

**To:** RRS

**From** Wes Yeomans

**Regarding:** NYSRC EC Comments to RRS Recommendation for Policy 1, Section 5

Wes Yeomans presented the RRS recommendation for Policy 1, Section 5 at the November 14, 2025, NYSRC Executive Committee meeting. Below is the recommendation and NYSRC Executive Committee comments and questions to RRS to consider for drafting the red-line Policy 1, Section 5 modification for eventual NYSRC voting & approval.

### **RRS Recommendation to November 14, 2025 NYSRC EC Meeting**

The RRS came to a unanimous, consensus agreement at the November 7 RRS meeting to provide the below recommendation to the NYSRC EC. RRS prefers to receive feedback from the NYSRC EC prior to drafting and providing a red-line change of Policy 1, Exception 5 for eventual NYSRC EC approval.

- Revise Policy 1, Exception 5 to state that for requests for new planning and/or operating exceptions that the request be formally defined as temporary with a forecasted expiration date with provisions that the expiration date could be modified at a later point in time based on status of planning, rate approvals, and construction progress.
- Subsequently consider modifications to Rule C.7 “Exceptions to NYSRC Reliability Rules” whereby Requirement R1.1 language be modified Strengthen the requirement for the Transmission Owner requirements for exceptions review consistent with an eventual modification of Policy 1, Section 5. Described differently, enhance C.7 R1 for Transmission Owners to more rigorously evaluate opportunities to eliminate existing exceptions.

### **NYSRC EC Comments & Questions to RRS for Consideration for Drafting Red-Line Edits for Eventual EC Vote and Approval**

Below are the verbal comments from EC Members:

- Will RRS bring both Policy 1, Section 5 and Rule C:7 R1 at the same time? (Wes responded no on the thought any changes to C:7 require a PRR).
- Consider clarifying the distinction between a new and a change to an existing exception in Policy 1, Section 5.
- Ensure review of Rule C:7 requires TO's to review recent transmission topology modifications inclusive of material change to power system. Consider strengthening language for review of existing exceptions when infrastructure changes.
- Upon modifying Policy 1, Section 5 to require an expiration date for new exceptions, consider a requirement that the relevant TO provide annual progress reports
- Remove any reference to "rate approvals" with project approval and/or funding approval.
- Suggestion that no requirement for TO to come back with updated expiration date. Simply require TO to re-ask approval for the new exception.
- Consider strengthening review of existing exceptions when infrastructure changes. (Wes, a lot of those requirements already exist)

Wes Yeomans

Chair RRS

XC: David Allen

