

**Joint Meeting of the  
New York State Reliability Council, L.L.C. (NYSRC)  
Reliability Rules Subcommittee (RRS) /  
Reliability Compliance Monitoring Subcommittee (RCMS)  
Thursday, June 2, 2016**

**Minutes of RRS Meeting No. 202**

**RRS Members and Alternates:**

Roger Clayton, Electric Power Resources (Chairman)  
Larry Hochberg, NYPA (Vice Chairman) (Phone)  
Abhilash Gari, NYPA (Phone)  
Martin Paszek, Con Edison (Secretary)  
Matilda Duli, Con Edison (Phone)  
Zoraini Rodriguez, PSEG\_LI/LIPA (Phone)  
Roy Pfleiderer, National Grid (Phone)  
Erin Doane, Central Hudson  
Brian Gordon, NYSEG/RGE (Phone)

**Non-Voting Participants:**

Al Adamson, Consultant (Phone)  
Jim Grant, NYISO  
Edward Schrom, DPS (Phone)

**Guests:**

Wayne Sipperly, NYPA  
Dan Head, Con Edison (Phone)  
Brian Shanahan, National Grid  
Mark Capano, NYISO  
Chris Sharp, NYISO  
Paul Gioia, Counsel  
David Johnson, Read & Laniado, LLP  
Wes Yeomans, NYISO (Phone; Partial)  
John Broyles, NYISO (Phone; Partial)  
Brad Garrison, NYISO (Phone; Partial)

RRS Meeting # 202 was called to order by Mr. Clayton at 9:30 am.

**1. Introduction**

1.1 Executive Session

None requested.

## 1.2 Requests for additional Agenda Items

Mr. Clayton requested the following Agenda Items:

- 3.1.4 PRR 130 C.1: Establishing Operating Transfer Capabilities
- 3.2.2 Con Edison's Exceptions #17
- 3.2.3 Discussion of Action Item 201-2

In addition, the following Additional Agenda Item was requested:

- 6.2 I.5 Disturbance Recording, Requirement 2

## 2. Approval of Minutes / Action Items

### 2.1 Approval of RRS Minutes #201

RRS reviewed the Minutes from the last RRS meeting. Minor comments were provided to the Minutes and with these changes, Minutes are considered as final.

### 2.2 RRS 201 Status Report to EC

Mr. Clayton presented to the RRS a copy of the 'RRS 201 Status Report to EC', which he develops for the purpose of summarizing at the next NYSRC Executive Committee meeting, what RRS has done at its prior meeting.

### 2.2 RRS Action Items List

Action Item 201-7: Mr. Adamson will apply the appropriate changes to the Introductions to Section B *Transmission Planning* and Section C *Transmission Operation* with the issuance of the next revision of the NYSRC Reliability Rules & Compliance Manual.

Action Item 201-6: On agenda today and status is changed to complete.

Action Item 201-5: On agenda today and status is changed to complete.

Action Item 201-4: On agenda today and status is changed to complete.

Action Item 201-3: On agenda today and status is changed to complete.

Action Item 201-2: On agenda today and status is changed to complete.

Action Item 201-1: On agenda today and status is changed to complete.

Action Item 197-8: On-going.

Action Item 191-2: On-going.

Action Item 141-1: On-going.

Action Item 139-1: On-going.

Action Item 87-5: On-going.

Action Item 83-8: On-going.

### 3. NYSRC Reliability Rules Development

#### 3.1 Outstanding PRR List

PRR 128 is tabled pending NPCC A-10 revision.

The NYSRC Executive Committee approved PRR 130 to post for comment. Comments were due May 31st, 2016 and no comments were received. Thus, RRS made a recommendation, without any objections / abstentions, to the NYSRC Executive Committee to approve PRR 130 as final to be included in the next revision of the NYSRC Reliability Rules & Compliance Manual.

All other PRRs are on the table for today's discussion.

##### 3.1.1 PRR 131 I.6 Modeling & Data (Dual fuel Generating Unit Testing)

Mr. Clayton provided a short summary of the last meeting's discussion on this subject where comments from the Generator Sector were received and discussed. Mr. Clayton also reminded the group that there are a few outstanding items that came out of that discussion that need to be addressed. Item 1 deals with the applicability of PRR 131 - NYC/LI versus the entire NYCA system. Item 2 deals with the 'compensation' issue. Mr. Gioia asked Mr. Clayton should the issue of compensation be a NYISO issue. Mr. Clayton stated 'Yes' and that RRS will not address it.

On the point of applicability, Mr. Clayton stated that, at the last NYSRC Executive Committee meeting there was a short discussion on how the NYISO actually models dual fuel units in their operating and planning studies. The discussion uncovered that not all NYISO "Gold Book" dual fuel units are actually modeled in the NYISO studies as such. Thus, the question was raised whether there should be a definition of a dual fuel unit that PRR 131 would be applicable to.

