

Meeting Minutes
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Compliance Monitoring Subcommittee
Meeting No. 111 – April 16, 2009
NYSERDA Offices – Albany, NY

Members and Alternates:

Jeff May, Secretary	Central Hudson Gas & Electric
Leyvi Gelman	Consolidated Edison Co. of NY
Jonathan Appelbaum	Long Island Power Authority
Larry Hochberg	New York Power Authority – phone (Alternate)

Others:

Greg Campoli	NYISO Representative
Alan Adamson, substitute Chair	RCMS Consultant
Greg Drake	NYISO Staff (Part-time)
Ed Schrom	NYSPSC

Guests:

None

1. Introduction

Mr. Adamson chaired the meeting in S. Fanning's absence. He opened the meeting with introductions.

2. Approval of Minutes for Meeting #110

The 2nd draft of the minutes of RCMS Meeting #110 held on March 12, 2009 at the NYSERDA offices were approved with one grammatical, one spelling, and three wording changes. All three wording changes were made to Section 7.3.

The approved minutes will be distributed to RCMS members and sent to Carol Lynch for posting on the NYSRC Web site, with a copy to Don Raymond.

3. Review of Action Items List

The following open action items were mentioned:

- Action Item #103-3: no action at this time; the resource adequacy assessment is due in May 2009; AI remains Open
- Action Item #103-4: to be discussed today; Agenda Item #8
- Action Item #108-1: to be discussed today; Agenda Item #5.3
- Action Item #108-4: to be discussed today; Agenda Item #6.1
- Action Item #108-7: to be discussed today; Agenda Item #6.1

- Action Item #108-8: to be discussed today; Agenda Item #7
- Action Item #110-1: complete; follow-up from meeting #110; no further action required.
- Action Item #110-2: complete; to be discussed today; Agenda Item #6.2

4. NERC/NPCC/NYISO Activities

4.1 NYISO 2008/2009 NERC/NPCC Compliance Program Status

NYISO provided an electronic copy of the 2009 Program Schedule at the meeting. G. Campoli indicated that NYISO is in full compliance with the 5 NPCC standards due in April.

A. Adamson raised the issue of CIP standards in relation to an April 9, 2009 letter from US Representative E. Markey to FERC Chairman J. Wellinghoff, which alleges that some utilities are not in compliance with CIP standards, among other allegations. General discussion ensued on the topic with no noteworthy details. A. Adamson made a specific observation that NYSRC does not have any CIP standards. He also stated that this observation was not meant to imply that NYSRC should develop any CIP standards, but that the NYSRC should have a better understanding of the implications of these standards on NYISO CIP requirements.

4.2 NERC Standards Development Update

Relative to the NERC Standards Program, G. Campoli raised the issue of the CIP vote, the upcoming ballot on system restoration (NYISO and NYSRC are in favor), and the backup facilities standard (NYISO in favor, but asked for clarification of the new term ‘data center’).

4.3 NPCC Compliance Committee Report

J. Appelbaum indicated that the under-frequency draft standards are being routed for comment. No other new items to report.

4.4 Other NERC, NPCC and NYISO Activities

G. Campoli reminded everyone about the NPCC Spring 2009 Compliance Workshop in Boston on May 19 – 21. No activities for NERC or NYISO were raised.

5. NYSRC 2009 Reliability Compliance Monitoring Program

5.1 2009 Compliance Monitoring Program Summary Update

A. Adamson lead the discussion by first reviewing 3 items from the March 2009 RCMS meeting: RCMS found the NYISO to be in full compliance of A-M2, RCMS’s receipt of the revised C-M1 self-certification form from A. Elacqua (RCMS found the NYISO to be in full compliance), and the RCMS approved 2008 Intermediate Area Transmission Review report.

5.2 Operating Report for March 2009

The NYISO provided the February Report in electronic format in advance of the meeting. G. Campoli reviewed the March 2009 Operating Report with the subcommittee, as well as details regarding the one Major Emergency that occurred on 3/20/09. The NYISO provided a full report under separate cover. The RCMS found the NYISO to be in full compliance with Measurement K-M2d for March 2009.

5.3 2008 Transmission Assessment – Final ATR Report

The RCMS found the NYISO to be in full compliance with Measurement K-M2a, B-M3, I-M4, and K-M3 for 2009, based on the supplemental material issued by W. Lamana. Action Item 108-1 is complete.

