

***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, October 3, 2013***

Minutes of RRS Meeting #170

In Attendance:

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Dan Head, Con Edison
Larry Hochberg, NYPA
Jeff May, Central Hudson (Secretary)
Zoraini Rodrigues, LIPA
Henry Wysocki, Con Ed (phone)
Abhilash Gari, NYPA (phone)
Pat Hession, LIPA

Non-Voting Participants:

Al Adamson, NYSRC Consultants
Jim Grant, NYISO
Ed Schrom, NYSPSC (phone)

Guests:

Chris Sharp, NYISO Counsel
Winnie Holden, PSEG (phone)
Brian Shanahan, NGrid (phone)
Annie Philip, LIPA (phone)
Robert Eisenhuth, LIPA (phone)
Paul Gioia, Legal Counsel
Kevin DePugh, NYISO
Meyer Sasson, ConEd (phone)
Martin Paszek, ConEd (phone)

Agenda Items

1.0 Introduction

RRS Meeting #170 was called to order by Mr. Clayton at 9:35 AM. Participants and guests introduced themselves.

Mr. Clayton announced that he received an e-mail from Mr. Sasson, EC Chair, immediately prior to this meeting. The email is addressed to all members of the EC, Subcommittee Chairs, PSC, and NYISO observers. The NYSRC received comments regarding PRR 116 from IPPNY on Wednesday October 2nd, 2013, the last day for comment. Following recommendation from NYSRC Counsel, Mr. Sasson wrote that the comments received from IPPNY must be reviewed by legal counsel prior to public discussion due to fact that the arguments regarding the proposed black start Rules are of a legal nature and not technical. Mr. Clayton concluded that this directive from the EC Chair will shorten the discussion regarding PRR 116.

1.1. Executive Session

Mr. Clayton asked for any executive session requests; none requested.

1.2. Requests for Additional Agenda Items

Mr. Clayton asked for requests for additional agenda items. In addition to the standing additional agenda items, he added Agenda Item 4.3 to discuss the 2014 meeting schedule.

2. Approval of Minutes/Action Items

2.1 Approval of Minutes #169

Mr. Clayton reviewed the latest draft meeting minutes. The meeting minutes provided for the meeting was the raw first draft posted for today's meeting. Mr. Adamson sent his comments to the raw first draft to RRS members. The following editorial changes were made:

Page 1: none

Page 2: none

Page 3: none

Page 4: minor editorials as provided by Mr. Adamson. Mr. May recognized Mr. Grant's additional statement regarding the NYISO's certifications with B-M4 specifically identify the A-10 list of facilities comprising the NYSBPS.

Page 5: minor editorials provided by Mr. Adamson. Mr. Clayton clarified the last sentence of paragraph 2, by stating that he noted, but did not agree with, Mr. Gordon's statement. More specifically, Mr. Clayton did not agree with the content or intent of what Mr. Gordon surmised.

Page 6: minor editorials provided by Mr. Adamson

Page 7: minor editorials provided by Mr. Adamson

Page 8: none

Page 9: several clarifications & editorials of Section 5.2 provided by Mr. Adamson. Additionally, Mr. Clayton questioned the practicality of the [ICS modeling] approach.

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 169-1 – completed; PRR 116 comments distributed by Mr. Clayton

AI 169-2 – completed; presentation today by NYISO staff

AI 169-3 – completed; presentation today by NYISO staff

AI 169-4 – completed; discussion as part of today's meeting

AI 169-5 – completed; on today's agenda

AI 169-6 –RCMS completed, RRS incomplete; adjust date to 10/31/13.

3. NYSRC Reliability Rules Development

3.1 List of Potential Reliability Rules Changes

Mr. Clayton opened the discussion acknowledging there are two open PRRs and that PRR 116 & 117 will be discussed today.

3.1.1: PRR 116: SRP clarifications – R. Clayton

Mr. Clayton opened the discussion stating that PRR 116 was approved by the EC for posting and posted for comment. The 45 day comment period has ended and one set of comments were received from IPPNY on October 2, 2013.

