

***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 31, 2013***

Final Minutes of RRS Meeting #171

In Attendance:

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Brian Gordon, NYSEG
Wayne Sipperly, NYPA
Larry Hochberg, NYPA
Jeff May, Central Hudson (Secretary)
Zoraini Rodrigues, LIPA (phone)
Henry Wysocki, Con Ed (phone)
Pat Hession, LIPA (phone)
Dan Head, Con Ed (phone)
Mike Schiavone, NatGrid (phone)

Non-Voting Participants:

Al Adamson, NYSRC Consultants
Jim Grant, NYISO

Guests:

Liam Baker, US Power Gen (phone)
Brian Shanahan, NatGrid (phone)
Annie Philip, LIPA (phone)
Jalpa Patel, LIPA (phone)
Paul Gioia, Legal Counsel
Abhilash Gari, NYPA (phone)

Agenda Items

1.0 Introduction

RRS Meeting #171 was called to order by Mr. Clayton at 9:35 AM. Participants and guests introduced themselves.

Mr. Gari stated that he would be the Alternate RRS member for NYPA instead of Ms. Derring. Mr. Gari will send an e-mail to Mr. Clayton for reporting to the Executive Committee [**Action Item 171-1**].

Mr. Shanahan asked Mr. Clayton if he received notification that he will be replacing Mr. Ferella on RCMS for National Grid. Mr. Clayton indicated that he did receive that e-mail and will address it under the RCMS agenda.

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; none were requested.

2. Approval of Minutes/Action Items

2.1 Approval of Minutes #170

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. The following editorial changes were made:

Page 1: Mr. May asked for, and received, clarification of Mr. Martin Paszek from ConEd.

Page 2: In Section 2.1 Mr. Clayton softened Mr. Gordon's statement as he surmised the BPTF list and Mr. Clayton disagreed with what Mr. Gordon surmised.

Page 3: Mr. Adamson requested the minutes in Section 3.1.1 to reflect that RRS agreed with PRR 116 going to EC for posting. Mr. Clayton clarified that PRR 116 was approved by the EC for posting.

Page 4: Mr. Adamson asked for the second sentence to be stricken; redundant.

Page 5: Mr. Clayton pointed out that there was an incomplete sentence in paragraph 2; Mr. Gioia provided clarification for what to include in the minutes.

Page 6: none

Page 7: none

Page 8: none

Page 9: none; Mr. Sipperly noted his absence from the last meeting and recognized the level of discussion detail and circular nature of the discussion. He questioned the amount of value this level of detail. Mr. Clayton pointed out the differences in style, but indicated that either approach is correct.

Page 10: Mr. Adamson asked to clarify the last paragraph at the bottom of the page that the template is the byproduct of the Rules Enhancement Plan.

Page 11: none

Page 12: none

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

Before moving onto the next Agenda Item, Mr. Gioia had a question based on a review of the meeting minutes; the NYISO has a 10-year planning horizon which looks out to see if there will be any reliability violations. In the process they use the list of Bulk Power Facilities; he asked if the NYSRC Rules are limited to only Operations. Mr. Clayton and Mr. Adamson responded that the NYSRC Rules apply to both Planning and Operating; they cited various sections of the Manual. Mr. Gioia surmised that the NYISO is using the A-10 definition for the purposes of Planning. Mr. Clayton surmised that the NYISO is using the augmented A-10 list for Operations and a larger list, the BPTF list, for Planning. However, he further commented that it is the intent of the NYSRC Rules, that the same set of facilities are applied to both Planning and Operations.

Mr. Clayton noted that there is an error in the RRS meeting agenda: the next meeting is #172 on Tuesday (not Thursday) December 3rd. Secondly, he noted an additional agenda item for consideration of a formal vice-chair for RRS; this will be Agenda Item 4.3.