5.4 Procedure for Maintenance of Load Flow, Short-circuit, and Stability Data (C-M9)

The RCMS found the NYISO to be in full compliance with Measurement C-M9 for 2009.

5.5 Reporting of Load Flow, Short Circuit, and Stability Data (C-M11)

See discussion notes in Item 7 below. RCMS decided to postpone this review until July 2009, which is after governor response data will be received from market participants. (See Agenda Item 7.)

5.6 Review of May Compliance Documentation Requirements (K-M2c)

A. Adamson requested the NYISO to have somebody from their staff provide a presentation to RCMS on the Inter-regional reliability assessment at the May RCMS meeting.

6. Reliability Compliance Review of 2004 GADS Outage Data Misreporting Event Report Recommendations Update

A. Adamson recommended that RCMS provide a final report to the EC upon the completion of all recommendations. See table below for specific recommendation updates.

6.1 Implementation Status of Recommendations #1 - #7

The following table provides recommendation and status excerpts from the RCMS C-M5 Report:

Rec. #	Recommendation Excerpt	Status Excerpt
1	The EC should find the NYISO to be non-compliant regarding C-M5, but not issue a letter of non-compliance.	Complete
2	The NYISO should include mitigation measures in future non-compliance letters to Market Participants.	Complete.
3.1	RRS interpretation of Measurement C-	

	M5 meaning “accurate resource outage data”	Complete.
3.2	RRS determines if NYISO definition of measurement C-M5 is consistent with RRS definition	Complete.
3.3	RCMS recommendation to EC as to whether or not further compliance reviews of previous cases is warranted.	See Agenda Item #6.2.
3.4	RRS to prepare a PRR to modify Measurement C-M5	RRS is developing PRR 101 to modify C-R2, C-M4, C-M5, & C-M6. See discussion below in Agenda Item #6.3.
4	Improving the outage screening process	NYISO continues to meet weekly or semi-weekly to develop the process. A. Elacqua to provide monthly status updates until further notice. <i>(Action Item #108-4)</i> See agenda item 6.2 Task 4 discussion below for additional information from the April 16, 2009 RCMS meeting.
5	NYISO conducting in-house NERC-GADS workshop	Complete. Workshop took place on 4/1/09. Approximately 65 Generator Owners attended. The NYISO intends to provide workshops annually, or more frequently if there is Market Participant interest.
6	MMU to notify Resource Planning during its investigation	Complete.
7	Joint NYISO/ICS EFOR trend analysis	A scope for this analysis is being prepared by ICS. A. Adamson indicated that the EC approved the scope at their 3/13/09 meeting and the analysis will be completed by June 2009. ICS will be using the results as a baseline for the review of 2010-2011 IRM Study assumptions. <i>(Action Item #108-7)</i>

6.2 Recommendation #3, Task 3 – NYISO Data Request

Task 3:

RCMS reviewed and discussed the GADS/EFORd data written response provided by the NYISO. A. Adamson will report at the 4/17/09 EC meeting that RCMS received and reviewed the provided data. While RCMS believes that there were possible additional violations in the reported data, RCMS will not issue any letters of non-compliance to the NYISO for suspected Market Participant errors. A formal summary report of RCMS findings will be submitted to the EC for approval at their May 8, 2009 meeting, following RCMS review *(Action Item 111-1)*.

6.3 Recommendation #3, Task 4 – PRR #101: C-R2 Revision - Status

Task 4:

G. Campoli indicated the NYISO continues to develop the electronic data input system and has begun preliminary testing. He expects that it will be ready for rollout sometime during the first quarter of 2010. A. Adamson noted that approval and compliance requirement reviews pertaining to modification of C-R2, C-M4, C-M5, & C-M6 (PRR 101) assume that the NYISO will have implemented the new method of data screening.

RRS's development of PRR 101: After the March RRS meeting A. Adamson drafted Full Compliance Statements and Non Compliance Levels for C-M4, C-M5, & C-M6. Prior to discussing these draft statements, G. Campoli provided two suggestions for the Measurement C-M4 rewording. Note that the NYISO developed these latest comments since the April 9 RRS meeting, where it was believed that the NYISO was in agreement with RRS's wording. The first suggestion to break the first sentence into two was accepted. The second suggestion involved a re-wording of Outage Data Processing Requirement 5, "shall be designed to provide complete, consistent, and accurate data." The NYISO suggested wording, "procedures will be designed to filter, identify suspect data, and replace with proxy data as appropriate." A long discussion ensued regarding the introduction of so-called 'proxy (substitution) data', the impact on compliance reporting, the effect on the second sentence of the C-M5 Full Compliance Statement.