Mr. Gioia characterized the comments from IPPNY as legal in nature specific to contesting the NYISO and NYSRC's ability to require black start generators to provide the service and participate in the black start program. He read them quickly and is unsure when his review will be complete & provided to the EC. He recommended that the EC and Subcommittees not take any action until he has had a chance to review and provide guidance. He asked, and Mr. Adamson confirmed, that there is no timetable for the Reliability Council to take action on comments. Mr. Clayton stated that PRR 116 will be tabled until Mr. Gioia has had a chance to review them. Mr. Adamson stated that RRS has an obligation to recommend approval of PRR 116 by the EC notwithstanding the comments from IPPNY; RRS agreed and confirmed their recommendation for EC approval. He further stated that aside from the IPPNY comments, there are no other changes to PRR 116.

Mr. Sasson reiterated his e-mail to EC and the NYSRC subcommittees to table any discussion on the comments until legal counsel has completed its review.

Mr. Clayton asked RRS, and nobody objected, for him to discuss the status of PRR 116 with EC. He tabled this discussion pending legal guidance from Mr. Gioia and/or next steps requested by the EC.

3.1.2: PRR 117: BPS Facilities List – R. Clayton

Mr. Clayton opened this agenda item by stating that there is no template yet for this PRR, but there was a long discussion at last month's meeting about what are the BPS facilities to which the NYSRC Rules apply. It is his understanding that the facilities list to which the NYSRC Rules apply is the ATR list for Planning and Operations. The NYISO has a different interpretation. He asserted this is a fundamental issue regarding NYSRC's jurisdiction. RRS requested in the action items for the NYISO to provide a presentation on the various facility lists and their interpretation to which list the Rules apply. Mr. Grant stated that the NYISO assembled the spreadsheet (displayed on projector screen) that shows the primary list used by the NYISO. (The presentation included CEII information, which can be shown to RRS, but not provided.) The list was developed as part of the NYISO / TO initiative for the NERC 100kV Bright-line definition. Mr. Clayton asked why does the list need to be redefined because of the NERC BES definition? Mr. Grant responded that the list of BPS facilities has been recently refined in a review of NERC compliance and columns J & K on the spreadsheet are the lists that are relevant to the NYSRC. The spreadsheet can be filtered to show a comparison of BPS (Bulk Power System) vs. BPTF (Bulk Power Transmission Facilities). Mr. Clayton asked if the A-10 list is the BPS list; Mr. Grant agreed and stated that this is the list that the NYISO has been using to certify compliance with B-M4.

Mr. Clayton asserted that the NYSRC BPS definition is totally different from the NPCC A-10 definition of BPS; he described the similarity of facilities having a stability impact outside the local area, and the difference in the requirement of all 230kV and above classed transmission facilities and all generating units 300MW and larger. Ms. Philip did not agree with Mr. Clayton's assertion. She referred to page 7 of the NYSRC Reliability Rules Manual for the NYS BPS facilities definition and expressed that she sees more alignment than differences between the two definitions. Mr. Clayton disputed that resemblance and characterized NYSRC's definition as a carry-over of the former NYPP definition. Mr. Gioia read both the NYSRC and NPCC A-10 definitions out loud. The primary difference is that the NPCC A-10 definition appears to be broader and does not specify minimum transmission voltage class or generating unit size. Mr. Clayton continued to insist that the two definitions are different. The conversation was re-focused back to the NYISO's spreadsheet at this point.

Mr. Clayton asked the NYISO to describe the difference between the A-10 (BPS) and the BPTF. Mr. Sharp stated that the BPTF list is the same as the ATR list. Mr. Clayton asked why the name of the facilities list has changed. Mr. DePugh agreed with Mr. Sharp and explained that the BPTF is a defined term under the NYISO tariff. It references the facilities that are an attachment through the ATR process.

