

NEW YORK STATE RELIABILITY COUNCIL

2012 Reliability Compliance Program Highlights

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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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 2012 NYSRC Reliability Compliance Program, the major process used by the NYSRC to monitor NYISO compliance with the Reliability Rules. In addition, this report covers two Self-Reports submitted by the NYISO and a RCMS evaluation of the NYISO Black Start Program.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-6, *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 2012 (Version 24), reflecting adoption of two new measurements and related compliance elements. See the CT Manual at: <http://www.nysrc.org/NYSRCReliabilityRulesComplianceMonitoring.asp>.

2012 NYSRC Reliability Compliance Program

By the end of 2012 the NYSRC maintained a total of 60 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.

As shown in Table 1, the 2012 Reliability Compliance Program included 19 NYSRC measurements having NYISO reporting responsibility and 13 measurements having Market Participant reporting responsibility. This number of measurements for which NYISO and Market Participant compliance was assessed represents over 50% of total NYSRC measurements. Appendices A and B are summaries of the NYSRC 2012 Reliability Compliance Program that depicts the measurements that were assessed, compliance documentation requirements, milestone dates, and compliance findings.

Table 1 – NYSRC 2012 Reliability Compliance Program Summary

	Measurements Requiring Actions by the NYISO	Measurements Requiring Actions by Market Participants	Total Measurements
Total NYSRC Measurements	47	13	60
Measurements included in 2012 NYSRC Compliance Program	19	13	32
2012 Program Measurements – NYISO in Full Compliance	19	13	32
2012 Program Measurements – NYISO in Non-Compliance	0	0	0

Table 1 shows that the NYISO was in full compliance with all measurements that were reviewed by RCMS in the 2012 Reliability Compliance Program. The NYISO found one market participant in non-compliance with one of these measurements, G-M3, Black Start Provider Requirements. This finding is discussed under NYISO Self-Reports.

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 a similar transmission review submission that is 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), two NYISO transmission reviews were submitted to RCMS in 2012, a 2011 review and a 2012 review.

The reliability assessments performed the more recent NYISO transmission review, the *2012 Interim Area Transmission Review*, reflected changes in NYCA system load forecasts and

planned facilities. The study concluded that the NYS Bulk Power Transmission System, as planned through the year 2017, is compliant with NYSRC Reliability Rules, NPCC Criteria, and NERC Standards, with the exception of thermal violations that were identified in four areas on the system. Certain facilities in these areas were found to be overloaded due to the N-1-1 loss of multiple sources (generators or transformers). The 2013 NYISO Area Transmission Review will evaluate the areas of the system impacted by these violations, and will identify upgrades that are necessary to meet Reliability Rule performance requirements. RCMS will closely monitor this NYISO analysis as part of the 2013 Reliability Compliance Program.

In addition to the above assessments, NYSRC rules require: (1) an assessment to ensure that the planned system is compatible with the NYCA System Restoration Plan (Measurement B-M3); (2) an assessment showing that the planned system is compatible with NYSRC local reliability rules (Measurement I-M4); and (3) an evaluation of an extreme system condition that assumes the loss of a major gas supply (Measurement K-M3). NYISO studies for these assessments concluded that the planned 2017 transmission system is compliant with all three of these NYSRC requirements.

RCMS accepted both NYISO transmission assessments submitted in 2012, and concluded that the NYISO was in full compliance with transmission assessment requirements covered by Measurement K-M2a.

To demonstrate compliance with NYSRC resource adequacy assessment requirements in Measurement K-M2b, the NYISO prepared the report, *Annual Assessment of Resource Adequacy covering the NYCA for the 2012-2014 Period*. Under all but one of the scenarios studied by the NYISO, a projected 16.0% statewide reserve margin would be met throughout the study period. Under a scenario where both Special Case Resources (SRCs) and net purchases are removed, a reserve margin of 16.0% could not be met. However, since the SCR program and purchases are forecast to remain constant for 2013 and 2014, this scenario is extremely remote. RCMS accepted the report and concluded that the NYISO was in full compliance with NYSRC resource adequacy assessment rule requirements.

NYISO Compliance Documentation Submissions

Required NYISO compliance documentation for two 2012 Reliability Compliance Program compliance reviews were received late or incomplete. NYSRC compliance documentation lateness policy allows a 30-day grace period before non-compliance is found – acceptable compliance documentation was received from the NYISO for both assessments within the grace period.

