

Proposed NYSRC Reliability Standard for the Interconnection of Large Loads

Dr. Mayer Sasson
Con Edison

September 12, 2025

NYISO Current Involvement with Large Load Interconnections

- The NYISO tariff does not govern large load connections but does require an informational, non-binding, System Impact Study (SIS) that includes proposing some solutions for reliability deficiencies identified
- NYISO currently considers its function ending with the SIS, after Large Load customer has paid for the performance of the SIS
- The Federal Power Act (“FPA”) and New York State Public Service Law (“PSL”) establish the jurisdictional boundaries applicable to large load customers
 - Under section 201 of the FPA, FERC has jurisdiction over the “transmission of electric energy in interstate commerce” and “the sale of electric energy at wholesale in interstate commerce
 - FERC does “not have jurisdiction over the sale of electric energy for end use, which is a retail transaction,” or “over facilities used in local distribution.”
- Because a large load customer would consume all and not resell any of the power it purchases from the utilities, the sale is a retail sale outside of FERC’s jurisdiction.

NYISO Jurisdiction over the Reliability of Large Load Interconnections

- FERC's reliability authority, and therefore the NYISO's, is distinct from its authority over wholesale sales and transmission
- Section 215(b)(1) of the FPA states:

[t]he Commission shall have jurisdiction, within the United States, over the [Electric Reliability Organization] certified by the Commission under subsection (c), any regional entities, and all users, owners and operators of the bulk-power system, including but not limited to the entities described in section 201(f), for purposes of approving reliability standards established under this section and enforcing compliance with this section. **All users, owners and operators of the bulk-power system shall comply with reliability standards that take effect under this section.**
- The NYSRC is a FERC-approved organization and its rules are mandatory over the NYISO and all entities signatories of the NYISO Agreement
- Signatories of the NYISO Agreement are required to abide by all NERC, NPCC and NYSRC reliability standards

Proposed New NYSRC Reliability Standard

- The NYSRC is in a unique position, and in accordance with its responsibilities over the reliability of the New York State Transmission System, to establish a new rule that is consistent with the jurisdictional authorities under the FPA and New York's PSL
 - Require the NYISO to perform reliability activities under its FPA jurisdiction, including the verification that the actual Large Load interconnection meets all NERC, NPCC and NYSRC reliability standards
 - Require the NY Transmission Owners to perform reliability activities under their PSL jurisdiction, including that their State two-party Interconnection Agreements with Large Loads meet all NERC, NPCC and NYSRC reliability standards

Proposal for the Interconnection of Large Loads

NYSRC

New Large Load Reliability Standard

Require NYISO to:

- a) Obtain models and perform impact studies
- b) Develop performance requirements on frequency and voltage fluctuations ride-through, on ramp rates, and other requirements
- c) Perform SIS and verify that the actual final interconnection meets all applicable reliability standards
- d) Require TOs to include in their state IAs:
 - 1) Development of solutions to reliability deficiencies found in impact studies
 - 2) Interconnection only after solutions are in service
 - 3) Meeting NYISO performance requirements
- e) Address (with NYTOs) impact to UFLS and restoration

Mandatory over
NYISO

Mandatory over
NY TOs as MPs

NYISO

OATT Provisions

Compliance with
NYSRC Reliability
Standard In
accordance with its
FPA jurisdictional
authority

NY TOs

IA provisions

Compliance with
NYISO OATT
requirements