

**Joint Meeting of the
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Rules Subcommittee (RRS) /
Reliability Compliance Monitoring Subcommittee (RCMS)
Thursday, February 28, 2019**

Minutes of RRS Meeting No. 235

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Larry Hochberg, NYPA (Vice Chairman)
Zoraini Rodriguez, PSEGLI/LIPA
Brian Shanahan, National Grid (Secretary)
Mike Ridolfino, Central Hudson
Dan Head, Consolidated Edison
Martin Paszek, Consolidated Edison
Sal Spagnolo, NYPA
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. 235 was called to order by Mr. Clayton at 10:00 AM.

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 NO_x Proposal

2. Approval of Minutes / Action Items

2.1 Approval of RRS Minutes No. 234

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 234 Status Report to EC

Mr. Clayton presented to the RRS, a copy of the 'RRS 234 Status Report' which was developed for summarizing the prior meeting of the RRS, at the next Executive Committee (EC) meeting.

2.3 RRS 234 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: Completed.

Action Item 233-7: Completed.

Action Item 233-4: Completed.

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

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

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)

Mr. Paszek introduced discussion of PRR 142 with a presentation of Remedial Action Scheme (RAS and Special Protection System (SPS) examples and their distinctions along with rationale for evaluating interactions between them. SPS are defined by NPCC while RAS are defined by NERC. With the exception of one NPCC SPS, all NPCC SPS are also classified as NERC RAS. Mr. DePugh noted that the NYISO Annual Transmission Review (ATR) addresses SPS impacts on the BPTF while the annual NERC Planning Assessments (TPL-001-4) consider impacts of RAS (The NERC Planning Assessments are performed jointly by the NYISO and TOs where the NYISO consider impacts of RAS on the BPS-BES while TO's consider RAS impacts on the non-BPS BES). Mr. Burrell noted that during each Comprehensive ATR, an SPS analysis is performed that looks at all three conditions (correct operation, failure to operate, and mis-operation) for each SPS. However, this PRR would appear to require the evaluation of permutations of SPS/RAS interactions between each other, in addition to individual SPS & RAS conditions (fail to operate, mis-operate, etc.). Mr. Clayton observed that the proposed PRR is potentially imposing an N-1-1 evaluation condition, which neither NPCC Directories nor NERC Reliability Standards require. A few other summary discussion points were that: 1) the RAS testing is covered by the NERC Planning Assessment (TPL-001-4); and 2) If a RAS adversely impacts the BPS, it could be identified as an SPS and evaluated through NPCC processes including NYISO ATR; 3) Conversely, if a RAS does not impact the BPS it may not be classified as an SPS.

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.

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 (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 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.

Following Mr. Paszek's presentation and ensuing discussion, Mr. Markham (NYISO) presented information from a prior (November 2018) Gas-Electric Coordination presentation. As part of seasonal readiness procedures, NYISO surveys generators as to their fuel preparedness, including alternate fuels. In the event of a generator experiencing a fuel supply shortage, NYISO procedures would involve coordination with NY State Agencies and an emergency communication protocol is put in place to address needs, such as emergency gas availability. Mr. Markham also identified that there are market-based financial incentives available to dissuade the burning of fuel oil for strictly economic reasons. It was also identified that NYISO is currently engaged in a Fuel Security assessment which could be a reference point for future rule making evaluation on this subject.

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.

3.4. Discussion Items

3.4.1 Public Appeal Load Reduction Data

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) 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.

3.4.2 New York Power Pool Tie Line Report (1995)

Mr. Clayton informed RRS that New York Transmission Owners, with NYISO involvement, are discussing updating the New York Power Pool Tie Line Report 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. NYISO, Consolidated Edison and PSEG-LI/LIPA will present an impact study to the upcoming March TPAS/ESPWG meeting.

4. NPCC Directories

No update.

5. NERC SARS/Organization Standards

5.1 NERC Standard Tracking

No new ballots were due in the past month.

5.2 NYSRC NERC Voting Process

No update.

6. Additional Agenda Items

6.1 DER Potential Impact on NYS BPS Reliability

Various informational items presented from a Wall Street Journal article on DER penetration.

7. Reports

7.1 NYSRC EC Meeting Reports

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

- Search for a new unaffiliated EC member is in progress;
- Mr. Clayton / NYSRC Letter to NERC regarding their use of a 15% IRM (versus 17%) for NY in their Summer and Winter Seasonal Assessments.

7.2 NYSRC ICS Meeting Report

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 Executive Committee and NYISO.

The meeting ended at 1:40 PM

8. Next Meeting No. 236

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