

***Meeting of the  
New York State Reliability Council, L.L.C. (NYSRC)  
Reliability Rules Subcommittee (RRS)***

***Draft Minutes of Meeting #118  
RRS Meeting @ NYSERDA Offices  
17 Columbia Circle, Albany, NY  
Thursday, April 09, 2009***

**In Attendance:**

Al Adamson	Consultant	Member
John Adams	NYISO	Member
Edward Schrom	NYSDPS	Member
Roger Clayton	Chairman	Member
Brian Gordon	NYSEG (Secretary)	Member
Roy Pfleiderer	National Grid	Member
Robert Ganley	LIPA	Member
Dean Ellis	Dynegy	Member
Henry Wysocki	ConEd	Member
Anthony Elacqua	NYISO	Member

\* Denotes part time attendance.

**Agenda Items**

**1.0 Introduction**

Meeting 118 was called to order by Mr. Clayton at 09:30.

**1.1 Executive Session**

No Executive Session was requested.

**1.2 Requests for Additional Agenda Items**

BES / BPS issues were assigned to item 4.1 on the agenda. Proposal for reliability rule rewrites to match the format of the NPCC directory (only more specific or stringent rules to the NYSRC will be listed) has been put on the agenda for item 4.2.

Mr. Elacqua and Mr. Ellis have been approved for RRS membership by the EC at the last meeting.

**2.0 Meeting Minutes/Action Items**

**2.1 Approval of RRS Meeting #117 Minutes**

The minutes of RRS Meeting #117 were approved with changes as final.

## **2.2 Action Items List**

The following Action Items were reviewed:

### AI 117-1 EC request for Mr. Qayyum to be an alternate RRS member

Status changed to complete on 4/9/2009. ConEd representative was asked to provide a letter to RRS requesting the change.

### AI 117-2 Request opinion from Mr. Gioia concerning the need for PPR 101

Status changed to complete on 4/9/2009.

### AI 117-3 Under PRR 101 C-M6, Mr. Adams to introduce Mr. Hochberg's suggested revision to the NYISO

Status changed to complete on 4/9/2009.

### AI 117-4 Bring PRR 103 main issue at the EC

Status changed to complete on 4/9/2009.

### AI 117-5 Obtain latest version of NYISO secured list and ATR list with cross check

Status changed to complete on 4/9/2009.

### AI 117-6 Obtain criteria of how facilities get onto the NYISO secured list

Status changed to complete on 4/9/2009.

## **3.0 NYSRC Reliability Rules (RR) Development**

### **3.1 List of Potential RR Changes**

RRS reviewed the list of potential rule changes.

#### PRR 99 System restoration

Balloting for related NERC Standard EOP-005 is scheduled in a few weeks. The EC has tabled approval to post PRR 99 to its April meeting. Mr. Adamson will resend the latest version of PRR 99 to the EC for consideration.

#### PRR 101 Resource Data Availability

RRS has reviewed several NYISO comments. PRR 101 C-M4 requirement 5 was modified based on discussion from last meeting. "Utilized" or "employed" wording is preferred instead of the word "followed". Mr. Adamson contacted Mr. Gioia concerning PRR 101 C-M4 requirement 4. Mr. Gioia was in agreement with the wording of the PRR

101 C-M4 requirement 4. Mr. Ellis stated that at a recent GADS workshop he attended there was concern over the difference between the NERC and NYISO interpretation of NERC GADS data. Market participants have been instructed that the NYISO interpretation of the submission of GADS data is the final ruling on generator outage data. NERC reporting is optional but NYISO reporting is required by the tariff. NERC annual generation availability report format may be acceptable by the NYISO but there may be some concern within some parts of the NYISO that it could result in additional work. Recommended a change to the wording in PRR 101 CM-6 to remove “resource class statistics, averaged for an appropriate historical period“ and add the words “availability performance of classes of generating units presented in similar format as NERC’s annual generation availability report unless otherwise specified”. Mr. Adamson will provide revised PRR 101 by Monday to Mr. Elacqua. RRS will review the new revision including compliance elements, which will be prepared by RCMS, by the next meeting. RCMS will be reviewing the last three years of generator data under the existing rules to identify any compliance issues.

### PRR 103 C-R4 System data requirements

Mr. Clayton and Mr. Adamson met with NYISO staff (John Adams, Zach Smith and Steve Corey) to discuss the current process in receiving and verifying data used in load flow and short circuit studies. Mr. Clayton was impressed with the existing procedures at the NYISO to verify short circuit, stability, and load flow data. Unlike the due diligence generator data, there is a well establish procedure in place for data verification. Mr. Nguyen and three NYISO staff engineers accept all study data and perform data checking for the load flow that is submitted on April 1 for FERC 715 filing.