NYISO also has concern about the revised Measurement C-M6 wording that was raised at ICS. J. Appelbaum raised a concern about memorializing the intent of the screening process design. RCMS & NYISO would prefer to return to the previous wording. This request will go back to RRS for consideration.

Compliance Elements (Full Compliance Statements and Non-Compliance Levels) discussion:
C-M4:

J. Appelbaum requested that the word 'Finally' be struck as the first word in the last sentence of the Full Compliance Statement.

C-M5:

A long discussion ensued regarding intent of the second sentence of the Full Compliance Statement and all of the Non-Compliance Levels. NYISO provided several scenarios that were not envisioned when the Compliance Elements were written. Further discussion ensued regarding the proposed 2nd sentence of the Full Compliance Statement. L. Gelman proposed to change the word 'misreported' to 'suspect', which effectively modifies the statements' intent. A. Adamson will revamp the proposed Compliance Elements Statements (merge Compliance Element document w/ PRR document) and issue to RCMS for comment by 4/17/09 (**Action Item 111-2**). RCMS must provide comments back to A. Adamson by Thursday 4/23/09 (**Action Item 111-3**). A. Adamson will incorporate RCMS comments and return the revised PRR 101 to RRS by Friday 4/24/09 (**Action Item 111-4**).

Regarding the Non-Compliance Levels, G. Campoli suggested to move the proposed Level 3 to Level 2, Level 4 to Level 3, and create a new Level 4 statement applicable to a Generator Owner that refuses to provide any GADS data. He further suggested modification of the Level 1 statement such that it applies to a Generator Owner whose data is delayed beyond the NYISO schedule. J. Appelbaum noted that through the proposed use of proxy data in the screening

process, the NYISO has the potential to save a Market Participant from a Level 2 (drafted Level 3) compliance violation.

C-M6:

G. Campoli had one minor editorial comment.

7. Report on February 24, 2009 Meeting with NYISO Staff on C-M9 UFLS Reporting Issues

E. Schrom issued his report to RCMS prior to this meeting. He discussed how data is procured from Generators every year. G. Campoli stated that the NYISO is going to survey the market participants to demonstrate how well they are complying with the C-M9 procedures. The NYISO made a FERC 715 filing on April 1st based on the collection of data from Transmission Owners. The more recent data request is due June 30th. Through C-M11, the NYISO certifies that Market Participants are in compliance. G. Campoli is confident that the April C-M11 certification is compliant, however J. Appelbaum indicated that the FERC 715 filing alone is not necessarily representative of compliance. RCMS postponed compliance approval until July, which is after the NYISO's receipt of MP survey results. A. Adamson will change the 2009 NYSRC Reliability Compliance Program to reflect a July 2009 due date (*Action Item 111-5*). Based on this postponement, Action Item 108-8 remains Open. (See Agenda Item 5.5.)

NYISO offered to show the survey questions to the PSC prior to submittal to generator owners. The NYISO would provide the survey results to RCMS in July (*Action Item 111-6*).

8. PRR #102: Modification of K-M2d – Monthly Operations Report

A. Elacqua was not in attendance at this meeting; formal RCMS review postponed until the May 2009 meeting. Action Item 103-4 will remain incomplete until RCMS is satisfied with PRR 102.

9. Review of March 13, 2009 Executive Committee Meeting

A. Adamson substituted for S. Fanning at the 3/13/09 EC meeting. A. Adamson indicated that no items of interest to RCMS were discussed at the last EC meeting. S. Fanning notified RCMS that he is unavailable to attend the 4/17/09 EC meeting; A. Adamson will substitute for Steve.

10. Other Business

None.

11. Next RCMS Meeting

The next monthly RCMS Meeting is scheduled for Thursday May 7, 2009. The meeting will be held via conference call starting at 09:30. The dial-in number and access code will be provided in the agenda.

Jeff May prepared the minutes of meeting #111.