

To: Mark Domino, Chair NYSRC Executive Committee

From: Wes Yeomans, Chair RRS

Date: November 11, 2025

Re: **RRS Goal B1.2 - RRS Recommendation to the NYSRC Executive Committee Regarding Policy 1, Section 5 “Exception Process and Criteria”**

Introduction

In late fall of 2025, the NYSRC Executive Committee (“EC”) assigned a goal, Goal B1.2, to RRS to review the Policy 1, Section “Exception Process and Criteria” to determine if any modifications should be considered by the NYSRC EC and, if so, provide recommendations to the EC for consideration. The RRS did discuss this goal over several RRS meetings during 2025 with significant progress on consensus being made at a special (ad hoc) single-agenda-item October 21 RRS meeting. To aid & manage the discussion, RRS did draft an “RRS Discussion Paper Policy 1, Section 5”

Discussion Points

For the purposes of developing a recommendation, RRS did discuss the below issues. NYISO Grid Operations was invited and participated in the discussions.

1. Original basis for the existing planning and operating exceptions
2. Specific review of the applicable rules associated with current exceptions specifically B.1 “Transmission System Planning and Performance Requirements” with exact application to Tables B-1 & B-2 and C.1 “Establish Operating Transfer Capability” with exact application to Tables C-1 & C-2.
3. Benefits and concerns with exceptions; mostly generically with some specific discussion examples.

4. Review of the discussion points identified by Roger Clayton in his November 2024 note to the NYSRC EC members

RRS Recommendation to NYSRC EC

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, Exception5 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.

Next Steps

Based on NYSRC comments and feedback the RRS will quickly proceed with developing and providing to the NYSRC EC draft, red-line edit modifications to the NYSRC EC for approval in 2026 Q1 consistent with the 2026 RRS Goal.

Wes Yeomans
Chair, NYSRC RRS