

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

*RRS Meeting  
Thursday, June 27, 2013*

*Meeting Minutes of RRS Meeting #167*

**In Attendance:**

**RRS Members and Alternates:**

Pat Hession, LIPA (phone)  
Henry Wysocki, Con Ed (phone)  
Dan Head, Con Edison  
Jeff May, Central Hudson (Secretary)  
Brian Gordon, NYSEG  
Wayne Sipperly, NYPA  
Larry Hochberg, NYPA (Acting Chairman)

**Non-Voting Participants:**

Al Adamson, NYSRC Consultant  
Paul Gioia, NYSRC Counsel (phone)  
Jim Grant, NYISO

**Guests:**

Kristen Bluvas, NYISO Counsel  
Chris Sharp, NYISO Counsel  
Abhilash Gari, NYPA (phone)  
Meyer Sasson, ConEd (phone)

**Agenda Items**

**1.0 Introduction**

RRS Meeting #167 was called to order by Mr. Hochberg at 9:32 AM.

**1.1. Executive Session**

No Executive Session was requested.

**1.2. Requests for Additional Agenda Items**

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

### **2.1 Approval of Minutes #166**

Mr. Hochberg reviewed the latest draft meeting minutes. The following editorial changes were made:

Page 1: none

Page 2: none

Page 3: none

Page 4: none

Page 5: none; Mr. May recognized a missed Action Item to present PRR 116 to the generator community prior to submitting the PRR to the EC for approval. Ms. Bluvas indicated that Mr. Clayton sent an e-mail with this PRR to Mr. Jim D'Andrea of TC Ravenswood, but it was generally agreed that this one discussion did not satisfy the intent to share the PRR with the generator community at large. As such, Mr. May was asked to create an action item [**Action Item 166-8**] for Mr. Clayton. Mr. Hession asked to strike Mr. Clayton's words, 'whatever that means'.

Page 6: none

Page 7: Mr. Adamson had several changes to Section 4.1; he clarified that he reviewed the latest draft of the Reliability Rule Template updates for Sections A, C, D, & F; that in some cases he is developing new Reliability Rules; and sentence 5 could be deleted. The next sentence should read that some old Reliability Rules and all Measurements will become requirements. There were a few other minor edits throughout the paragraph that were captured in the final version of the minutes.

Page 8: none

The minutes were approved for issue after incorporation of the identified changes.

### **2.2 RRS Action Item List**

AI 43-9 – No update

AI 83-8 – No update

AI 87-5 – No update

AI 139-1 – No update

AI 141-1 – No update

AI 155-4 – No update

AI 165-4 – No update

AI 165-5 – No update

AI 166-1 – completed

AI 166-2 – Ms. Bluvas did not issue the tariff language, but had information to share with (read to) RRS; Mr. Hochberg asked her to hold the information until the PRR 116 discussion. Ms. Bluvas will send the tariff language to Mr. Clayton for distribution to RRS. This Action Item will remain open.

AI 166-3 – Mr. Adamson indicated that Mr. Sasson’s comments were incorporated into the latest version of PRR 116. There was one comment that was not included, but Mr. Sasson will talk about that today. Completed.

AI 166-4 – Mr. Adamson stated that, as described in the meeting minutes, these are two different things. In G-R1 it is stated that the goal is to restore the system to a normal operating state. The minimum power system has nothing to do with the rules. He was unsure as to why there was confusion. ‘Minimum Power System’ is defined in Directory 8. This is also a discussion item for PRR 116. Mr. May pointed out that, at the last meeting, RRS was discussing and trying to decide at what point the intent of the Rule is met. Mr. Hochberg stated that the goal is to achieve the normal operating state from a minimum power system. Completed.

AI 166-5 – completed; NYISO information will be discussed under Agenda Item 3.1.1.

AI 166-6 – completed; NERC’s ‘Adequate Level of Reliability’ information.

AI 166-7 – The ‘definition document’ is NERC’s ‘Adequate Level of Reliability’ document. Leave as ‘on-going’ for now.

AI 166-8 – This Action Item was added retrospectively to the meeting #166 minutes. Ms. Bluvas reported that Mr. Clayton provided a copy of PRR 116 to Mr. Jim D’Andrea of TC Ravenswood. She was uncertain if Mr. Clayton provided PRR 116 to the generator community at large. This Action Item will remain open with a modified completion date of 8/1/13.

