

Meeting Minutes
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Compliance Monitoring Subcommittee
Meeting No. 118 – November 12, 2009
NYSERDA Offices – Albany, NY

Members and Alternates:

Steve Fanning, Chairman	National Grid
Jeff May, Secretary	Central Hudson Gas & Electric
Leyvi Gelman	Consolidated Edison Co. of NY
Joharath Kutty	New York Power Authority
Anie Philip	LIPA - phone
Jonathan Appelbaum	LIPA - phone

Others:

Al Adamson	NYSRC/RCMS Consultant
Tony Elacqua	NYISO Representative
Paul Kiernan	NYISO (future NYISO Representative)

Guests:

Edward C. Schrom	NY Department of Public Service
David Mahlmann	NYISO
Peter Carney	NYISO - phone
Clyde Custer	NYISO
Bill Lamana	NYISO
John Cordi	NYISO
Ken Layman	NYISO

1. Introduction

Mr. Fanning opened the meeting with introductions. Mr. Elacqua introduced Mr. Paul Kiernan, who will replace Tony Elacqua as the NYISO representative starting in December 2009. RCMS thanked Tony for his contributions to RCMS and wished him good luck in retirement.

2. Approval of Minutes for Meeting #117

The Minutes (2nd draft) of RCMS Meeting #117 held on October 8, 2009 were approved as amended in Section 5.5. 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: remains open; PRR not yet drafted
- Action Item #108-4: remains open, to be discussed in Agenda Item # 6

- Action Item #111-7: complete; submitted to EC in October
- Action Item # 116-1: complete; to be discussed in Agenda Item #4
- Action Item # 116-11: complete
- Action Item # 117-1: complete; provided on 10/9/2009
- Action Item # 117-2: complete; included as part of the roster update (Action Item #116-11)
- Action Item # 117-3: complete; provided on 10/9/2009
- Action Item # 117-4: complete; provided on 10/9/2009
- Action Item # 117-5: complete; provided on 10/8/2009
- Action Item # 117-6: complete, to be discussed in Agenda Item 5.1
- Action Item # 117-7: complete; to be discussed in Agenda Item 5.4 – 5.7
- Action Item # 117-8: complete; to be discussed in Agenda Item 6.1
- Action Item # 117-9: remains open; due in April 2010; reassigned to P. Kiernan

4. NERC/NPCC/NYISO Activities

4.1 NYISO 2008/2009 NERC/NPCC Compliance Program Status

Mr. Elacqua reviewed the latest NPCC & NYSRC requirements for which the NYISO has submitted data and is in full compliance.

4.2 NERC Standards Development Update

Mr. Appelbaum discussed issues related to NERC. In general, the topics included:

- CIP-004 interpretation: verify criminal background and identity every 7 years
- Interchange Standards: TLR Process IRO-006 including Eastern Interconnect
- Certifying System Operators PER-002 – requires NERC cert. Some of the wording is problematic, such as use of “real-time operators”. There is a need to prove that an operator has the skills to obtain, not just maintain, a certificate.
- NPCC PRC-002 DME is up for comment

4.3 NPCC Compliance Committee Report

Mr. Appelbaum reported on the November 2, 2009 NPCC Compliance Committee meeting. He provided highlights of the meeting, which included:

- NERC audited NPCC CMEP process in October 2009.
- Lack of progress on the BES definition, in part due to the FERC stay for review of the Tier methodology
- NPCC’s pursuit to ensure all DP & LSE entity registrations are complete, as appropriate
- NPCC Compliance Workshop on 12/1 – 12/2 at the Desmond Hotel in Albany, NY
- Mismatch of the compliance template for Directory #8 and the Directory itself

- Audit schedules for entities registered as both a TOP and TO will be handled separately. The 3-year audit cycle for TOP requirements will not drive the 6-year audit cycle for TO requirements.

4.4 Other NERC, NPCC and NYISO Activities

RCMS discussion moved directly to 4.4.1.

4.4.1 NYISO Audit Results

At RCMS's request, Mr. Elacqua provided RCMS with an electronic link to the public version of the audit report posted on the NERC website. RCMS discussed the desire to review the full or complete version of the report. Mr. Elacqua recommended that RCMS develop and submit a request letter to Mr. Rick Gonzales at the NYISO. Mr. Adamson will prepare the letter for RCMS (*Action Item #118-1*).

5. NYSRC 2009 Reliability Compliance Monitoring Program

5.1 2009 Compliance Monitoring Program Summary Update

Mr. Adamson reviewed updates to the 2009 Compliance Monitoring Program summary and there are no significant updates.

5.2 Operating Report for October 2009

Mr. Elacqua reviewed the October 2009 Operating Report with RCMS. He provided highlights of the one Major Emergency that was declared on 10/25/09. The operating report was approved and the RCMS found the NYISO to be in full compliance with Measurement K-M2d for October 2009.

5.3 Certifying LSE ICAP Obligations are Met (A-M3)

Mr. Elacqua reviewed the NYISO self-certification form that was submitted on 11/1/09. RCMS found the NYISO to be in full compliance with Measurement A-M3 for 2009.

5.4 NYISO Procedures for Maintaining a NYISO System Restoration Plan (G-M1)

Mr. Mahlmann provided RCMS with a large spreadsheet that cross-references NERC, NPCC, & NYSRC standards and rules with NYISO documentation. He reviewed each requirement and its reference within NYISO documentation indicating their compliance with the identified NYSRC rule requirements. RCMS reviewed the documents and identified a philosophical difference with the NYISO approach for preparing those NYSRC-required NYISO procedures that require Market Participant actions. Specifically, the NYISO documentation in its manuals references NYSRC, NPCC, & NERC rules, as opposed to including the specific procedure verbiage required by G-M1 measurements that require Market Participant actions (for example G-M1.6, G-1.10 and G-1.11). RCMS disagrees with that approach. Mr. Adamson will request

RRS to develop an interpretation of the rules in regard to this issue (*Action Item 118-2*). In the interim RCMS agreed to postpone a finding of compliance until after the interpretation from RRS has been received. RCMS has delayed its' finding of NYISO compliance with Measurement G-M1 until 2010.