Mr. Yeomans advised RRS that PRR 131 should be 'very careful' defining the dual fuel units. Mr. Yeomans stated that there are two subsets of dual fuel units from a definition perspective. He stated that first of all, the annual NYISO "Gold Book" lists any unit as dual fuel unit where the capability - to be able to switch fuels - was installed when it was built, but that capability may not be working, or never actually worked (i.e. the owner did not get appropriate air permissions, fuel tanks were not installed, etc.). Mr. Yeomans stated that the NYISO's annual fall survey process provides the NYISO with the units that are actually dual fuel capable. In the Rest of State (w/o NYC and LI) there are about 6,630 MW of dual fuel units listed in the NYISO "Gold Book" and out of that about 3,971 MW (22 units) are dual fuel capable (per the annual fall survey). The remaining 2,659 MW (10 units) report that they are not dual fuel capable, although the NYISO "Gold Book" lists them as such; they report that they would have to make additional investments to get the dual fuel capability operational.

Mr. Paszek asked if the annual fall survey can be made public. Mr. Yeomans stated that the annual fall survey is confidential for NYISO use only. Mr. Gioia asked Mr. Yeomans if the NYISO is counting these units for system reliability. Mr. Yeomans stated that the NYISO is counting on these units in the annual fall survey. Mr. Gioia stated PRR 131 as written states “failure rate of fuel switching events which could jeopardize the reliability of the NYS Bulk Power System”, and Mr. Gioia asked Mr. Yeomans if the NYISO is assuming that these dual fuel units are there if needed and will perform fuel swap as requested (for reliability). Mr. Yeomans stated that when the NYISO performs Winter Capacity Assessment, the NYISO starts out with 50/50 January peak load and lists capacity requirements for that load. Then, the NYISO subtracts (in order to stress the calculation) units that run on gas only in NYS (as the majority of units do not have firm gas rights) and the NYISO also subtracts the dual fuel units that did not make the business decision to maintain dual fuel capability; the NYISO keeps the units in the calculation which, through the annual fall survey, have dual fuel capability.

Mr. Clayton asked Mr. Yeomans if the NYISO is running any power flow analysis to ascertain if there are any violations on the system. Mr. Yeomans stated that for the Lower Hudson Valley the NYISO performs Transmission Security Analysis. Mr. Clayton followed with a statement that the NYISO is relying on the dual fuel units for system reliability. Mr. Yeomans stated that the NYISO relies on these units to assess positive or negative capacity margins.

Mr. Clayton asked Mr. Yeomans if there is anything different for Zones J (NYC) and K (Long Island). Mr. Yeomans stated that for the Rest of State there aren't any reliability rules as they exist for Zones J and K (LOG/MOB).

Mr. Pfleiderer asked if there is any way to quantify how many days the dual fuel units can run on oil. Mr. Yeomans stated that the NYISO does not have a minimum requirement on how many days of oil should be kept on site (or secured), but based on the annual fall survey Mr. Yeomans states that these units are in pretty good / healthy shape (w/o having to state confidential information).

Mr. Clayton asked Mr. Yeomans if the Winter Capacity Assessment is confidential. Mr. Yeomans stated that it is not. **Action Item 202-1**: Mr. Yeomans to present NYISO's Winter Capacity Assessment.

Mr. Clayton asked Mr. Yeomans if the Winter Capacity Assessment shows that the Load-to-Generation balance cannot be met, is that a reliability violation. Mr. Yeomans stated that it is not, but the NYISO would be ‘uncomfortable’ with the results.

Mr. Clayton provided to RRS members an excerpt from PSC Article 10 Exhibit 5 Regulations that addresses dual fuel and back up fuel. Mr. Clayton stated that Article 10 Exhibit 5 would add dual fuel capability to new units in NYC as Con Edison has in its local reliability rules a requirement for dual fuel, however Article 10 Exhibit 5 does not state that everybody must have dual fuel capability. It is only after ‘consultation’ with DPS, NYISO and local Transmission Owner. The Deciding Boards may require dual fuel capability.

Mr. Schrom stated that the language may not be ‘black and white’ on the issue but if DPS Staff saw a need for such a service, DPS Staff would push to have such a service as part of Article 10. Mr. Gioia seconded Mr. Schrom explanation. Mr. Schrom also stated that the two identified Generation Project at the last RRS meeting – Cricket Valley and CPV Valley – did not go through the new Article 10 process; they followed State Environmental Quality Review (SEQR), where dual fuel is not required.