### **3. NYSRC Reliability Rules Development**

#### **3.1 List of Potential Reliability Rules Changes**

PRR 97 – Mr. Adamson explained that this PRR was opened at the time when NERC started looking at a new definition of the Bulk Power System. He believes that RRS should no longer be waiting for any information on this topic and that the committee should be able to move forward to discuss it at future meetings. **Action Item 167-1** will be created for Mr. Clayton to make this topic an agenda item for a future RRS meeting.

##### **3.1.1: PRR 116: SRP clarifications – L. Hochberg**

Mr. Hochberg opened the discussion by asking Mr. Adamson to describe the discussion that took place amongst himself, Mr. Clayton, and Mr. Gioia. Mr. Adamson stated that

the outcome of that meeting is captured in the version of PRR 116 that RRS has for discussion today. He further described that, in preparation of that meeting, he developed a 'process' document to simplify the content of the PRR. If RRS can agree on this process document, then the rules will be structured to satisfy the identified steps. Mr. Hochberg noted that the current draft of PRR 116 is different from what RRS reviewed in meeting #166 because it includes comments from Mr. Gioia, Mr. Sasson, and the NYISO. There is one comment from Mr. Sasson that was not included and will be discussed as we talk about this latest version.

In light of the discussion about comments, Mr. Hochberg re-visited Action Item 165-4 regarding the surveying of LIPA, ConEd, and NYISO management for input and reaction to the PRR. Mr. Adamson indicated that between RRS and the EC, there should not be an issue with obtaining comments. He indicated that the EC will see this no sooner than their August meeting. Mr. Hochberg asked Mr. Hession if he was able to discuss this concept internally and what was the general sense of their leadership. Mr. Hession indicated that this concept has not yet been vetted with LIPA leadership due to the transition activities. He does not see any urgency or value to LIPA for initiating any local reliability rule at this time. He asked that LIPA LRR language be removed if RRS believes it is necessary to move this forward more quickly. LIPA may be willing to consider an LRR specific to LIPA at a future date. Mr. Adamson responded by indicated that the PRR is written with LRRs because ConEd and LIPA have black start generators that would be applicable to this issue. Regardless, there will be a rule that requires all TOs to identify black start units. Con Ed is on-board with this local rule.

Mr. Grant spoke about other LRRs and how they are separate for each specific transmission owner; the LOG/MOB rules came to his mind. Mr. Adamson explained that whether RRS creates LRRs specific to ConEd and LIPA or makes the requirements applicable to all TOs, the requirements are going to be the same. Mr. Hochberg asked Mr. Hession if it would be ok to proceed with the LRR in place until such time that he has had time to review with LIPA management and get a definitive answer. Mr. Hession responded that the LRR was created to address a situation that is specific to the ConEd territory and that LIPA will not support any changes to the rules that will require LIPA to perform annual studies and make recommendations for compliance. His position is that the PRR covers changes that addresses the NYSRC's concern regarding ConEd's territory and that should be enough at this time.

Mr. Adamson read the existing rule and there was brief discussion about how all the transmission owners must comply with the rules as they are currently written. Mr. Hession stated that LIPA does comply with the existing rules. Mr. Hochberg closed the discussion by stating that removal of the LIPA LRR will happen based on the feedback comments from the current draft PRR. He also summarized that LRRs were created to address concerns raised by ConEd and LIPA. Mr. Hession responded back by indicating that they fully appreciate the concerns raised by ConEd, but that LIPA does not have the same concerns. He characterized the current Reliability Rule is more than adequate for LIPA. Mr. Sasson supported LIPA's position by pointing out that the NYISO tariff covers local black start requirements for ConEd's territory and not LIPA's territory. Mr. Hochberg asked Mr. May to leave open the Action Item for the next meeting.

Mr. May raised a question about the impact to restoration performance if the LIPA LRR is removed from the PRR. It was generally explained that there would be no change in the impact because the original Reliability Rules would remain. Mr. Adamson suggested that a review of the process document may help address Mr. May's question.

