

**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  
Tuesday, November 29, 2011**

**Draft Minutes of RCMS Meeting No. 143**

**RCMS/RRS Members and Alternates:**

Roger Clayton, Electric Power Resources (Chairman)  
Dan Head, Con Edison (Secretary)  
Larry Hochberg, NYPA  
Zoraini Rodriguez, LIPA  
Patrick Hession, LIPA  
Roy Pfleiderer, National Grid  
Jeff May, Central Hudson

**Non-Voting Participants:**

Alan Adamson, NYSRC Consultant  
Jim Grant, NYISO  
Paul Kiernan, NYISO  
Edward Schrom, NYSDPS  
Ed Schrom, NYSDPS

**Guests:**

Paul Gioia, Executive Committee  
Greg Campoli, NYISO  
Meyer Sasson, Con Edison & Executive Committee (Phone)  
Wesley Yeomans, NYISO  
Carl Patka, NYISO  
Jim Orosz, Con Edison

**1. Introduction**

Roger Clayton called the meeting to order at approximately 12:30 pm.

As an administrative note, items in these minutes are presented in the order in which they occurred.

**1.1. Executive Session**

None requested.

## 1.2. Requests for Additional Agenda Items

Dan Head added a discussion of the group's secretary rotation to the agenda as item 9.1.

## **2. Approval of Minutes / Action Items**

### 2.1 Approval of RCMS Minutes #142

The minutes for meeting #142 were approved with minimal changes.

### 2.2 RCMS Action Items List

- Action Item 134-5. This item is complete.
- Action Item 139-1. The item is ongoing. Mr. Grant will brief the group on the amount of demand response, in MW, achieved during the state's peak load period when the data becomes available.
- Action Item 141-3. Jeff May briefed the group on potential clarifying language for the NYISO certification and self-certification forms. This item is now complete.
- Action Item 142-1. Al Adamson reported that he asked Carol Lynch to remove this CII documentation from the NYSRC website. He will check to be sure that this action was completed.
- Action Item 142-2. The certification was resubmitted. This item is complete.
- Action Item 142-3. The certification was resubmitted. This item is complete.
- Action Item 142-5. This item was on the agenda for meeting #143 and was completed during the meeting.
- Action Item 142-6. This item was on the agenda for meeting #143 and was completed during the meeting.
- Action Item 142-7. Revision of these forms is ongoing, and the action item remains open.

## **3. NYSRC 2011 Reliability Compliance Monitoring Program**

### 3.1. 2011 Reliability Compliance Monitoring Program Summary

Al Adamson reported that he had updated the subcommittee's scorecard with the results from last meeting. The NYISO was found in compliance with all rules save for G-M3, Blackstart

Provider Requirements, which remained ongoing as of last meeting. He further noted that G-M3 was scheduled for further discussion at the current meeting.

### 3.2. NYISO Monthly Operations Report

Jim Grant reported that he had submitted the October Operations report to the subcommittee electronically, and he asked for questions. None were asked.

Mr. Grant then noted that the November operations report was not yet ready, stating that he would submit it to the group when it was available.

### 3.4. Certification: Reporting Resource DMNC Test Results (C-M2)

Jim Grant presented compliance documentation from the NYISO certifying that all market participants were in full compliance with C-M2. RCMS found the NYISO in Full Compliance with C-M2.

### 3.5. Certification: Reporting Generator Reactive Power Capacity Test Results (C-M3)

Mr. Grant presented compliance documentation from the NYISO certifying that all market participants were in full compliance with C-M3. RCMS found the NYISO in Full Compliance with C-M3.

### 3.6. Certification: Con Ed Local Rule I-R1, R2, and R4 Procedures (I-M5)

Mr. Grant presented compliance documentation from the NYISO for I-M5, however, RCMS found this compliance documentation to be incomplete. Compliance documentation for I-M5 requires the NYISO to provide illustrations of the types of Con Edison actions that were reported in its I-M5-required notifications to NYISO. This information was not provided. To this, Al Adamson responded that last year the NYISO presented actual evidence of compliance—operator logs showing thunderstorm watch executions and other examples of specific operator actions. He further asked why this evidence had not been submitted for the current year and whether something of this kind could be submitted during the week via electronic mail. Mr. Grant replied that he would submit this evidence, and subject to the completion of this task, RCMS found the NYISO in Full Compliance with I-M5.