2012 NYISO Self-Reports

Measurement G-M3, Black Start Provider Requirements – Non-Compliance Finding

In May 2012, the NYSRC received a Certification from the NYISO stating that one black start provider was found to be non-compliant with Measurement G-M3 for failing to perform black start tests for the 2012/2013 Capability Year for one of its facilities. This was the third year in a row that this same black start provider failed to successfully conduct required black start tests for this unit. The NYSRC concluded that the NYISO had taken all reasonable action to secure black start provider compliance with Measurement G-M3, and therefore, in accordance with Policy 4 procedures, the Executive Committee exercised its discretion to waive the NYISO's non-compliance.

Disruption of NYISO ICCP Data Communications

Measurement J-M3 requires the NYISO to submit a report to the NYSRC summarizing any loss of critical voice/and or data systems. Such a report was received for an event on March 20, 2012 that led to a disruption of NYISO ICCP data communications which impacted real-time data collection with several TOs. The report described the event, its cause, corrective actions, and implementation schedule. The cause of the communication disruption was determined to be a software problem for which the software had since been replaced. RCMS concluded that the report fully complied with J-M3 reporting requirements.

Evaluation of the NYCA Black Start Program

During late 2011, TC Ravenswood, a Con Edison black start provider, informed the NYISO that it wished to cease providing black start service for some of its units. As result, RCMS raised concerns as to what the reliability impacts would be if Ravenswood were to be unavailable for black start service, i.e., what would be the effect on the ability of the NYISO and Con Edison to restore the NYCA system in a safe, orderly, and prompt manner in accordance with NYSRC Reliability Rules? To respond to this concern, RCMS conducted an evaluation to: (1) determine how the withdrawal of existing black start units from the NYCA SRP Black Start Program will affect the NYCA System Restoration Plan, and (2) provide the Executive Committee with recommendations for maintaining system reliability in the NYC area. The first phase of the RCMS black start evaluation was participation of NYISO and Con Edison in a forum in January 2012 that responded to a series of RCMS questions on the NYCA Black Start Program.

A major finding of the RCMS evaluation was that if the largest Ravenswood facility were to no longer participate in the NYISO Black Start Program – following a blackout – restoration time to a significant portion of load in New York City could increase by up to five hours. RCMS considered this outcome to have a serious adverse impact on the NYCA SRP and would be

unacceptable. The RCMS report, *Evaluation of the NYCA Black Start Program*, contained several recommendations that were implemented by the Executive Committee, including a filing to FERC providing NYSRC's concern about the reliability impact of withdrawal of Ravenswood from the Black Start Program, and development of rules for providing a more effective System Restoration Plan. The RCMS report was included in the FERC filing.

2012 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 2012, as a part of the NERC/NPCC Standards Compliance Program, NPCC reviewed NYISO compliance relative to 41 NERC standards and 210 related requirements, as well as four NPCC standards. NPCC found that the NYISO was in full compliance with these standards and requirements.

Conclusions

The following conclusions were reached by RCMS with regard to the NYSRC 2012 Reliability Compliance Program:

1. As in past years, the NYISO staff – especially Jim Grant – provided valued assistance during the RCMS compliance review process.
2. The NYISO was found to be in full compliance with all 32 NYSRC measurements that were assessed by RCMS in the 2012 NYSRC Reliability Compliance Program. A Black Start Provider was found by the NYISO in non-compliance with one measurement, G-M3. In addition, NPCC found the NYISO in full compliance with all NERC and NPCC standards and requirements that were assessed during 2012.
3. RCMS initiated an investigation in 2012 to ascertain how withdrawal of black start units from the NYCA Black Start Program will impact system reliability and promptness of system restoration. This investigation led to preparation of the report, *Evaluation of the NYCA Black Start Program*, which was submitted to FERC as part of a NYSRC filing.
4. NYISO compliance documentation for two 2012 Reliability Compliance Program compliance reviews were received late or incomplete. No non-compliance findings were

established because the required documentation was received within a 30-day grace period allowed by NYSRC policy. Although this is an improvement over previous years, the NYSRC continues to encourage the NYISO to make an effort to meet all future compliance documentation due dates.