Mr. Adamson reviewed the black start process document, which is intended to match PRR 116, regardless of whether the LRRs apply to ConEd, LIPA, or both. After Mr. Adamson read the first step, Ms. Blugas first clarified that this process is not something that is done now, then indicated that the NYISO does not necessarily have the expertise or ability to review transmission owner studies, nor would the transmission owners want the NYISO to review their studies. Mr. Adamson responded by indicating that this is not the intent with this step; the step states that the intent is for a one-time meeting to develop the guidelines and principles for reviewing the transmission owner studies. The NYISO and TOs should agree on the objective. Further, she expressed concern regarding the difficulty the NYISO perceives to be able to certify a transmission owners methodology and determination for identifying the need for specific black start facilities. Mr. Adamson asserts that this is no change from the implementation plan presented to the EC several months ago. He further indicated that the NYISO can disagree with this process proposal, however if the NYISO disagrees with this methodology, then RRS may as well throw out PRR 116. Ms. Blugas clarified the distinction between reviewing a study process versus the details and results of a specific study. He stated that it would be generally fine if different transmission owners have different methodologies as long as they satisfy the Reliability Rule in the end.

Mr. Adamson continued by reading steps 2 & 3. Mr. Adamson explained that the expectation is for the NYISO to accept the study. Ms. Blugas took exception to the NYISO's ability to accept the study work; she would prefer that the transmission owner make any requests directly to the involved generator and not to the NYISO. Mr. Hochberg pointed out that Reliability Measure I-M7.3 uses the word 'approves', which is the concern being raised by the NYISO. He attempted to clarify why the NYISO was taking exception to the process step. Mr. Gioia tried to clarify that the NYISO will request a unit to participate and that if the unit wanted to file for an exemption from participation that the NYISO would need to make a determination on the units' participation. Ms. Blugas stated that the NYISO would prefer that the TO make the request to an identified unit and not the NYISO. There was no initial aversion to this approach.

Mr. Sasson asked to clarify some of this discussion and the NYISO's position. He indicated that a transmission owner cannot go directly to a generator due to critical energy infrastructure information. As he understands it, a transmission owner's restoration plan is confidential and will not be shared with a participating or requested generator. Ms. Blugas thought that a generator would need to see the transmission owners study in order to determine if they can file for an exemption. Mr. Sasson responded by indicating that the generator owner will not be able to pass judgment on a transmission owner's restoration plan, but they can claim an exemption based on their ability to provide the service. A generator will participate under the terms of the existing tariff and cannot pass any judgment on the transmission owners study. The transmission owner never talks to any generator about participation in the NYISO's black start

program. The NYISO can ask the requesting TO for additional information; they can also ask the requested generator for additional information regarding their exemption request. In the end the NYISO has to make a decision regarding participation. He was emphatic that the NYISO, but not a generator, can pass judgment on a TO's restoration plan. Mr. Gioia pointed out that the draft PRR indicates that if a generator is applying for an exemption, the transmission owner will provide the generator with a copy of the study. Mr. Sasson admitted that he overlooked this aspect and that will need to be changed. Regardless, a generator owner has the right to prepare and submit their own study, which may not be provided to the transmission owner. It is up to the NYISO to understand both studies and make a decision on the facts presented. The current PRR does not encompass the NYISO providing a transmission owner study to a selected resource, however the process document indicates this and must be changed. Mr. Grant asked if an abbreviated rationale could be provided to the generator. Mr. Sasson responded that it is the transmission owner's responsibility to convince the NYISO that a specified resource provides a material benefit. The NYISO still requested that the identified generator be notified by the transmission owner in parallel with the TO's request to the NYISO to provide the service. There was some interest by the NYISO to involve the generator in order to get them on-board with the anticipated selection and to speed up the process by giving the generator owner time to prepare any exemption documentation while the NYISO reviews the transmission owner study work. Ms. Blugas indicated that this is a whole new process and that currently a generator's participation is voluntary. Mr. Sasson responded that a generator has a right to apply for an exemption. Some further discussion ensued regarding a generator's potential investment, the interconnection process, and feasibility studies through the NYISO. Ultimately, ConEd is willing to provide a summary of their SRP study findings that does not disclose any confidential information. There was also some discussion on when the study would be done. Mr. May pointed out that RRS is mixing two different processes: one for new unit studies and one for the annual transmission owner SRP study. After some additional discussion Mr. May indicated that there is also a difference between a generator claiming an exemption based on a transmission owner's study versus an exemption based on their individual circumstances to be able to perform and provide the service. Mr. Sasson confirmed that this is a key point in the discussion. The focus turned back to the latter issue with transmission owner SRP and the timing of when a generator owner is notified.

