

**NEW YORK STATE  
RELIABILITY  
COUNCIL**

*2013 Reliability  
Compliance Program  
Highlights*

*Prepared by the  
Reliability Compliance  
Monitoring Subcommittee*

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# **NYSRC 2013 Reliability Compliance Program Highlights**

## **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 2013 Reliability Compliance Program, the major process used by the NYSRC to monitor NYISO compliance with the Reliability Rules. In addition, this report covers a Self-Report submitted by the NYISO.

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 2013 (Version 25), reflecting adoption of two new measurements and related compliance elements. See the CT Manual at: <http://www.nysrc.org/NYSRCReliabilityRulesComplianceMonitoring.asp>.

## **2013 Reliability Compliance Program**

By the end of 2013 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 during February.

As shown in Table 1, the 2013 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. The Appendix A is a summary of the 2013 Reliability Compliance Program that depicts the measurements that were assessed, milestone dates, and compliance findings. Appendix B depicts compliance documentation requirements.

**Table 1 – NYSRC 2013 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 2013 NYSRC Compliance Program	19	13	32
2013 Program Measurements – NYISO in Full Compliance	19	13	32
2013 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 2013 Reliability Compliance Program.

**Black Start Generator Requirements Compliance Review**

A major modification of a NYSRC system restoration reliability rule related to black start testing requirements was adopted in January 2013. The revised rule requires comprehensive black start testing every three years for steam units, which was a relaxation of a previous rule which required comprehensive testing every year for all units. This change was recommended by the NYISO which concluded after an extensive review that the new testing requirements would permit the reduction of start-up cycles of critical equipment and thereby improve the likelihood of higher long term steam unit availability without impacting black start performance. The NYSRC adopted this steam unit testing change after conducting a thorough review of the NYISO proposal. RCMS closely monitored the NYISO black start testing program in 2013 to assure testing procedures were prepared in accordance with the revised rule and testing was

performed consistent with the new NYISO black start procedures. All black start generators were found in full compliance with NYSRC testing requirements in 2013.

#### 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. During 2013, no NYCA transmission reviews were submitted by the NYISO. Two reviews were submitted and reviewed during 2012 – a 2011 and a 2012 transmission review – a 2013 transmission review is expected to be submitted in early 2014.

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 2013-2015 Period*. The assessment concluded that for the NYCA base case peak load forecast, a 17.0% IRM requirement would be met throughout the study period when all planned resources are available. If SCRs were not available, the IRM requirement would not be met in 2015. The assessment also concluded that the New York City and Long Island locational capacity requirements would be met throughout the study period.

#### NYISO Compliance Documentation Submissions

An RCMS compliance review of one NYISO compliance documentation submission found the initial compliance submission to be 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 in this case within the grace period.

### **NYISO Self-Report**

#### 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 November 17, 2013 in which the NYISO experienced a disruption of Inter-Control Center Communications Protocol (ICCP) that impacted real-time data collection with the TOs and external Reliability Coordinators for 38 minutes. Changes were implemented and a vendor consulted to correct problem causing the disruption.

## **NERC and NPCC 2013 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 2013, as a part of the NERC/NPCC Standards Compliance Program, NPCC reviewed NYISO compliance relative to 29 NERC standards and 195 related requirements, as well as five NPCC standards. NPCC found the NYIS 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. The NYISO Staff continued to provide valued assistance during the RCMS reliability 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 2013 NYSRC Reliability Compliance Program. In addition, NPCC found the NYISO in full compliance with all NERC and NPCC standards and requirements that were assessed during 2013.
3. NYISO compliance documentation for only one 2013 Reliability Compliance Program compliance review was found by RCMS to be incomplete when initially received. Non-compliance was not found because corrected and complete documentation was received within a 30-day grace period allowed by NYSRC policy. This represents an improvement over previous years: in 2009 there four instances of late or incomplete compliance submissions, declining to two or three during 2010 to 2012. The NYSRC continues to encourage the NYISO to continue its effort to submit required documentation in time.