### 3.1.2 PRR 132 I.4, Transmission Data (Clarification of Material Error)

Mr. Clayton provided a short description of this PRR and what changes have been applied since the last RRS meeting; Mr. Adamson has added Compliance Elements to PRR 132. Mr. Gioia asked if the NYISO is OK with Requirement 1.7 as written. Mr. Sharp stated, ‘Yes’. Mr. Adamson highlighted to the group the proposed implementation plan of PRR 132.

RRS recommended PRR132, without any objections / abstentions, to the NYSRC Executive Committee for approval to post for comment.

### 3.1.3 PRR 133 F System Restoration (F.1 revision / F.2 retirement)

Mr. Clayton provided a short summary of the last meeting’s discussion on this subject where the group discussed whether the NYSRC Reliability Rules are more stringent or specific than NERC and NPCC standards and directories. Mr. Clayton stated that in fact the NYSRC Reliability Rules are less stringent or specific than NERC and NPCC standards and directories (in most cases). Mr. Adamson has developed a PRR that would rectify this issue by retiring Section F2 *System Restoration Training and Simulation Programs* from the NYSRC Reliability Rules & Compliance Manual; but still have a requirement in Section F1 *NYCA System Restoration Plan* that would cover training and training records (and provide these records to NYSRC).

Mr. Adamson agreed with the fact that the NYSRC Reliability Rules are less stringent or than NERC and NPCC standards and directories as it relates to Black Start testing, however Mr. Adamson stated that the NYSRC Reliability Rules cover other aspects of Black Start testing, thus these Reliability Rules should be retained (thus PRR 133 does not address Black Start testing requirements). Mr. Paszek disagreed with this assessment stating, for example, the NERC and NPCC standards and directories require to: (1) energize transmission and (2) prove stable operation for 10 minutes, versus the NYSRC Reliability Rules requiring only – for certain units – startup and synchronization to the transmission system.

Mr. Clayton asked Mr. Paszek does the PRR 133 at hand address this issue. Mr. Paszek stated ‘No’, it does not. Mr. Sipperly seconded Mr. Paszek’s opinion.

**Action Item 202-2:** Mr. Adamson to review Section F1 *NYCA System Restoration Plan* Requirement 1.5 and Requirement 3 as it relates to NERC and NPCC Black Start testing requirements and update PRR 133 as necessary.

Mr. Shanahan questioned the need for the new Requirement 1.14 in PRR 133 as it is simply an administrative requirement (i.e. provide training records to the NYSRC). Mr. Clayton stated that this falls under NYSRC being more specific. Mr. Grant stated that the NYSRC can, per NYISO-NYSRC agreement, review any NYISO documentation at any time. The discussion on this item was tabled until the next RRS meeting.

### 3.1.4 PRR 130 C.1: Establishing Operating Transfer Capabilities

See Agenda Item 3.1.

## 3.2. Discussion Items

### 3.2.1 NERC, NPCC Black Start Testing Requirements

See Agenda Item 3.1.3.

### 3.2.2 Con Edison’s Exceptions #17

Mr. Paszek provided a short summary of the three proposed clarifications to Con Edison’s Exception #17. Exception #17 deals with transformer TA-5 that connects Con Edison’s Buchanan 345 kV and 138 kV substations. Exception #17 allows for loading on this transformer to exceed STE rating under N-1/-1 conditions. If the stated event occurs, there is an automatic overload protection installed on this transformer that would trip transformer TA-5. This protection is considered a Special Protection System (SPS) under the NPCC definition, but not as a Remedial Action Scheme (RAS) under the NERC definition.

Mr. Paszek stated that Con Edison is proposing to make three clarifications to the language of the existing Exception #17. Clarification 1: Due to the fact that the Exception always dealt with the “Post-Contingency Flow on Buchanan Transformer TA-5”, and not “Ramapo to Buchanan 345 kV Feeder Outages” the title of this exception was changed (from Ramapo to Buchanan 345 kV Feeder Outages to Post-Contingency Flow on Buchanan Transformer TA-5). Clarification 2: This exception is ‘silent’ on the action when the loading on the transformer is above its LTE rating (which is a criteria violation) but below the STE rating. This could lead to multiple interpretations where day-to-day system operation flexibility may be lost (i.e. should the SPS trip the bank at its LTE rating). The new revision of Exception #17 addresses this issue (it states: if the flow on transformer TA-5 is above LTE rating but below STE rating, local generation will be adjusted to reduce the flow below LTE rating within 15 minutes).

Clarification 3: As the SPS monitors and protects only transformer TA-5, it does not matter which N-1/-1 event occurs that could create this violation; the overload and the protection is of transformer TA-5. The new revision of the Exception addresses this issue as well (i.e. The post- contingency flow on the Buchanan 345/138 kV transformer TA-5 is allowed to exceed LTE and STE ratings for the non-simultaneous loss of two transmission feeders).

