

**NEW YORK STATE
RELIABILITY
COUNCIL**

*2010 NYSRC Reliability
Compliance Program*

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

February 3, 2011



2010 NYSRC Reliability Compliance Program

Introduction

The New York State Reliability Council (NYSRC) Reliability Compliance Program is designed to measure and ensure compliance with NYSRC Reliability Rules in order to provide for a reliable bulk electric supply and delivery system in New York State. The NYSRC Reliability Compliance Monitoring Subcommittee (RCMS) manages the compliance program, which includes conducting reviews to ensure that the NYISO is in compliance with all NYSRC Reliability Rules, even those identified in the Rules as requiring actions by Market Participants. The NYISO has the responsibility of ensuring market participant compliance through its procedures and Market Services Tariff. The objective of the compliance program is to encourage compliance to the NYSRC Reliability Rules necessary to preserve the reliability of the New York Control Area. This report presents the highlights of the NYSRC 2010 Reliability Compliance Program.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-4, *Procedure for Monitoring Compliance with the NYSRC Reliability Rules*, at: <http://www.nysrc.org/policies.asp>.

Another major reference document for the reliability compliance monitoring process is the NYSRC *Compliance Template Manual* (CT Manual). The CT Manual includes a compliance template for each measurement. These templates cover compliance documentation reporting and compliance monitoring responsibilities, reporting frequencies, and statements of requirements for full compliance and levels of non-compliance. The CT Manual also describes the types of non-compliance notification letters that must be issued for various levels of non-compliance. The CT Manual was updated once during 2010 (Version 21), reflecting adoption of two modified measurements, and in January 2011 (Version 22) to reflect revision of the Introduction and five modified measurements. See the CT Manual at: <http://www.nysrc.org/NYSRCReliabilityRulesComplianceMonitoring.asp>.

In 2010, the NYSRC maintained a total of 58 NYSRC measurements. Generally, each year's Reliability Compliance Program includes compliance reviews of most NYSRC measurements. Factors used for selecting the group of measurements to be reviewed each year include: (1) Measurements that require annual or monthly review, (2) Measurements in which compliance have not been reviewed in the past three years, (3) Measurements that have been adopted or modified over the previous year, (4) All measurements requiring actions by market participants, and (5) Measurements that were found in non-compliance during the previous year or if there are other compliance issues requiring a follow-up review. The annual Reliability Compliance Program is approved by the NYSRC Executive Committee every February. During 2010, RCMS reviewed NYISO compliance with 41 measurements.

2010 NYSRC Reliability Compliance Program Measurements

As shown in Table 1, the 2010 Reliability Compliance Program included 29 NYSRC measurements having NYISO reporting responsibility and 12 measurements having Market Participant reporting responsibility. This number of measurements, for which NYISO and Market Participant compliance was assessed, represents 71% of total NYSRC measurements. The Appendix is a summary of the NYSRC 2010 Reliability Compliance Program that depicts the measurements that were assessed, compliance documentation requirements, milestone dates, and compliance findings.

Table 1 – NYSRC 2010 Reliability Compliance Program Summary

	Measurements Requiring Actions by the NYISO	Measurements Requiring Actions by Market Participants	Total Measurements
Total NYSRC Measurements in 2010	46	12	58
Total Measurements in 2010 in NYSRC Compliance Program	29	12	41
2010 Program Measurements – Full Compliance Finding	29	11	40
2010 Program Measurements – Non-Compliance Finding	0	1	1

Table 1 shows that the NYISO and market participants were in full compliance with all measurements, but one, that were reviewed in the 2010 Reliability Compliance Program. For one measurement, the NYISO and a market participant were found in non-compliance. This finding is discussed below.

In addition to reviewing compliance with measurements associated with the Reliability Compliance Program, there are several measurements that require the NYISO to submit reports on an as-required basis. During 2010, RCMS received reports from the NYISO on events related to loss of critical voice and/or data systems in LIPA and Central Hudson in accordance with J-M3 (loss of control center communications requirements). RCMS found the NYISO fully compliant with J-M3 in both cases.