**APPENDIX A**  
**NEW YORK STATE RELIABILITY COUNCIL 2013 RELIABILITY COMPLIANCE PROGRAM**

MEASURE- MENT	RELATED RULE(S)	MEASUREMENT DESCRIPTION	COMPLIANCE DOCUMENTA- TION DUE <sub>1</sub>	DATE RECV'D	DATE OF RCMS REVIEW	NYISO COMPL. Level <sub>2</sub>
<b>Resource Adequacy</b>						
A-M2	A-R2,3	Establishing Locational Capacity Requirements	3/28/13	3/28/13	4/4/13	FC
A-M3	A-R2,3	Certifying LSE ICAP obligations are met*	10/24/13	10/25/13	10/31/13	FC
<b>Transmission Capability -- Planning</b>						
B-M1	B-R1, B-R2, B-R3, and B-R7	Thermal, voltage, stability, and fault duty assessments for the planned NYCA system	3			
B-M2	B-R4	Extreme contingency assessment for the planned NYCA system	3			
B-M3	B-R5	Demonstration that the system is planned considering ease of restoration	3			
B-M4	B-R6	List of NYS Bulk Power System facilities	6/20/13	6/21/13	6/27/12 8/1/13	FC
<b>Resource, System &amp; Demand Data Requirements</b>						
C-M2	C-R1	Reporting resource DMNC test results to the NYISO*	3/28/13	3/28/13	4/4/13	FC
C-M3	C-R1	Reporting generator reactive power capacity test results to the NYISO*	3/28/13	3/28/13	4/4/13	FC
C-M4	C-R2	Requirements for reporting & reviewing generating unit outage data	8/29/13	8/29/13	9/5/13	FC
C-M5	C-R2	Reporting generating unit outage data to the NYISO*	8/29/13	8/29/13	9/5/13	FC
C-M6	C-R2	Generating unit outage statistics	5/30/13	6/3/13	6/6/13	FC
C-M11	C-R4	Reporting load flow, short-circuit and stability data to the NYISO*	8/29/13	8/29/13	9/5/13	FC
C-M12	C-R5	Disturbance recording device installation and data reporting requirements	4/25/13	4/25/13	5/2/13	FC
C-M13	C-R5	Certification that disturbance recording devices have been installed and data reported*	9/26/13	9/26/13	10/3/13	FC
C-M14	C-R2	Reporting requirements for SCR performance data and calculation of SCR performance	9/26/13	9/26/13	10/3/13	FC

MEASURE-MENT	RELATED RULE(S)	MEASUREMENT DESCRIPTION	COMPLIANCE DOCUMENTATION DUE <sup>1</sup>	DATE RECV'D	DATE OF RCMS REVIEW	NYISO COMPL. Level <sup>2</sup>
C-M15	C-R2	Reporting SCR performance data to the NYISO*	9/26/13	9/26/13	10/3/13	FC
<b>Operating Reserves</b>						
D-M2	D-R1 to R4	Ensuring adequacy of operating reserves	2/21/13	2/21/13	2/28/13	FC
<b>Transmission Capability – Operating</b>						
E-M6	E-R8	Pre-seasonal fault duty assessment	5/30/13	6/3/13	6/6/13 <sup>7</sup>	FC
E-M7	E-R8	MP evaluation of NYISO fault duty assessments*	9/26/13	9/26/13	10/3/13	FC
<b>Operation During Major Emergencies</b>						
F-M3	F-R8	Ensuring sufficient load shedding capability	4/25/13	4/25/13	5/2/13	FC
F-M4	F-R8	TO load shedding capability*	7/25/13	7/24/13	8/1/13	FC
F-M6	F-R5	Voltage reduction testing	7/25/13	7/24/13	8/1/13	FC
<b>System Restoration</b>						
G-M1	G-R1	NYISO requirements for maintaining the NYCA System Restoration Plan	4/25/13 <sup>4</sup>	4/25/13 5/17/13 <sup>6</sup>	5/2/13 <sup>6</sup> 6/6/13 <sup>6</sup>	FC
G-M2	G-R1	Transmission Owner System Restoration Plan requirements*	10/24/13	10/25/13	10/31/13	FC
G-M3	G-R1	Black Start Provider requirements*	10/24/13	10/25/13	10/31/13	FC
G-M4	G-R2	NYISO system restoration training requirements	10/24/13	10/25/13	10/31/13	FC
<b>System Protection</b>						
H-M1	H-R1	System protection criteria compliance documentation	7/25/13	7/24/13	8/1/13	FC
H-M2	H-R2	Maintenance criteria for BPS protection compliance documentation	7/25/13	7/24/13	8/1/13	FC
H-M3	H-R2	Procedure for monitoring compliance with maintenance criteria for BPS protection requirements	7/25/13	7/24/13	8/1/13	FC
<b>Local Reliability Rules</b>						
I-M4	I-R1 to I-R5	Consideration of local rules for transmission planning and establishing operating limits	<sup>3</sup>			
I-M5	I-R1, I-R3, I-R4	Con Ed procedures for operating its system per Local Rule I-R1, R2 and R4 requirements*	11/27/13	11/26/13	12/3/13	FC

