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NEW YORK STATE RELIABILITY COUNCIL

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2025 Reliability Rules Subcommittee Annual Report

January 2026

NYSRC 2025 Reliability Rules Subcommittee Report

Introduction

The Reliability Rules Subcommittee (RRS) manages the review, development, and modification of the New York State Reliability Council (NYSRC) Reliability Rules to maintain or enhance the reliability of the NYS Bulk Power System. Reliability is monitored in accordance with the NYSRC and NYISO/NYSRC Agreements, NYSRC Policy 1, *Procedure for Reviewing, Modifying, and Disseminating NYSRC Reliability Rules,* and other processes and procedures established by the NYSRC Executive Committee. RRS is an open subcommittee whose meetings are open to all interested parties who wish to attend. Meetings are publicly posted on the NYSRC website.

The responsibilities of RRS include:

1. Recommend to the NYSRC Executive Committee processes and procedures, including Policy 1 revisions, for reviewing, developing, and modifying the NYSRC Reliability Rules.

2. Consider requests by the Executive Committee for the development of new Reliability Rules or modifications of existing Reliability Rules and recommend to the Executive Committee whether such requests should be accepted or denied.

3. For those Reliability Rule change requests approved by the Executive Committee, recommend to the NYSRC Executive Committee Reliability Rule additions or modifications. The process of developing new reliability rules and modifying existing rules, when the change is intended to enhance reliability, should consider the economic and environmental implications of the proposed rule change.

4. When requested by the Executive Committee, review and comment on requests for exceptions to the Reliability Rules[1].

5. Recommend to the NYSRC Executive Committee revisions to the NYSRC Reliability Rules Manual when appropriate.

6. Conduct self-assessments of the NYSRC Rules to ensure consistency with NERC and NPCC standards and criteria.

7. Participate in NPCC, NERC, or other related open processes for developing and approving new

[1] Includes removal of and modification to existing Exceptions

reliability standards or modifications of existing standards. Review and comment on proposed standards, when appropriate. Address issues associated with the potential impact of proposed NPCC, NERC, or other standards on New York Control Area reliability.

8. Maintain a database for the tracking of new and revised NERC and NPCC standards and criteria.

9. Review Reliability Rule disputes and recommend potential solutions to the NYSRC Executive Committee.

10. Prepare and submit status reports requested by the NYSRC Executive Committee. Also prepare, on request, reports for the NYSRC Executive Committee to disseminate to FERC and the PSC.

11. Review system operations trending information collected by the Reliability Compliance Monitoring Subcommittee (RCMS) when requested by the Executive Committee or RCMS.

12. Develop interpretations of the Reliability Rules when requested by the Executive Committee.

2025 Highlights

NYSRC Reliability Rules and Compliance Manual

The initial NYSRC rules, adopted in 1999, were based on former New York Power Pool criteria. Since then, these rules have been revised numerous times to reflect the need for: new and modified NYSRC rules; NERC and NPCC standards; and criteria changes.

The NYSRC has always worked towards improving its Reliability Rules by introducing new Rules, revising existing Rules and retiring existing Rules when appropriate. Potential Reliability Rule (PRR) changes are considered by RRS to ensure that the NYSRC Reliability Rules and related requirements are consistent with, or more specific, or more stringent than the corresponding NERC and NPCC reliability standards and criteria.

2025 NYSRC Reliability Rules - New, Revised & In Development

No new or modified Reliability Rules were approved in 2025. PRR-153, "Sudden loss of fuel delivery system to multiple solar & wind plants as Category 1 & II Design Contingencies in Table B-1 remains under development awaiting additional renewable generation performance analysis. The NYISO procured consulting services from DNV and on December 19 DNV presented their modeling analysis of sudden weather-based renewable generation outages. The RRS and EWWG will continue to discuss DNV analysis into early 2026 and develop the next steps for PRR-153.

PRR-156 was developed in 2025. PRR-156 proposes a set of modifications to the Resource Adequacy Rule, A.2 to enhance resource adequacy. The proposed modifications include (1) adjustments to seasonal LSE capacity requirements to capture increasing winter reliability risks, (2) improved alignment with current reliability rules to current NYISO installed capacity purchase rules, (3) clarification of A.2 R1.3 in relation to Installed Capacity Requirements (IRM) and the NYISO's Locational Minimum Installed Capacity Requirements (LCRs) as reflected in current practices, and, (4) provision to update LCRs in response to entry of certain new capacity requirements which pose significant impacts on transmission security for Localities. In November 2025 the NYSRC Executive Committee approved posting PRR-156 for comments and the RRS expects to review comments at their January 2026 meeting.

RRS continued to monitor issues potentially affecting NYCA long-term reliability including:

- The Invertor Based Resources Working Group ("IBRWG") continues to meet, monitor and review IEEE-2800.2 (Guide for Test and Verification Procedures for Inverter Based Resources Interconnecting with Bulk Power Systems) with the goal of developing a new PRR 155 to cover IEEE 2800-2022 modeling, test and verification requirements for interconnection of as-built

IBR plants.

- The IBRWG is reviewing the details associated with the recently approved NERC Standards, PRC-024 & PRC-029 for consistency with NYSRC Reliability Rule B.5, R1 & R2.

- The RRS created an Under Frequency Working Group consisting of Transmission Asset Owner Subject Matter Experts to discuss and consider risks associated with the rapidly increasing penetration of Behind the Meter renewable resources and specifically the challenges of identifying and incorporating sufficient, additional load shed feeders to meet existing requirements long with discussion of incorporating large loads. RRS approved the UFLS WG White Paper in July 2025 and RRS presented the White Paper to the NYSRC Executive Committee in August 2025. The RRS continues to discuss an implementation plan for the recommendations, one of which may likely result in a new PRR.

