

**Request to Develop or Modify Reliability Rules or Measurements (NYSRC Policy No. 1-7)**

Submit request to [raymond40@aol.com](mailto:raymond40@aol.com) via the NYSRC site [www.nysrc.org](http://www.nysrc.org)

Item	Response
<b>1. Respondent</b>	
Name	RRS
Organization	
Address	
Phone & Fax numbers	
Email address	
<b>2. Title of proposed Reliability Rule /Measurement change &amp; PRR No.</b>	<b>PRR 116A</b> – Reliability Rule G-R1 Revision and New Local Reliability Rule I-R6 and Related Measurements: Identification of Black Start Resources Needed for an Effective System Restoration Plan
<b>3. New rule/measurement or modification of NYSRC RR or Measurement?</b>	
If a new rule/measurement is proposed, provide any relevant citation to existing standards	
If a modification to an existing Reliability Rule/Measurement is proposed, provide NYSRC RR reference	G-R1, G-M1, G-M2, and Local Rules
<b>4. Rationale for proposed Reliability Rule/Measurement change</b>	
Identify advantages	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.
Identify disadvantages	
<b>5. Wording of proposed Reliability Rule change</b>	<p><b><u>Reliability Rule G-R1 – NYCA Restoration Plan</u></b></p> <p>A NYCA System Restoration Plan (NYCA SRP) shall be maintained to restore the NYCA system to a normal operating state in a safe and orderly manner and as promptly as reasonably possible following a major or total blackout. The NYCA SRP shall be composed of a NYISO system restoration plan and Transmission Owner system restoration plans.</p> <p><b><u>Local Reliability Rule I-R6 – System Restoration from Eligible Black Start Resources</u></b> (new Reliability Rule)</p> <p>The NYCA SRP shall allow for the inclusion or continued inclusion of any <i>Eligible Black Start Resource</i> in the Con Edison SRP that would provide a <i>Material Benefit</i> to its SRP if included.</p> <p>[Note: The terms “Material Benefit” and "Eligible Black Start Resource" are defined in the NYSRC Glossary – see Comments, Line 12.]</p>

**6. Wording of proposed Measurement change**

**Measurement G-M1** (NYISO Responsibilities)

The NYISO shall develop and maintain a NYCA SRP that provides assurance that the NYCA system will be restored in a safe and orderly manner and as promptly as reasonably possible following a major or total blackout.

The NYCA SRP shall include system restoration 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 (TO SRPs).

The NYCA SRP shall include the following minimum requirements:

[Note: G-M1.1 through G-M1.13 unchanged]

**Measurement G-M2** (TO Responsibilities)

Each Transmission Owner shall establish and maintain a restoration plan in accordance with the NYCA SRP, NYISO procedures, and Measurement G-M1. These restoration plans shall be coordinated with the restoration plans of other Transmission Owners and shall be part of the NYCA SRP. The Transmission Owner SRP shall adopt procedures to identify black start resources that are necessary for implementing their SRP including testing requirements, in accordance with the NYCA SRP and NYISO procedures. Transmission Owners shall conduct an annual review of their SRP. Transmission Owners shall conduct annual training of their operating personnel on their SRP procedures, including the procedures for coordinating with the NYISO SRP. Each Transmission Owner shall report to the NYISO the completion of the annual training and review. (G-R1&2)

*Note: Local Reliability Rule I-R6 and Local Rule Measurements I-M7 and I-M8 cover additional NYISO and Con Edison requirements for the inclusion, when necessary, of any Eligible Black Start Resource in the Con Edison SRP.*

**LOCAL RULES**

**Measurement I-M7** (NYISO Responsibilities)

The NYISO shall have procedures and implement actions to provide for the inclusion or continued inclusion of any *Eligible Black Start Resource* in the Con Edison SRP, as follows:

**I-M7.1** Con Edison shall perform and document studies to identify any *Eligible Black Start Resource* that would provide a *Material Benefit* to its SRP if included.. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.

**I-M7.2** If Con Edison identifies an *Eligible Black Start Resource* that would provide a *Material Benefit* to its SRP if included.based on a study pursuant to I-M7.1, Con Edison shall designate the resource for participation in its SRP. Con Edison shall notify the NYISO and the applicable generator owner that

the resource has been designated for participation or continued participation as a black start resource in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. The NYISO may request additional documentation, as required, from Con Edison.

**I-M7.3** If the owner of the *Eligible Black Start Resource* designated by Con Edison pursuant to I-M7.2 does not want to participate or continue to participate in the Con Edison SRP, it must seek an exemption from the NYISO for good cause.

