



[New York Reliability Council](#)

c/o Paul Gioia, Esq.
Whiteman Osterman & Hanna LLP
One Commerce Plaza- 99 Washington Av.
Albany, NY 12260

TO: Roy Thilly, Chair NERC Board of Trustees

FROM: Mayer Sasson – Chair New York State Reliability Council Executive Committee

DATE: October 20, 2020

SUBJECT: Response to Request for Policy Input to the NERC Board of Trustees

The New York State Reliability Council, L.L.C. ("[NYSRC](#)")¹ is a NERC member and a member of sector 10 - Independent System Operator/Regional Transmission Organization and votes on standards related matters in Registered Ballot Body segment 9 – Regional Organization. The NYSRC tailors its New York rules specifically so as not to conflict with the mandatory requirements of NERC or the regional Criteria of the Northeast Power Coordination Council, Inc. (NPCC). Many of the NPCC Criteria address resilience.

The NYSRC appreciates the opportunity to provide these comments in response to the request in your letter to Ms. Jennifer Sterling dated September 30, 2020. These comments apply specifically to the ERO’s establishment of a consistent framework to identify, prioritize, as well as address known and emerging reliability and security risks. The Framework we have been asked to revise addresses “*Known and Emerging Reliability and Security Risks (Whitepaper) (Attachment B)*”,

¹ NYSRC is a FERC sanctioned, not-for-profit entity, organized as a Delaware limited liability company, whose mission is to promote and preserve the reliability of electric service on the New York State Power System by developing, maintaining, and, from time-to-time, updating the Reliability Rules which shall be complied with by the New York Independent System Operator ("NYISO") and all entities engaging in electric transmission, ancillary services, energy and power transactions on the New York State Power System.

Are there any ERO policies, procedures, and/or programs that are missing or need amplification?

Response: The NYSRC recommends that there be greater policy level recognition by the Board of Trustees on the impact of renewable generating resources on resource adequacy planning. Specifically, the NYSRC is concerned about the impact on installed reserve margin as a result of the increasing level of renewable generation penetration. The NYSRC has noted that there are diminishing returns in terms of contribution to meeting system peak demand as the penetration of renewables increases. We recommend that the NERC Board of Trustees and NERC Reliability Assessment Staff take note of the work the NYSRC has done in this area in its report titled “ [The Impacts of High Intermittent Renewable Resources- On the Installed Reserve Margin for New York](#)”

In our study we note the following:

“The study shows that to meet the resource adequacy criterion, the installed capacity quantity for New York State will need to increase by 24.3 percentage points, from the 2020 IRM Study preliminary base case value of 118.6% to 142.9%. The increase in the installed capacity requirement is driven primarily by the intermittent characteristics of weather-dependent resources. The amount of the increase is predominantly a result of the lower availability of intermittent generators, which reduces the average availability of NYCA suppliers.”-page 3

We believe that the consequences are significant in terms of the amount of nameplate capacity that must be installed to retain the one day in ten-year Loss of Load Expectation Criteria required in the NPCC region and in general use throughout North America..

This issue in our opinion deserves a high priority in the NERC BOTs efforts to keep NERC and its resource assessments program ahead of the curve on a North America wide basis.

Does the iterative six-step risk management framework provide a sound basis for risk identification and mitigation?

Response: The NYSRC believes find the s six-step risk management framework provides a sound basis to risk identification and mitigation.

Are there any significant steps missing from the iterative risk management framework? If so, what steps do you propose adding?

Response: There are no significant steps missing from the iterative risk management framework.

Are there any missing key elements in the RSTC/RISC triage approach? If so, what key elements do you propose adding?

Response: There are no missing key elements in the RSTC/RISC triage approach.

Is the multi-dimensional model shown in Figure 4 of the Whitepaper complete?

Response: NYSRC supports the multi-dimensional model shown in Figure 4 of the Whitepaper.