

NYISO Certification

Description:

NYSRC Reliability Rule Reference (No. and Name):

G.4: System Restoration from Eligible Black Start Resources

NYSRC Requirement(s) for which compliance is being certified:

R2. Con Edison shall have procedures and implement actions for the identification of *Eligible Black Start Resources* in accordance with R1 and *NYISO* procedures, as follows:

R2.1. Con Edison shall perform and document studies to identify *Eligible Black Start Resources* that would provide a *Material Benefit* to its SRP if included. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.

For this requirement, “relevant system conditions” are defined as:

An existing black start resource leaves the NYISO Black Start and System Restoration Services Program, or the cranking path (a portion of the electric system that can be isolated and then energized to deliver electric power from a generation source to enable the startup of one or more other generating units) utilized in the SRP has been permanently altered.

R2.2. If Con Edison identifies an *Eligible Black Start Resource* that would provide a *Material Benefit* to its SRP if included based on a study pursuant to R2.1, it shall designate the *resource* for participation or continued participation in its SRP. Con Edison shall notify the *NYISO* and the applicable generator owner that the *resource* has been designated for participation or continued participation as a black start *resource* in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. If requested, Con Edison shall provide additional documentation to the *NYISO*.

R2.3. If, after being notified that it has been designated as a *Eligible Black Start Resource* for participation or continued participation in the Con Edison SRP, the owner of the *resource* does not want to participate or continue to participate, Con Edison shall prepare supplemental information, if requested by the *NYISO*, for use in a *NYISO* review to determine whether an exemption for the *resource* from participation or continued participation in the Con Edison SRP shall be granted or denied pursuant to R1.3.3.

Compliance Monitoring Process

Compliance Monitoring Responsibility:

- M2: NYISO/RCMS

Compliance Documentation Reporting Frequency:

- M2: Annually

Compliance Reporting Requirements:

- M2: NYISO Certification of Con Edison compliance.

Measure No.

<p><input checked="" type="checkbox"/> Full Compliance</p>	<p>M2. Con Edison provided evidence that: (1) Con Edison has prepared procedures for identifying <i>Eligible Black Start Resources</i>, in accordance with R2; (2) Con Edison performed and documented a study for identifying Eligible Black Start Resources conducted during the past 12 months, or certified that a study was not required because there were no changes to relevant system conditions that would have affected the results of the previous study, in accordance with R2.1; (3) Con Edison submitted to the NYISO its methodology and/or study that identified a <i>Eligible Black Start Resource</i> that would provide a <i>Material Benefit</i> to its SRP, in accordance with R2.2; and (4) when a <i>Eligible Black Start Resource</i> that was designated to participate in the Con Edison SRP did not want to participate or continue to participate, Con Edison prepared supplemental information requested by the NYISO, in accordance with R2.3.</p>
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Levels of Non-Compliance

<p>___ Level 1</p>	<p>M2. Not applicable</p>
<p>___ Level 2</p>	<p>M2. Con Edison has procedures for identifying <i>Eligible Black Start Resources</i> for inclusion or continued inclusion in its SRP, but the procedures were incomplete.</p>
<p>___ Level 3</p>	<p>M2. Con Edison did not submit its black start <i>resource</i> identification methodology or study or other information to the NYISO when requested, in accordance with R2.2 and R2.3.</p>
<p>___ Level 4</p>	<p>M2. Con Edison failed to conduct a study for determining the need to include or continue to include any Eligible Black Start Resources in its SRP when required and did not certify that the study was not needed because there were no changes to relevant system conditions that would have affected the results of the previous study, as required by R2.1.</p>

Reliability Rule G.4 R2 Narrative:

The NYISO has been provided with Con Edison Specification TP-7700-5 "BLACKSTART EVALUATION METHODOLOGY" December 2020 which provides the methodology for identifying Eligible Black Start Resources that provide a Material Benefit to the Con Edison SRP.

Con Edison has not identified a new Black Start Resources in 2022 that is currently on the interconnection queue.

Certified by: Raj Reddy Dontireddy

Title: Manager, Operations Engineering

Date: June 1, 2023