Highlights of the NYSRC 2010 Reliability Compliance Program

1. Improving the Quality of Forced Outage and Transmission System Data

In November 2008, RCMS prepared a report to the Executive Committee, *Reliability Compliance Review of 2004 NERC-GADS Outage Data Misreporting Event*. (This report can be found at <http://www.nysrc.org/reports3.asp>.) The report provided RCMS findings and recommendations relative to its review of a 2004 outage data reporting NYSRC rule violation and related compliance concerns that were raised. The report further presented a series of seven recommendations for implementation by the NYISO and NYSRC, targeted at improving the quality of GADS data used for IRM and other NYSRC and NYISO studies.

Through the end of 2009, six of these recommendations were fully implemented. NYISO work to implement the seventh and remaining recommendation – to develop software for a new NYISO generating unit GADS outage data screening process – was successfully completed and implemented in early 2010. During 2010 the NYISO provided to RCMS, as part of the NYSRC Compliance Program documentation requirements, updates on the initial implementation of its new outage data screening process. The new NYISO screening process resulted in identifying one generating unit with suspect outage data that was later replaced with proxy data by ICS for the 2011 IRM Study.

During 2010, measurements C-M9 and C-M11 were modified (PRR #103), to clarify and make more specific, requirements for accurately reporting equipment data (load flow, short circuit and stability data) to the NYISO, and to review the data after it has been received by the NYISO in order to ensure the quality of data that is available for reliability studies. The NYISO is now in the process of preparing procedures and guidelines – to check the reasonableness of equipment data – for implementing these new reliability rules. A RCMS compliance review of these procedures and guidelines is scheduled for early 2011.

2. System Restoration Requirements

Modifications of Rules G-R1 and G-R2 and related Measurements G-M1 to G-M4 (PRR #99) were adopted in 2009. These rules include a large number of system restoration requirements. During 2010, RCMS worked with NYISO staff to ensure that the NYISO *Emergency Restoration Manual* was revised to be fully compliant. RCMS reviewed NYISO compliance of NYSRC emergency restoration rules and related measurements as part of the 2010 Reliability Compliance Program, and found NYISO emergency restoration procedures to be in full compliance.

3. Non-Compliance Finding Related to Measurement G-M3

In 2010, the NYISO certified that it had determined that a blackstart provider was noncompliant with Measurement G-M3. This measurement defines emergency restoration requirements for blackstart facilities. The specific compliance violation reported by the NYISO was that the provider failed to perform an annual test for one of its blackstart generators as required by this measurement. In accordance with NYSRC policy, if a market participant has not taken actions required by the NYSRC rules – as in this case – the NYISO is subject to a finding of non-compliance. The RCMS reported this NYISO non-compliance finding to the Executive Committee, along with a recommendation that a non-compliance letter not be issued to the NYISO. (This RCMS report, *Measurement G-M3 Non-Compliance Finding* report can be found at <http://www.nysrc.org/reports2.asp>.) The basis for this RCMS recommendation was that the NYISO had taken all reasonable action to secure compliance with Measurement G-M3. The NYISO is working with the noncompliant blackstart provider to ensure that it will be in full compliance in 2011.

4. NYCA Transmission and Resource Adequacy Assessments

The NYSRC Reliability Rules require that the NYISO provide NYCA transmission and resource adequacy assessments to demonstrate that the NYISO complies with NYSRC Reliability Rules. The timing of the annual transmission review is coordinated with that of similar submissions required by NPCC.

To demonstrate compliance with NYSRC transmission design criteria in Reliability Rules B-R1, B-R2, B-R3, and B-R4 (thermal, voltage, stability, extreme contingency, and fault duty assessments), a NYISO transmission review, *2009 Intermediate NYCA Transmission Review Through 2014* was submitted to RCMS in early 2010. The main conclusion of this review was that the NYS Bulk Power System, as planned through the year 2014, is in conformance with the NPCC Basic Criteria and the NYSRC Reliability Rules. The same report was submitted to NPCC.

The NYSRC also requires that the NYISO provide an Addendum to its annual transmission assessment report, that includes: (1) (N-1)-1 assessments; (2) identification of the impacts of the planned transmission system on the NYCA System Restoration Plan in accordance with B-M3; (3) an assessment showing local rules have been considered in accordance with I-M4; (4) an extreme contingency assessment for the loss of gas delivery system; and (5) an extreme contingency condition assessment assuming generating unit loss of gas supply. RCMS accepted the 2009 NYISO transmission review report, including the Addendum, and concluded that the NYISO was in full compliance with all NYSRC transmission assessment rule requirements.

