Joint Meeting of the New York State Reliability Council, L.L.C. (NYSRC) Reliability Rules Subcommittee (RRS) / Reliability Compliance Monitoring Subcommittee (RCMS) Thursday, February 284, 2019

Minutes of RRS Meeting No. 2354

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Larry Hochberg, NYPA (Vice Chairman)
Zoraini Rodriguez, PSEGLI/LIPA
Rahul Pandit, PSEGLI/LIPA
Khatune Zannat, PSEG/LIPA
Brian Shanahan, National Grid (Secretary)
Mike Ridolfino, Central Hudson
Dan Head, Consolidated Edison
Martin Paszek, Consolidated Edison
Sal Spagnolo, NYPA

Mike Roszkowski, Consolidated Edison

Brian Gordon, NYSEG

Non-Voting Participants:

Al Adamson, Consultant Jim Grant, NYISO Mark Capano, NYISO Chris Sharp, NYISO David Johnson, IPPNY Khatune Zannat, PSEG/LIPA

Guests:

Aaron Markham, NYISO
Kevin DePugh, NYISO
Keith Burrell, NYISO
Paul Gioia, NYSRC Counsel
Humi Kabir, DPS

RRS Meeting No. 234 was called to order by Mr. Clayton at 10:00 AM.

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1. Introduction

1.1 Executive Session

None requested.

1.2 Requests for Additional Agenda Items

Mr. Clayton announced that he had one additional agenda item:

3.4.3 Informational presentation on NYSDEC NOx Proposal 6.2 2018 RRS Annual Report Summary

2.1 Approval of RRS Minutes No. 23<u>4</u>3

RRS reviewed the Minutes from the last RRS meeting and adopted comments by Mr. Paszek and Mr. Clayton. The Minutes were then accepted as final.

2.2 RRS 2343 Status Report to EC

Mr. Clayton presented to the RRS, a copy of the 'RRS 2343 Status Report' which was developed for the purpose of or summarizing the prior meeting of the RRS, at the next Executive Committee (EC) meeting.

2.3 RRS <u>233-234</u> Action Items List

Action Item 228-1: This action item remains as "Ongoing".

Action Item 83-8: Nothing new reported. The status remains as 'Ongoing'

Action Item 232-6: ICS Task, is an "Ongoing" item to monitor developments.

Action Item 232-7: Completed.

Action Item 233-8: Scheduled for completion at the February 28th meetingCompleted.

Action Item 233-76: Completed.

Action Item 233-<u>54</u>: Completed.

AI 233-3: No information is available on this subject, Completed.

Action Item 233-1: <u>Discussed at February 28th RRS meeting</u>. Action Item will be continued to next meeting to allow time for further consideration and input.

2 - Draft as of 01/15/2019

3. NYSRC Reliability Rules Development

- 3.1 PRR List
 - 3.1.1 PRR Outstanding List

No 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 PRR 142 B.2 Transmission Planning Assessments (SPS/RAS)

At Mr. Paszek's request, RRS agreed to defer further discussion of this PRR to the next meeting to enable an in-person presentation of discussion materials.

Following the discussion, it was decided that RRS Action Item 233-1 would remain open for future consideration by RRS members. Mr. Paszek will adjust the PRR going forward to refine the meaning of interaction between SPS and RAS.

This is scheduled to include a comparison of SPS to RAS, a list of SPS's, and the SPS exception list, (RRS Action Item 233-1). This will also include justification for including RAS in the PRR.

3.3.2 PRR 143 - G.2 Loss of Gas Supply (Fuel storage/supply)

Mr. Paszek started the discussion of PRR 143 with a presentation of the PRR and its underlying concern relating to potential unavailability of on-site fuel oil reserves stemming(or not having guaranteed delivery of alternate fuel) from their being used as a result of prior economic decision making for dual fuel units. In part of the discussion it was identified that this mainly concerns NY-Zone J (NYC). Mr. Paszek stated that to his knowledge, such an event/condition is not known to have previously occurred. Mr. Johnson (IPPNY) questioned the need for the proposed new Reliability Rule based on a lack of prior such events and the additional burden that would be imposed on generators. Ms. Rodriguez expressed concern that there have been past events where some Unit's lack of fuel availability affected the Day-Ahead Markets.

Mr. Clayton proposed to table the issue until after the NYISO Fuel Assessment is completed later in 2019 as there is no evidence of an ongoing problem and there are robust NYISO procedures and fuel audit practices in place. New RRS Action Item 235-1 was created to track this task.