- The RRS followed NERC industry work in the area of Large Load reliability risks and concerns. A new, NYSRC Large Load Reliability Working Group has been formed along with a draft scope describing a range of reliability concerns.

- The Extreme Weather Working Group ("EWWG") met monthly to discuss the PRR-153 as noted above and other extreme weather conditions

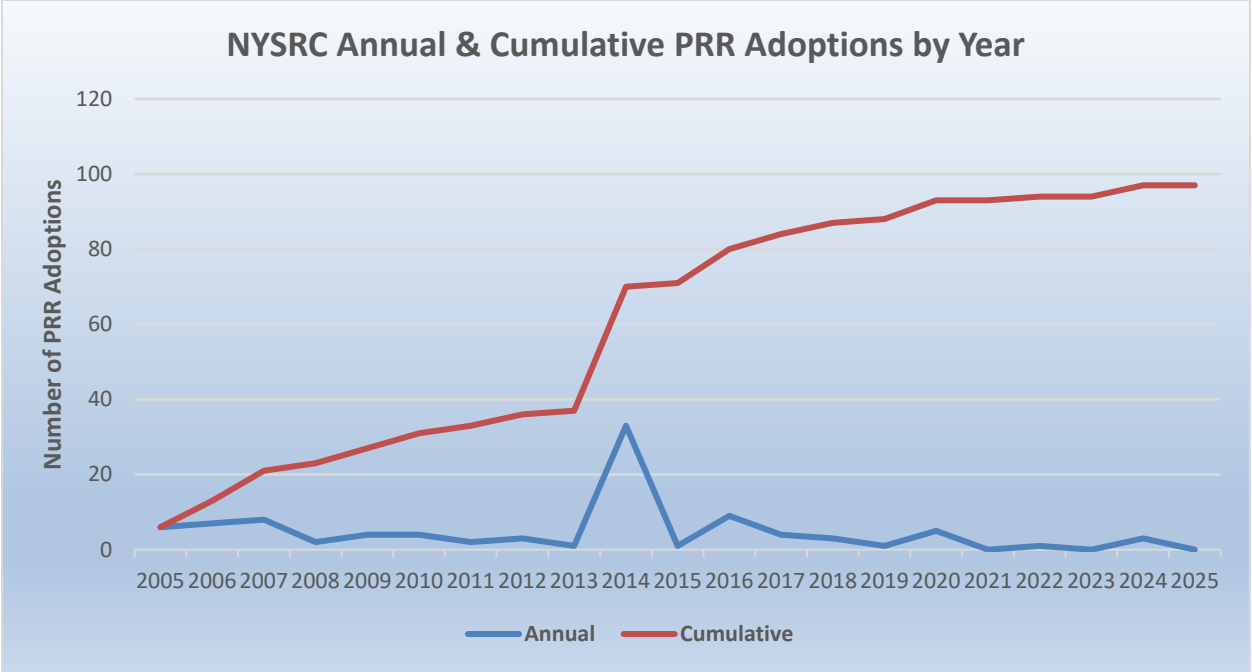
  - Analysis of DNV renewable production shapes utilizing rolling average capacity factor identified significant frequency & duration of combined production lulls.[2]

  - Continued discussion on PRR 153 which covers sudden loss of renewables as transmission planning contingencies.

  - Discussion on need for a companion PRR defining new system conditions for transmission planning based on long duration renewable production lulls.

The annual and cumulative adoption of Potential Reliability Rules by NYSRC through 2025 is shown below.

[2] https://www.nysrc.org/wp-content/uploads/2024/10/2030_State_Scenario_Lull_Frequency.pdf


NYSRC Annual & Cumulative PRR Adoptions by Year
Number of PRR Adoptions
120
100
80
60
40
20
0
2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025
Annual
Cumulative

Review of Policy 1-12, Section 5, "Exceptions to the NYSRC Reliability Rules"

The RRS, consistent with Goal B1.2, discussed and considered enhancements to the criteria and processes for planning and operating exceptions as currently defined in Policy 1, Section 5. After several lengthy discussions, the RRS did present, for comment, a draft recommend to the NYSRC Executive Committee for a slight modification to limit the time period of any new exceptions. The RRS received comments and is in the process of producing a formal recommendation for Executive Committee approval in 2026 Q1.

Conclusions

The Reliability Rules Subcommittee reached the following conclusions with regard to its 2025 activities:

1. NYISO Staff continued to provide timely and valued assistance to RRS during 2025.

2. RRS considers that the NYCA Bulk Power System will experience significant operating and transmission planning challenges in the next decade with the ongoing retirement of NYCA fossil and nuclear resources with a corresponding increase in renewable resources and with extreme weather conditions.

3. RRS continues to monitor current and predicted reliability trends in the NYCA BPS with the goal of developing new, revised or retirement of individual Reliability Rules.

4. While no new PRRs were adopted by the Executive Committee in 2025, the RRS continues to develop PRR-153 and PRR-156. The average PRR adoption rate since NYSRC inception is 4.62 PRRs per year and the cumulative total of adopted PRRs is 97.

5. PRR 153: I*nclude "Sudden loss of fuel delivery system to multiple solar & wind plants" as Category I & II Design Contingencies in Table B-1* is under development pending technical input from the EWWG.

6. PRR 156: Proposes four Resource Adequacy enhancements and is currently posted for comment.

7. RRS provides an active technical forum for discussion of NYS reliability matters. All parties including New York State DPS staff, Transmission Owners, Developers, the public and NYISO staff have a platform to develop new or revised Reliability Rules and continue to do so in a collegial and cooperative manner.