MEASURE- MENT	RELATED RULE(S)	MEASUREMENT DESCRIPTION	COMPLIANCE DOCUMENTA- TION DUE <sup>1</sup>	DATE RECV'D	DATE OF RCMS REVIEW	NYISO COMPL. Level <sup>2</sup>
I-M6	I-R5	LIPA procedures for operating its system per Local Rule I-R5 requirements*	11/27/13	11/26/13	12/3/13	FC
<b>NYISO Control Center Communications</b>						
J-M1	J-R1, J-R2	NYISO/MP communications requirements	8/29/13	8/29/13	9/5/13	FC
J-M2	J-R2	Performance data for control center communications interfaces	8/29/13	8/29/13	9/5/13	FC
<b>Reliability Assessment</b>						
K-M2a	K-R2	2013 NYCA transmission review <sup>3</sup>	<sup>3</sup>			
K-M2b	K-R2	2013 NYCA resource adequacy assessment	5/30/13	6/3/13	6/6/13 <sup>7</sup>	FC
K-M2d	K-R2	Monthly operations reports	Monthly	1/8/14 <sup>5</sup>	1/30/14 <sup>5</sup>	FC <sup>5</sup>
K-M3	K-R3	Extreme system condition assessment	<sup>3</sup>			

\*Applicable to Market Participants, NYISO compliance certification required.

#### Footnotes

- Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in the Appendix.
- 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
- The 2013 NYCA Transmission Review, of which this measurement is a related, is expected to be completed by the NYISO in early 2014.
- This due date is in accordance with PRR 114 Implementation Plan.
- This date and compliance finding is applicable to the December 2013 Operations Report. All previous 2013 reports were found in full compliance.



6. G-M1 compliance documentation, received on 4/25/13, was in error and incomplete. Revised documentation, received on 5/1/13 and reviewed by RCMS on 5/2/13, was also found in error and incomplete. In accordance with the NYSRC policy on lateness, the NYISO was granted 30 days, to 6/1/13, to submit corrected and compliant documentation to avoid a non-compliance finding. Revised documentation was received on 5/17/13 which was found to be fully compliant on 6/6/13.
7. Although compliance documentation for this measurement was found in full compliance, supplemental information from the NYISO was requested and then received at the June 27 RCMS meeting.

**2013 “As Required” NYISO Compliance Reports**

<b>Measurement</b>	<b>Reported Event</b>	<b>Date NYISO Event Report was Received</b>	<b>RCMS Review Date(s)</b>	<b>Comments</b>	<b>NYISO Compl. Level</b>
J-M3	Disruption of NYISO ICCP data communications which impacted real-time data collection with several TOs.	12/6/13	12/3/13, 1/7/14	At the 12/3/13 RCMS meeting, NYISO staff reported on an ICCP event experienced on 11/17/13. After the meeting, the NYISO submitted a report in accordance with J-M3, which described the event, its cause, corrective actions, and implementation schedule. Compliance was reviewed by RCMS on 1/7/14.	FC

## APPENDIX B -- 2013 RELIABILITY COMPLIANCE PROGRAM COMPLIANCE DOCUMENTATION REQUIREMENTS

Meas.	Type of Reporting (a)	Compliance Period	Compliance Documentation Requirements
<b>A-M2</b>	Complete Documentation		A NYISO Locational Capacity Requirement (LCR) Report covering the 2013-14 Capability Year shall be provided. The NYISO shall also provide: (1) In accordance with NYSRC Policy 5, a report on the base case alignment analysis that was conducted for the 2013-14 LCR study, and (2) The allowable amount of LSE ICAP requirements that may be located externally to the NYCA, and how this was calculated. An appropriate NYISO staff person shall be available at the RCMS meeting to discuss this information and answer questions.
<b>A-M3</b>	Certification	Nov 2012-Oct 2013	
<b>B-M1</b>	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 2013 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>B-M2</b>	Complete Documentation		An evaluation of performance of the NYS BPS for extreme contingencies as defined in NYSRC Rule B-R4 and B-M2 shall be provided. This evaluation shall be included with the 2013 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>B-M3</b>	Complete Documentation		Evidence shall be provided of 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 2013 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>B-M4</b>	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.
<b>C-M2</b>	Certification	Winter 2011-12, Summer 2012	
<b>C-M3</b>	Certification	Summer 2012	
<b>C-M4</b>	Self-Certification		Evidence of procedures required by C-M4, Requirements 1-4, shall be provided. In addition, documentation shall be provided describing the processes for screening generation outage