During 2010, RCMS prepared a NYSRC procedure for NYCA Transmission Reviews. As discussed above, the NYISO is required annually to conduct several types of transmission assessments to ensure compliance with the NYSRC Reliability Rules. The purpose of this new procedure is to clarify the scope of transmission reviews in order to be consistent with reliability rule requirements.

To demonstrate compliance with NYSRC resource adequacy assessment requirements, the NYISO prepared the report *Annual Assessment of Resource Adequacy covering the NYCA for the 2010-2013 Period*. The study concluded that the 2011 NYCA IRM requirement of 18.0% could be met throughout the 2010-2013 study period, assuming all planned resources were completed on schedule. RCMS accepted the report and concluded that the NYISO was in full compliance with NYSRC resource adequacy assessment rule requirements.

2010 NERC and NPCC Reliability Compliance Programs

In addition to complying with the NYSRC Rules, the NYISO must also comply with all applicable NERC standards and NPCC criteria. Compliance with NERC standards is mandatory. RCMS has oversight responsibility concerning NYISO compliance with these standards and criteria. NPCC has direct responsibility and authority to implement a compliance monitoring and enforcement program for NERC and regional standards, as well as monitoring compliance with NPCC-specific reliability criteria. During 2010, as a part of the NERC/NPCC Standards

Compliance Program, NPCC reviewed NYISO compliance relative to 64 NERC standards and all criteria included within four NPCC Directories, as well as one additional NPCC criterion. NPCC found that the NYISO was in full compliance with all standards and criteria in the Program.

During December 2010, NPCC conducted a comprehensive on-site compliance audit which evaluated NYISO compliance with 38 NERC standards. The audit found that all NERC standards reviewed were in full compliance. RCMS expects to review a report describing the results of the audit in early 2011.

Conclusions

The following conclusions were reached by RCMS with regard to the NYSRC 2010 Reliability Compliance Program:

1. As in past years, the NYISO staff – especially Paul Kiernan and Jim Grant – provided valued assistance during the RCMS compliance review process.
2. The NYISO and market participants were found to be in full compliance with 40 NYSRC measurements that were assessed by RCMS in the 2010 NYSRC Reliability Compliance Program. The NYISO was found in non-compliance with one measurement, G-M3. In addition, NPCC found the NYISO in full compliance with all NERC standards and NPCC criteria that were assessed in 2010.
3. RCMS has a goal to revise Policy 4 in 2011.
4. NYISO compliance documentation for two 2010 Reliability Compliance Program compliance reviews were received late or incomplete. This is an improvement from 2009 when four submissions were received incomplete. No non-compliance findings were established because the required documentation was received within a 30-day grace period allowed by NYSRC policy. RCMS will continue its efforts of making the NYISO aware of NYISO compliance documentation requirements and due dates at several levels to further encourage on-time compliance documentation submissions.

2010 NYSRC RELIABILITY COMPLIANCE PROGRAM

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED 1	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL 2
Resource Adequacy							
A-M2	A-R2,3	Establishing LSE ICAP & LCR requirements	A	3/3/10	3/10/10	3/10/10 ⁴ 4/8/10	FC
A-M3	A-R2,3	Certifying LSE ICAP obligations are met*	B	11/4/10	11/4/10	11/11/10	FC
Transmission Capability – Planning							
B-M1	B-R1, B-R2, B-R3, and B-R7	Thermal, voltage, stability, and fault duty assessments for the planned NYCA system	C	3/3/10	2/22/10	3/25/10 ⁵	FC
B-M2	B-R4	Extreme contingency assessment for the planned NYCA system	D	3/3/10	2/22/10	3/25/10 ⁵	FC
B-M3	B-R5	Demonstration that system is planned considering ease of restoration	E	3/3/10	2/22/10	3/25/10 ⁵	FC
B-M4	B-R6	List of NYS Bulk Power System Facilities	F	9/30/10	9/30/10	10/7/10	FC
Resource, System & Demand Data Requirements							
C-M1	C-R1	Procedures for resource verification capacity testing requirements	G	3/3/10	2/22/10	3/10/10	FC
C-M2	C-R1	Reporting resource DMNC test results to the NYISO*	H	3/3/10	2/22/10	3/10/10	FC
C-M3	C-R1	Reporting generator reactive power capacity test results to the NYISO*	I	3/3/10	2/22/10	3/10/10	FC
C-M4	C-R2	Procedures for reporting & reviewing generating unit availability data	J	6/3/10	6/3/10	6/10/10 7/8/10 ⁶	FC
C-M5	C-R2	Reporting generating unit outage data to the NYISO*	K	9/2/10	9/2/10	9/9/10	FC
C-M6	C-R2	Report depicting generating unit outage statistics	L	7/1/10	7/1/10	7/8/10	FC
C-M11	C-R4	Reporting of load flow, short-circuit and stability data to the NYISO*	M	11/24/10	11/23/10	12/2/10	FC