The NYISO would prefer that the transmission owner, who can request any unit to participate, discuss a generator's participation in advance of notification to the NYISO. Assuming that the generator owner agrees to participate, then the NYISO will perform their normal critique of the transmission owner's study, but with an understanding that the generator is already 'on-board' with their selection into the program. Mr. Adamson and other RRS members were uncomfortable with notification to the generator before, or even simultaneous to, providing the study work to the NYISO for their review. The concern is that the NYISO may disagree with the transmission owner's study. Ms. Blugas reiterated the NYISO's interest to only get involved if there is a disagreement between the TO and GO. Mr. Gioia pushed back on this idea because the NYISO is responsible for system reliability. Ms. Blugas asserted that there is no reliability concern until a GO refuses participation. Mr. May stated that there is no reliability impact until the Reliability Council determines that the system is not being restored in a prompt and orderly fashion. Mr. Sasson supported this statement as a key point. He further

explained that it is everyone's goal to determine how the system can be restored as quickly and prompt as reasonably possible. Ms. Bluvás was not disagreeing with this objective, but still did not understand why the NYISO had to involve themselves in the TO SRP. Mr. May pointed out that the NYISO should be responsible for this review since they have responsibility for the overall NYCA SRP, which includes the NYISO SRP and all TO SRPs. Ms. Bluvás did not disagree with this statement, but reiterated their interest to have the generator notified at least at the same time as the NYISO. Additionally, it is important to note that the NYISO should be involved in this process because NYSRC Reliability Rules must be satisfied such that the NYCA system is restored as prompt as reasonably possible. Mr. Grant described two scenarios under which the NYISO needs to be involved: first, to verify that a designated unit does not have an adverse impact on the restoration of the NYCA and second, to dig into the transmission owner studies in the event that a generator that may want to be exempt from the black start program. Mr. Hochberg asked why simultaneous notification is not reasonable; Mr. Adamson responded by stating that a unit has not yet been officially selected. He reiterated his position that the NYISO is responsible for the dispute resolution process and be able to answer why a unit was selected to participate in the black start program. Mr. Sasson also reiterated his position that a generator does not have the ability to dispute the reasons why the unit was selected for restoration. The NYISO's position is that the transmission owners have discretion as to what generators are included in their SRP and the NYISO would like for the transmission owners to retain as much of that discretion to the extent that they can.

Mr. Gioia asked to make two points before leaving the meeting. In paragraph #5, the term non-participating units has not been defined. He asserted that 'non-participating' should be defined as non-participating in the ConEd SRP. The Reliability Council would be interested in the scenario where a generator, like TC Ravenswood, has been selected to participate but is not participating. Second, he indicated a need for a definition of 'material benefit'. There is a definition in the NYISO tariff and Mr. Adamson pointed out that there is a definition of 'material benefit' in Line 12 of PRR 116. Further, he tied this discussion back to the NYISO approving a selected generator prior to notifying the generator because there is the need for a transmission owner to identify the material benefit prior to a generator being asked to participate in the black start program. Mr. Hochberg closed this discussion by indicating that this issue will remain unresolved for now.

Mr. Adamson reviewed the last few sections of step 5 of the process.

Mr. Hession clarified that with regard to LIPA, they have black start generators within their territory, but they are satisfied with their participation at this time and do not need to request any non-participating units to join the program. The committee discussed various aspects of this statement and the need for the LRR. Mr. May stated that when the discussion moves to RCMS for review, a determination will need to be made as to whether the restoration simulations provided comply with the definition of prompt. He reiterated the need to define the performance criteria under which system restoration will be judged and the possibility of revisiting the need for a LRR for LIPA if RCMS determines that the LIPA system is not restored promptly. Mr. Adamson supported that statement by indicating that the compliance elements can address this concern. Mr. May

stated his concern that while RRS is spending time on the process, it is not focusing on the performance aspect of rules.

