



Draft NEW YORK STATE RELIABILITY COUNCIL

2025 Reliability Compliance Program Highlights

*Prepared by the Reliability Compliance Monitoring
Subcommittee*

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NYSRC 2025 Reliability Compliance Program Highlights

Introduction

This report presents the highlights of the 2025 New York State Reliability Council (NYSRC) Reliability Compliance Program, the major process used by the NYSRC to monitor the New York Independent System Operator (NYISO) compliance with the Reliability Rules¹ and related Requirements.²

The NYSRC Reliability Compliance Program is designed to measure and ensure compliance with NYSRC Reliability Rules to provide for a reliable bulk electric supply and delivery system in New York State. The NYSRC Reliability Compliance Monitoring Subcommittee (RCMS) manages the compliance program, which includes conducting reviews to ensure the NYISO is in compliance with all NYSRC Reliability Rules, including those identified in the Rules as requiring actions by Market Participants. The NYISO has the responsibility of ensuring market participant compliance through its procedures and Tariffs. The objective of the compliance program is to require compliance with the NYSRC Reliability Rules necessary to ensure the reliability of the New York Control Area.

The NYISO and Market Participants are responsible for complying with the reliability requirements related to the Reliability Rules. Full compliance with a reliability requirement, as defined by an associated measure, is demonstrated by evidence provided by the NYISO or a Market Participant. The Reliability Rules also include levels of non-compliance and a description of the compliance process associated with each measure. These compliance elements are described in detail in the Introduction to the Reliability Rules & Compliance Manual.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-8, *Procedure for Monitoring Compliance with the NYSRC Reliability Rules*, at: <http://www.nysrc.org/policies.asp>.

In 2023, a three-year NYSRC compliance review plan covering the 2024-2026 period, prepared by RCMS, was approved by the Executive Committee. The 2025 NYSRC Reliability Compliance Program represented the second year of this three-year compliance program.

¹ The reliability objective that is expected to be achieved through compliance with a set of related Requirements.

² The actions that shall be performed or outcomes that shall be achieved by the NYISO or Market Participants to comply with the reliability objective of an associated Reliability Rule. Requirements are material to reliability and are measurable.

2025 NYSRC Reliability Compliance Program

In 2025 the NYSRC maintained a total of 97 Requirements associated with 28 Reliability Rules. The 2025 Reliability Compliance Program included 29 reliability assessments which reviewed NYISO and Market Participant compliance with a total of 35 Requirements or 37% of NYSRC's Requirements.

As shown in Table 1 below, the 2025 NYSRC Reliability Compliance Program incorporated a total of 30 reliability assessments which included compliance reviews of 21 Requirements having NYISO reporting responsibility and 14 Requirements having Market Participant reporting responsibility. Table 1 also shows that the NYISO and Market Participants were in full compliance with all Requirements for which compliance was reviewed in the 2025 NYSRC Reliability Compliance Program. In addition to the 2025 NYSRC Reliability Compliance Program, Resource Adequacy Rule A1, Requirement 1 was met by the NYSRC Executive Committee approval of the NYSRC Installed Capacity Subcommittee annual NYCA IRM Study for the May 1, 2026 – April 30, 2027, capability year as described in R1.

Table 1

2025 NYSRC Compliance Program Summary

	Number of Compliance Assessments	Reliability Requirements Found in Full Compliance	Reliability Requirements Found in Non-Compliance
NYISO	19 ³	21	0
Market Participants	10	14	0
Totals	29	35	0

In addition to compliance certification submissions, compliance with six assessments required the NYISO to submit reports to RCMS, not including 12 monthly operations reports. The Appendix is a summary of the 2025 Reliability Compliance Program that depicts the Requirements that were assessed, related compliance milestone dates, and compliance findings.

³ Twelve NYISO monthly real-time operating report submissions in 2025 are counted as a single assessment.

New York Control Area Resource Adequacy Assessments

Installed Reserve Margin

To demonstrate compliance with the “Next Capability Year” resource adequacy assessment requirement (A.3 R1), the NYISO prepared the report, *Next Capability Year Resource Adequacy Assessment*. This assessment concluded that for existing and planned NYCA resources and a baseline forecast of peak load, NYCA IRM requirements would be met during the 2025-2026 capability year period, even under an extreme (90 percentile) high load case, assuming emergency actions could be taken.