**I-M7.3.1** The NYISO shall require the owner of the *Eligible Black Start Resource* seeking an exemption to provide to the NYISO and Con Edison a study and/or other documentation to support its contention that good cause exists for the exemption. Good cause may include engineering, technical, financial, environmental, or other reasons that would render the provision or continued provision of black start service by the resource unduly burdensome or unreasonable.

**I-M7.3.2** After reviewing the documentation pursuant to I-M7.3.1 the NYISO may request additional documentation from the *Eligible Black Start Resource* requesting the exemption or from Con Edison.

**I-M7.3.3** The NYISO shall determine whether good cause for an exemption has been demonstrated after considering: (1) the supporting documentation submitted by the resource owner seeking the exemption, and (2) information developed by the NYISO or provided by Con Edison. If the NYISO determines that good cause has been demonstrated for an exemption, it shall grant the exemption. If the NYISO determines that good cause has not been demonstrated, it shall deny the exemption and direct the black start resource to participate or continue to participate in the Con Edison SRP.

**I-M7.3.4** The NYISO shall inform the NYSRC that an exemption request has been made and submit a report to the NYSRC regarding its determination, subject to appropriate confidentiality protections.

**Measurement I-M8** (Con Edison Responsibilities)

Con Edison shall have procedures and implement actions for the identification of *Eligible Black Start Resources* in accordance with I-M7 and NYISO procedures, as follows:

**I-M8.1** Con Edison shall perform and document studies to identify *Eligible Black Start Resources* that would provide a *Material Benefit* to its SRP if included. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.

**I-M8.2** If Con Edison identifies an *Eligible Black Start Resource* that would provide a *Material Benefit* to its SRP if included, based on a study pursuant to I-M8.1, it shall designate the resource for participation or continued participation in its

	<p>SRP. Con Edison shall notify the NYISO and the applicable generator owner that the resource has been designated for participation or continued participation as a black start resource in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. If requested, Con Edison shall provide additional documentation to the NYISO.</p> <p><b>I-M8.3</b> If, after being notified that it has been designated as a <i>Eligible Black Start Resource</i> for participation or continued participation in the Con Edison SRP, the owner of the resource does not want to participate or continue to participate, Con Edison shall prepare supplemental information, if requested by the NYISO, for use in a NYISO review to determine whether an exemption for the resource from participation or continued participation in the Con Edison SRP shall be granted or denied pursuant to I-M7.3.1.</p>
<p><b>7A. G-M1 Full Compliance Statement</b> (This is a revision of the existing G-M1 Compliance Elements)</p>	<p>The NYISO has a NYCA SRP and documented procedures that fully comply with requirements in accordance with sub-requirements in G-M1.1 through G-M1.13 and has identified NYISO SRP black start facilities in accordance with G-M1.4.</p>
<p><b>8A. G-M1 Levels of Non-Compliance</b></p>	
<p><b>Level 1</b></p>	<p>The NYISO has an NYCA SRP, but failed to have procedures and complete actions that fully comply with one of the sub-requirements in G-M1.</p>
<p><b>Level 2</b></p>	<p>The NYISO has an NYCA SRP, but failed to have procedures and complete actions that fully comply with two of the sub-requirements in G-M1. OR The NYISO failed to identify NYISO black start facilities in accordance with G-M1.4.</p>
<p><b>Level 3</b></p>	<p>The NYISO has an NYCA SRP, but failed to have procedures and complete actions that fully comply with three of the sub-requirements in G-M1.</p>
<p><b>Level 4</b></p>	<p>The NYISO has an NYCA SRP, but failed to have procedures and actions that fully comply with four or more of the sub-requirements in G-M1.</p>
<p><b>7B. G-M2 Full Compliance Statement</b> (This is a revision of the existing G-M2 Compliance Elements)</p>	<p>The NYISO certified that each TO has a SRP in accordance with G-M2 and each TO has confirmed that the black start resources that each TO has identified as necessary for implementing its SRP will assure that the TO system will be restored in a safe and orderly manner, and as promptly as reasonably possible following a major or total blackout.</p>
<p><b>8B. G-M2 Levels of Non-Compliance</b></p>	
<p><b>Level 1</b></p>	<p>The NYISO certified that all Transmission Owners have SRPs, but one or more failed to fully comply with one of the three of the black start testing, SRP coordination, or training requirements.</p>
<p><b>Level 2</b></p>	<p>The NYISO certified that all Transmission Owners have SRPs, but one or more failed to fully comply with two of three of the black start testing, SRP coordination, or training requirements. OR The NYISO certified that one or more TOs failed to confirm that</p>

