



July 27, 2026

VIA ELECTRONIC MAIL

Rich Dewey
President and Chief Executive Officer
New York Independent System Operator
10 Krey Boulevard
Rensselaer, NY 12144

RE: NYSRC Comments on NYISO Show Cause Order Proposal

Dear Rich:

The New York State Reliability Council ("NYSRC") submits these comments in response to the New York Independent System Operator, Inc.'s ("NYISO") request for stakeholder feedback on its Show Cause Order response design by July 27, 2026. As directed by the Federal Energy Regulatory Commission ("FERC"), the NYISO must seek an abeyance of its responsibility to show cause as to why its tariff is just and reasonable by August 3 or respond to FERC in full by August 17. The NYSRC supports the NYISO seeking an abeyance of its August 17 deadline to allow for more time to develop a comprehensive and well-supported tariff proposal for FERC.

Consistent with the NYSRC's mission, these comments are focused on the topic of reliability, technical system matters impacting reliability and ensuring that electric system reliability is maintained with the addition of incremental large loads onto the Bulk Power System. Specifically, paragraph seventy of FERC's Show Cause Order states that FERC "preliminarily find[s] that NYISO's Tariff appears to be unjust and unreasonable because it lacks provisions addressing ongoing operational requirements for transmission customers taking transmission service on behalf of large loads." Among other reliability concerns noted, FERC states:

[It is] also concerned that the Tariff does not require the transmission customer to enable NYISO to remotely disconnect large loads when necessary to maintain reliability of the transmission system, with the costs of such equipment directly assigned to the transmission customer, as well as the terms and conditions under which NYISO may remotely disconnect the large load (e.g., emergency conditions, so that transmission equipment is not harmed).

The NYSRC agrees that the ability of the NYISO to disconnect large loads when necessary to maintain reliability of the transmission system is essential. One critical form of such disconnection capability is automatic Underfrequency Load Shedding (“UFLS”) which is a critical capability necessary to preserve power system reliability and resilience. If UFLS does not work as expected, it will lead to several risks to the reliable operation of the Bulk Electric System. These include:

1. Cascading Outages: UFLS is designed to prevent cascading outages. If it is ineffective due to invalid power system models or miscoordination, it may not achieve this reliability objective.
2. Voltage Instability: the mandatory UFLS program must mitigate the risk of instability, voltage collapse, or cascading outages impacting the Bulk Electric System. If it fails to do so, the stability of the entire power system will be at risk.

Therefore, ensuring the continued effective operation of UFLS is crucial for maintaining the reliability and resilience of the power system. For these reasons, effective UFLS operation remains widely recognized as the power system’s “last line of defense” during severe disturbances.

The design and documentation requirements governing UFLS in the New York Control Area (“NYCA”) are established through NERC Reliability Standard PRC-006-5 and NPCC Standard PRC-006-NPCC-2. NYISO’s responsibilities for administering the NYCA UFLS program are implemented through Section 4 of NYISO Manual 33, *System Protection*.

The primary objective of the UFLS program is to restore the balance between generation and load following major contingencies that result in a significant generation deficiency. Given the scale of emerging large-load projects—ranging from tens to thousands of megawatts—and the increasing concentration of such facilities throughout the NYCA, large loads must be appropriately considered within the NYCA UFLS program to ensure continued compliance with mandatory performance criteria.

Large loads are projected to create significant load growth in the NYCA, which is expected to cause the relative percentage of load under automatic UFLS control to be reduced to below the 25% requirement. Therefore, the NYSRC submits that connecting Transmission Owners must coordinate with the NYISO and use studies to analyze the impact of large loads in their portions of the NYCA UFLS program. The NYISO and the Transmission Owners should collect all necessary information about facility protections and transfer schemes that may impact the NYCA UFLS program.

Finally, responsibilities should be clearly defined for design, control, and operation of necessary equipment for the NYCA UFLS program and must be coordinated between the large load entity, the NYISO, and the Transmission Owners. Under NERC PRC-006-5, the NYISO as Planning Coordinator is responsible for designing and documenting automatic UFLS programs to prevent cascading blackouts and protect the Bulk Electric System. It does so via its Manual 33. Effective implementation of these obligations is critical because they directly support the reliability and resilience of the power grid, which underpins public health and safety.

The Transmission Owners in New York play a key role in selecting loads to be included in the NYCA UFLS program, but the overall effectiveness of the NYCA UFLS program and verification of its function through simulation-based analysis, rests with the Planning Coordinator under the NERC and NPCC standard requirements. Those requirements specify the Planning Coordinator obligations and related measures. The effectiveness of the NYCA UFLS program can only be verified through simulation because an actual test of the NYCA UFLS program effectiveness only occurs when a system disturbance drives frequency to the levels that trigger the automatic load shedding steps.

Accordingly, the NYSRC recommends that as part of the NYISO's new tariff rules governing the interconnection of large loads, automatic UFLS programs must be analyzed on a forward-looking basis, taking into account the presence of large loads, rather than on an as-connected basis after electric service facilities are designed, committed, and energized to serve the large load. While recognizing that not all large load projects are certain to be built, and to facilitate the forward-looking analysis, uniform inclusion rules must be developed by planning coordinators so that large load projects and their impact on automatic underfrequency load shedding programs can be analyzed with confidence. Such studies will set the stage to ensure that sufficient load is placed under automatic UFLS program control to achieve the resilience goal of stabilizing frequency and arresting frequency decline after a system disturbance.

In addition, the NYSRC submits that the NERC standard (R4) that requires a five-year interval between UFLS design assessment is not suited to the current pace of large load interconnections and load growth. Given the accelerated development of large loads and FERC's ongoing efforts to facilitate and expedite the study and interconnection of such load, UFLS design assessments must be both forward looking and conducted more frequently than the minimum five-year interval prescribed by NERC. NERC did not envision the magnitude of the single load additions that are being contemplated and studied at this time (*i.e.*, 500, 1,000, 1,500 MW/MVA loads). At the time of the initial adoption of PRC-006, load growth was either relatively slow or non-existent in most areas of North America and there was consensus around the current requirement in R4 to perform a functional review of the effectiveness of the UFLS program only once every five years.

Today's circumstances are materially different and it is likely that without offering some portion of the newly connected large load to become part of the automatic UFLS program, the Transmission Owner may not be able to find enough additional load to place under automatic UFLS control to meet the NERC or regional standard requirements. More importantly, if a portion of the large new load is not incorporated into the UFLS design assessment, the studied system's automatic UFLS program may not work to achieve the purpose of providing guidance and limiting the extent of system separation. This is currently a reactive, not preemptive approach. Inclusion of more frequent analysis between the NERC minimum interval UFLS design assessments is a prudent requirement for the NYISO to include in its tariff and make visible to connecting large loads.

The NYSRC looks forward to further discussing the inclusion of automatic UFLS into the NYISO's response to FERC's Show Cause Order directives.

Sincerely,

Stephen Whitley

Stephen Whitley
Chairman-Elect
New York State Reliability Council
Executive Committee