New York Control Area Transmission Reviews Planning Assessments

NYSRC Reliability Rule (B.2 R1) requires that the NYISO conduct annual New York Control Area (NYCA) area transmission reviews (ATRs). The timing of the NYISO’s transmission review submissions to the NYSRC are coordinated with that of similar transmission review submissions required by NPCC. In addition to NPCC reporting requirements, the NYSRC requires the NYISO to provide supplemental information as described in the NYSRC Procedure for NYCA Transmission Reviews.”

At the January 9, 2025, RCMS meeting, it was noted that the NPCC Reliability Coordinating Committee (RCC) approved the 2024 Interim Area Transmission Review (ATR), and the contingent approval dated October 31, 2024, was released.

The NYISO is currently developing the 2025 Comprehensive Area Transmission Review (ATR) which will be submitted to the NYSRC for conditional approval at the March 5, 2026, RCMS meeting. Final NPCC RCC Approval is anticipated in May 2026, with final NYSRC approval scheduled for the June 2026 RCMS meeting. This review will assess the 2030 study year and conclude whether the planned NYCA bulk power transmission facilities, as projected through 2030, conform to applicable NPCC and NYSRC Reliability Rules.

In parallel, NYISO is also preparing the 2026 Interim ATR. The proposed schedule targets RCMS contingent approval in late 2026, with final approval expected in February 2027. This review will assess the 2031 study year and conclude whether the planned NYCA bulk power transmission facilities, as projected through 2031, conform to applicable NPCC and NYSRC Reliability Rules.

Reliability Rule B.5 - Large Inverter-Based Resource Generating Facilities

NYSRC Reliability Rule B.5, *Establishing New York Control Area (NYCA) Interconnection Standards for Large Inverter-Based Resource (IBR) Generating Facilities*, was introduced in the 2025 Reliability Compliance Program. The rules include two requirements; each will be assessed every two years. To support implementation, NYISO prepared and maintains procedures aligned with the Large IBR Generating Facility Developer’s interconnection requirements through their Open Access Transmission Tariff and a supporting Technical Bulletin – both publicly available on the NYISO website. NYISO certified

that each Large IBR who submitted a Transition Cluster Study Application during the window of August 1, 2024, to October 15, 2024, provided the necessary data, models, and a compliance attestation that their facility is designed to meet the mandatory requirements of IEEE 2800-2022.

NYISO Compliance Documentation Submissions

The success of the NYSRC Reliability Compliance Program depends on timely and complete submissions of compliance documentation prepared by the NYISO. In 2025 all required compliance certifications and related compliance documents were submitted to RCMS by the NYISO in accordance with compliance documentation due dates, and all submissions were found to be complete.

NERC and NPCC 2025 Reliability Compliance Programs

In addition to complying with the NYSRC Rules, the NYISO must also comply with all applicable NERC standards and NPCC criteria. Compliance with NERC standards is mandatory. The RCMS has oversight responsibility concerning the NYISO's compliance with these standards and criteria. NPCC has direct responsibility and authority to implement a Compliance Monitoring and Enforcement Program (CMEP) for NERC and regional standards, as well as a Compliance Criteria Enforcement Program (CCEP) for NPCC-specific reliability criteria. During 2025, as a part of the CCEP, NPCC reviewed and found the NYISO in full compliance with two NPCC directories.

Conclusions

The following conclusions were reached by RCMS regarding the NYSRC 2025 Reliability Compliance Program:

1. The NYISO staff continued to provide valued assistance during the NYSRC reliability compliance review process.
2. The NYISO and Market Participants were in full compliance with all 35 NYSRC Requirements that were assessed by RCMS in the 2025 NYSRC Reliability Compliance Program. In addition, NPCC found the NYISO in full compliance with all NPCC criteria and NERC standards that were assessed during 2025.
3. All required NYISO compliance documentation associated with the 2025 Reliability Compliance Program was submitted to RCMS within the defined schedules and found to be complete.