A few improvements were identified. Each market participant has a professional responsibility to submit accurate data and it should be noted and communicated that the market participant needs to check the data when they receive the case from the NYISO. A due diligence fault analysis is not performed by the NYISO before the cases are sent to the market participants. Queue positions for market participants are currently maintained without expiration. This results in load flow representations that have projects that are not currently in service and may never be in service. It would be more desirable for SRIS studies to be performed on realistic load flow representations so that the results will accurately reflect the future power grid. A tariff change would be required to place an expiration date on queue positions. Market participants must understand the case development process and must understand what their responsibilities are. The NYISO is not adverse to a due diligence process for the developers and market participants as was defined by the generator outage data. NYISO will provide a white paper document on current load flow data checking procedures to be presented at the next RRS meeting (**AI 118-1**).

### **3.2 NPCC Criteria**

#### NPCC Update

Criteria for classification of BPS elements (A-10) item revisions are posted and comments are due at end of month. NPCC Directory #3 second posting comments are due May 11. No rule change required for NPCC Directory #3 based on Mr. Adamson review of new directory as compared to the existing NYSRC reliability rules. NPCC

Directory #12 UFLS program requirements were questioned. Mr. Gordon will provide NPCC progress on the UFLS project (AI 118-2). Mr. Wysocki will review NPCC Directory #12 for any reliability rule changes (AI 118-3).

### **3.3 NERC Standards**

#### NERC Standard Tracking

The NERC Standards Committee has withdrawn the FAC -011 SAR.

CIPs 002 to 009, Cyber Security, balloting will end tomorrow. NPCC has not reached a consensus on the vote. Two issues that are of particular concern are the single senior manager responsible for any non-compliance and a continuous escort of external parties within the security perimeter. NYISO may be a yes vote. NPCC is suggesting a yes vote. Mr. Elacqua suggested a yes vote for NYSRC with comments for a definition of continuous escort. After discussion RRS agreed that NYSRC should vote yes.

### **4.0 Additional Agenda Items**

#### **4.1 BES / BPS Impact on NYSRC RR**

Under NYISO tariff the secured system was the defined original list of facilities. The original secured list came from a negotiation process between the NYISO and transmission owners. Generation dispatch adjustment is invoked to secure the transmission system as defined by the secured transmission system.

Currently, the criteria for getting on the secured transmission list are still a negotiation between NYISO and transmission owners. This reason is for price transparency. The purpose to securing the transmission system is to run the market and maintain reliability.

The distribution factor analysis method (5% or 2% or some other chosen percentage) may be a future criterion to determine the NERC Bulk Electric System. NYISO and NPCC are moving towards a distribution factor method. Mr. Elacqua will apply the TDF analysis to the comprehensive transmission facility lists including secured facilities, dated 5/8/2008. (AI 118-4).

#### **4.2 Reliability rewrites to NPCC directory format**

The NPCC near the year 2000 started a compliance reporting program after FERC approved the NERC standards until last year. The NERC standards use monetary sanctions for compliance. NPCC criteria use letters for compliance. NPCC developed a directory process to provide the demarcation between NERC and NPCC for compliance purposes. NYSRC compliance looks at compliance of the entire reliability criteria so all reliability criteria are listed in the reliability rules which may include NPCC and NERC requirements. NYSRC reliability rules also contain more specific or stringent criteria than NERC and NPCC. A reason to describe all criteria in the NRSRC reliability rules is to maintain a full list for the purpose of compliance. [The purpose of this item was to discuss a suggestion from an EC member to consider rewriting the NYSRC Reliability Rules similar to the new NPCC directories. Your words above should describe the NPCC

directories and the circumstances why they are needed, and why we believe that NYSRC's situation is different.

## **5.0 Committee Reports**

### **5.1 EC**

None

### **5.2 ICS**

ICS is preparing for 2010 IRM study. Modeling improvements are being performed for SCR and wind power for the study in August.

### **5.2 RCMS**

RCMS is reviewing compliance and working on recommendations. Mr. Elacqua is developing PRR 102 to put all requirements in one place.

## **6.0 Next Meeting**

Meeting #118 was adjourned at 14:11.

The next meeting (#119) is scheduled for Thursday, April 30, 2009 at 9:30 in the NYSERDA offices located at Columbia Circle, Albany, NY.