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED ¹	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL ²
C-M12	C-R5	Procedures for disturbance recording device installation and reporting of data	N	9/30/10	9/30/10	10/7/10	FC
C-M13	C-R5	Certification that disturbance recording devices have been installed and data reported as required*	O	9/30/10	9/30/10	10/7/10	FC
Operating Reserves							
D-M2	D-R1, R2, R3, R4	Procedures that ensure adequacy of operating reserves	P	8/5/10	8/5/10	8/12/10	FC
Transmission Capability – Operating							
E-M1	E-R1, R2, R3	Procedures that ensure appropriate actions when transmission limits are violated	Q	4/1/10	3/24/10	4/8/10	FC
E-M3	E-R5	Procedures to ensure transmission outages are coordinated	R	4/1/10	3/24/10	4/8/10	FC
E-M4	E-R6, R7	Procedures for operating during severe weather conditions	S	4/1/10	3/24/10	4/8/10	FC
E-M6	E-R8	Pre-seasonal fault duty assessments	T	[A] 6/3/10 [B] 9/30/10	[A] 6/3/10 [B] 9/30/10 10/18/10	[A] 6/10/10 [B] 10/7/10 ⁹ 11/11/10	FC
E-M7	E-R8	MP evaluation of NYISO fault duty assessments*	U	9/30/10	9/30/10	10/7/10	FC
E-M9	E-R10	Reliability Rules exception review	V	9/2/10	9/2/10	9/9/10	FC
Operation During Major Emergencies							
F-M3	F-R8	Procedures for ensuring that sufficient load shedding capability exists	W	7/1/10	7/1/10	7/8/10	FC
F-M4	F-R8	TO load shedding capability*	X	7/1/10	7/30/10 ⁷	7/8/10 ⁷ 8/12/10	FC
F-M6	F-R5	Voltage reduction testing	Y	7/1/10	7/30/10 ⁸	7/8/10 8/12/10 ⁸	FC
System Restoration							
G-M1	G-R1	NYISO procedures for maintaining a NYCA System Restoration Plan	Z	11/24/10 ¹⁰	11/23/10	12/2/10	FC

MEAS./ COMP. TEMP.	RELATED RULE	MEASUREMENT DESCRIPTION	COMPLIANCE DOC. REQUIRED ¹	DUE NYSRC	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL ²
G-M2	G-R1	Transmission Owner Restoration Plan requirements*	AA	11/24/10 ¹⁰	11/23/10	12/2/10	FC
G-M3	G-R1	Blackstart Provider requirements*	BB	11/24/10 ¹⁰	12/9/10 ¹¹	¹¹	NC1
G-M4	G-R2	NYISO Emergency Restoration Training Requirements	CC	11/24/10 ¹⁰	11/23/10	12/2/10	FC
System Protection							
H-M1	H-R1	Documentation and data for meeting BPS system protection requirements	DD	6/3/10	6/3/10	6/10/10	FC
H-M2	H-R2	Documentation and data for meeting procedures required by H-M3	EE	6/3/10	6/3/10	6/10/10	FC
H-M3	H-R2	Procedure for monitoring compliance with maintenance requirements for BPS system protection	FF	6/3/10	6/3/10	6/10/10	FC
Local Reliability Rules							
I-M4	I-R1 to I-R5	Consideration of local rules in transmission planning and determination of operating limits	GG	3/3/10	2/22/10	3/25/10 ⁵	FC
I-M5	I-R1, I-R3, I-R4	Con Ed Local Rule I-R1, R2 and R4 Procedures*	HH	11/24/10	11/23/10	12/2/10	FC
I-M6	I-R5	LIPA Local Rule I-R5 Procedures*	II	11/24/10	11/23/10	12/2/10	FC
NYISO Control Center Communications							
J-M1	J-R1, R2	Procedures for supporting NYISO/MP communications	JJ	8/5/10	8/5/10	8/12/10	FC
J-M2	J-R2	Report providing performance data of control center communications interfaces	KK	8/5/10	8/12/10	8/12/10	FC
Reliability Assessment							
K-M2a	K-R2	NYCA 2009 transmission review	LL	3/3/10	2/22/10	3/25/10 ⁵	FC
K-M2b	K-R2	NYCA 2010 resource adequacy assessment	MM	6/3/10	6/3/10	6/10/10	FC
K-M2d	K-R2	Monthly operations reports		1/6/11 ³	1/6/11 ³	1/6/11 ³	FC ³
K-M3	K-R3	Extreme system condition assessment	NN	3/3/10	2/22/10	3/25/10 ⁵	FC