Mr. Clayton asked for the [BPTF] definition in the tariff. Mr. DePugh read the definition of the Bulk Power Transmission Facilities from the NYISO tariff, specifically as, “the facilities defined as the New York State Bulk Power Transmission Facilities in the Annual Transmission Review submitted to NPCC by the NYISO pursuant to NPCC requirements.” Mr. Gioia asserted that this definition is somewhat different than the Reliability Council definition. Mr. DePugh agreed that the terminology is a little confusing, but they are essentially the same.

Mr. Gioia referred to NYISO Attachment Y of the tariff and suggested that violations are related to the bulk power system. Mr. DePugh responded by stating that the NYISO performs their planning studies in accordance with the tariff and they are using the BPTF.

Mr. Hochberg asked if the NYISO BPTF list includes generation. Mr. DePugh indicated that it does not. The lack of generation on the NYISO BPTF list was considered a significant difference between the two lists. Mr. Grant stated that the intent of the NYISO spreadsheet is to demonstrate the differences between the BPTF/ATR list and the BPS/A-10 list of facilities. Mr. DePugh continued to describe the background origin of the lists as a result of negotiation with transmission owners for use in both the reliability analysis and economic planning processes. This list was negotiated in 2003-04 timeframe and memorialized in Attachment Y of the NYISO tariff.

Mr. Gioia asked Mr. Clayton to describe the basic issue from his perspective. Mr. Clayton stated that it has been his long held understanding that the NYSRC Rules have been applied to the facilities identified according to [the NYSRC’s] definition, and those facilities include both transmission and generation and have manifested themselves into the ATR list. Mr. Hochberg disagreed on the premise that the ATR list does not contain generation. He further asserted that there has always been a definition [for NYSBPS], but never a list of facilities. Mr. Adamson stated that this [absence of a list of facilities] violates the Rules because the Rules state that the NYISO is required to have a list of facilities. Mr. Grant strongly opposed Mr. Adamson’s assertion that the NYISO has been violating the Rules because they have been certifying compliance for years based on the A-10 list and the RCMS has been accepting that certification since the beginning of the Reliability Council.

Mr. Gioia summarized the NYSRCs definition of BPS facilities and acknowledged that NYSRC started with a very broad list of facilities (transmission and generation) because the Reliability Council did not want to focus on local facilities. Additionally, it was generally understood that the focus of the Rules has been on the NYS Bulk Power System because that is where the main concern for reliability resides. This was a voluntary interpretation by the Reliability Council. Mr. Gioia surmised that the NYISO is going through a process of redefining these facilities however Mr. Grant asserted that the NYISO is not looking to redefine anything. He continued by describing the genesis of PRR 117 as an outcome of an RRS Action Item where NYSRC has been monitoring changes to the NERC BPS definition with the intent to review its’ definition as appropriate.

Mr. DePugh explained that the A1 list is a negotiated list of facilities used for Operations over which the NYISO has control. The A2 list is also a negotiated list of facilities the NYISO would monitor, but have no control over. There is no relationship or interdependence of the A1 and A2 lists. The BPTF is a list of facilities negotiated in 2003 as an addendum to the NYISO tariff to be used for reliability, planning process, and economic studies. He reiterated that there is no relationship among any of the lists; they all exist for separate purposes. Any commonality is by coincidence. The BPS list is a performance based list that is expected to have facilities intended to show up on the NPCC A-10 list. The performance test is a test where faults are applied on a [substation] bus and the NYISO reviews the results for stability, voltage, and thermal impacts outside of the local area.

Mr. Clayton asked Mr. DePugh to describe the definition of local area in NYS; he responded by stating that the NYISO defines the local area as small local pockets where a 10-second fault applied causes generation spin off, but does not impact any other generation. Mr. Clayton compared this to New England where they consider outside the local area as outside of New England. In NY, outside the local area is still within NY State. As an example, the NYISO has listed Clay & Porter 115kV transmission lines because faults on either substation bus causes loss of generation outside the local area. Mr. DePugh stated it is important to note that there is no voltage limit applied by the NYISO to define the NYSBPS. Ms. Philip clarified this is a similar application as the [NPCC] A-10 Criteria. Mr. DePugh confirmed that the BPS undergoes the same performance testing as the A-10 Criteria.