APPENDIX A – NEW YORK STATE RELIABILITY COUNCIL 2012 RELIABILITY COMPLIANCE PROGRAM

MEASURE- MENT	RELATED RULE(S)	MEASUREMENT DESCRIPTION	COMPLIANCE DOCUMENTA- TION DUE 1	DATE RECV'D	DATE OF RCMS REVIEW	NYISO COMPL. LEVEL 2
Resource Adequacy						
A-M2	A-R2,3	Establishing LSE ICAP & LCR requirements	4/26/12	4/27/12	5/3/12	FC 6
A-M3	A-R2,3	Certifying LSE ICAP obligations are met*	10/25/12	10/29/12	11/29/12	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	1/26/12	2/1/12	2/2/12 4	FC
B-M2	B-R4	Extreme contingency assessment for the planned NYCA system	1/26/12	2/1/12	2/2/12 4	FC
B-M3	B-R5	Demonstration that system is planned considering ease of restoration	1/26/12	2/1/12	2/2/12 4	FC
B-M4	B-R6	List of NYS Bulk Power System Facilities	6/28/12	6/22/12	6/28/12 9	FC
Resource, System & Demand Data Requirements						
C-M2	C-R1	Reporting resource DMNC test results to the NYISO*	3/29/12	3/30/12	4/5/12	FC
C-M3	C-R1	Reporting generator reactive power capacity test results to the NYISO*	3/29/12	3/30/12	4/5/12	FC
C-M5	C-R2	Reporting generating unit outage data to the NYISO*	8/30/12	8/30/12	9/6/12	FC
C-M11	C-R4	Reporting load flow, short-circuit and stability data to the NYISO*	8/30/12	8/30/12	9/6/12	FC
C-M13	C-R5	Certification that disturbance recording devices have been installed and data reported as required*	9/27/12	9/27/12	10/4/12	FC
C-M14	C-R2	Procedures for reporting SCR performance data to the NYISO and calculating SCR performance	8/30/12 3	8/30/12	10/4/12 11	11
C-M15	C-R2	Reporting SCR performance data to the NYISO*	11/23/12 3	11/20/12	11/29/12	FC
Transmission Capability – Operating						
E-M1	E-R1, E-R2 and E-R3	System operated in accordance with thermal, voltage and thermal limits	4/26/12	4/27/12	5/3/12	FC

MEASUREMENT	RELATED RULE(S)	MEASUREMENT DESCRIPTION	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECV'D	DATE OF RCMS REVIEW	COMP. LEVEL ²
E-M6	E-R8	Pre-seasonal fault duty assessments	5/24/12	5/24/12	5/31/12	FC
E-M7	E-R8	MP evaluation of NYISO fault duty assessments*	9/27/12	9/27/12	10/4/12	FC
E-M8	E-R9	Applications of the NYSRC Reliability Rules	4/26/12	4/27/12 5/24/12	5/3/12 ⁷ 5/31/12 ⁷	FC ⁷
Operation During Major Emergencies						
F-M1	F-R1 to F-R7	Maintaining procedures for frequency, reserve, and transfer limit violations	5/24/12	5/24/12	5/31/12	FC
F-M4	F-R8	TO load shedding capability*	7/26/12	8/1/12	8/2/12	FC
F-M6	F-R5	Voltage reduction testing	7/26/12	7/26/12	8/2/12	FC
System Restoration						
G-M1	G-R1	NYISO procedures for maintaining a NYCA System Restoration Plan	10/25/12	10/29/12	11/29/12	FC
G-M2	G-R1	Transmission Owner System Restoration Plan requirements*	10/25/12	10/29/12	11/29/12	FC
G-M3	G-R1	Black Start Provider requirements*	10/25/12	10/29/12	11/29/12	FC ¹⁰
Local Reliability Rules						
I-M4	I-R1 to I-R5	Consideration of local rules in transmission planning and determination of operating limits	1/26/12	2/1/12	2/2/11 ⁴	FC
I-M5	I-R1, I-R3, I-R4	Con Ed Local Rule I-R1, R2 and R4 procedures*	11/23/12	11/20/12	11/29/12	FC
I-M6	I-R5	LIPA Local Rule I-R5 procedures*	11/23/12	11/20/12	11/29/12	FC
Reliability Assessment						
K-M1	K-R1	Compliance of NYISO manual procedures with the NYSRC Reliability Rules	8/30/12	8/30/12	8/30/12	FC
K-M2a	K-R2	2011 NYCA transmission review	1/26/12	2/1/12	2/2/12 ⁴	FC
K-M2a	K-R2	2012 NYCA transmission review	¹²	8/30/12	9/6/12	FC
K-M2b	K-R2	2012 NYCA resource adequacy assessment	5/24/12	6/22/12 ⁸	6/28/12 ⁸	FC
K-M2d	K-R2	Monthly operations reports	Monthly	12/7/12 ⁵	1/4/13 ⁵	FC ⁵
K-M3	K-R3	Extreme system condition assessment	1/26/12	2/1/12	2/2/12 ⁴	FC

