

**Joint Meeting of the
New York State Reliability Council, L.L.C. (NYSRC)
Reliability Rules Subcommittee (RRS)/
Reliability Compliance Monitoring Subcommittee (RCMS)
NYSERDA, 17 Columbia Circle, Albany
Thursday, April 30, 2015**

Minutes of RRS Meeting No. 189

RRS Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman)
Larry Hochberg, NYPA (Vice Chairman) (phone)
Martin Paszek, Consolidated Edison
Pratiba Anand, Consolidated Edison (phone)
Mayer Sasson, Consolidated Edison (phone)
Brian Shanahan, National Grid
Zoraini Rodriguez, PSEGLI
Doug Voos, PSEGLI
Dan Head, CONED (phone)
Abhilash Gari, NYPA (phone)
Brian Gordon, NYSEG (Secretary)

Non-Voting Participants:

Al Adamson, NYSRC Consultant
Jim Grant, NYISO
Mark Capano, NYISO
Kevin DePugh, NYISO
Chris Sharp, NYISO
Paul Gioia, Counsel
Chris Larow, IPPNY

RRS Meeting # 189 was called to order by Mr. Clayton at 9:30

1. Introduction

1.1. Executive Session

None requested.

1.2. Requests for Additional Agenda Items

None requested.

2. Approval of Minutes / Action Items

2.1 Approval of RRS Minutes #188

RRS reviewed Minutes from the last meeting with comments received from Mr. Paszek and Mr. Adamson. A few additional typographic errors were corrected and RRS approved Minutes with those changes.

2.2 RRS Action Items List

Action 186-5: NYISO reports that development of the corrective action plans are the responsibility of the transmission owners. Status change to completed. PRR121

Action Item 187-4 and 5: These items are better discussed offline at the NYISO. Change the status to complete.

Action Item 188-1: NYISO will provide response in writing for June 4 meeting.

Action Item 188-2: Modify the status of this action item to June 4.

Action Item 188-3: More time will be needed to confirm that this was complete so the status is to be changed to June 4.

Action Item 188-4: Change the status to June 4.

Action Item 188-5: Completed. On agenda.

Action Item 188-6: Retired.

Action Item 188-7: Completed. On agenda.

Action Item 188-8: Completed. On agenda.

Mr. Clayton will set up offline meeting at the NYISO to discuss item 187-4 and 187-5 (**Action Item 189-1**).

For Action Item 186-5, Mr. Adamson will add transmission owner responsibility language from Mr. Grant to the corrective action plan on PRR 120 and 121 (**Action Item 189-2**).

3. NYSRC Reliability Rules Development

3.1 Outstanding PRR List

3.1.1 New PRR 127 (C-R1, Establishing Operating Transfer Limits)

This PRR was presented last month to request an exception for underground service up to the STE rating. The Consolidated Edison request was to only change the operational requirements but not the System Planning requirements. Mr. Paszek stated that the

acceptance of this PRR adds flexibility and potentially can reduce the possibility of an actual load shedding event. The only transmission owners that are affected are LIPA, NYPA, and Consolidated Edison. It was mentioned that the original language in the reliability rules must have been in error because it was noted that the NYISO T&D manual already agreed that the treatment for reserves or transmission would have the same results. It will be posted for the purpose of public comment. Implementation plan has already been added. Item 9 was blank and it will be changed to 90 days. Mr. Paszek will modify PRR 127 to revise the procedures section to specify implementation in 90 days.

3.2. Bucket List

Mr. Clayton and Mr. Adamson reviewed the latest Bucket List version line item by line item with the RRS.

3.3 NYSRC BPS definition

It was discussed at the last meeting that the EC approved the use of the NPCC A10 test for a determination of what facilities the reliability rules apply. Mr. Paszek introduced the Consolidated Edison version of a BPS definition change and addition of a new local definition. After discussion at the RRS, there was acceptance in concept with removing local area impact facilities from the NYSRC BPS definition in a similar way that the NERC BES definition does; however, there was concern over an exclusion process and the mention of generation in the definition. Mr. DePugh described in more detail the A10 testing which identifies busses for the Bulk Power System. These busses are used to include facilities connected to these busses for the NYISO to use in their studies as the Bulk Power System. It was also mentioned that the MW requirement total used in the local area definition is a total of all generation tripped during stability testing. Mr. Clayton expressed concern that the RRS needs to better understand the A10 methodology and the application of the methodology to the facilities under which the NYSRC reliability rules is applied. For the next meeting, Mr. Clayton requested that the NYISO prepare a presentation on the interpretation on A10 methodology and application including the NYISO interpretation of a local area. **(Action Item 189-3)**. There was some discussion if NPCC will need to make changes on the A10 testing before this action can be made. Over concern that it is a substantial change in a glossary definition and it requires public comment, it was decided to create a PRR with an attached white paper to fully explain the changes that are being proposed and why it is being proposed. Mr. Clayton requested Mr. Paszek to develop a PRR with an attached white paper for posting **(Action Item 189-4)**. There was some discussion over what generation should be included in the definition or if any generation should be described at all. Because of generation of all sizes are merchant generation, the NYISO would not be impacted even if all generation was included. NERC does include generation in the radial definition and is why that was being proposed that way by Consolidated Edison.