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 169-6 –The RCMS roster was updated on 10/3/13, but based on earlier comment from Mr. Shanahan, Mr. Gordon will update the roster again; refer to RCMS meeting minutes. Regarding RRS, Mr. May read names from the existing roster. The changes are limited to Franz St. Phar, who is no longer the Alternate member for ConEd (Mr. Wysocki will send a name to Mr. May [[Action Item 171-2](#)]), and Abhilash Gari as the Alternate for NYPA. For Generator Owners, Mr. Clayton asked Mr. May to contact Mr. Ellis of Dynegey to confirm his interest to continued participation [[Action Item 171-3](#)]. Mr. Clayton will contact IPPNY to determine what, if any, generator member wishes to represent IPPNY at RRS [[Action Item 171-4](#)]. Regarding non-voting participants, Mr. Grant indicated that Mr. Paul Kiernan and Mr. Zach Smith from the NYISO could be removed from the roster.

AI 170-1 – completed; Mr. Adamson was provided a hard copy list. Mr. Grant indicated that additional information was also provided to Mr. Adamson.

AI 170-2 – incomplete based on discussion; change date to 12/3/13.

AI 170-3 – incomplete, change date to 12/3/13.

AI 170-4 – Mr. Grant stated that he reviewed this Action Item with Mr. Mahlman; it is redundant with NPCC. Mr. Adamson stated that RRS had concluded that NYSRC does not need to require NYISO to maintain compliance with [redundant] NPCC requirements. Many years ago the NYISO suggested, and NYSRC agreed, to include Measurement H-M3 requiring NYISO procedures for preparing data to satisfy NPCC requirements. Mr. Adamson asked the NYISO if they are now suggesting that Section H Rules be eliminated from the manual; the NYISO agreed. Mr. Clayton read the introduction to Section H and confirmed that the adoption of NERC and NPCC requirements means that everything contained within Section H is redundant. Mr. Adamson stated that there have been no issues with this section over the past 12 years; as such, Mr. Adamson agreed that there should be no reason to retain this section. Mr. Clayton suggested to the transmission owners that they discuss internally the RRS proposal to eliminate Section H due to redundancy, then be prepared to respond / confirm that they have no objection (and there would be no adverse impact) to elimination of this section of the Rules Manual [Action Item 171-5]. Mr. Adamson stated that NYSRC requires the NYISO and market participants to be compliant with NERC and NPCC requirements. Mr. Gordon asked if there is any benefit of Section H with regard to its reference to B-R1 through B-R4 that make these Rules more stringent than NERC or NPCC and thus would not allow his Rule section to be eliminated. After brief discussion RRS concluded that there is no connection of Section H to B-R1 through B-R4 that makes Section H more stringent than NERC or NPCC requirements. The Action Item described was re-confirmed.

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 at the last meeting RRS did not find any technical content for change, but the PRR has been subject to legal review. Mr. Gioia stated that he is preparing a response to the IPPNY comments that he will circulate to the EC in advance of their meeting next week. Mr. Clayton tabled this topic until the EC gets to review it and take action.

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

Mr. Clayton opened this agenda item by stating RRS had a long discussion at the last meeting regarding this topic and the issues have been aired. He reported this committee's discussion at the last EC meeting. Mr. Clayton read the meeting minute summary regarding what the EC said about his RRS report. In summary, the EC was told that RRS asked Mr. Adamson to identify facilities that meet the definition but are not on the augmented A-10 list. [Note: the augmented A-10 list has approximately 343 facilities

listed, whereas the BPTF (formerly ATR) has approximately 498 facilities listed.] The EC asked Mr. Adamson to identify the Sections of the manual that would no longer be relevant because the applicable facilities are no longer on the augmented A-10 list. Mr. Gioia asked the NYISO to provide the list of facilities it feels meets the NYSRC glossary definition, but are not on the NYISOs list. The NYISO agreed to develop the list of facilities it feels are applicable to the NYSRC Rules and review with Mr. Clayton & Mr. Adamson.

Mr. Clayton acknowledged that Mr. Grant had not yet been able to provide the list due to computer problems. Mr. Grant suggested that a NYISO subject matter expert should be present at an RRS meeting to discuss the particulars of the various lists. He also acknowledged that this topic has been under discussion and subject to confusion for many years. Mr. Grant agreed that a list needs to be generated, but indicated that because the list of facilities is CEII, the NYISO needs to determine how the list can be shared. Mr. Grant referenced PRR 97 from several years ago that had been created for a similar reason. He also indicated that the NYISO needs to document the methodology being used to develop the list.

