

**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, October 6, 2011**

Final Minutes of RCMS Meeting No. 141

RCMS/RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Dan Head, Con Edison (Secretary)
Larry Hochberg, NYPA
Zoraini Rodriguez, LIPA (Phone)
Roy Pfeleiderer, National Grid
Henry Wysocki, Con Edison
Jeff May, Central Hudson

Non-Voting Participants:

Alan Adamson, NYSRC Consultant
Jim Grant, NYISO
Edward Schrom, NYS DPS (Phone)

Guests:

Zach Smith, NYISO (Part-Time)
Paul Gioia, lawyer representing Transmission Owners (Part-Time)

1. Introduction

Roger Clayton called the meeting to order at 12:59 pm. Shortly thereafter, he announced that LIPA representative Anie Phillip will be leaving the committee. Her place is being taken by LIPA's Zoraini Rodriguez.

Jim Grant handed out a new copy of the NYISO's self-certification form for requirement E-M9. This was an update to the copy that was posted on the Reliability Council's website with the rest of this meeting's materials.

Finally, in deference to Paul Gioia's presence, Roger Clayton moved agenda items 4 and 5.1 to the beginning of the meeting.

4. Policy 4 Draft Revision

Paul Gioia handed out copies of the new Policy 4 draft revision, complete with the NYISO's comments and suggestions (these were posted on the website with the meeting materials). He then pointed out a few of the NYISO's top priorities in its suggestions.

First, the NYISO was concerned with the use of the term "oversight" with respect to RCMS and its compliance with NERC and NPCC reliability requirements. Instead of overseeing the NYISO's compliance, Mr. Gioia recommended that RCMS merely "monitor" it. The difference is that the NYISO does not believe that it is or should be subordinate to RCMS in matters of NERC and NPCC compliance; however, the NYISO realizes that RCMS is fundamentally concerned with electric reliability in New York State, and to this end, it is willing to keep RCMS and the Reliability Council informed.

Next, Mr. Gioia pointed out that if the NYISO disputes a non-compliance letter, then that fact will be pointed out within the text of the non-compliance letter itself, and the entire issue will then go to the Executive Committee (EC) for resolution. To this, Jim Grant asked if there is a difference in procedure if the non-compliance was driven by a market participant (MP) act or shortcoming rather than by an actual shortcoming of the NYISO itself. Mr. Gioia responded that, no, there was no difference. In either case, the process was the same, and it would be resolved by the EC. As an action item, Mr. Grant will report to the sub-committee on the NYISO's reception of the new Policy 4 draft (Action Item 141-1).

5. Ravenswood Blackstart Status and RCMS Actions

Roger Clayton reported that TC Ravenswood has asked to pull out of the NYISO's Blackstart program, and that Con Edison has asked the Public Service Commission (PSC) to disallow this. Ravenswood appealed to FERC, saying that the PSC cannot force it to stay in the blackstart program, but the PSC disagreed, issuing a clarification that it has always had authority over blackstart. That said, the PSC has not yet actually ruled on whether or not Ravenswood will be allowed to discontinue providing blackstart support, so this remains an open issue.

To all of this, FERC refused to intervene. FERC won't waive the most recent failed test results for Ravenswood 30, and it won't intervene to prevent the PSC from forcing Ravenswood to remain in the blackstart program.

After this, there was discussion about what might happen if TC Ravenswood does indeed discontinue its participation in the NYISO's blackstart service. Jim Grant noted that Con Edison has more than one option in their restoration plan, and that not all of the options rely on Ravenswood 30. Roger Clayton noted that losing Ravenswood 3 might slow the re-start process, however. Dan Head then noted that there is no actual NYISO blackstart market, so although Transmission Owners (TOs) are responsible for identifying blackstart units within their service territories, there's not much that a specific TO can do if there are insufficient blackstart resources present. To this, Roger Clayton asked if TOs could enter into a bilateral contract for blackstart,

but Edward Schom responded by saying that Con Edison would not be allowed by the PSC to pay more for blackstart than what's allotted for it in the tariff.

After this discussion, Mr. Gioia departed, and Roger Clayton brought the meeting back to its agenda order.

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 #140

The minutes for meeting #140 were approved with minor changes.

2.2 RCMS Action Items List

- Action Item 139-1. Mr. Grant reported that the demand response data during the July peak is not yet available. He expects that this information will be available by the November meeting. This item remains open.
- Action Item 139-2. Mr. Grant reported verbally on the August NPCC Compliance Committee report. This item is complete.
- Action Item 139-3. At this point, it appears that the G-M3 non-compliance issue is nearing its end. RCMS is in the process of reporting back to the Executive Committee (EC), and with that, this item was closed.
- Action Item 140-1. Jim Grant sent the NYISO's August Operations Report to the group via email. This item is complete.
- Action Item 140-2. Roger Clayton reported the NYISO's suggestions on the Compliance Review Process to the EC. This item is complete.