	black start resources it has identified will assure that its system will be restored in a safe and orderly manner, and as promptly as reasonably possible.
<b>Level 3</b>	The NYISO certified that all Transmission Owners have SRPs, but one or more failed to fully comply with all of the black start testing, SRP coordination, and training requirements.
<b>Level 4</b>	The NYISO certified that one or more Transmission Owners do not have a SRP.
<b>7C. I-M7 Full Compliance Statement</b>	The NYISO has documented procedures and has implemented actions for Con Edison to designate <i>Eligible Black Start Resources</i> in the Con Edison SRP, in accordance with requirements in I-M7.1 to I-M7.3.
<b>8C. I-M7 Levels of Non-Compliance</b>	
<b>Level 1</b>	N.A.
<b>Level 2</b>	The NYISO has procedures and implements required actions for Con Edison to identify <i>Eligible Black Start Resources</i> but the NYISO did not fully comply with required actions in I-M7.3 when an <i>Eligible Black Start Resource</i> requests an exemption.
<b>Level 3</b>	N.A.
<b>Level 4</b>	The NYISO does not have procedures nor implements actions for Con Edison to identify <i>Eligible Black Start Resources</i> .
<b>7D. I-M8 Full Compliance Statement</b>	Con Edison has procedures and has implemented actions for the identification of <i>Eligible Black Start Resources</i> for participation or continued participation in its SRP, in accordance with I-M8. Con Edison has submitted its methodology and/or study for identifying <i>Eligible Black Start Resources</i> that provide a <i>Material Benefit</i> to its SRP to the NYISO and/or NYSRC when requested.
<b>8D. I-M8 Levels of Non-Compliance</b>	
<b>Level 1</b>	N.A.
<b>Level 2</b>	Con Edison has procedures for identifying <i>Eligible Black Start Resources</i> for inclusion or continued inclusion in its SRP, but the procedures were incomplete.
<b>Level 3</b>	Con Edison did not submit its black start resource identification methodology or study to the NYISO or NYSRC when requested.
<b>Level 4</b>	Con Edison failed to conduct a study for determining the need to include or continue to include any <i>Eligible Black Start Resources</i> in its SRP when required, as required by I-M8.1.
<b>9. Compliance Documentation Reporting Entity</b>	G-M1: NYISO G-M2: TOs I-M7: NYISO I-M8: Con Edison
<b>10. Compliance Monitoring Entity/Entities</b>	G-M1: RCMS G-M2: NYISO/RCMS

	I-M7: RCMS I-M8: NYISO/RCMS
<b>11. Implementation Plan</b>	<p>A NYISO Tariff change will be required before the rule changes in this PRR can be implemented. Following NYSRC Executive Committee approval of PRR 116, the NYISO shall pursue the tariff revisions necessary to establish the authority needed to comply with this rule change.</p> <p>Within 60 days of receiving FERC approval for the Tariff change, the NYISO shall submit evidence to RCMS that the NYISO has modified procedures in the NYISO System Restoration Manual and other relevant NYISO documents to comply with PRR 116 rule changes.</p> <p>Within 12 months of receiving FERC approval for the Tariff change, Con Edison shall complete an initial study for identifying any <i>Eligible Black Start Resource</i> that would provide a <i>Material Benefit</i> to the SRP if included. This study shall be conducted in accordance with Measurement I-M8 requirements. A summary of the study shall be reviewed by the NYISO and NYSRC subject to appropriate confidentiality protections.</p>
<b>12. Comments</b>	<p>As used in the proposed I-R6 and related measurements, determining if an <i>Eligible Black Start Resource</i> would provide a “<i>Material Benefit</i>” to the Con Edison SRP complies with the “prompt restoration” requirement of Reliability Rule G-R1, i.e., a system restoration plan shall have sufficient black start resources to provide assurance that the system will be restored as promptly as reasonably possible given all generation resources with black start capability.</p> <p>New NYSRC Glossary Term: “<i>Material Benefit</i>” – The benefit to system restoration when the addition of a black start resource would improve the speed, adequacy or flexibility of restoring electric service in a safe, orderly and prompt manner following a major system disturbance. This definition is consistent with use of the <i>material benefit</i> term in NYISO OATT Section 30.2.5.</p> <p>New NYSRC Glossary Term: “<i>Eligible Black Start Resource(s)</i>” - Either a non-participating black start capable resource in the Con Edison SRP that has the physical capability installed to provide black start service or a participating black start resource that has given notice of its intent to withdraw from black start service in the Con Edison SRP.</p>
<b>13. Date Reliability Rule/Measurement Adopted</b>	
<b>14. PRR Revision Dates</b>	5/17/13, 5/29/13, 6/3/13, 6/20/13, 7/15/13, 7/18/13, 8/6/13, 8/12/13, 8/18/13, 4/5/14