### 3.7. Certification: LIPA Local Rule I-R5 Procedures (I-M6)

Jim Grant presented compliance documentation from the NYISO for I-M6, and the same issues arose as in the discussion of I-M5. Again, subject to illustrations of the local reliability rules being submitted, RCMS found the NYISO in Full Compliance with I-M6.

### 3.3. Certification: Blackstart Provider Requirements (G-M3)

This item was postponed in the agenda order in order to allow Meyer Sasson from Con Edison to join the meeting by phone.

Roger Clayton started the discussion, noting that RCMS had received a G-M3 certification at the last meeting that was subsequently withdrawn by the NYISO. The group then received a new certification via electronic mail on Monday, the day before the meeting, certifying that one Blackstart Provider (Provider) was in Level 1 non-compliance for “failing to perform a timely black start test for the 2011/2012 Capability Year.” NYISO staff stated that the NYISO had done all that it could to ensure compliance, As a consequence of the NYISO’s non-compliance finding for the Provider, the NYISO is subject to non-compliance in accordance with Policy 4. In addition to the NYISO certification, RCMS received a redacted copy of a non-compliance letter to the Blackstart Provider, dated November 22, 2011. Mr. Clayton further noted that this letter referred to another letter to the Provider, dated October 28, 2011, alleging non-compliance and giving the Provider a ten-day opportunity to respond to and refute this allegation. Following Mr. Clayton’s request for a copy of this letter, NYISO staff stated that this letter, even redacted, is considered confidential information and could not be provided to the NYSRC.

In response to Mr. Clayton’s inquiry, Greg Campoli explained that the October 28, 2011 letter referenced in the non-compliance letter is part of the non-compliance investigation. It’s a private communication between the NYISO and its market participants, and as such, it is non-public information. In the past, the reliability council hasn’t received a non-compliance letter until the market participant that is in alleged non-compliance has had a chance to argue its case. A non-compliance letter might still be sent at that point, but there is an internal process first. After that, there was some discussion as to which letters exactly needed to be sent and when as well as what was confidential and why. NYISO representatives stated that they had made every effort to keep the reliability council informed without either violating confidentiality or abridging the appropriate due process. Mr. Adamson and Mr. Clayton responded by saying that they understood that the issue was ongoing but that RCMS still had ongoing responsibilities of its own and therefore needed to be kept in the loop per the committee’s procedures.

Jim Grant then reviewed the actions taken by the NYISO to try to bring the generator within compliance. He noted that NYISO has prepared a letter for the EC, further detailing the points he covered. Mr. Clayton requested that the NISO send that letter to RCMS instead, with a copy to the EC.

The November 22 non-compliance letter was next discussed. Mr. Adamson noted that the letter did not include a required mitigation plan for ensuring market participant compliance for the 2012-13 Capability Year. As required by Policy 4, the letter must also direct the Provider to come into compliance and state its obligation to comply with NYSRC Reliability Rules.

Mr. Campoli explained the mitigation of the current non compliance was not possible due to the fact that the allowed period to perform the test had ended and that the current non compliance could not be resolved. Mr. Campoli further reported that the NYISO has issued the market participant a separate letter outlining the requirements for the market participant to test for the next capability period, that began November 1, 2011.

Discussion closed when Mr. Clayton noted that RCMS did not need to take any specific actions at the current meeting. Instead, the group would wait to review a letter from the NYISO stating its actions relative to securing compliance. RCMS will then make a decision about their

recommendation to the Executive Committee (EC). He noted that RCMS is working towards a report for the EC, as it did for the EC last year on this same issue, with a recommendation as to whether to send a non-compliance letter to the NYISO or to waive non-compliance. This decision will be based on an RCMS finding as to whether it believes that the NYISO has taken all reasonable action to secure compliance. Moreover, this discussion shows a need to review Policy 4 and to clarify expectations for the timeliness in the NYISO's reporting of non-compliance.