* Applicable to Market Participants, with compliance certification required by the NYISO.

Footnotes

1. NYISO Compliance Documentation Requirements:

- A. **A-M2.** The NYISO Locational Capacity Requirement (LCR) Report for the 2010-11 capability period. In addition, provide either in the LCR Report or in a separate report, required 2010 LSE capacity and IRM requirements for meeting the NYCA 2010 IRM requirement of 18.0% and locational requirements; and whether any intra-zonal transmission constraints caused by deliverability issues or “bottled” generation have been considered by the NYISO.
- B. **A-M3.** Certification that each LSE has demonstrated that it has procured sufficient capacity for the November 2009 to October 2010 period to meet its ICAP requirement in accordance with NYISO procedures and A-M3.
- C. **B-M1.** Evaluations of the thermal, voltage, short-circuit, and stability performance of the NYS BPS that shows that the system, as planned, is in conformance with the criteria described in NYSRC Rules B-R1 to B-R3, and B-R7. These evaluations shall be included in the 2009 Transmission Assessment required by K-M2a (see Note LL).
- D. **B-M2.** An evaluation of performance of the NYS BPS for extreme contingencies as defined in NYSRC Rule B-R4 and B-M2. This evaluation shall be included in the 2009 Transmission Assessment required by K-M2a (see Note LL).
- E. **B-M3.** As required by B-M3, provide either required procedures, or reference to the required procedures, for assessing the impact of the system expansion plan on the NYCA Restoration Plan. This assessment shall be included in the 2009 Transmission Assessment required by K-M2a (see Note LL).
- F. **B-M4.** Compliance documentation shall include: (1) NYISO procedure for developing the list of NYS Bulk Power System facilities, (2) a BPS Facilities List, and (3) Location of where the BPS Facilities List is published. These documentation requirements shall be defined by existing B-M4 or a modification of B-M4.
- G. **C-M1.** Self-Certification, listing references to required NYISO resource testing procedures that comply with C-M1.
- H. **C-M2.** Certification that, during the Winter 2008 and Summer 2009 capability periods, applicable generation owners responsible for providing ICAP were in compliance or non-compliance with C-M2.
- I. **C-M3.** Certification that, during the Summer 2009 capability period, applicable generation owners were in compliance or non-compliance with C-M3.
- J. **C-M4.** Self-Certification, listing references to required NYISO outage data reporting and review procedures that comply with Requirements 1-5 of C-M4. In addition, related to C-M4.5, the NYISO shall provide a report describing its new generating unit outage data screening model, results of the initial application of its new outage data screening process, any planned outage data screening model improvements, and the schedule for a planned NYISO staff meeting that will identify suspect and erroneous outage data; and will recommend proxy data to be submitted to ICS for use in the 2011 IRM Study.
- K. **C-M5.** Certification that ICAP providers submitted outage data to the NYISO as required by NYISO procedures and C-M4. This submission shall include references to any non-compliance notifications to the NYSRC during the Jan. 2009 to May 2010 period.
- L. **C-M6.** A document depicting generating unit outage data statistics as specified by the ICS, in accordance with C-M6 requirements.

