

Request to Develop or Modify Reliability Rules (NYSRC Policy No. 1-4)
 Submit request to raymond40@aol.com via the NYSRC site www.nysrc.org

Item	Response
1. Respondent	
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2. Title of proposed rule change and PRR No.	Blackstart Provider Requirements - Modifications to Measurements G-M1 and G-M3 (PRR 106)
3. New rule or modification of NYSRC RR?	Modification
4. Wording of proposed rule change	<p><u>G-M1</u> The NYISO shall develop and maintain a NYCA System Restoration Plan (NYCA SRP) that will assure the prompt restoration of the NYCA system following a major or total blackout. The NYCA SRP shall define that system restoration take place at two integrated levels: restoration of the NYCA backbone system in accordance with a NYISO System Restoration Plan (NYISO SRP) and restoration of local areas in accordance with transmission owner system restoration plans (transmission owner SRPs). The NYCA SRP shall include the following minimum requirements:</p> <ol style="list-style-type: none"> 1. Procedures for coordinating the NYISO SRP and the transmission owner SRPs. 2. Required actions to be included in each transmission owner’s restoration plan, consistent with NYISO procedures and NYSRC, NPCC, and NERC criteria. 3. Procedures for coordinating the SRPs of the NYISO and neighboring Reliability Coordinators, including restoration of interconnections. 4. Identification of blackstart facilities required for implementing the NYISO SRP, including the names, location, megawatt capabilities, megavar capabilities, and unit type. 5. Identification of blackstart facility test requirements to verify that each blackstart facility in the NYISO SRP is capable of meeting the

requirements of the NYISO SRP. These tests, at minimum, shall be conducted ~~once per for each capability year~~ Capability Year and include those tests described in Table BS-1 of NPCC Directory #8, System Restoration. The NYISO procedures shall indicate that with due regard for reliability considerations and subject to approval by the Transmission Owner and the NYISO, a test performed by blackstart facilities in the Transmission Owner's SRP within one month beyond the Capability Year test period, or longer in force majeure cases, shall be considered a valid test for that Capability Year. On request by the NYSRC, the NYISO shall certify that reliability was considered when the NYISO and the Transmission Owner approved blackstart facility testing beyond the Capability Year.

6. Procedures requiring that each transmission owner identify *blackstart* resources that are necessary for implementing its SRP. These procedures shall also require transmission owners to identify the name, location, megawatt capacity, megavar capacity, and type of *blackstart* resource(s). The identity of transmission SRP *blackstart facilities* shall be made available to the NYISO and to affected *transmission owners*. In addition, NYISO procedures shall include a requirement that each *Blackstart Provider* annually provide a letter to the NYISO confirming that it identifies and maintains a list of critical components in its facilities (i.e., batteries, diesel back-up generators, inverters etc.) to verify the condition of these critical components in accordance with good industry practice.

7. Identification of the necessary operating instructions and procedures to cover loss of telecommunications channels during a system disturbance.

8. Identification of protocols for disseminating information to operating entities identified in the plan during a system disturbance.

9. Procedures for ensuring that the coordination of NYISO and *transmission owner* SRPs be demonstrated by drill or by simulation.

10. Procedures requiring *transmission owners* to notify the NYISO of any proposed changes to *transmission owner* SRP facilities or procedures that could effect the coordination of the NYISO and *TO* restoration plans at least two months prior to their implementation.

	<p>11. Procedures requiring that the <i>NYISO</i> and <i>transmission owner</i> SRPs be reviewed and updated annually and whenever changes are made in the <i>NYS Power System</i>. This review shall evaluate the impact of planned system expansion or reconfiguration on these SRPs, prior to implementation.</p> <p>12. Identification of guidelines which provide the basis for alternative restoration actions if normal restoration procedures cannot be executed due to system conditions.</p> <p>13. Procedures for coordinating annual updates to the <i>NYISO</i> SRP and restoration plans of neighboring Reliability Coordinators. (G-R1)</p> <p>G-M3 Each <i>Blackstart Provider</i> shall develop appropriate test procedures in accordance with G-M2 requirements to ensure those <i>blackstart facilities</i> that are included in the <i>transmission owner's</i> SRP are able to perform their intended functions. Each <i>Blackstart Provider</i> shall complete a successful test of the startup and operation of each of its <i>Blackstart Facilities</i> included in the <i>NYCA</i> SRP in <u>for each capability year Capability Year to demonstrate that its <i>Blackstart Facilities</i> can perform their intended functions in accordance with the procedures required in Measurement G-M1. <u>With due regard for reliability considerations and subject to approval by the Transmission Owner and the NYISO, a test performed by blackstart facilities in the Transmission Owner's SRP within one month beyond the Capability Year test period, or longer in force majeure cases, shall be considered a valid test for that Capability Year.</u> Each <i>Blackstart Provider</i> shall provide documentation of these test results to the appropriate entity in accordance with <i>NYISO</i> and <i>transmission owner</i> procedures.</u></p> <p>In addition, each <i>Blackstart Provider</i> shall annually provide a letter to the <i>NYISO</i> confirming that it identifies and maintains a list of critical components in its facilities (i.e., batteries, diesel back-up generators, inverters etc.) and performs tests to verify the condition of these critical components in accordance with good industry practice. Test results will be provided to the <i>NYISO</i> upon request. <i>Blackstart Providers</i> shall attend <i>NYISO</i> and <i>transmission owner</i> restoration training as required.</p>