Mr. Paszek also presented a CEII diagram showing the local transmission system and explained the mechanics of Exception #17.

Mr. Clayton stated that that the process is for Con Edison to forward this request to the NYSRC Executive Committee. Mr. Paszek stated that this has been done; with a copy to the NYISO. Mr. Clayton then stated that if the NYSRC Executive Committee agrees to consider this proposal then they would ask the NYISO for their opinion, sending it back to the RRS. Mr. Paszek asked can it be stated, at the next NYSRC Executive Committee meeting, that the RRS has already discussed this item. Mr. Clayton states 'Yes' but asked the NYISO for their opinion on this clarification to Exception #17. Mr. Grant stated that the NYISO will render its opinion once requested by the NYSRC Executive Committee.

Mr. Shanahan raised an issue that clarification #3 could be interpreted as expanding the scope of Exception #17, and that Con Edison should be prepared (at the NYSRC Executive Committee meeting) to answer this question; if it comes up.

### 3.2.3 Discussion of Action Item 201-2

Mr. Clayton stated that Mr. Markham has provided a written response to the posed question "why the NYISO wouldn't declare Major Emergency for a Stuck Breaker or Loss of Tower contingency". Mr. Markham's response was provided to the membership as part of the June 2<sup>nd</sup>, 2016 NYSRC RCMS meeting material package.

### 3.3 Bucket List

Mr. Clayton stated that RRS is progressing well on most of the items, with the Exception for item 10 and 18.

Item 18 *Consider preparation of a new glossary DMNC definition* was addressed at this meeting – the change is not required. Mr. Grant recommended, as part of this discussion, that all references to a NYISO Manual or to a NYISO OATT should drop the 'section' numbers and simply point simply to either the NYISO OATT or the NYISO Manual, as appropriate. **Action Item 202-3:** Review NYSRC RR&CM Glossary Section and remove all references to a NYISO Manual 'section' or to a NYISO OATT 'section'; keep a broad reference to a NYISO Manual or to a NYISO OATT.

Item 10 C.4 (*Solar Magnetic Disturbances*) – revise to be consistent with the new NERC standards. Mr. Clayton stated that Mr. Grant has already performed a comparison between the NYSRC Reliability Rule C.4 and NERC EOP-010-1. **Action Item 202-4:** Forward the comparison of the NYSRC Reliability Rule C.4 versus NERC EOP-010-1 to RRS members.

#### **4. NPCC Directories**

Mr. Clayton reported that at the last NPCC RCC meeting there was a discussion toward the NPCC A-10 Document that one of the big issues that needs to be resolved is the application of A-10 amongst the various entities within NPCC (as there is uneven application). They need to look into this on top of the radial exclusion that Con Edison has brought up.

#### **5. NERC SARS/Organization Standards**

##### 5.1 NERC Standard Tracking

Mr. Adamson highlighted to the RRS members that there is a project to provide a defined event for assessing system performance during a Geomagnetic Disturbance (GMD) event (TPL-007-1).

Mr. Adamson also stated that he is working with NERC towards (re)defining the proper sector for the NYSRC.

#### **6. Additional Agenda Items**

##### 6.1 REV potential impact on NYS BPS reliability

Mr. Grant provided a short discussion toward what the NYISO is doing as it relates to REV. The NYISO is aware of it, and will incorporate REV initiatives into their studies, as appropriate. Mr. Sharp added that the NYISO had changed its Tariff in order to allow behind the meter generation sell into wholesale market (accepted by FERC).

Mr. Clayton informed that group that at the NYSRC Executive Committee the NYISO reported that the NYISO is performing a study toward impact of Distributed Generation on the Bulk Power System. **Action Item 202-5:** NYISO to provide status on the on-going studies as it relates to REV initiatives.

##### 6.2 I.5 Disturbance Recording, Requirement 2

**Action Item 202-6:** Compare I.5 Disturbance Recording, Requirement 2 in order to ascertain whether the NYSRC Reliability Rules are more stringent or specific than NERC and NPCC standards and directories.

## **7. Reports**

### **7.1 NYSRC EC Meeting Report**

There is nothing additional to report.

### **7.2 NYSRC ICS Meeting Report**

Mr. Adamson stated that ICS has agreed on the new PJM representation in the model, which includes 5 zones in it. The ICS also agreed on the white paper for modeling of wind shapes, etc. In addition, ICS is revising Policy 5 (methodology and assumptions for the IRM studies).

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Meeting ended at 11:55 AM.

### **Next Meeting #203**

Thursday, June 30, 2016; 9:30 am @ NYSERDA, 17 Columbia Circle, Albany