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3.4. Discussion Items

3.4.1 Public Appeal Load Reduction Data

This item was tabled until the next RRS meeting. Mr. Markham (NYISO) presented, in detail, the actions contained in the NYISO Emergency Operations Manual to address Capacity Deficiency conditions. It was also noted that the capacity procured is virtually always sufficient for the Day—Ahead Market (DAM). A key point was that the market Security Constrained Unit Commitment (SCUC) SCUC-program evaluates operating reserve for the DAM and if deficient, NYISO progresses through a series of actions which include a Public Appeal to curtail energy use via media outlets when identified by the DAM. The Public Appeal is a last resort type of action that is not relied upon due to the non-binding and uncertain public response that might be attained.

Mr. Adamson questioned why only one Transmission Operator provides an estimate of Public Appeals for load relief (80 MW by PSEG-LI/LIPA). This value is used in the IRM determination process. No specific answer was readily available although it was commented by multiple people that it is likely because such values are not considered reliable and could represent a non-conservative assumption. As a reference point, Mr. Clayton noted that IESO does not factor in Public Appeals into its IRM studies, but they are considered as an additional potential margin.

RRS discussed the practice of ICS using Public Appeals for load relief for IRM calculations. The consensus feedback of the RRS members to the Executive Committee is that there should be more investigation into the LIPA 80 MW load relief validity and that RRS does not believe that the IRM should consider this value.

Mr. Clayton informed RRS that New York Transmission Owners, with NYISO involvement, are discussing updating the New York Power Pool Tie Line Report Mr. Clayton informed the RRS that this report will be the subject of discussion at the next EC meeting for consideration of potential future action regarding its status and usage An initiative is being started via the Executive Committee to update this document to to account for new conductor types, calculation methods, references, and such that have evolved since original 1995 report.

3.4.3 NYSDEC NOx Proposal

Mr. Paszek presented information on the NYSCEC NOx reduction proposal to RRS. The new rules would impact up to 3,500 MW of generation in NYS. Sources of targeted emissions must file a compliance plan by March 2, 2020. Initial compliance deadline would occur in 2023.—NYISO, Consolidated Edison and PSEG-LI/LIPA will present an impact study to the upcoming March TPAS/ESPWG meeting.

4. NPCC Directories

4 - Draft as of 01/15/2019

No update.

5. NERC SARS/Organization Standards

5.1 NERC Standard Tracking

Balloting (Affirmative) was completed for Modifications to BAL 003-1.1 (Frequency Response) and Revision of CIP 008 (Cyber Security Incident Reporting) standards. No new ballots were due in the past month.

5.2 NYSRC NERC Voting Process

Mr. Clayton conveyed that it is the EC's intention that a procedure is to be developed to institute a consistent method of soliciting and obtaining NERC ballot positions from NY TO's in a timely manner, to support determination of NYSRC balloting by the NYSRC voting representative (Mr. Adamson). No update.

6. Additional Agenda Items

6.1 DER Potential Impact on NYS BPS Reliability

An unaffiliated EC Member (George Smith) will be monitoring industry events (NERC etal.) and provide reports to the NYSRC EC regarding DER developments, workshops industry committees and working groups. Areas of interest include NPCC via solicitation of input via the Regional Standards Committee, NERC SAR activity, NERC System Planning Impacts of Distributed Energy Resources (SPIDER) Working Group, and inverter based performance working groups. The RRS will continue to monitor developments relative to DER and provide input as needed. Various informational items presented from a Wall Street Journal article on DER penetration.

6.2 RRS Annual Report Summary

7.1 NYSRC EC Meeting Reports

A review of EC meeting subjects was provided by Mr. Clayton. These included:

- IRM selection of 17.0% and Selkirk withdrawal of their notice of withdrawal letter.;
- Mr. Clayton / NYSRC Letter to NERC regarding will be discussing their use of a 15% IRM (vice 17%) for NY in their Summer and Winter Seasonal Assessments following a letter from NYSRC to NERC expressing concerns on the matter:

EC will be discussing issue of how late data is handled after the selection of an IRM+

value.;

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ICS discussed a list of 8 tasks that are being worked on for this year, and for follow-on year's IRM studies. The review of Public Appeal program data is on hold pending further information from the $\underline{\text{Executive Committee and}}$ NYISO.

The meeting ended at 1:40 PM1:10 AM.

Friday Thursday, February 28th April 4th, 2019; 10:00 AM @ NYSERDA, 17 Columbia Circle, Albany.