

**Joint Meeting of the
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Rules Subcommittee (RRS)/
Reliability Compliance Monitoring Subcommittee (RCMS)**

**RRS/RCMS Meeting at the NYSERDA Offices
17 Columbia Circle, Albany, NY
Thursday, June 30, 2011**

Draft Minutes of RCMS Meeting No. 138

RCMS/RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Dan Head, Con Edison (RCMS Secretary)
Larry Hochberg NYPA (RRS Secretary) Member
Anie Philip, LIPA (Phone)
Roy Pfleiderer, National Grid (Phone)
Mark Stanbro, National Grid (Phone)

Non-Voting Participants:

Alan Adamson, NYSRC Consultant
Jim Grant, NYISO
Paul Kiernan, NYISO
Edward Schrom, NYS DPS

1. Introduction

Roger Clayton called the meeting to order at approximately 10:35 am.

1.1. Executive Session

None requested.

1.2. Requests for Additional Agenda Items

None requested.

2. Approval of Minutes / Action Items

2.1 Approval of RCMS Minutes #137

The minutes for meeting #137 were approved with minor changes.

2.2 RCMS Action Items List

- Action Item 134-1. Complete.
- 135-1. This item is complete in that Zach Smith from the NYISO has responded to the issues in question. However, there was some brief discussion of whether the responses were adequate, and so Chairman Roger Clayton decided to re-address the issue as part of Agenda Item 5.
- 136-2. Complete.
- 137-1. This item is complete in that the Pre-seasonal Fault Duty Assessment report was updated. However, further questions may be forthcoming as part of Agenda Item 3.3.

3. NYSRC 2011 Reliability Compliance Monitoring Program

3.1. 2011 Reliability Compliance Monitoring Program Summary

Al Adamson reported that the NYISO had submitted documentation for the outstanding items from last month's meeting. The NYISO is now using standard compliance documentation for all RCMS requirements, not because such is required by RCMS, but because it makes the NYISO's administrative tasks easier.

Mr. Adamson then noted that the following items were up for review during the current meeting: I-M1, I-M2, and I-M3 as well as holdover item E-M6.

3.2. NYISO Operations Reports for May 2011

Jim Grant gave the May 2011 NYISO Operations Report. There was one Major Emergency, caused when a line went out of service and was then brought back into service, causing a parallel line to become loaded above its Long Term Emergency (LTE) limit. The overload was cleared following a Phase Angel Regulator (PAR) move.

Larry Hochberg asked why the PAR on the overloaded line was not set to avoid the overload prior to the outaged line's return to service. As an Action Item (138-1), Jim Grant from the NYISO agreed to investigate the root cause of the Major Emergency.

3.3. Pre-Seasonal Fault Duty Assessment (E-M6)

Mr. Grant presented the NYISO's revised Pre-Seasonal Fault Duty Assessment report. Where the report had previously promised the lowest breaker fault duty ratings for each station and then not given those ratings, the report's verbiage had since been changed to avoid mention of the promised breaker ratings. But while that makes the report internally consistent, as Roy Pfleiderer noted, it does not provide the actual breaker fault duty ratings that have been in the report in previous years. In response, Mr. Clayton asked if RCMS needs to require the NYISO to include those ratings and noted that though the ratings are perhaps not actually needed, they are very helpful for anyone doing studies in support of potential facilities that might seek to connect to New York State's bulk power system. Mr. Grant agreed to take the issue back to the NYISO (Action Item 138-2), and Mr. Clayton decided to again postpone

voting compliance on the issue. He noted that he did not consider this a problem going forward but that the committee nonetheless wants to leave the issue open for discussion.

3.4. NYISO Requirements for Con Ed to have Procedures in Accordance with I-R1, I-R3, and I-R4 (I-M1)

Jim Grant presented the NYISO's compliance documentation for I-M1. I-M1 implements I-R1, I-R3, and I-R4 requirements. The NYISO provided a self-certification along with supporting documentation – NYISO Technical Bulletin #159 (TB 159), *Application of the NYSRC Reliability Rules and Local Reliability Rules* and *Applications of the Reliability Rules* (Applications). Upon review of this supporting documentation, RCMS found that TB 159 did include required NYISO procedures for implementing I-R3, but not for I-R1 and I-R4. In addition, the self-certification did not refer to any recent NYISO review and approval of Con Edison procedures and studies, also required by I-M1. It was further noted that the Con Edison application for I-R3, as shown in the Applications (Con Edison's loss of gas studies and procedures), is out of date. RCMS concluded that in order to find the NYISO in full compliance with I-M1, the NYISO must (1) either add I-R1 and I-R4 implementation procedures in TB 159 or separately provide I-R1 and I-R4 implementation procedures; and (2) reference recent NYISO reviews of Con Edison procedures and studies as required by I-M1. Update of the Con Edison application of I-R3 is not required for I-M1 compliance (it is part of E-M8 and I-M5 requirements); however, it was strongly suggested that this update be completed as soon as possible. The NYISO then reported that the review of the ARRs for 2011 was recently completed.

In accordance with NYSRC policy, the NYISO has 30 days, to July 30, to provide compliant I-M1 documentation in order to avoid a non-compliance finding.