Mr. Clayton stated that RRS should be concerned with adhering to a couple of principles. One is that the NYSRC glossary definition is fairly detailed, but has one glaring ambiguity with the inclusion of the word 'generally'. Mr. Clayton's interpretation is that all transmission 230kV and above along with lower voltage transmission important from a reliability point of view. He admitted that there could be facilities 230kV and above that may not impact reliability and be left off the list. Mr. Clayton stated that he and Mr. Grant had several conversations on this topic and the NYISO does not have any concern to include all generators on the NYSBPS facility list. Mr. Grant responded that the NYISO could [include all generators], but that the NYISO would like to open up that discussion again. There are certain Rules, like resource adequacy, GADS, and black start, where all generators are considered. Mr. Grant stated that the NYISO is aware of some facilities that are not on the list that could be of concern from the NYSRC position. Mr. Hochberg suggested that all facilities being operated by the NYISO (lines, transformers, generators) should be included on the list. Mr. Grant suggested that the NYISO and RRS are very close to agreement regardless of where NERC and NPCC are with their BES facilities lists. Mr. Grant raised the point that the [NERC] 100kV bright line had been discussed and considered by RRS, but Mr. Clayton stated that the 100kV bright line for the NYSBPS list was strongly opposed by the EC members. Mr. Clayton proposed a combination definition be considered, one that is part performance based and part bright line based. The performance portion is based on the A-10 criteria and the bright line portion is all transmission facilities 230kV and above, all generators, with a caveat of other facilities included based upon their importance to reliability. He surmised that the NYISO would be in agreement with this definition; Mr. Grant suggested that the NYISO could be, but that the transmission owners are really the stakeholders who need to buy into this proposal. Mr. Schiavonne suggested that the current definition being used by the NYISO, the A-10 list, with its inclusion of some 115kV and exclusion of some 230kV and 345kV, is adequate in his opinion.

Mr. Gioia suggested that the current definition could be considered adequate if there was an additional statement added that requires reasons to be provided and accepted by

NYSRC for any facilities that meet the bright line criteria but are not included. Mr. Gioia also clarified that Mr. Clayton stated he would like to see all generators and not only generators 300MW and larger subject to the Reliability Rules. Mr. Clayton agreed with Mr. Gioia's clarification. Mr. Gioia stated that this change would require a change to the NYSRC BES definition. The change for generators stems from the IRM, GADS, and other Rules that require compliance from all generators regardless of size.

The discussion got off-track for several minutes to answer questions about various generator Rules and what Rules are applicable in various circumstances. The essence of this discussion related to the need for just one, or more than one, list of facilities that apply to the Rules. Mr. Hochberg used the example of separate lists for Planning and Operating. Mr. Gioia reiterated that the NYSRC relies on the NYISO to insure that the Reliability Rules are being applied appropriately.

Mr. Clayton moved the discussion back to clarify Mr. Schiavonne's statement about use of the A-10 list being ok for NYSRC purposes. Mr. Schiavonne confirmed Mr. Clayton's interpretation of what he said. Ms. Philip cautioned Mr. Clayton in applying a firm bright line definition because she is concerned about applying more stringent criteria to facilities that do not have a negative impact on the reliability of the system and/or having to design those facilities to the 'n-1-1' criteria. Mr. Clayton took exception to Ms. Philip's concern with a bright line definition because that is what NERC is doing. Mr. Schiavonne reminded Mr. Clayton that the NPCC transmission owners were generally opposed to that criteria citing that the A-10 methodology has been adequate for many years. Ms. Philip agreed and described some facility configuration examples where she has concern with them being subject to stringent NYSRC Rules. Mr. Clayton expressed concern regarding the facilities 230kV and above that would not be subject to the NYSRC Rules if the NYSRC went in the direction of using only the A-10 criteria.