### 3.8. Compliance Reviews Scheduled for Next Meeting

There are no compliance reviews scheduled for the next RCMS meeting.

### **4. Review of NYCA and Con Ed Restoration Programs Questions for the January 5 Meeting**

RCMS reviewed a list of proposed RCMS questions to be posed to NYISO staff and Con Ed in order to gain a better understanding of issues related to the NYCA Blackstart Program. Of particular interest, Roger Clayton discussed the following questions to the NYISO:

- What implication would current blackstart providers' withdrawal from the program have on reliability?
- Does losing one or more generators from the program affect blackstart adequacy and promptness.

Certain questions will be revised per RCMS discussion. Jim Grant pledged to take these questions back to the NYISO.

### **5. 2012 NYSRC Reliability Compliance Program Measurements**

Mr. Adamson proposed 2012 reliability compliance program requirements that were posted with the meeting materials. He noted that there had been thirty-five reliability requirements in 2011, but that in the coming year, there are only thirty. This is simply a result of the frequency with which the requirements come up for review. RCMS approved the measurements to be incorporated in the 2012 Compliance Program.

When asked, Mr. Adamson further explained the review process. First, he reviewed all requirements to see which were due in the coming year. The next step is to begin preparing a new Scorecard, which he will then present to the EC for approval in January. After that, he will sit down and design a draft compliance schedule and compliance documentation requirements, which will then be reviewed with the NYISO. Normally, this meeting with the NYISO takes place during the third or fourth week of the new year. Finally, the finished compliance review schedule will be submitted to the EC in February.

## **6. Implementation Plan for Newly Adopted Rule—PRR 108**

The EC just adopted rule F-R1, Transmission Thermal Overloads (PRR-108). Mr. Adamson reminded RCMS that the implementation plan must show, compliance with the rule within ninety days of EC adoption of PRR 108. Fitting this into the group's current schedule, this means that the NYISO must submit compliance documentation by February 23 in order to get the review completed during RCMS's March 1 meeting.

## **7. NYISO/NPCC/NERC Activities**

### 7.1. NYISO 2011 NERC/NPCC Compliance Program Status

Mr. Grant reported that the NYISO is working with Transmission Owners (TOs) and NPCC to develop a plan to ensure that the NYISO is compliant with all relevant procedures and requirements when the new 100-kV and above bright line definition of the Bulk Electric System (BES) comes into effect. Right now, the NYISO and NPCC are pushing a 24-month compliance/transition period after the new BES definition takes effect.

Mr. Grant then reported that he'd sent out a new compliance tracking spreadsheet this morning, and that the NYISO is currently completely up to date with its NERC and NPCC requirements.

### 7.2. NPCC Standards/Criteria Development Update

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

### 7.3. NERC Standards Development Update

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

### 7.4. NPCC Compliance Committee Report

Mr. Grant noted that he will be attending this meeting on Wednesday, November 30.

### 7.5. Other NYISO, NPCC, and NERC Activities

No report.

## **8. Reports**

### 8.1. NYSRC EC Meeting Report

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

### 8.2. NYSRC ICS Report

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

## **9. Additional Agenda Items**

### 9.1. Committee Secretary Rotation

Dan Head noted that although he does not consider being the group's secretary to be a particularly onerous responsibility, the fact is that RCMS traditionally assigns the secretary position to the group's newest member. He further noted that he is no longer the group's newest member, and so it is now time for the responsibility to rotate. Mr. Clayton responded that while that was true in theory, the reality is that Mr. Head had been good about attending meetings whereas the committee's newer members had yet to come physically to a meeting. All agreed that physical presence was necessary for acting as secretary.

After a brief discussion, Mr. Clayton decided to broach the subject of potentially hiring a third-party secretary to take meeting minutes with the EC. He quipped that this might make meeting attendance more attractive since new members would no longer have to worry about becoming secretary just because they showed up personally to a meeting.

## **10. Next Meeting #144: Thursday, January 5, 2012, 9:30 am @ NYSERDA, 17 Columbia Circle, Albany, NY.**

The meeting closed at 2:58 pm.