



March 22, 2023

Gas-Electric Harmonization Forum

NAESB

1415 Louisiana, Suite 3460

Houston, Texas 77002

The New York State Reliability Council (NYSRC)

The mission of the NYSRC is to assist in the maintenance and enhancement of reliability of New York State's electric system. Since its formation in 1999, when it was approved by the Federal Energy Regulatory Commission (FERC) as part of the comprehensive restructuring of the electricity market in New York State, the NYSRC has carried out its mission in accordance with FERC-approved NYSRC and New York Independent System Operator (NYISO) Agreements.

To the Forum,

The New York State Reliability Council (NYSRC) has followed with interest the proceedings of the NAESB Gas-Electric Harmonization Forum. We commend the NAESB, its staff, and the Forum chairs for their work to date. We have found the survey, which was distributed on February 8, 2023, to be particularly helpful in getting a sense of the concerns of the participants.

We welcome the opportunity to respond to the survey. We appreciate your allowing us to forward these late filed comments, and we thank you for recognizing that it was necessary to do so because the NYSRC Executive Committee's scheduled monthly meeting came after the due date of the survey. We will restrict our comments to the following survey item:

Section II – Prioritization of Recommendations & Comment Opportunity

- I. Measures to improve gas-electric information sharing for improved system performance during extreme cold weather emergencies.

Recommendation 5 (page 5 of 27) - Consider using third parties (for example, the Texas Energy Reliability Council) to bring together important critical sectors during extreme events in order to facilitate collaboration and coordination at a regional level, better informing decision making between critical sector participants.

The Issue

The extent to which the NYSRC can or should be involved in bringing together important critical sectors during extreme events in order to facilitate collaboration and coordination at a regional level, better informing decision making between critical sector participants.

Discussion

The NYSRC has a specific role to play in the exercise of its authority over the NYISO. It has no direct authority over New York's gas industry. It does not set energy policy for either the gas or electric industries. It is not involved in secondary capacity release markets, gas market scheduling, electric and gas marketing design, cost recovery, fuel purchasing, or prioritization of service. It is not a broker between the gas and electric industries.

The authority and responsibilities of the NYSRC are specifically to:

Establish NYSRC Reliability Rules consistent with North American Reliability Council (NERC) and Northeast Power Coordinating Council (NPCC) standards. The NYSRC Reliability Rules are consistent with, and sometimes more stringent or specific than, NERC and NPCC standards. The NYSRC Reliability Rules are binding on the NYISO and all participants in the NYISO's wholesale electricity market.

Responsibilities

- Monitor and assess NYISO conformance with NYSRC Reliability Rules
- Establish statewide installed capacity requirements.
- Assess New York State electric system resource and transmission system adequacy.

Findings

In view of the specific responsibilities of the NYSRC in its relationship to the NYISO, and due its lack of any direct authority over New York's gas industry, the NYSRC finds that:

- It is not within its charter to bring together important critical sectors during extreme events in order to facilitate collaboration and coordination at a regional or state level, as identified in Recommendation 5 of the NAESB Gas-Electric Harmonization Forum;
- As with any policy decision issued by an authorized agency, findings of the NAESB Gas-Electric Harmonization Forum which affect the NYISO, and its market participants will be reviewed and addressed by the NYSRC pursuant to its rulemaking practices, and;
- We have reviewed the responses submitted by the NYISO and have found none that appear contrary to their existing operating practices. Accordingly, we support their position.

Sincerely yours,

Christopher Wentlent

Chairman, NYSRC Executive Committee