

**New York State
Reliability
Council**

*2015 Reliability
Rules
Subcommittee
Report*

February 24, 2016



NYSRC 2015 Reliability Rules Subcommittee Report

Introduction

The Reliability Rules Subcommittee (“RRS”) manages the review, development, and modification of the NYSRC Reliability Rules to maintain or enhance the reliability of the NYS Bulk Power System. Reliability is monitored in accordance with the NYSRC and NYISO/NYSRC Agreements, NYSRC Policy 1, *Procedure for Reviewing, Modifying, and Disseminating NYSRC Reliability Rules*, and other processes and procedures established by the NYSRC Executive Committee. RRS is an open subcommittee whose meetings are open to all interested parties who wish to attend. Meetings are publicly posted on the NYSRC website.

The responsibilities of RRS include:

1. Recommend to the NYSRC Executive Committee processes and procedures, including Policy 1 revisions, for reviewing, developing, and modifying the NYSRC Rules.
2. Consider requests by the Executive Committee for development of new Reliability Rules or modifications of existing Reliability Rules, and recommend to the Executive Committee whether such requests should be accepted or denied.
3. For those Reliability Rule change requests approved by the Executive Committee, recommend to the NYSRC Executive Committee Reliability Rule additions or modifications. The process of developing new reliability rules and modifying existing rules, when the change is intended to enhance reliability, should consider the economic and environmental implications of the proposed rule change.
4. When requested by the Executive Committee, review and comment on requests for exceptions to the Reliability Rules.
5. Recommend to the NYSRC Executive Committee revisions to the NYSRC Reliability Rules Manual when appropriate.
6. Conduct self-assessments of the NYSRC Rules to ensure consistency with NERC and NPCC standards and criteria.
7. Participate in NPCC, NERC, or other related open processes for developing and approving new reliability standards or modifications of existing standards. Review and comment on proposed standards, when appropriate. Address issues associated with the potential impact of proposed NPCC, NERC, or other standards on New York Control Area reliability.
8. Maintain a data base for the tracking of new and revised NERC and NPCC standards and criteria.

9. Review Reliability Rule disputes and recommend potential solutions to the NYSRC Executive Committee.
10. Prepare and submit status reports requested by the NYSRC Executive Committee. Also prepare, on request, reports for the NYSRC Executive Committee to disseminate to FERC and the PSC.
11. Review system operations trending information collected by the Reliability Compliance Monitoring Subcommittee (RCMS) when requested by the Executive Committee or RCMS.
12. Develop interpretations of the Reliability Rules when requested by the Executive Committee.

2015 Highlights

NYSRC Reliability Rules and Compliance Manual

The initial NYSRC rules, adopted in 1999, were based on former New York Power Pool criteria. Since then, these rules have been revised numerous times to reflect the need for: new and modified NYSRC rules; NERC and NPCC standards; and criteria changes.

The NYSRC has always worked towards improving its Reliability Rule development process. Likewise, RRS recognized that how reliability rules are organized is important for a clear understanding of rule and compliance requirements by those entities affected by the NYSRC rules. Accordingly, RRS reviewed the present rule organization and considered how it can be improved.

RRS developed a Rules Enhancement Program (REP) that was approved by the Executive Committee on April 4, 2013. The concept was to reformat the NYSRC Reliability Rules without changing any of the technical criteria. The program proposed that the organization and format of the NYSRC Reliability Rules should be revised to follow industry-wide formatting standards and to ensure that they are consistent with:

- NERC and NPCC standards and criteria
- NERC's Bulk Electric System (BES) definition
- Maintenance of NYSRC's more stringent and specific requirements
- Consolidation of the Reliability Rules Manual and the Compliance Template Manual

This program continued through 2013 and 2014 culminating on January 1, 2015 when a NYSRC Reliability Rules and Compliance Manual (RR&C Manual) was published. This was a major effort by the Reliability Rules subcommittee and all concerned, including NYISO staff.

RRS "Bucket List"

An innovation resulting from the Rules Enhancement Program described above was to establish a bucket list of potential new or revised rules, and potential administrative changes to the NYSRC Reliability Rules and Compliance Manual.

The actual process of reformatting the rules suggested many new potential rules, revisions to existing rules, elimination of some rules, changes to nomenclature, incorporation of NPCC's Directory 1 requirements, clarifications and changes to promote consistency, as well as Policy changes and errata corrections.

RRS has been working through the original bucket list of 21 items with 16 items completed or initiated in 2015.

New & Revised NYSRC Reliability Rules

The following is a list of major new or revised Reliability Rules considered in 2015:

- PRR 120 - Revision of Reliability Rule B.1
 - Transmission System Planning Performance Requirements.
 - Need: To ensure that B.1 is consistent with NPCC Directory 1 (R7 to R10)
 - Status: Posted for comment
- PRR 121 - Revision of Reliability Rule B.2
 - Transmission Planning Assessments
 - Need: Conversion of the previous transmission assessment rules resulted in unnecessary redundancy and possibly unclear requirements. This PRR eliminates the redundancy and more clearly conveys the intent of NYSRC transmission assessment requirements
 - Status: Posted for comment
- PRR 122 - Revision of Reliability Rule C.1
 - Establishing Operating Transfer Capabilities
 - Need: To ensure that C.1 is consistent with NPCC Directory 1 (R13 and R14)
 - Status: Posted for comment
- PRR 128 - Glossary revision
 - Adoption of NPCC A-10 definition for NYS Bulk Power System
 - Need: Consideration of exclusion of radial facilities
 - Status: Tabled pending NPCC A-10 revision
- PRR 130 - Revision of Reliability Rule D.1
 - Mitigation of Major Emergencies
 - Need: Clarification of the application of Emergency Transfer Criteria
 - Status: Under RRS review
- PRR 131 - New Reliability Rule I.6
 - Dual fuel testing requirements
 - Need: Annual testing to ensure reliable fuel switch over
 - Status: Under RRS review

- PRR 132 - Revision of Reliability Rule I.4
 - Transmission Data
 - Need: Clarification of material data error
 - Status: Under RRS review

FERC 2015 Approval of NYSRC's Black Start Requirements

FERC approved NYISO's tariff changes enabling the implementation of PRR 116A

- Identification of Black Start Resources Needed for an Effective System Restoration Plan
- Establishes procedures and required actions for identifying black start resources needed for an effective SRP.
- Clarifies the meaning of “prompt” in G-R1.
- Expands the range of potential black start resources

Conclusions

The Reliability Rules Subcommittee reached the following conclusions with regard to its 2015 activities:

1. The NYISO Staff continued to provide valued assistance to RRS during 2015.
2. The reformatted Reliability Rules & Compliance Manual was found to be useful in promoting a clear understanding of rule and compliance requirements by NYRSC and NYISO staff. The reformatting process also provided insight into the Reliability Rules themselves, resulting in numerous enhancements to the rules.
3. RRS provides an active technical forum for discussion of NYS reliability matters. All parties including Transmission Owners, Developers and NYISO staff have a platform to develop new or revised Reliability Rules, and continue to do so in a collegial and cooperative manner.