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

Footnotes

- 1 Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in Appendix B.
- 2 NYISO Compliance Levels
FC – Full Compliance
NC1 – Non-Compliance Level 1
NC2 – Non-Compliance Level 2
NC3 – Non-Compliance Level 3
NC4 – Non-Compliance Level 4
- 3 These dates reflect EC approval of PRR 109 (C-M14 & C-M15) on June 8 and its implementation plan.
- 4 On 2/2/12, RCMS found that this measurement is in Full Compliance pending receipt of a revision of the 2011 NYCA Transmission Review report. A revised report was received on 2/3/12 in accordance with RCMS comments, and accepted by RCMS on 3/1/12.
- 5 These dates and compliance finding are applicable to the November 2012 Operations Report. All previous 2012 monthly operations reports were found in Full Compliance.
- 6 The A-M2 submission was found in Full Compliance with the proviso that a NYISO procedure for calculating locational capacity requirements would be approved by ICS and published in the NYISO ICAP Manual, NYSRC Policy 5, or other publication approved by ICS.
- 7 RCMS found parts of the NYISO compliance submission for E-M8 (Applications of the NYSRC Reliability Rules) to be outdated and in error. In accordance with the NYSRC policy on lateness, the NYISO was granted 30 days, to June 2, 2012, to submit corrected and compliant documentation to avoid a non-compliance finding. The corrected compliance submission was received on 5/24/12, within the 30 day grace period, and was found in Full Compliance.
- 8 The NYCA Resource Adequacy Report (K-M2b), due on 5/24/12, was not provided for 5/31/12 meeting review. In accordance with the NYSRC policy on lateness, the NYISO was granted 30 days, to June 30, 2012, to submit required documentation in order to avoid a non-compliance finding. The report was received on 6/22/12.
- 9 B-M4 requires that the NYISO submit a NYCA BPS facilities list to the NYSRC for review and publication of this list. Because of CEII, the list could only be shown at the RCMS meeting, but could not be retained by RCMS members. Also, the BPS list cannot be published in documents available to the public. There is an RCMS action item to consider these issues in a rule revision, and discuss with NYSRC counsel.
- 10 On May 31, 2012, RCMS received a redacted copy of a non-compliance letter from the NYISO to a black start provider for failing to perform required tests for the 2012-13 Capability Year. On July 13, based on RCMS recommendations, the Executive Committee waived NYISO non-compliance.

- 11 The PRR 109 implementation plan does not require a compliance finding in 2012. The documentation provided by the NYISO was forwarded to ICS for review on 10/3/12, which confirmed that NYISO SCR procedures are consistent with PRR 109's C-M14 requirements. RCMS reviewed and agreed with ICS' findings on October 4.
- 12 The 2012 NYCA Transmission Review was added to the 2012 Compliance Program.

2012 "As Required" NYISO Compliance Reports

Measurement	Reported Event	Date NYISO Event Report was Received	RCMS Review Date(s)	Comments	NYISO Compl. Level
J-M3	Disruption of NYISO ICCP data communications which impacted real-time data collection with several TOs.	3/20/12	4/5/12 & 5/3/12	RCMS accepted a NYISO J-M3 report which described the event, its cause, corrective actions, and implementation schedule. The NYISO later provided supplemental information at RCMS' request.	FC

APPENDIX B: 2012 RELIABILITY COMPLIANCE PROGRAM – COMPLIANCE DOCUMENTATION REQUIREMENTS

Meas.	Type of Reporting ^(a)	Compliance Period	Document Description or Supplemental Documentation
A-M2	Complete Documentation		Submit a NYISO Locational Capacity Requirement Report covering the 2012-13 Capability Year. In addition, the NYISO shall provide, as required by A-M2: (1) the allowable amount of LSE ICAP requirements that may be located externally to the NYCA, and how this was calculated; and (2) Sections or references to sections in the ICAP Manual that describe NYISO procedures for establishing locational capacity requirements. An appropriate NYISO staff person should be available at the RCMS meeting to discuss this information and answer questions.
A-M3	Certification	Nov 2011-Oct 2012	
B-M1	Complete Documentation		Provide 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 criteria described in NYSRC Rules B-R1 to B-R3, and B-R7. These evaluations shall be included in the 2011 Transmission Assessment required by K-M2a and prepared in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see NYSRC Reliability Rules Manual, Section VII).
B-M2	Complete Documentation		Provide 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 with the 2011 Transmission Assessment required by K-M2a, and prepared in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see NYSRC Reliability Rules Manual, Section VII).
B-M3	Complete Documentation		Provide either required procedures, or reference to the required procedures, for assessing the impact of the system expansion plan on the NYCA Restoration Plan. The assessment required by B-M3 shall be included with the 2011 Transmission Assessment required by K-M2a, and prepared in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see NYSRC Reliability Rules Manual, Section VII).
B-M4	Complete Documentation		Compliance documentation shall include: (1) a NYISO procedure for developing the list of NYS Bulk Power System facilities, and how the proposed BES definition will impact the procedure; (2) a BPS Facilities List; and (3) location of where the BPS Facilities List is published.
C-M2	Certification	Winter 2010-11, Summer 2011	
C-M3	Certification	Summer 2011	
C-M5	Certification	Jan-Dec 2011	
C-M11	Certification	2011-12 Capability Year	