Mr. Hochberg asserted that there is no NYSBPS identified list of facilities. The BPTF, along with some of the other lists, are negotiated lists, but these negotiated lists cannot be used to demonstrate compliance with the NYSRC Rules because reliability cannot be negotiated. Mr. Clayton responded that the negotiated lists are identified by the transmission owners based on reliability as well as for other reasons. Mr. Hession stated that we need to be careful not to apply reliability rules to a non-technically determined list of facilities; there should be a technical justification for the facilities to which the NYSRC Rules apply. Mr. Clayton agreed and added that it could also be a “brightline” criteria, as the current NYSRC definition states.

Mr. Gioia stated that the Reliability Council determines the applicability of its Rules. The NYISO cannot change the applicability; only the Reliability Council can through its discretion in the event of a FERC ruling, order, or other circumstance.

Mr. DePugh reiterated that the BPTF list is used as a planning list and not an operating list whereas the BPS is a performance based list. Mr. Clayton contended that the way the BPTF list gets created is in contrast to the NYSBPS list. There are some facilities on the list for economic purposes. Mr. Clayton asked if the facilities chosen for economic purposes were removed from the list would there be an adverse impact to reliability. Mr. DePugh responded by stating that the BPS list is a performance based list and if a facility

needs to be on the list, then it will be there. Mr. Clayton asked if there were any facilities not included in the BPTF that would have an adverse impact on reliability. Mr. DePugh responded negatively. Mr. Clayton asked about ConEd 138kV underground cables not being included as part of the BPS list. Mr. Gioia clarified that the focus is on facilities of the defined ratings and performance criteria. He further stated that these cables do not meet any of the NYSRC BPS definition criteria, which is the reason they are not included. Mr. Clayton stated that some of the NYSRC rules specifically refer to the ConEd 138kV cables and he wanted to know how these facilities would be included on the NYISOs list of BPS facilities because they would not be captured under the A-10 test. Mr. Grant stated that those facilities are identified because they are exceptions to the Rules. Mr. Head responded that it depends on their connection to other defined BPS facilities in the system. Some of the 138kV feeders are radial to generators and would be considered part of the NYSBPS. Further discussion took place reiterating how facilities make the list.

Mr. Gioia asserted that the NYISOs list is consistent with the NYSRC BPS definition. Mr. Clayton disagreed by stating that there might be 230kV facilities that are not identified by the A-10 criteria, but must be on the NYSRC BPS list. Mr. Gioia asked the NYISO to address Mr. Clayton's concern (about missing 230kV facilities) understanding the NYSRC definition uses the term, 'generally'. The NYISO showed what facilities are 230kV (or above) and not on the BPS list.

Mr. Sasson stated that while the NYSRC Rules can be more stringent than NERC, they cannot be in conflict with the NERC BPS definition. He suggested one way to address the discussion could be to say that the NYISO has responsibility for part of the system and the transmission owners have responsibility for the remainder; overall, both entities cover the whole system since each TO has their own criteria posted as required by NERC. Mr. Gioia did not want to confuse the issue by introducing transmission owner rules. He further stated that the concern could be because the NYISO has not created a list of facilities based specifically on the NYSRC BPS definition. Mr. Gioia thought that it is possible the NYISOs criteria is broader than the NYSRC definition, but regardless, it would be good to have some confirmation that the NYSRC definition has been addressed. Ms. Philip expressed concern that there could be an impact both ways, whether the list is incomplete or broader than necessary. She expressed concern that capturing more facilities than necessary could be resulting in [a proverbial] 'gold plating' of the system. Mr. Clayton and Mr. Gioia agreed with Ms. Philip.