5.5 TO Restoration Plan Requirements (G-M2)

Mr. Mahlmann reviewed the e-mail documentation requested by the NYISO and responded to by all Transmission Owners indicating their compliance with the identified requirements. RCMS reviewed the documents and found the NYISO to be in full compliance with Measurement G-M2 for 2009.

5.6 Black Start Provider Requirements (G-M3)

Mr. Mahlmann indicated that NYISO has received notification from all Black Start Providers indicating their compliance with the identified requirements. RCMS reviewed the documents and found the NYISO to be in full compliance with Measurement G-M3 for 2009.

5.7 System Restoration Training Requirements (G-M4)

Mr. Mahlmann provided RCMS with a large spreadsheet that cross-references NERC, NPCC, & NYSRC standards and rules with NYISO documentation. He reviewed each requirement and it's reference within NYISO documentation indicating their compliance with the identified NYSRC rule requirements. RCMS noted that certain required NYISO procedures were missing. RCMS has delayed its' finding of NYISO compliance with Measurement G-M4 until 2010, pending further RCMS review of G-M4 compliance documentation.

5.8 ConEd Local Rule Procedures (I-M5)

Mr. Elacqua submitted a letter to ConEd requesting a statement of Market Participant compliance with this measurement. ConEd supplied a response to the NYISO, which is summarized in the documentation provided by the NYISO. RCMS reviewed the documents and found the NYISO to be in full compliance with Measurement I-M5 for 2009.

5.9 LIPA Local Rule Procedures (I-M6)

Mr. Elacqua submitted a letter to LIPA requesting a statement of Market Participant compliance with this Measure. LIPA supplied a response to the NYISO, which is summarized in the documentation provided by the NYISO. RCMS reviewed the documents and found the NYISO to be in full compliance with Measurement I-M6 for 2009.

5.10 Preview of 2009 Transmission Assessment (K-M2a)

Mr. Layman reviewed the status of the 2009 Annual Transmission Review. The 2009 ATR is intended to cover measurements B-M1, B-M2, B-M3, I-M4a, & K-M3 for expected system

conditions in 2014. This presentation was a preview of elements of the draft report. RCMS is expecting the draft report submittal in late December. The NYSRC Reliability Compliance Program identifies 12/1/09 as the tentative due date, based on previous NPCC reporting schedules. It was agreed that the NYISO would provide the compliance statements with their draft report at the end of December.

5.11 Review of December Compliance Assessments: B-M1-M3, C-M4, C-M5, C-M13, E-M9, I-M4-M6, K-M2a, & K-M3

A brief discussion regarding these anticipated Measurement compliance reviews took place. Collectively, B-M1-3, K-M2a & K-M3 are part of the Annual Transmission Assessment.

Measurements I-M5 & I-M6 were reviewed this month (Agenda Items 5.8 & 5.9) therefore, they can be deleted from December's agenda.

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

6.1 GADS EFORD Screening Process – NYISO Response to RCMS/ICS Questions

RCMS reviewed the letter provided by Ms. Whitaker. The subcommittee agreed that more discussion would take place when the NYISO submits their first report of the screening tool test in March 2010.

6.2 ICS Review of NYISO Proposal to Mitigate Recommendation #6 Issue

Mr. Adamson summarized the latest developments with this issue. NYISO will implement its plan for an annual meeting among the MMU, AMO, & SRP departments to communicate known issues with suspect EFORD data. RCMS and ICS agree with this approach, which completes this RCMS report recommendation.

7. 2010 Reliability Compliance Program – Preliminary List of Measurements

Mr. Adamson reviewed the 5 general criteria for identifying Rules & Measurements for review in the upcoming year. There are approximately 39 Measures to be reviewed in 2010. Historically, there have been only 32 requirements reviewed each year. More discussion will take place at the December meeting. A meeting between RCMS and NYISO will take place at the end of January 2010 to agree upon compliance documentation due dates and scope.

8. Review of October 9, 2009 Executive Committee Meeting

Mr. Fanning reported that, aside from the discussion from agenda item 6.2 above, there were not any other significant items to report. Also, he informed the subcommittee members that Mr. Adamson would represent RCMS at the November 13, 2009 meeting.

9. Other Business

Mr. Fanning acknowledged a suggestion from Ms. Philip to discuss NYSRC Reliability Rules in Rules Section F as they relate to NPCC Directory #2. An Agenda Item will be identified for the December meeting (*Action Item 118-3*).

Mr. Elacqua raised the C-M5 discussion from the RCMS August 2009 meeting. At that meeting the NYISO reported finding a MP non-compliant with GADS misreporting for 2008 data. The MP did not provide mitigation measures at that time. RCMS concluded NYISO did not violate C-M5. In September 2009 the EC confirmed the RCMS conclusion. Today, the NYISO reports that the MP has notified the NYISO in a letter dated 10/12/09 that they have implemented mitigation measures to promote accurate GADS data reporting going forward, confirming verbal conversations received during the investigation. The NYISO has closed its investigation.

10. Next RCMS Meeting

The next monthly RCMS Meeting is scheduled for Thursday December 3, 2009. The meeting will be held in the NYC conference room in the basement of the NYSERDA offices at 17 Columbia Circle starting at 09:30.

Jeff May prepared the minutes of meeting #118.