Meas.	Type of Reporting (a)	Compliance Period	Document Description or Supplemental Documentation
C-M13	Certification	Jan-Dec 2011	
C-M14	Complete Documentation		This is a will be a new measurement (PRR 109). In accordance with the PRR 109 implementation plan, the NYISO will be required to submit instructions and procedures for submission of SCR performance data by Responsible Interface Parties, and a statement that the NYISO has begun to collect and process this data for the 2012-13 Capability Year. An appropriate NYISO staff person should be available to discuss this information and answer questions. There will be no compliance finding.
C-M15	Certification	2012-13 Capability Year	Because this will be a new measurement requiring submission of SCR data (PRR 109), there will be no compliance finding. The NYISO shall comment on any issues encountered thus far during the data submission process.
E-M1	Self-Certification		
E-M6	Complete Documentation		Submit a report covering an evaluation of the fault duty at each BPS station for the 2012-13 Capability Year. If the report shows fault duty levels exceed equipment ratings, provide mitigation plans jointly approved by the NYISO and equipment owners.
E-M7	Certification		This certification applies to the 2012-13 Capability Year fault duty evaluation required by E-M6.
E-M8	Complete Documentation		Submit an up-to-date "Applications of the Reliability Rules" document, noting any changes over the past three years. The NYISO shall also submit its procedure for preparing and updating the Applications, including transmission owner responsibilities.
F-M1	Self-Certification		
F-M4	Certification		The certification shall cover transmission owner load shedding capabilities for the 2012-13 Capability Year.
F-M6	Complete Documentation		Submit a report on the results of statewide voltage reduction tests for the 2012 summer period in accordance with F-M6 requirements.
G-M1	Self-Certification		Additional documentation may be required if G-M1 changes in 2012.
G-M2	Certification	2011-12 Capability Year	
G-M3	Certification	2011-12 Capability Year	Additional documentation may be required if G-M3 changes in 2012.
I-M4	Complete Documentation		Submit: (1) An assessment showing that I-M4 requirements have been met for transmission planning, including application examples; and (2) An assessment showing that I-M4 requirements have been met for developing operating limits, including examples. These assessments shall be included with the 2011 NYCA Transmission Assessment required by K-M2a, and prepared in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see Reliability Rules Manual, Section VII).

Meas.	Type of Reporting ^(a)	Compliance Period	Document Description or Supplemental Documentation
I-M5	Certification	2011-12 Capability Year	In addition, provide illustrations of the types of Con Edison actions taken that were reported in these notifications.
I-M6	Certification	2011-12 Capability Year	In addition, provide illustrations of the types of LIPA actions taken that were reported in these notifications.
K-M1	Self-Certification		
K-M2a	Complete Documentation		Prepare a NYCA 2011 Transmission Assessment report in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see Reliability Rules Manual, Section VII). Submission of the assessment report to the NYSRC should be coordinated with its submission to NPCC. An appropriate NYISO staff person should be available to discuss this report and answer questions.
K-M2b	Complete Documentation		Submit a NYCA Resource Adequacy report covering the 2012-2014 period. An appropriate NYISO staff person should be available to discuss this report and answer questions.
K-M2d	Complete Documentation	Monthly	Submit monthly operations reports that provide data on the performance of the NYCA system for that month. Data to be included in this report shall be in accordance with Measurement K-M2d requirements.
K-M3	Complete Documentation		Prepare an analysis of simulation testing to assess the impact of Extreme System Contingency Conditions on the NYS BPS. This analysis shall be included with the 2011 Transmission Assessment required by K-M2a and prepared in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see Reliability Rules Manual, Section VII).

(a) Types of compliance reporting are described in NYSRC Policy 4-5, Section 4.