRR for C.3 Outage Coordination at the next meeting.

### 3.4.3 SPS/RAS

Mr. Paszek presented this agenda by stating that currently there is no specific rule in NYSRC that covers SPS (Special Protection System) requirement, since RRS relies on the NPCC Directories for guidance. However, Con Edison believed that the NPCC does not really provide real analysis of SPS or interaction between the SPS. A Transmission Owner can follow TFSS, TFCP or other sub-committee’s guidelines. Con Edison was concerned that the use of SPS is expanding with no clear analysis on the interactions between the SPS and the impact to the system. Mr. Paszek proposed to add assessment 6 to B.2 R1 C which requires the NYISO to study SPS, and any possible interaction between SPS as part of the transmission review that is required as per B.2-2.

Mr. Clayton shared his past personal experience in getting approval for an SPS, which requires a lot of analysis, very exhaustive studies and having to attend various NPCC meetings to present and getting approvals. He believed that based on these reasons, each TOs have their own requirements and authority in determining an SPS in their system.

Mr. Paszek pointed out that Con Edison’s main concern is that we have no idea as to how each SPS interacts with each other as the electric system changes rapidly. Mr. Shanahan then asked if Mr. Paszek would want the NYISO to perform an SPS review as part of their Annual Transmission Review (B.2), and his answer was affirmative. Mr. Paszek believed that the NYISO is not doing enough with the SPS analysis, specifically the interactions between each SPS.

The discussion then moved to the term usage of SPS vs. RAS (Remedial Action Schemes). NERC is using the RAS definition. NPCC is still using SPS because the existing definition of SPS does not fit in RAS. Mr. Grant suggested that the Reliability Council should consider moving to RAS definition. Mr. Clayton asked if NYISO to give their opinion on this matter at the next meeting.

Mr. Paszek was asked to create a PRR for this agenda and present it to RRS at the next meeting (AI 132-2).

#### 3.4.4 Fuel Storage

Mr. Paszek clarified that this agenda item is in relation to the G.2 Loss of Gas Supply – New York City applicable to Con Edison. Con Edison wanted to create a requirement to deal with onsite fuel storage. A Generator Owner would need to certify to the NYISO that they have oil on site for a certain number of days.

Mr. Paszek was asked to create a PRR for this agenda and present it to RRS at the next meeting (AI 232-3).

Mr. Clayton informed RRS that at the last EC meeting, there was a good presentation that talked about dual fuel units and reserve. He will distribute the presentation called, “Winter 2018-2019 Capacity Assessment Winter Preparedness” to RRS (AI 232-4).

#### 3.4.5 Public Appeal Issue

Mr. Clayton reported that the RRS was given a task at the last EC meeting regarding the Public Appeal issue. The directives stated that the ICS should have a technical review on the assumptions given by the TOs; and RRS should discuss whether a rule should be developed to provide guidance on how public appeal and load reduction are reported and what documentations are required.

Mr. Adamson asked for clarification as to whether RRS should develop a rule or provide guidance, since RRS deals with rules and requirements. Mr. Clayton will confirm.

Mr. Adamson pointed out that ICS viewed this as operational issue, which then prompted him to inquire if each Operations groups utilize Public Appeal for their companies. NYISO said that they would utilize voltage reduction, if needed since this method has been tested and would yield measurable result. Some members believes that the Public Appeal is called by the TO. NYISO reiterated that they do not count on Public Appeal because there is no way of testing or measure the outcome of this method.

Mr. Adamson also pointed out that some ICS members’ view that the SCR and Demand Reduction programs have replaced the Public Appeal, although this could lead to a double counting issue.

The discussion ended with an action item for Mr. Adamson to develop a matrix on Public Appeal data submitted by each TO for the past 20 years (AI 232-5).

#### 3.4.6 Monitor Load Shape Issue for Energy Limited Resources

Mr. Clayton explained that there appears to be an issue with the load shape that goes into the IRM calculation due to Energy Limited Resources. We may need to create a potential

rule to address this issue. Concurrently, there was a discussion on new modeling changes in ICS to address this as well.

RRS will keep an eye on this issue and see this could yield a potential new rule in the future. Hence, an action item was created for RRS called “Load Shape of Energy Limited Resources Impact on the IRM” (AI 232-6).

#### 3.4.7 DEC’s Proposal for a more stringent NOx Emission Standard

Mr. Paszek informed the RRS that the DEC is proposing a more stringent NOx Emission Standard that would impact Con Edison’s and PSEGLI/LIPA’s generation. NYISO is currently performing the study to see the impact of this new proposal on Con Edison and PSEG/LIPA’s system.

Mr. Paszek was requested to present the DEC’s proposed NOx Emission Standard to RRS at the next meeting (AI 232-7).

### 4. NPCC Directories

No update.

### 5. NERC SARS/Organization Standards

#### 5.1 NERC Standard Tracking

Mr. Adamson went over the NERC Reliability Standard Development Tracking Summary (dated 11-17-2018) with RRS. For CIP-008, he reported that he received comments from four TOs (Transmission Owners): PSEGLI/LIPA, NYPA, Con Edison and National Grid. Con Edison voted yes and the others voted No. Mr. Adamson voted No on behalf of the NYSRC and referred to PSEGLI/LIPA’s comments.

There was a discussion on how should Mr. Adamson vote if he were to receive conflicting votes from the participating TOs. Should we “abstain” if the TOs couldn’t agree on a vote? Mr. Clayton will bring this question to the EC for guidance.

### 6. Additional Agenda Items

#### 6.1 REV Potential Impact on NYS BPS Reliability

Mr. Clayton reported that the DER workshop went very well. All presentations could be found on the NYSRC website. He had an action item to present the outcome of the DER workshop at the next EC meeting. Mr. Clayton promised to share the presentation with RRS once it’s completed.

From this workshop, Mr. Clayton found that there are two big issues looming over us:

1. Technical issue. The lack of information on modeling data and performance characteristics has not been established. Although NERC and IEEE have created standards that would apply to this issue, the data is not consistent especially with lack of modeling data.
2. Business model issues. Currently, the NYISO is developing an aggregator model where small units can provide energy and capacity to the NYISO. These units are subject to all supervisory control and communication to NYISO and will get paid by NYISO. However, all behind the meter resources, that could potentially be thousands of MW, are managed by their respective distribution services providers. Since the standards and criteria are not standardized, we have two markets that are operating in the dark, yet operating next to each other.

Mr. Gioia pointed out that the presentation by Paul Herring showed thousands of current and future little projects at distribution level that NYISO has no visibility or control over. It's comforting to know that these units will follow local TO rules. However, should we look at the potential impact of these units on the bulk electric system? RRS will continue this discussion at the next meeting.

## **7. Reports**

### 7.1 NYSRC EC Meeting Reports

There were no additional RRS items to report.

### 7.2 NYSRC ICS Meeting Report

Mr. Adamson reported that ICS approved the final draft IRM report. The report will be presented at the next EC meeting for approval. The basecase IRM value is 16.8%. However, without the 80MW public appeal from PSEGLI/LIPA, the IRM value will increase by 0.4%.

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The Chairman thanked Ms. Rodriguez for her service as RRS' secretary for 2018.

The meeting ended at 11:14 AM.

## **8. Next Meeting No. 233**

Thursday, January 3, 2019; 10:00 AM @ NYSERDA, 17 Columbia Circle, Albany.