- M. **C-M11.** Certification that market participants have provided load flow, short-circuit, and stability data bases to the NYISO in accordance with C-M11.
- N. **C-M12.** Self-Certification, listing references to required NYISO disturbance monitoring procedures and actions that comply with C-M12.
- O. **C-M13.** Certification that market participants have installed disturbance recording devices and reported data in accordance with NYISO procedures as required by C-M13.
- P. **D-M2.** Self-Certification, listing references to required NYISO operating reserve procedures that comply with D-M2.
- Q. **E-M1.** Self-Certification, listing references to required NYISO transmission limit violation procedures that comply with E-M1.
- R. **E-M3.** Self-Certification, listing references to required NYISO transmission outage coordination procedures that comply with E-M3.
- S. **E-M4.** Self-Certification, listing references to required NYISO severe weather operating procedures that comply with E-M4.
- T. **E-M6.** [A] A NYISO report covering a 2010 pre-seasonal assessment evaluating fault duty at each BPS station. [B] If the above report shows fault duty levels exceed equipment ratings, provide mitigation plans jointly approved by the NYISO and equipment owners.
- U. **E-M7.** Certification that applicable equipment owners have evaluated NYISO fault duty assessments in accordance with E-M7.
- V. **E-M9.** Self-Certification, including a summary of the 2010 NYISO exception review in accordance with revised NYSRC Policy 1 and E-M9 requirements (PRR 105). Summarize any approved exception additions, removals, or revisions since January 2010.
- W. **F-M3.** Self-Certification, listing references to required NYISO load shedding procedures that comply with F-M3.
- X. **F-M4.** Certification that transmission owners have reported to the NYISO load shedding documentation in accordance with NYISO procedures and F-M4.
- Y. **F-M6.** A report of the results of statewide voltage reduction tests for the 2010 summer period in accordance with F-M6. The results of these tests shall be available in time for use in the NYSRC 2011 IRM Study. In the event system conditions delay voltage tests, test results may be submitted as late as July 30, 2010.
- Z. **G-M1.** Self-Certification, listing references to required NYISO restoration procedures and actions in compliance with G-M1 requirements. These procedures shall include new or revised procedures that were identified by RCMS in November 2009, required for fully complying with G-M1 requirements. This documentation shall include an updated matrix showing G-M1 requirements and related restoration procedure references.
- AA. **G-M2.** Certification that all TOs have established restoration plans and procedures, and completed actions in compliance with NYISO procedures and G-M2.
- BB. **G-M3.** Certification that blackstart providers have established procedures and completed actions in compliance with NYISO procedures and G-M3 requirements, including annually providing a letter to the NYISO confirming that they have identified and maintained a list of critical components of its facilities.
- CC. **G-M4.** Self-Certification listing references to required restoration training program procedures and completed actions in compliance with G-M4 requirements. These procedures shall include new or revised training procedures that were identified by RCMS in November 2009, required for fully complying with C-M4 requirements. This documentation shall include an updated matrix showing G-M4 requirements and related training procedure references.
- DD. **H-M1.** Submit compliance documentation and data in compliance with H-M1 system protection requirements. Coordinate compliance submission with 2010 NPCC/NERC requirements.

