Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1)
Submit request to Herb Schrayshuen (herb@poweradvisorsllc.com) via the NYSRC site www.nysrc.org

Item	Information
1. PRR No. & Title of Reliability Rule or Requirement change	PRR 160 Modification to the underground cable operating criteria Table B-2
2. Rule Change Requester Information	
Name	Martin Paszek, Greg Campoli
Organization	Consolidated Edison Company of New York and New York State Independent System Operator
3. New rule or revision to existing rule?	Table B-2 revision
4. Need for rule change, including advantages and disadvantages	Currently, Table B-2 (Planning) focuses on traditional reserves for post-contingency recovery. However, to maintain consistency with the proposed changes to Table C-2 (Operations) under [Insert PRR #], the planning criteria must also recognize Emergency Response Capability. Planning the system to account for downward flexibility (generation curtailment and fast-ramping ESS/HVDC) ensures that the NYS Bulk Power System is designed to handle modern thermal constraints on underground cables without over-building transmission or over-relying on load shedding in planning models. This creates a 'seamless' transition from how a project is studied in the planning phase to how it is utilized by System Operators. The proposed modification to the language in table B-2: 1. For normal transfers, no facility shall be loaded beyond its LTE rating following the most severe of Contingency Events 1 through 9 specified in Table B-1. An underground cable circuit may be loaded to its STE rating following: Loss of Generation - provided ten ~~*(10) minute operating reserve*~~ ten (10) minute Emergency Response Capability (including the ability to increase or decrease resource output) and/or phase angle regulation is available to reduce the loading to its LTE rating within fifteen (15) minutes and not cause any other facility to be loaded beyond its LTE rating. Loss of Transmission Facilities - provided phase angle regulation is available to reduce the loading to its LTE rating within fifteen (15) minutes and not cause any other facility to be loaded beyond its LTE rating. Advantage: Enhances reliability by providing additional flexibility to System Operators that may prevent the shedding of load. The inclusion of 'decreasing' output leverages the inherently faster downward ramp rates of thermal resources and the near-instantaneous response of ESS and HVDC assets. This provides a more certain and rapid mitigation of post-contingency overloads on underground cables compared to traditional upward reserve deployment alone. Disadvantage: None

5. Related NYSRC rules	
6. Section A – Reliability Rule Elements	
1. Reliability Rule	
2. Associated NERC & NPCC Standards and Criteria	No change
3. Applicability	No Change
7. Section B – Requirements	Addition of glossary term: **Emergency Response Capability** – The sum of the available capacity from Generation, Energy Storage Systems (ESS), and HVDC facilities that can be adjusted (increased or decreased) and sustained within ten (10) minutes following a contingency to restore Transmission Facility loadings to within applicable limits.
8. Section C – Compliance Elements	
1. Measures	No Change
2. Levels of Non-Compliance	No Change
3. Compliance Monitoring Process (See Policy 4):	No Change
3.1 Compliance Monitoring Responsibility	No Change
3.2 Reporting Frequency	No Change
3.3 Compliance Reporting Requirements	No Change
9. Comments	"Expedited action is necessary to ensure that this rule change will unlock additional resource flexibility going into the summer high load period. By formalizing 'Emergency Response Capability' now, the NYISO can more effectively resolve post-contingency overloads on critical underground cables through both increasing and decreasing resource output. This provides System Operators with the full suite of bi-directional tools required to manage the modern grid, thus enhancing system reliability and reducing the risk of load shedding during the upcoming 2026 summer peak."
10. Date Rule Adopted	Effective immediately after EC approval
11. PRR Revision Dates	
12. Implementation Plan	Effective immediately after EC approval