Mr. DePugh summarized the discussion agreements, including the possibility of missing some critical 230kV facilities. Mr. Clayton refused to agree with Mr. DePugh. He would be more comfortable if the NYISO could demonstrate that the BPTF includes all of the facilities defined by the 'old' ATR list. Mr. Clayton recounted the history of RRS's struggles with understanding the various NYISO lists and ultimately used a list called the 'Steve Corey' list, which was an amalgamation of various lists.

Mr. Gioia asked the NYISO to which list does the NYISO apply the NYSRC Rules; Mr. DePugh responded, BPS. Mr. Gioia then asked if it is possible that the NYISO could find a violation of the NYSRC Rules on a facility that is not included on the BPS list. Mr. DePugh responded by stating that the NYISO certifies compliance to the BPS list.

Mr. Clayton asked for clarification that the NYSRC Rules only apply to the BPS list. Mr. Hochberg added that this could not be the case because the NYSRC BPS definition includes generators and the BPS list does not include generators. Mr. Grant clarified that for planning and economic analysis the NYISO uses the BPTF list. Mr. Clayton became concerned that the NYISO is applying NYSRC Rules to the A-10, but using the more comprehensive BPTF list for planning and economic analysis under the premise of it being the right thing to do. NYISO responded by stating it is required by tariff to complete planning studies based on BPTF list.

Mr. Clayton reiterated his concern about the NYISO missing facilities below 230kV. When the NYISO certifies, they add generation to the A-10 list of transmission facilities. Mr. Gioia asked if this conversation is as simple as the NYISO certifying that they are applying NYSRC Rules to the NYSRC BPS definition. Mr. Sharp stated that the NYISO uses A-10 list augmented by generator facilities to meet the NYSRC BPS definition. Mr. Hochberg stated that there has never been a list of facilities specific to the NYSRC BPS definition, which is why this conversation continues on, and will continue on, until a NYSRC BPS definition list has been created. Mr. Clayton is concerned that the A-10 or BPS list is a contraction of the list of facilities he expects as part of the NYSRC definition. Mr. Grant stated that the NYISO believes that the A-10 criteria meets the NYSRC BPS facility definition.

The conversation continued for additional time, but the committee got to a point where it was generally understood that there are only 11 facilities, rated 230kV, that are not included in the A-10 (or BPS) list. Mr. Gioia asked the NYISO to explain why these facilities are not included as part of the NYSRC BPS definition and compliance certification, as well as any facilities that are lower than 230kV, but have a negative impact outside the local area. The NYISO responded that there are no facilities rated below 230kV that result in an impact outside the local area when the performance criteria was applied. The same is true regarding the 11-230kV facilities. Mr. Clayton stated that NYISO is, in effect, saying that the NYSRC Rules do not apply to the 11-230kV facilities; he asked if anyone else found that to be surprising. No members did because the NYSRC definition uses the term 'generally'. Mr. Gioia thought this was a reasonable answer.

Mr. Clayton asked Mr. DePugh if the NYISO tests included ConEd's 138kV facilities; Mr. Grant displayed the 138kV facilities on their spreadsheet, but there were no 138kV facilities listed. Mr. Sharp explained that the 138kV facilities would have been on the list if they met the performance test criteria. Mr. Clayton continued to be concerned about 'a whole slew of facilities' that may not be included according to the definition interpretation by the NYISO. Mr. DePugh defended the NYISO's performance based testing and resulting list of facilities. Mr. Hochberg expressed concern that there were exceptions that apply to facilities that are not included in the NYISO's interpretation of the NYSRC BPS. Mr. Paszek asked for examples of exceptions for 138kV facilities, but no one from the committee could find any 138kV examples.

