

Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1)

Submit request to herb@poweradvisorsllc.com via the NYSRC site www.nysrc.org

Item	Information
1. PRR No. & Title of Reliability Rule or Requirement change	PRR 158: Resolve Difference between NYSRC Reliability Rule Table B-1 and NPCC Directory 1, Table 1, and NERC Standard TPL-001-5.1, Table 1 regarding Multiple Tower Exclusion Criteria
2. Rule Change Requester Information	
Name	Brian Shanahan
Organization	National Grid USA
3. New rule or revision to existing rule?	Revisions to existing rule.
4. Need for rule change, including advantages and disadvantages	<p>This rule change is intended to resolve an inconsistency that now exists between NYSRC Reliability Rule, Table B-1, NPCC Directory 1, Table 1, and NERC Standard TPL-001-5.1 Table 1, footnote 13, regarding the criteria for Multiple tower Exclusion criteria.</p> <p>More specifically, NPCC Directory 1 Table 1 Performance Requirement footnote vii, regarding the exclusion criteria for Multiple Circuit Tower contingencies, was changed in 2024. The original Directory 1 requirement was the same as the existing NYSRC RR Multiple Tower exclusion criteria but changed from 5 towers at the entrance/exit of a station to a cumulative distance of less than 1 mile along a circuit path. Additional guidance was also added that addressed how to apply the one mile limit.</p> <p>Similarly, NERC Standard TPL-001-5.1 includes a multiple tower exclusion criteria of 1 mile or less for P7 Planning Event, extreme steady state events 2a & 2b.</p> <p>Advantages / Rationale for the change:</p> <ul style="list-style-type: none"> • Aligns Multiple Tower Planning Criteria between NERC/NPCC/NYSRC • Change is comparably as stringent as the NPCC/NERC criteria • Avoids the complexity and potential confusion of maintaining a separate list of facilities that only trigger NYSRC criteria • Avoids unnecessary Project construction costs and durations <p>Refer to Additional Information at the end of this PRR for a direct comparison of requirements.</p>

5. Related NYSRC rules	B.1: Transmission System Planning Performance Requirements
6. Section A – Reliability Rule Elements	
1. Reliability Rule	B.1: Transmission System Planning Performance Requirements, Table B-1 Performance Requirements.
2. Associated NERC Standards & NPCC Standards and Criteria	NPCC: Directory 1 NERC: TPL-001
3. Applicability	NYSRC Reliability Rules
7. Section B Requirements	Table B-1, Performance Requirements: vii. Regarding contingency no 6, <u>if multiple circuits share common structures for a cumulative length of one mile or less if multiple circuit towers are used only for station entrance and exit purposes and if they do not exceed five towers at each station</u> , then this condition is an acceptable risk and therefore can be excluded. <u>For instances where single (non-consecutive) structures are shared along the route, half of the length of the longest single span attached to the multiple circuit tower structure should be included for the purpose of determining the cumulative length.</u> Other similar situations can be excluded on the basis of acceptable risk, provided that the NYSRC Executive Committee specifically accepts each request for exclusion.
8. Section C – Compliance Elements	
1. Measures	N/A
2. Levels of Non-Compliance	N/A
3. Compliance Monitoring Process (See Policy 4):	N/A
3.1 Compliance Monitoring Responsibility	N/A
3.2 Reporting Frequency	N/A
3.3 Compliance Reporting Requirements	N/A
9. Implementation Plan	Effective immediately upon EC approval and to be included in next Reliability Rules and Compliance Manual revision following EC approval.
10. Comments	

11. Date Rule Adopted	This rule was approved for posting for receiving public comments by the NYSRC Executive Committee on June 12, 2026 for a 45-day comment period under the normal process.
12. PRR Revision Dates	Initial v0 draft 04/02/26, V1 draft approved by the EC for posting on 6/12/26,

Additional Information

Existing Multiple Tower Exclusion Criterion:

Performance Requirements for the contingencies defined in NYSRC RR, Table B-1:

vii. Regarding contingency no 6, if **multiple circuit towers** are used only for station entrance and exit purposes and **if they do not exceed five towers at each station**, then this condition is an acceptable risk and therefore can be excluded. Other similar situations can be excluded on the basis of acceptable risk, provided that the NYSRC Executive Committee specifically accepts each request for exclusion.

NPCC Directory 1, Table 1:

vii. Regarding contingency event #6 if multiple circuits **share common structures for a cumulative length of one mile or less**, then this condition is an acceptable risk and therefore can be excluded. For instances where single (non-consecutive) structures are shared along the route, half of the length of the longest single span attached to the multiple circuit tower structure should be included for the purpose of determining the cumulative length. Other similar situations can be excluded on the basis of acceptable risk, provided that the Reliability Coordinating Committee specifically accepts each request for exclusion. (See Appendix E.)

NERC Standard TPL-001-5.1, Table 1, Footnotes:

11. Excludes **circuits that share a common structure** (Planning event P7, Extreme event steady state 2a) or common Right-of-Way (Extreme event, steady state 2b) for **1 mile or less**.