<b>Meas.</b>	<b>Type of Reporting (a)</b>	<b>Compliance Period</b>	<b>Compliance Documentation Requirements</b>
			data as required by C-M4, Requirement 5. Also the number of generating units found to have suspect and erroneous data during the 2012 Calendar Year shall be provided. An appropriate NYISO staff person shall be available at the RCMS meeting to discuss this information and answer questions.
<b>C-M5</b>	Certification	Jan-Dec 2012	
<b>C-M6</b>	Self-Certification		The NYISO shall provide generating outage statistics as required by C-M6. ICS shall specify the type and form of statistics to be submitted for use in the 2014 IRM Study.
<b>C-M11</b>	Certification	2012-13 Capability Year	
<b>C-M12</b>	Self-Certification		In addition, the NYISO shall provide examples of recent NYCA performance analyzes that utilized the data collected by disturbance recording devices.
<b>C-M13</b>	Certification	Jan-Dec 2012	
<b>C-M14</b>	Self-Certification		A statement shall be included with the self-certification indicating any issues encountered collecting required SCR data. An annual report shall be submitted covering SCR performance results as required by C-M14, Requirement 4. ICS will specify the information to be included in the report.
<b>C-M15</b>	Certification	2012-13 Capability Year	
<b>D-M2</b>	Self-Certification		Evidence of required procedures shall be provided.
<b>E-M6</b>	Complete Documentation		A report covering an evaluation of the fault duty at each BPS station for the 2013-14 Capability Year shall be provided. If the report shows fault duty levels exceed equipment ratings, provide mitigation plans jointly approved by the NYISO and equipment owners.
<b>E-M7</b>	Certification		This certification applies to the 2013-14 Capability Year fault duty evaluation required by E-M6.
<b>F-M3</b>	Self-Certification		Evidence of required procedures shall be provided.
<b>F-M4</b>	Certification	2012-13 Capability Year	
<b>F-M6</b>	Complete Documentation		A report on the results of statewide voltage reduction tests for the 2013 summer period in accordance with F-M6 requirements shall be provided.
<b>G-M1</b>	Self-Certification		In accordance with the PRR 114 Implementation Plan, the NYISO shall submit evidence that it has modified procedures in the System Restoration Manual and other relevant NYISO documents. This compliance submission shall include a written report describing the implementation status of the revised NYISO black start testing procedures. The status report

Meas.	Type of Reporting (a)	Compliance Period	Compliance Documentation Requirements
			shall include a confirmation that the requirement that a steam unit comprehensive test is required if one has not been completed within the last two years.
<b>G-M2</b>	Certification	2012-13 Capability Year	
<b>G-M3</b>	Certification	2012-13 Capability Year	
<b>G-M4</b>	Self-Certification		Evidence shall be provided documenting that NYISO and Market Participant personal have been trained and restoration simulations have been conducted during Jan-Dec 2012 in accordance with G-M4, Requirements 1-6.
<b>H-M1</b>	Complete Documentation		A summary of NYISO and TO responses to NPCC Directory 4 (Section 7) compliance monitoring requirements for the Jan-Dec 2012 period shall be provided.
<b>H-M2</b>	Complete Documentation		A summary of NYISO and TO responses to NPCC Directory 3 (Section 7) compliance monitoring requirements for the Jan-Dec 2012 period shall be provided.
<b>H-M3</b>	Self-Certification		Evidence of required procedures shall be provided.
<b>I-M4</b>	Complete Documentation		The following information shall be submitted: (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 2013 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).
<b>I-M5</b>	Certification	2012-13 Capability Year	In addition, illustrations of the types of Con Edison actions taken that were reported in these notifications shall be provided.
<b>I-M6</b>	Certification	2012-13 Capability Year	In addition, illustrations of the types of LIPA actions taken that were reported in these notifications shall be provided.
<b>J-M1</b>	Self-Certification		Evidence of required procedures shall be provided.
<b>J-M2</b>	Complete Documentation		A report summarizing performance data of control center communication interfaces shall be provided in accordance with J-M2.
<b>K-M2a</b>	Complete Documentation		If NPCC schedules a NYCA 2013 Transmission Assessment submission in 2013, a report in accordance with the <i>NYSRC Procedure for NYCA Transmission Reviews</i> (see Reliability Rules Manual, Section VII) shall be provided. Submission of the assessment report to the NYSRC should be coordinated with its submission to NPCC. The scope of supplemental assessments required by B-M3, I-M4, and K-M3 will be reviewed by RCMS and NYISO staff prior to their

Meas.	Type of Reporting (a)	Compliance Period	Compliance Documentation Requirements
			preparation. An appropriate NYISO staff person shall be available at the RCMS meeting to discuss this report and answer questions.
<b>K-M2b</b>	Complete Documentation		A NYCA Resource Adequacy report covering the 2013-2015 period shall be provided. An appropriate NYISO staff person should be available at the RCMS meeting to discuss this report and answer questions.
<b>K-M2d</b>	Complete Documentation	Monthly	Monthly operations reports that provide data on the performance of the NYCA system for that month shall be provided. Data to be included in this report shall be in accordance with Measurement K-M2d requirements.
<b>K-M3</b>	Complete Documentation		An analysis of simulation testing to assess the impact of Extreme System Contingency Conditions on the NYS BPS shall be provided. This analysis shall be included with the 2013 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).

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(a) Types of compliance reporting are described in NYSRC Policy 4-6, Section 4.