5. Rationale for proposed rule change	
Identify advantages	<p>Makes it possible to determine <u>precisely</u> compliance with G-M3 and resolves incompatibilities with NYISO tariff and procedures. The current measurement is deficient in that it:</p> <ol style="list-style-type: none"> 1. Uses the term “capability year” which is undefined in lower case in the Rules document. Further, for the Con Edison area the test period should not be for an entire year because no blackstart testing is contemplated during the critical summer months. The NYISO tariff currently establishes a 6-month testing period from November 1 to April 30 for black start units in the Con Edison area. In the rest of NYCA the tariff and procedures allow for testing at any time during the Capability Year. 2. Does not contemplate the concept of a <u>one month (or longer in force majeure cases)</u> an extension of the annual testing period for reasonable cases <u>and with due consideration to reliability</u>; as the NYISO tariff and procedures <u>contemplate the concept of an extension. This extension has been found to be needed in practice to provide for among other, the possibility of a re-test in case of an unsuccessful test made within the Capability Period. By limiting the extension to one month, the proposed rule makes it clear that testing during the critical summer months is not allowed. The rule also makes it clear that testing within the one-month extension is a test valid only for the Capability Year that has just ended. The proposed rule also requires the NYISO to document at the NYSRC’s request why the one month extension, or longer for force majeure cases, was granted recognizing reliability considerations.</u> 3. Does not define how long an extension can be for it to still be a valid extension, which the NYISO tariff and procedures also does not define. A one month extension period was selected to place a reasonable bound on the testing period and so that if the limit of April 30 is reasonably extended it does not go beyond May 31 to avoid scheduling blackstart tests during the critical summer period (in the Con Edison area).
Identify disadvantages	None
6. Measurement(s)	See Line 4.
7A. Full Compliance Statement (G-M1)	The NYISO shall have a NYCA SRP that complies <u>fully</u> with all 13 requirements as defined in G-M1.
8A. Levels of Non-Compliance (G-M1)	Level 1: The NYISO failed to <u>prepare procedures and</u>

	<p><u>complete actions necessary for fully complying</u> comply with one of the requirements within G-M1.</p> <p>Level 2: The NYISO failed to <u>prepare procedures and complete actions necessary for fully complying</u> comply with two of the requirements within G-M1.</p> <p>Level 3: The NYISO failed to <u>prepare procedures and complete actions necessary for fully complying</u> comply with three of the requirements within G-M1.</p> <p>Level 4: The NYISO failed to <u>prepare procedures and complete actions necessary for fully complying</u> comply with three or more of the requirements within G-M1.</p>
<p>7B. Full Compliance Statement (G-M3)</p>	<p><u>As defined in G-M1, G-M32, and G-M43,</u> Tthe NYISO certifies that: (1) it has annually received a letter from each Blackstart Provider <u>confirming that it maintains a list of critical components and tests these components accordingly</u> certifying that it is in compliance with all blackstart facility procedural and testing requirements, including the testing of critical facility components, (2) it has received sufficient documentation from each Blackstart Provider showing that the Blackstart Provider has developed required test procedures and accordingly tested its blackstart facilities for each Capability Year in accordance with these test procedures, and (3) each Blackstart Provider <u>has met NYISO</u> and training requirements. as defined in G-M1, G-M3, and NYISO procedures.</p>
<p>8B. Levels of Non-Compliance (G-M3)</p>	<p><u>Level 1:</u> The NYISO certifies that one Blackstart Provider did not provide a letter to the NYISO satisfying required testing of critical facility components, <u>or did not comply with blackstart facility testing requirements</u> in accordance with <u>G-M1, G-M2, G-M3,</u> and in accordance with NYISO or transmission owner procedures.</p> <p><u>Level 2:</u> The NYISO certifies that two Blackstart Providers did not provide a letter to the NYISO satisfying required testing of critical facility components, <u>or did not comply with blackstart facility testing requirements</u> in accordance with <u>G-M1, G-M2, G-M3,</u> and in accordance with NYISO or transmission owner procedures and schedules.</p> <p><u>Level 3:</u> The NYISO certifies that three Blackstart Providers did not provide a letter to the NYISO satisfying required testing of critical facility components, <u>or did not comply with blackstart facility testing requirements in accordance with G-M1, G-M2, G-M3,</u> and in accordance with NYISO or transmission owner procedures and schedules.</p> <p>OR</p> <p>The NYISO certifies that one or more Blackstart</p>

	<p>Providers failed to attend restoration training as required by the NYISO or transmission owner.</p> <p><u>Level 4:</u> The NYISO certifies that four or more Blackstart Providers did not provide a letter to the NYISO satisfying required testing of critical facility components, <u>or did not comply with blackstart facility testing requirements in accordance with G-M1, G-M2, G-M3, in accordance with</u> NYISO or transmission owner procedures or schedules.</p>
9A. Compliance Documentation Reporting Responsibility – G-M1	NYISO
10A. Compliance Monitoring Responsibility - G-M1	Review of NYISO Compliance Documentation – RCMS.
9B. Compliance Documentation Reporting Responsibility – G-M3	Blackstart Providers
10B. Compliance Monitoring Responsibility – G-M3	<ol style="list-style-type: none"> 1. Review of Blackstart Provider Compliance Documentation – NYISO 2. Review of NYISO Compliance Certification – RCMS
11. Implementation Plan	<p>NYISO procedures shall be modified in accordance with G-M1 requirements 90 days following Executive Committee approval of PRR 106, or by May 1, 2011, whichever comes later. The NYISO shall assess blackstart provider compliance with C-M3 within an appropriate time after C-M1 procedures have been finalized, but prior to the end of 2011.</p>
12. Comments	<p>A new Glossary definition will be added for the term “Capability Year,” as follows: “A summer capability period followed by a winter capability period.” Also, a sentence referring to Capability Year in the existing definition of <i>Capability Period</i> will be removed.</p>
13. Date Rule/Measurement Adopted	
14. PRR Revision Dates	7/27/10, 9/1/10, 9/8/10, 9/30/10, 10/21/10, 11/4/10, 11/12/10