- EE. **H-M2.** Submit compliance documentation and data in compliance with H-M2 requirements. Coordinate compliance submission with 2010 NPCC/NERC requirements.
- FF. **H-M3.** Self-Certification listing references to required system protection maintenance procedures that comply with H-M1.
- GG. **I-M4.**[A] An assessment showing that I-M4 requirements have been met for transmission planning, including application examples. [B] An assessment showing that I-M4 requirements have been met for developing operating limits, including examples. These assessments shall be included in the 2009 NYCA Transmission Assessment required by K-M2a. (see Note LL)
- HH. **I-M5.** Certification that Con Edison maintains required procedures and has properly notified the NYISO when actions have been taken in accordance with I-R1, I-R3, and I-R4 requirements. The NYISO shall also provide illustrations of the types of Con Edison actions taken that were reported in these notifications.
- II. **I-M6.** Certification that LIPA maintains required procedures and has properly notified the NYISO when actions have been taken in accordance with I-R5 requirements. The NYISO shall also provide illustrations of the types of LIPA actions taken that were reported in these notifications.
- JJ. **J-M1.** Self-Certification listing references to required communications procedures and documentation for complying with Rules J-R1 & J-R2 requirements.
- KK. **J-M2.** A presentation describing the NYISO communications process; and report required by J-M2, which summarizes the performance data of control center communications interfaces, shall be provided to RCMS.
- LL. **K-M2a.** NYCA 2009 Transmission Assessment Report, including (1) (N-1) -1 assessments; (2) identification of the impacts of the planned transmission system on the NYCA System Restoration Plan (B-M3); (3) an assessment showing that local rules have been considered (I-M4); (4) an extreme contingency assessment for the loss of gas delivery system (K-M3); and (5) an extreme contingency condition assessment assuming generating unit loss of gas supply (K-M3). Submission of the assessment report to the NYSRC should be coordinated with its submission to NPCC. (An RCMS action item will be added that will request NYISO staff to periodically provide status reports on its preparation of the 2010 Transmission Assessment, which is tentatively scheduled to be submitted to RCMS in early 2011.)
- MM. **K-M2b.** NYCA Resource Adequacy Report for the 2010-2012 period.
- NN. **K-M3.** A report on simulation testing to assess the impact of Extreme System Contingency Conditions on the NYS BPS in accordance with K-M3. The report shall cover studies of those Extreme Contingency Events required by NPCC, including an event resulting the loss of gas supply to multiple NYCA generating units. The latter study shall recognize current environmental initiatives. This assessment shall be included in the 2009 NYCA Transmission Assessment required by K-M2a. (see Note LL.)
2. Levels of Non-Compliance
 NC1 – Non-Compliance Level 1
 NC2 – Non-Compliance Level 2
 NC3 – Non-Compliance Level 3
 NC4 – Non-Compliance Level 4
3. Applies to the November and December 2010 Operations Report. All previous monthly reports were in Full Compliance.
4. The final NYISO 2010 LCR report was provided at the RCMS122 meeting. This submission to RCMS was delayed due to the need for the NYISO to revise the LCR study. Compliance action was postponed to RCMS123 to allow RCMS adequate time to review the report.

5. Compliance review of the 2009 Transmission Assessment and related measurements was completed at a conference call with NYISO staff on 3/25/10 following the 3/8/10 meeting.
6. The C-M4 compliance documentation submitted on 6/3/10 did not include a required report describing the status of the initial application of the NYISO GADS data screening model (see NYISO Compliance Documentation Requirements for C-M4 described on page 4). On 6/15/10, a RCMS conference call was held to further discuss this requirement. During the conference call Mr. Kiernan agreed to send the required screening model report to RCMS by 6/18/10. The report was received by RCMS at its July 8 meeting and changes requested. The NYISO provided the final report to RCMS on 7/29/10, and accepted by RCMS on 8/12/10.
7. Required load shedding documentation was not received from the TOs because the NYISO failed to request these requirements in time to meet the required July 1 compliance certification. Therefore, RCMS found the NYISO and TOs in Non-Compliance Level 1 pending receipt of the required F-M4 documentation within 30 days, in accordance with the NYSRC lateness policy for overdue compliance reports. The required documentation was received by RCMS within the 30-day grace period, and as a result, RCMS withdrew the non-compliance finding on 8/12/10.
8. Because of system conditions, voltage reduction tests were delayed. The NYISO provided the results of these tests to RCMS prior the August 12 RCMS meeting.
9. On 10/14/10 a 30-day extension for revision of an E-M6 self-certification and possible updating of the 2010 NYISO Fault Current Assessment report was granted. The required documentation was received on 10/18/10.
10. This compliance documentation due date reflects a 20-day extension granted by RCMS to allow time for the NYISO and MPs to conform to a recent revision of the Emergency Restoration Manual.
11. G-M3 compliance documentation was not received on 12/2/10 when required. NYISO staff indicated that the delay was caused by an on-going NYISO review of possible non-compliance with G-M3 by a Blackstart Provider. On 12/9/10, RCMS received a non-compliance letter to a blackstart provider prepared by the NYISO along with a NYISO Certification in which the NYISO certified that it was in Non-Compliance Level 1: “The NYISO certifies that one Blackstart Provider did not provide a letter to the NYISO satisfying required testing of critical facility components, in accordance with NYISO or transmission owner procedures.” RCMS prepared a report to the EC on 1/6/11 recommending that the NYSRC not issue a non-compliance letter to the NYISO in accordance with Policy 4 requirements. On 1/7/11 the EC approved RCMS’ recommendation.

2010 “As Required” NYISO Compliance Reports

Measurement	Reported Event	RCMS Review Date	NYISO Compliance Level
J-M3	LIPA EMS outage – 6/1/10	6/10/10	FC
J-M3	CHGE inoperable PCC – 8/16/10	9/9/10	FC