3. NYSRC 2011 Reliability Compliance Monitoring Program

3.1. 2011 Reliability Compliance Monitoring Program Summary

Al Adamson gave a brief report on the updates to the compliance monitoring program.

3.2. NYISO Monthly Operations Report

Jim Grant asked for questions on the August and September operations reports, and in responding to an inquiry, noted that the last two major emergencies would not have been major emergencies given the new changes to the NYISO's major emergency rules. RCMS found the NYISO in full compliance for the August and September operations reports.

3.3. Certification that Disturbance Recording Devices Have been Installed and Data Reported as Required (C-M13)

Jim Grant presented self-certification compliance documentation from the NYISO, noting that the NYISO maintains the required information in a database at its headquarters. Al Adamson then noted that the "Full Compliance" box should have been checked on the compliance self-certifications, and that the same was true for all of the day's self-certifications. Stipulating that the NYISO should have checked the correct boxes, RCMS found the NYISO in Full Compliance with C-M13.

3.4. Pre-Seasonal Fault Duty Assessments (E-M6a)

Mr. Adamson review parts A and B of this requirement, discussing why it has two parts—which are essentially pre- and post-summer seasonal requirements. RCMS reviewed the NYISO's self-certification documentation, and as an action item, Jim Grant agreed to check with the fault duty study's authors about why this study was called a "pre-seasonal" assessment when it clearly covers more than one season (Action Item 141-2). RCMS then found the NYISO in Full Compliance with E-M6a.

3.5. Certification: MP Evaluation of NYISO Fault Duty Assessments (E-M7)

After reviewing the NYISO's self-certification documentation, RCMS found the NYISO in Full Compliance with E-M7.

3.6. Reliability Rules Exception Change Reviews (E-M9)

Before reviewing the compliance documentation, a discussion occurred explaining the differences between NYISO self-certifications and non-self-certification. Self-certifications occur when the NYISO certifies that a process it itself conducts is in compliance with Reliability Council requirements. Other certifications are certifying that MP processes are in compliance with Reliability Council requirements. After this, a discussion occurred between Mr. Adamson and Jeff May about the clarity of some of the compliance documentation for the various requirements in question. As an action item, Mr. May will study the compliance templates and see if he can recommend a better, clearer certification form (Action Item 141-3). Mr. Adamson will then look into putting the template requirements on the RCMS Scorecard in an effort to simplify the administrative process (Action Item 141-4). Mr. Head noted that these procedural issues had become major sources of discussion over the past few months. However, these issues of procedure are outside the scope of RCMS's core mission, determining whether or not the NYISO is actually in compliance with a given reliability requirement.

Following this discussion, RCMS found the NYISO in Full Compliance with E-M9.

3.7. Compliance Reviews Scheduled for Next Meeting

- A-M3
- B-M4
- C-M8
- G-M2
- G-M3

6. NYISO/NPCC/NERC Activities

6.1. NYISO 2011 NERC/NPCC Compliance Program Status

Mr. Grant reviewed the latest NYISO's compliance tracker and noted that the NYISO is up to date.

6.2. NPCC Standards/Criteria Development Update

This was covered during the RRS portion of the joint meeting.

6.3. NERC Standards Development Update

This was covered during the RRS portion of the joint meeting.

6.4. NPCC Compliance Committee Report

Mr. Grant gave a brief report on the NPCC Compliance Committee. The NYISO recently completed the NPCC Compliance Culture survey and was noted as one of the top three groups and/or organizations surveyed. Moreover, NPCC is on track to complete fully three-hundred fifty-five compliance spot checks this year. Though these were not all directed at the NYISO, so far the NYISO has been fully compliant with those areas that were spot checked.

6.5. Other NYISO, NPCC, and NERC Activities

Mr. Grant reported on a new tool that the NYISO is using to track its compliance with various reliability requirements. The tool is called CATS-Web, and it is an Internet-based application that automatically notifies responsible individuals when their specific areas of responsibility are coming up for compliance review and/or are coming out of date.

So far, the NYISO has been pleased with the results.

7. Reports

7.1. NYSRC EC Meeting Report

This was covered during the RRS portion of the joint meeting.

7.2. NYSRC ICS Report

This was covered during the RRS portion of the joint meeting.

8. Additional Agenda Items

None.

9. Next Meeting #142: Thursday, November 3, 2011, 9:30 am @ NYSERDA, 17 Columbia Circle, Albany, NY.

The meeting closed at 2:55 pm.