Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-~~11~~)
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-~~159~~ 162 Modification to the underground cable operating criteria Table C-2
2. Rule Change Requester Information	
Name	
Organization	
3. New rule or revision to existing rule?	Table C-2 revision
4. Need for rule change, including advantages and disadvantages	The current NYSRC rule limits corrective action to the use of ten-minute operating reserve, which is traditionally interpreted as the ability to increase generation. This constraint does not fully leverage the operational flexibility available to System Operators, particularly in scenarios where reducing generation output is the most effective and reliable method to alleviate post-contingency overloads on underground cables. From the NYSRC reliability rules manual glossary of terms: *Ten (10) Minute Operating Reserve* - The sum of synchronized and non-synchronized reserve capacity that is fully available in ten (10) minutes. *Non-synchronized Ten (10) Minute Operating Reserve* - The portion of ten (10) minute reserve consisting of resource capacity such as hydroelectric, pumped storage hydroelectric, and quick start combustion generation which can be synchronized and loaded to claimed capacity in ten (10) minutes or less, and interruptible load, including load reduction achieved by starting generation to offset demand, which can be achieved in 10 minutes or less. Non-synchronized reserve must not exceed half of the ten (10) minute reserve. *Synchronized Operating Reserve* -The portion of ten (10) minute reserve consisting of unused resource capacity which is synchronized and ready to achieve claimed capacity or resource capacity which can be made available by curtailing pumping hydro units or canceling energy sales to other systems. These definitions emphasize that operating reserve is primarily associated with increasing generation or reducing load, not reducing generation output. The proposed modification replaces “ten-minute operating reserve” with “ten-minute ~~emergency~~ Emergency ~~response~~ Response ~~capability~~Capability,” explicitly encompassing both increasing and reducing generation output. This change ensures operators can utilize all available resources - including generation curtailment, quick-start units, and phase angle regulation - to restore flows to LTE ratings within the required fifteen-minute window without causing other facilities to exceed LTE limits. The modification enhances reliability, reduces the risk of load shedding, and aligns operational practices with real-world system dynamics, while maintaining compliance with NYSRC’s reliability objectives.

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	The proposed modification to the language in table C-2: 1. For normal transfers, no facility shall be loaded beyond its LTE rating following the most severe of contingencies 1 through 8 specified in Table C-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 Eemergency R~~r~~esponse Ce~~a~~pability (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 ~~*ten (10) minute operating reserve*~~ ten (10) minute Eemergency R~~r~~esponse Ce~~a~~pability (including the ability to increase or decrease resource output) ~~of resources~~ 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 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	Proposed Table C-2 change. Addition of glossary term: **Emergency Response Capability** – The sum of the available capacity from Generation, Energy Storage Systems (ESS), ~~and~~ HVDC, and Variable Frequency Transformer (VFT) 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

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3.2 Reporting Frequency	No Change
3.3 Compliance Reporting Requirements	No Change
9. Comments	This pemanent rule will replace the temporary RR 159 approved by EC on June 12, 2026, as part of an Expedited Approval Process pursuant to Policy 1, Section
10. Date Rule Adopted	
11. PRR Revision Dates	July 1, 2026
12. Implementation Plan	Effective upon approval by the Executive Committee

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