Mr. Hochberg discussed NERC and NPCC definitions for Bulk facilities and the NYISO's associated list of those facilities. He asked why can't the NYSRC have a list of facilities it considers to be the NYS BPS. Mr. Adamson stated that NYSRC has a Rule that

requires the NYISO to have a list of BPS facilities that satisfies the NYSRC BPS definition. Mr. Grant responded by asking why the NYSRC BPS list cannot be the same as the NPCC list of facilities. Mr. Hochberg agreed it could be the same list (assuming the content was the same). Mr. Gioia stated that the NYSRC relies on the NYISO to create that list and suggested that the NYSRC confirm the list of facilities identified by the NYISO. The NYISO has a list of facilities; it is their responsibility to explain how the list was created and how the list is in compliance with the NYSRC definition. Further, the NYISO should also be able to explain why any facilities are not on the list that the NYSRC believes should be on it. Beyond that, there is nothing else of concern. Mr. Clayton reasserted his concern that there were many more facilities identified historically where NYSRC rules applied that are no longer included. He further suggested that the NYSRC could require two lists, one for planning purposes and a second for operating purposes.

The discussion continued for another 10 minutes before it was decided to take action. More specifically, the NYISO took an action item [Action Item #170-1] to provide Mr. Adamson with the list of facilities that they consider as NYSRC BPS. Mr. Adamson will review and point out where there are anomalies in the application of Rules to NYSRC BPS facilities [Action Item 170-2].

Mr. Clayton asked for the meeting minutes to specifically address that RRS has not discussed the option of having a definition that applies to facilities associated with Planning and a second definition of facilities that apply to BPS. These two discussions have been tabled for future discussion [Action Item #170-3].

3.2 NPCC Rules Revision Update

Mr. Adamson stated that there are no new Directories for review and that he issued the updated list of Standards; there have been no comments received.

3.3 NERC SARS/Organization Standards

3.3.1 NERC Standard Tracking

Mr. Adamson issued an updated list of standards. There were no comments on this list.

3.3.2 NERC Balloting Form

Mr. Clayton opened the discussion by referencing the balloting form that Mr. Adamson prepared at the ECs request. The purpose is to allow the individual members of the EC to provide their input on balloting issues so that Mr. Adamson can be advised as to how to vote. Mr. Adamson sent out a table for comment. It is anticipated to be used once per month or whenever Standards are open for voting. He populates the table with information links relative to what Standards are under review. Con Ed had one comment about comment B, which has to do with providing a comment on the voter's reason for voting against a ballot.

Mr. Clayton expressed concern about the timing of a vote. Mr. Adamson responded that there is adequate advance notice for a ballot; generally, a monthly collection of input from EC members is adequate.

Mr. Clayton asked about split votes and how Mr. Adamson decides his ultimate vote. Mr. Adamson responded that many times transmission owners will be united on a position even if it is counter to the NYISO. He will gather information from all stakeholders and make a best decision. Mr. Adamson stated that he has been voting with the recommendation issued by NPCC, but many times NPCCs recommendation provided late or immediately prior to a poll closing. Regardless, he did admit that split input on a vote is difficult.

Mr. Hochberg suggested a formalized voting process for EC, but Mr. Adamson wasn't convinced this approach would be effective. There was about 10 minutes of discussion regarding the difficulties posed by not having a rule set around voting criteria. The discussion was tabled for future discussion at the EC.

4. Additional Agenda Items

4.1 Rules Enhancement Plan – A. Adamson

4.1.1 PRR REP-01, A-R1 Establishing NYCA IRM

Mr. Clayton opened the discussion by highlighting the example template that uses A-R1 of the re-formatted Rules. The idea is that we take each Rule as it is re-formatted and pass them through RRS and EC before posting. It is preferred to get comments as each Rule has been re-formatted than to wait for all the Rules and post in one large block. Mr. Clayton asked Mr. Adamson to prepare the document that was provided for the meeting and highlight in red the new pieces and all of the associated re-formatted requirements. Mr. Clayton proposes that RRS review it at the meeting and submit it to EC for posting.

Mr. Adamson described the changes he made; item 1 is the same for all Rules. He referenced the provided information for the meeting and did not walk through all of the individual changes, but mentioned that comments will be accepted for any red lined wording, similar to standard PRRs. Each template will be for one Reliability rule; there could be about 30 templates in all.