Mr. May stated that there were only 11-230kV facilities and a small unknown number of 345kV facilities that would not be subject to the NYSRC Rules. Further, he summarized the discussion as a disagreement over which 230kV and above, or 300MW and greater facilities are not subject to the Reliability Rules. Mr. Gioia generally agreed except where the Reliability Rules apply to all facilities. He also believes that the EC would not agree to have the NYSRC Rules apply to those facilities that do not have an impact on the reliability of the NYS bulk system. There were additional comments made by Mr. Grant and Mr. Schiavonne regarding the identification and presentation of those facilities to RRS. Mr. Clayton circled back around to a lack of transparency as to the missing facilities. Mr. Adamson expressed his confusion with the discrepancy between the NYS BPS facilities list and the facilities to which the Rules apply. This discussion continued for another 15 minutes with no new information presented.

Mr. May noted that the NYSRC Introduction makes a distinction in the NYSRC mission to promote and preserve the reliability of the NYS power system (general, in all) versus fulfilling its mission through focusing on the NYS Bulk Power System a defined specific subset. He recited portions of Sections 2 and 9; Mr. Hochberg agreed and further suggested that a refinement of the Introduction may be necessary to clarify the NYSRCs intent. This discussion carried on for another 10 minutes without any new information presented.

Mr. Clayton asked the NYISO to provide every RRS member with the list of transmission facilities 230kV and above and generators 300MW and larger that are not included on the A-10/BPS list as soon as possible for discussion at the December 3rd meeting. Additionally, the NYISO is being asked to explain why those transmission and generation facilities are not on the list [Action Item 171-6]. RRS will be able to decide next steps once this information is provided.

Mr. Clayton expressed a desire to end the discussion at this point. Mr. Hession indicated that he joined late, but wanted to express his opinions on the discussion. Mr. Hochberg, Ms. Philip, Mr. Gioia, and Mr. Grant all weighed in on Mr. Hession's comments. It was another 10 minute discussion with no new information raised.

3.2 NPCC Rules Revision Update

Mr. Adamson stated that there have been no new revisions of NPCC Rules.

3.3 NERC SARS/Organization Standards

3.3.1 NERC Standard Tracking

Mr. Adamson issued an updated list of standards. The EC agreed to a new voting process for NERC ballots. There are 4 things that Mr. Adamson reviews before voting:

1. NPCC standards committee recommendation (assuming consensus was reached)
2. Mr. Adamson's own recommendation (after his personal review)
3. A recommendation from EC members (for each standard on the monthly list of upcoming ballots). If the member vote is 'no', then the EC member must provide their reason for that position.
4. Feedback recommendation(s) from NYISO (typically, Mr. Campoli).

Mr. Sipperly stated that there is a great deal of work that takes place behind the scenes that may not be apparent from the EC representative position and could result in dissention amongst the voting members. Mr. Adamson agreed that there could be situations where not all members share a common position, but the NYSRC has not run into that scenario. He is unsure how he will vote in those situations. He will be sending out an updated table to the EC for their use; he may copy RRS for informational purposes.

Mr. Clayton stated that this could be logistically difficult because the transmission owners sometimes have departments that think about and provide input to the transmission owner's own position. For the NYSRC to have an independent voice is difficult at times. Mr. Adamson stated that the recommendations are solicited from only the EC members; may be up to 13 inputs on how to vote.

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 stating that there were no objections to providing the latest version of PRR REP-01 to the EC with a recommendation to post for comments. He mentioned that PRR REP-02 for A-R2 should also be included as a block for review at EC before posting. The action for today is to discuss and recommend both of these PRRs be sent to the EC for approval to post for comment. For clarity, the expectation is that comments will be limited to the red-lined portions of the Rules; the rest of the information is there for context only. The intent of posting these PRRs individually is to provide an early opportunity for comment on the new layout.

There was clarifying discussion around some aspects of the REP provided. Mr. Hochberg raised a concern regarding the use of the terms IRM (Installed Reserve Margin) and ICR (Installed Capacity Requirement); the Rule talks about an IRM and this PRR talks about ICR. Mr. Hochberg also provided some comments on other sections of the PRR; Mr. Adamson will make the changes suggested by Mr. Hochberg. He further questioned the lack of italicized terms in the PRR that are included in the glossary. Mr. Adamson stated that it has been his process to include italicized terms only after the PRR changes are incorporated into the Rules Manual. After a brief discussion it was agreed to include the italicized terms in the PRR; Mr. Adamson will make this change prior to providing the PRR to the EC for posting.