Mr. Adamson, Mr. Gioia, and Mr. Clayton will modify the draft process document and PRR 116 based on the meeting discussion [**Action Item 167-2**]. The NYISO and Mr. Sasson will provide comments on their perspective of the draft process document and PRR 116 based on the meeting discussion [**Action Item 167-3 & 167-4**]. Mr. Sasson will provide some comments regarding the definition of ‘material benefit’ [**Action Item 167-5**]. Ms. Bluvas indicated that existing tariff language relative to black start capability is contained within Attachment X, Section 30.25. She will distribute [**Action Item 167-6**]

### **3.2 NPCC Rules Revision Update – A. Adamson**

No updates.

### **3.3 NERC SARS/Organization Standards – A. Adamson**

Mr. Grant indicated that FERC has ruled on the NERC request to extend the 100kV bright line implementation timeframe by one year. The Rule date is now July 1, 2014 and the effective date for full compliance implementation is July 1, 2016.

Mr. Adamson mentioned that he had an Action Item (#166-4) for determining ‘normal operating state’, but did not know when to discuss it. Mr. Grant stated that the NYISO would prefer to either capitalize the term and define it in the NYSRC Glossary, or change the term to ‘stable state’. Mr. Adamson reviewed his research on how NERC describes black start restoration in EOP-005-1 purpose. NERC uses the terms ‘normal condition’ and ‘stable and orderly manner’ when talking about restoring the system back to normal. The NYSRC Reliability Rule is synonymous with NERC’s purpose. NPCC does not say anything about a normal state. Mr. Hession read from EOP-005-2 that speaks to restoration is complete at a point where the next megawatt of load is not needed to control voltage or frequency. This is significantly more detailed and at a different level than the general term in EOP-005-1. Mr. May pointed out that the Reliability Rules need to be written in enough clarity that they can withstand being contested at FERC. Mr. Grant indicated that this concept is a ‘game changer’ and that the NYISO does not have the expertise to certify transmission owner SRPs and their ability to restore load pockets. A lengthy discussion took place around this topic. Mr. May asserted the need to create a performance metric in the Reliability Rules. RRS members do not necessarily agree with the need for a performance metric beyond prompt. Mr. Hession, in particular, described his perspective that beyond the need to establish a stable power system, it is up to the discretion of each individual transmission owner to prioritize the restoration of load within their respective territories. Mr. May then questioned why the Reliability Council was creating a LRR for ConEd’s territory. Mr. Hession responded that it is because they asked for this mechanism to support their SRP. Mr. Grant reminded everyone that NERC, NPCC, and NYSRC Reliability Rules focus on the bulk system, which does not include the local distribution systems. NERC definition of BES does not get into distribution level, therefore prompt restoration is the time it takes to get to a stable power system where the local transmission owner can begin to make decisions on what load to restore and in what order. Mr. Hochberg indicated that this would remain an open issue.

## **4. Additional Agenda Items**

### **4.1 Rules Enhancement Plan – A. Adamson**

Mr. Adamson reviewed the latest draft of the Reliability Rule Enhancement Plan. Regarding the Introduction, the intent is to leave this segment in-tact. The new layout contains only two Reliability Rules: A-R1 and A-R2. The full compliance statements are now called Measurements. Mr. Adamson used his best judgment to determine the layout and content; RRS needs to determine if it agrees with the approach. The project will be on-going for approximately the next year. All of the material is contained within the draft document, which can be adjusted at the subcommittee's discretion. Mr. Adamson asserted that there is nothing new in the wording; the changes are only an adjustment to the layout. Mr. Adamson asked RRS to provide comment on the layout [**Action Item 167-7**]

## **5. Reports**

### **5.1 NYSRC EC Meeting Report – L. Hochberg**

Mr. Hochberg reported that Mr. Sasson and Mr. Dahl were elected EC Chair and Vice Chair, respectively.

### **5.2 NYSRC ICS Meeting Report – A. Adamson**

Mr. Adamson indicated ICS met yesterday; big action item revolved around the assumption matrix; there are two new models for wind and load shape. Both of these models slightly lower the IRM. Parametric study and sensitivity studies will be added in the future and before the final IRM is determined.

## **6. Next Meeting #167:**

Ms. Blugas introduced Mr. Sharp, NYISO legal counsel, who will be attending RRS meetings going forward.

The next RRS/RCMS joint meeting is scheduled for Thursday, August 1<sup>st</sup>, 2013 at 9:30 AM in the NYSERDA offices located at 17 Columbia Circle, Albany, NY.

RRS meeting #167 was adjourned at 12:24 AM.