3.4. Dual-fueled generator testing & fuel supply

Mr. Sasson and Mr. Clayton introduced the dual fuel generation request and PowerPoint

presentation to RRS from the EC meeting. The questions that are being raised: Shall all new NYC units be required to provide dual fuel capability?, Shall all new units in NYS be required to provide dual fuel capability?, Shall all units with dual fuel capability be required to regularly test that capability?, and Shall there be a provision for obtaining backup? A PRR is not being requested by the EC at this point but the RRS is to consider these issues under question. This entire issue is a FERC discussion and was not specific to the NYISO or the RRS rules. It was noted that the DEC has stated that generation cannot void permit operation unless there is an ongoing emergency and DEC is moving away from heavy fuels. The transmission owners suggested that the NYSRC review this issue and requested this level of activity to resolve these issues. The RRS will need to consider the following before beginning consideration: need to obtain reliability statistics to determine dual fuel conversion failure and identify the reliability need that is evident require all new generation units to have dual fuel (**Action Item 189-5**). Assuming there is a reliability need to test dual fuel units, should there be a rule developed to test and to verify the conversion capability? It was noted that FERC was looking only for fuel assurance. There is also concern over units that may retire which may lead to a reduce fuel assurance. The NYISO mentioned that they did not request dual fuel capability they also were also concerned with fuel assurance. There needs to be significant justification to require all new units to require dual fuel resource due to incremental initial and ongoing generation expenses. The current rule that exists is for any new generation interconnection into a CONED gas line will require dual fuel capability but it does not include generation interconnection projects that connect into transmission gas pipelines, National Grid pipelines, or New Jersey pipelines. Mr. Clayton mentioned that the initial focus should be limited to NYC with a consideration beyond NYC as the need arises.

For the three basic issues: dual fuel capability, testing, and backup it does not necessarily require a PRR to handle all three components and it would be up to the RRS how to proceed. The NYISO has a procedure for generation that has dual fuel with LOG/MOB but not sure if any procedures are required to go beyond that reliability need. The reliability concern is that it may lead to load shedding if fuel assurance is not maintained. Testing and the cost to perform the testing would be developed by the NYISO. PRR 68 was developed in 2004 to develop a dual fuel testing process for the NYISO but it did not achieve acceptance because it was determined at that time that it was not required. Since 2004, the generation network in the NYISO has significantly changed and it may be at a higher level of concern now. Combined cycle units need dual fuel capability but there is no requirement to have the proper levels of fuel. Mr. Paszek will gather the data needed to develop a PRR (**Action Item 189-6**). Mr. Gioia will determine if there is still a NYS PSC requirement to have dual fuel for combined cycle units (**Action Item 189-7**).

3.5. RRC Manual V35 draft 2-18-15

It was recommended by the EC that the RRS post errata changes; therefore, it was determined that the RRS will hold the posting of the errata changes and tie it into the next revision for PRR 127. Version 35 will have both the PRR and the errata changes.

3.6. PRR Template 1-1-15

This was sent to the RRS group to make all aware of the new template. It will soon be posted.

4. NPCC Directories

4.1 Directory 1 Discussion

The latest date for a final version of NPCC Directory 1 is set for November 15.

5. NERC SARS/Organization Standards

5.1 NERC Standard Tracking

Brief discussion of updates.

6. Additional Agenda Items.

6.1 Policy 1 Revision Plan

RRS has latest version of Policy 1 and recommends that it moves forward for approval at the EC. Mr. Grant liked the original definition version better. After discussion it was determined that section 1.2 in the manual should be copied into the new version of Policy 1 to be consistent in describing the definition of the reliability rules. Also, defined terms will be italics.

6.2. Exceptions 7, 17 & 21

Exception 7, 17, and 21 revisions were posted to the EC. The EC has sent these revisions to the NYISO for consideration and then it will be sent to the RRS. The NYISO has no problem with 21 but questioned why 7 and 17 would only apply for operations and not planning. Both exception 7 and 17 was approved as well after further review. It was stated that for most cases System Planning exceptions should match Operation exceptions. Most of the exception change the rating used in the analysis. A new item will be added for the Bucket List to make sure each exception apply for operations and/or planning (**Action Item 189-8**)

7. Reports

8.1 NYSRC EC Meeting Report

A generation liability issue was raised at the EC to avoid environmental issues. A meeting with the DEC discussed Indian Point closure for 2017 for fish related concerns.

8.2 NYSRC ICS Meeting Report

They are still working on the assumptions and modeling. The PJM representation was expanded to include western areas.

Meeting ended at 13:24.

Next Meeting #190

Next Meeting #190: Thursday, June 4, 2015; 9:30 am @ NYSERDA, 17 Columbia Circle, Albany