Mr. Hochberg questioned why Requirement R1 appears to have no compliance element. Mr. Adamson responded that M1 is the compliance element for R1 even though it specifies for R2. Mr. Adamson stated that Rule A-R1 is the criteria and R2 is the study that incorporates the criteria in R1. Mr. Clayton suggested that M1 should reference both R2 and R1. Mr. Adamson was apprehensive to add this reference; Mr. Hochberg stated that the main thing is that an IRM is established and as well as identifying the consequences. Mr. Clayton believes that RRS should be able to use some editorial licensing on the translations to the new format.

Mr. Clayton asked if any RRS member objects to allowing these Rule enhancement template changes be posted for comment according to Policy 1 procedures; no objections were noted. Some further discussion took place regarding the logistics of the posting, including the numbering and a preamble or explanation. Mr. Adamson indicated that Mr. Raymond addresses all of these details.

Mr. May questioned the need for a difference in the numbering of these changes as REP vs. PRR. Mr. Clayton stated the reason for the different numbering scheme is tied to the implementation schedule; the REP versions will not be implemented for another year or more. Some additional discussion ensued, which resulted in recognition that the template described the REP as a PRR. Wording adjustments were made to the template to clarify.

Mr. Adamson asked to provide a status update on all of the other sections. Thus far he has provided template changes for Sections A, C, D, & F. Section B (transmission planning criteria) & E (transmission operating limits) are being held up by the [NPCC] Directory 1 changes. Section G is waiting for the EC to adopt G-R1. Section H is the System Protection Rules is on hold until RRS determines what they want to do with this section; RRS is unsure if they want to retain these Rules. Section I is for the Local Reliability Rules, which is being held up by PRR 116. Once PRR 116 has been adopted, then Mr. Adamson update Sections G and I. Section J (Communications) can be completed at any time. Section K (transmission assessments) is also being held up by [NPCC] Directory 1.

4.1.2 PRR REP-02, A-R2 Establishing LSE & External ICAP

There were minor changes recommended to the PRR as described as part of the REP-01 (A-R1) discussion.

4.2 RRS & RCMS Merger Consideration – R. Clayton

Mr. Clayton opened the discussion by stating that he sent an e-mail summary to the Executive Committee. The EC discussed the issue and agreed with the recommendation to keep the committees separate.

Mr. Clayton indicated that the EC Chairman suggested that both the RRS and RCMS committees appoint a vice-chair. Mr. Clayton nominated Mr. Hochberg for vice-chair of RRS. Mr. Clayton asked for any objection; none were received. Mr. Hochberg will contemplate the nomination and a vote will be held at the next meeting.

4.3 Reliability Rule Exception #15 – R. Clayton

Mr. Clayton received an e-mail from Mr. Gordon regarding the NYSRC Rule exception list. Exception #15 was approved for removal by the EC, but it has not been formally removed from the posted list. Mr. Adamson will have this exception removed from the list [**Action Item 171-7**].

5. Reports

5.1 NYSRC EC Meeting Report – R. Clayton

Mr. Clayton informed the EC about the BPS list issue, REP, and website problem; he stated that there was nothing more to discuss.

5.2 NYSRC ICS Meeting Report – A. Adamson

Mr. Adamson reported ICS met on Tuesday (10/29) and approved an IRM of 17.0%, which is 0.1% less than 2013. The NYISO has completed 90% of the sensitivity cases and approved the base cases used to determine the final IRM. A draft report will be distributed to the EC for their meeting on Friday 11/8. The EC will adopt the final IRM at their December meeting.

6. Next Meeting #172:

The next RRS/RCMS joint meeting is scheduled for **Tuesday**, December 3rd, 2013 at 9:30 AM in the NYSERDA offices located at 17 Columbia Circle, Albany, NY.

RRS meeting #171 was adjourned at 12:05 PM.