3.5. NYISO Requirements for LIPA to have Procedures in Accordance with I-R5 (I-M2)

Jim Grant presented the NYISO's compliance documentation for I-M2. I-M2 implements I-R5 requirements. The NYISO provided a self-certification for along with supporting documentation – TB 159 and Applications. Upon review of this supporting documentation, RCMS found that TB 159 included required NYISO procedures for implementing I-R5. In addition, the self-certification did not refer to any recent NYISO review and approval of LIPA procedures and studies, also required by I-M2. It was further noted that the LIPA application for I-R5, as shown in the Applications (LIPA's loss of gas studies and procedures), is out of date. RCMS concluded that in order to find the NYISO in full compliance with I-M1, the NYISO must reference recent NYISO reviews of LIPA procedures and studies as required by I-M2. Update of the LIPA application of I-R5 is not required for I-M2 compliance (it is part of E-M8 and I-M6 requirements); however, it was strongly suggested that this update be completed as soon as possible.

3.6. Procedures to Ensure Sufficient 10-min. Reserve in NYC (I-M3)

After the NYISO presented a self-certification for I-M3, Mr. Adamson noted that the self-certification references NYISO Running Order #53, which, according to the self-certification, provides the NYISO actions required for meeting I-M3. Unlike most other NYISO compliance documentation references, it is apparent that Running Order #53 is not located on the NYISO website. RCMS therefore requested the NYISO to provide the running order to ensure that it meets I-M3 requirements. In accordance with NYSRC policy, the NYISO has 30 days, to July 30, to provide Running Order #53 documentation in order to avoid a non-compliance finding.

Messrs. Kiernan and Grant argued that all that was needed to satisfy 2011 Compliance Monitoring Program documentation requirements for I-M1, I-M2, and I-M3 was to provide self-certifications, that

the requirements do not require extensive documentation according to the RCMS Scorecard, and that the supporting documentation that was provided by the NYISO was unnecessary. RCMS agreed, but Roger Clayton noted that the NYISO must comply with the full requirements, not just what is listed on the Scorecard, and Mr. Adamson pointed out that the supporting documentation that was provided was found incomplete, which means that NYISO's certifications indicating that the NYISO is in Full Compliance with I-M1, I-M2, and I-M3 may be in error.

Some RCMS members stated that certain compliance template full compliance statements, such as for I-M1 and I-M2, states that "the NYISO shall provide complete documentation" may be misleading when all that is required by RCMS for certain assessments is that the NYISO provide self-certifications that this documentation is available. As an action item, Al Adamson will review all of the RCMS compliance templates to ensure that such ambiguous wording is revised to clarify that required NYISO compliance documentation shall be available if requested.(Action Item 138-3).

3.7. Compliance Reviews Scheduled for Next Meeting – F-M4, F-M6

Jim Grant noted that these requirements concern the NYISO's operating reserve deficiency procedures and state-wide voltage reduction testing, and that this testing had been done, and that he was therefore ready to present these requirements as complete. After a brief review of the compliance documentation, RCMS found the NYISO in full compliance with F-M4 and with F-M6.

With that done, the conference call that had been scheduled for July 7th to discuss these issues was canceled.

4. Policy 4 Draft Revision

Mr. Adamson presented the new draft of the Policy 4 revision. This was a new document that Mr. Adamson himself had drafted (available as part of the meeting minutes for this meeting), and he went through some of the changes with the committee. In particular, he presented information about new sections on compliance monitoring methods, types of compliance reporting, and NYISO non-compliance levels, and sought feedback from the group. Roger Clayton suggested taking the re-drafted Policy 4 to Paul Goia, as well as to the NYISO council for further guidance. Mr. Clayton further noted that any additional comments by RCMS members should be submitted to either Mr. Clayton or Mr. Adamson for incorporation into the next draft.

5. Outstanding Items from Previous Meetings

Mr. Grant presented Zach Smith's email sent in reference to Action Item 135-1 (available as part of the meeting materials). That email referenced the terminal voltage issue discussed in Action Item 135-1 but not the questions about 10-minute operating reserves. To this, Mr. Pfeleiderer responded that the 10-minute operating reserve issue had been addressed via an editorial change to the 2010 NYCA Transmission Review report, and that he thought that this part of the Action Item had already been completed. A review of Mr. Smith's email followed, during which members discussed whether or not new sentences provided by the NYISO properly described how the studies were conducted. As an Action Item, Mr. Pfeleiderer agreed to discuss this issue with Mr. Smith for clarification going forward as well as to perhaps change the documentation in the Transmission Review report if that has not been finalized (Action Item 138-4).

The other outstanding items were then discussed briefly:

- E-M6 was dealt with during the discussion about breaker fault duty ratings.
- K-M2b was completed via email during the month.
- F-M1 was also completed via email during the month.
- The May Operations report was presented earlier in the meeting.

6. NYISO/NPCC/NERC Activities

6.1. NYISO 2011 NERC/NPCC Compliance Program Status

Mr. Grant briefed the NYISO's compliance tracker. The NYISO successfully self-certified with two NERC requirements during the month.

6.2. NPCC Standards/Criteria Development Update

Covered during the RRS portion of the joint meeting.

6.3. NERC Standards Development Update

Covered during the RRS portion of the joint meeting.

6.4. NPCC Compliance Committee Report

Covered during the RRS portion of the joint meeting.

6.5. Other NYISO, NPCC, and NERC Activities

No report.

7. Reports

7.1. NYSRC EC Meeting Report

Covered during the RRS portion of the joint meeting.

7.2. NYSRC ICS Report

Covered during the RRS portion of the joint meeting.

8. Additional Agenda Items

None.

9. Next Meeting #139: Thursday, August 4, 2011, 9:30 am @ NYSERDA, 17 Columbia Circle, Albany, NY

The meeting closed at 2:14 pm.