Mr. Clayton noted that there is no section for implementation in order to provide clarity. Mr. Adamson agreed to add an implementation section to the PRR.

RRS recommends that the new template is used to implement the re-formatting of the Rules. Mr. Adamson indicated his preference to provide the EC with each Section of the Rules as a package; all of Section A, then B, etc. Mr. Clayton asked the committee if they had any objection to posting A-R1 and A-R2 templates to the EC; none was expressed. Mr. Adamson expressed concern for his availability to finish A-R2 before

next Thursday, hence RRS decided to defer this action to the next meeting (RRS Meeting #171). Mr. Adamson will provide some information to EC for discussion.

4.1.2 Rule Templates A, C, D & F

This is an update with the addition of Section F. Mr. Adamson indicated that this is very similar to what RRS was provided 3-4 months ago.

4.1.3 Section F – Operation During Major Emergencies

This is an actual implementation of Section F; no action was taken at this meeting. This Section will be discussed at Meeting #171.

Mr. Adamson discussed Section G, System Protection. He stated that NYSRC does not have anything more stringent than NPCC and as such, he wondered if RRS wanted to continue with what we have now or abandon this section. Mr. Clayton stated that as a point of efficiency he said we should abandon this section. He asked RRS members if anyone objected to the abandonment of this section; there were no objections. Mr. Adamson explained that Mr. Engleson many years ago suggested NYSRC have a Rule that requires special procedures for certain elements specific to NPCC; he suggested that could be retained and the remainder that is the same as NPCC could be dropped. Mr. Grant will discuss this possibility of eliminating H-M3 with Mr. Mahlman [Action Item #171-4].

4.2 RRS & RCMS Merger Consideration – R. Clayton

This agenda item was discussed out of order and immediately following the PRR 117 discussion because there was a desire to have Mr. Gioia present for the discussion.

Mr. Clayton opened the discussion by indicating that this initiative was discussed at length at the last meeting and the issues associated with the merger. It is his opinion that combining the committees would be more efficient. Mr. Hochberg asked for someone to define the efficiency. Two areas of efficiency include having only one set of minutes and one set of committee members. One in-efficiency is that there are different personnel by company for the two different committees. Ms. Rodrigues expressed concern that there is a possible conflict of interest that the members who create the rules are also the passing judgment regarding compliance. Mr. Clayton was not convinced that this should be a concern.

Mr. Hochberg pointed out that NERC & NPCC does not combine their rule making and compliance subcommittees. Mr. Adamson suggested that this is most likely due to a heavy committee workload. He further commented that a combined committee should have both a compliance and rules person in attendance from each company. This approach does not save the transmission owners from reducing the number of participants involved in committee work. Mr. Adamson's opinion is that the only savings is in the reduction in the number of people, not time, necessary to perform this function. It was pointed out that a combined secretarial responsibility is an increased burden to the single person who would be responsible for that task.

RRS has been tasked with making a recommendation to the EC. What Mr. Clayton is hearing is that the RRS members do not see any major advantage to combining the membership. Mr. Hochberg added that there are two different committee scopes, which would need to be combined. In closing, RRS members were unanimous in their preference of the status quo. The committees will remain independent, but continue to meet on the same day. Mr. Clayton will report this conclusion to the EC.

The discussion moved back to NPCC Rules Revision Update.

4.3 2014 Meeting Schedule

In light of the earlier discussion regarding the subcommittee merger there were no comments. The schedule has been accepted as written.

5. Reports

5.1 NYSRC EC Meeting Report – R. Clayton

Mr. Clayton stated that there was nothing more to discuss.

5.2 NYSRC ICS Meeting Report – A. Adamson

Mr. Adamson reported ICS has completed 90% of the sensitivity cases and approved the base cases used to determine the final IRM.

6. Next Meeting #171:

The next RRS/RCMS joint meeting is scheduled for Thursday, October 31st, 2013 at 9:30 AM in the NYSERDA offices located at 17 Columbia Circle, Albany, NY.

RRS meeting #170 was adjourned at 12:13 PM.