**NEW YORK STATE RELIABILITY COUNCIL
2025 RELIABILITY COMPLIANCE PROGRAM**

REQUIREMENT(S)	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE LEVEL ²
A – Resource Adequacy						
A.1: R2	Calculation & reporting of LOLH and EUE metrics in the 2025 IRM Study	M1	1/30/2025	1/30/2025	2/6/2025	FC
A.2: R1	2025 Locational Capacity Requirements	M1	5/29/2025	5/29/2025	6/5/2025	FC
A.2: R2*	LSE ICAP obligations	M2*	11/19/2025	11/19/2025	11/26/2025	FC
A.3: R1	Resource Adequacy Assessment for the Capability Year 2025-2026	M1	5/29/2025	5/29/2025	6/5/2025	FC
A.3: R2	Long-Term Resource Adequacy Assessment for 2025-2034	M3	1/30/2025	1/30/2025	2/6/2025	FC
B – Transmission Planning						
B.2: R1	2025 NYCA Transmission Review	M1	February 2026 ³			
B.5: R1	Maintain procedures for interconnection studies for large IBR Facility Developers	M1	2/27/2025	2/27/2025	3/6/2025	FC
B.5: R2	Large IBR Facility Developers subject to interconnection studies	M2	2/27/2025	2/27/2025	3/6/2025	FC
C – Transmission Operation						
C.5: R1, R3	2025 Fault current assessment	M1	7/3/2025	7/2/2025	7/10/2025	FC
C.5: R2*	Equipment Owner fault current assessment	M2*	7/3/2025	7/2/2025	7/10/2025	FC
C.8: R1	Real-time operations monthly reports	M1	Monthly	--	Monthly	FC
D – Emergency Operations						
D.1: R10	Annual statewide voltage reduction test	M3	11/19/2025	11/19/2025	11/26/2025	FC

REQUIREMENT(S)	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE LEVEL ²
F – System Restoration						
F.1: R1	NYISO system restoration procedures and actions	M1	2/27/2025	2/27/2025	3/6/2025	FC
F.1: R2*	TO system restoration plans	M2*	2/27/2025	2/27/2025	3/6/2025	FC
F.1: R3*	Black Start Provider requirements	M3*	8/28/2025	8/28/2025	9/4/2025	FC
G – Local Area Operation						
G.1: R5	NYISO requirements for Con Ed planning & operating procedures	M1	3/27/2025	3/27/2025	4/3/2025	FC
G1: R6	NYISO requirements for Con Ed 10-min. reserve procedures	M2	3/27/2025	3/27/2025	4/3/2025	FC
G.1: R1-R4, R7*	Con Ed planning & operating Procedures	M3*	5/29/2025	5/29/2025	6/5/2025	FC
G.2: R1	NYISO requirements for Con Ed loss of gas supply	M1	5/29/2025	5/29/2025	6/5/2025	FC
G.2: R2*	Con Ed loss of gas supply procedures and actions	M2*	5/29/2025	5/29/2025	6/5/2025	FC
G.2: R3-R4	NYISO requirements for GO dual fuel testing of MOB combined cycle units	M3	8/28/2025	8/28/2025	9/4/2025	FC
G.2: R5*	GO procedures for testing dual fuel capability of MOB combined cycle units	M4*	8/28/2025	8/28/2025	9/4/2025	FC
G.2: R6*	GO dual fuel capability testing of combined cycle units	M5*	4/24/2025	4/24/2025	5/1/2025	FC
G.3: R1	NYISO requirements for LIPA loss of gas supply	M1	9/25/2025	9/25/2025	10/2/2025	FC
G.3: R2*	LIPA loss of gas supply procedures and actions	M2*	9/25/2025	9/25/2025	10/2/2025	FC
G.4: R1	NYISO requirements for inclusion of eligible Con Ed System Restoration Plan black start resources	M1	9/25/2025	9/25/2025	10/2/2025	FC
I – Modeling and Data						
I.2: R3	Generation outage statistics report	M3	11/19/2025	11/19/2025	11/26/2025	FC

REQUIREMENT(S)	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE LEVEL ²
I.2: R4.4	SCR performance report	M4	10/30/2025	10/30/2025	11/6/2025	FC
I.3: R2	Annual actual and forecast load data	M2	11/19/2025	11/19/2025	11/26/2025	FC
I.4: R3*	MP transmission data reporting	M3*	9/25/2025	9/25/2025	10/2/2025	FC

*Applicable to Market Participants; NYISO compliance certification is required (see Appendix).

Footnotes:

1. Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in the Appendix: 2025 Reliability Compliance Program – Compliance Documentation Requirements
2. NYISO Compliance Levels
FC – Full Compliance
NC1 – Non-Compliance Level 1
NC2 – Non-Compliance Level 2
NC3 – Non-Compliance Level 3
NC4 – Non-Compliance Level 4
3. This is the placeholder date. The final due date will depend on when NPCC will require the NYISO to submit the 2025 NYCA Transmission Review.

*Applicable to Market Participants; NYISO compliance certification is required. Footnotes:

1. Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in the Appendix.

2. NYISO Compliance Levels FC – Full Compliance

NC1 – Non-Compliance Level 1 NC2 – Non-Compliance Level 2 NC3 – Non-Compliance Level 3 NC4 – Non-Compliance Level 4

3. All 12 monthly operations reports were found in full compliance.