

Resilience

NYSRC Executive Committee
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Background

- April 2017
 - Rick Perry issues memorandum
- August 2017
 - DOE: Electric Markets and Reliability Report
- September 2017
 - DOE: RM17-3 - Grid Resiliency Pricing Rule
 - FERC: initiated consideration of Rule in RM18-1
- January 2018
 - FERC closed RM18-1, opened AD18-7
- AD18-7 - Grid Resilience in RTOs and ISOs
 - Includes a definition of resilience
 - RTO/ISO comments: March 2018
 - Reply comments: May 2018

Resiliency Definition

- FERC-proposed definition of Resiliency:

“The ability to withstand and reduce the magnitude and/or duration of disruptive events, which includes the capability to anticipate, absorb, adapt to, and/or rapidly recover from such an event.”

NYISO Comments

- FERC already recognized regional differences
- Its markets already address various elements of resilience
- New York does not face imminent resilience concerns
- On-going grid transformation is being addressed through:
 - Enhancements to planning process
 - Changes in the amount and location of operating reserves
 - Evaluating Ancillary Services shortage pricing levels
 - Evaluating the need to implement a flexible ramping product
 - Distributed energy resource integration
 - Energy storage resource integration and optimization

NERC Comments

- Resilience is an inherent component of reliability
- Adequate level of reliability (ALR) defined as state that design, planning, and operation of the Bulk Electric System (“BES”) will achieve when
 - The BES does not experience instability, uncontrolled separation, voltage collapse
 - Frequency and voltages are maintained under normal and contingency conditions
 - Adverse reliability impacts following low probability disturbances are managed
 - Restoration of the BES after a blackout performed in a controlled manner
- NERC’s Reliability Standards, Reliability Assessments, Event Analysis, Situational Awareness, and other activities address resilience
 - Resilience depends on the operating characteristics of the evolving resource mix and the capability of such resources to provide ERS
 - Fuel assurance and diversity are critical elements of a reliable and resilient system
 - Dual-fuel capability
 - Market rules that would provide assurances that generators will perform in normal and extreme circumstances.

NYPSC Comments

- Technical conference to share best practices on resilience
- Standards, operating and system planning requirements, and security and infrastructure protection requirements established by FERC, NERC, NPCC and NYSRC promote NYCA system resilience
- FERC should find that NYISO is addressing resilience
- NYPSC oversees a variety of distribution-level initiatives that supplement the NYISO's work on bulk system resilience
- RTOs/ISOs are well-suited to understand the needs of their respective regions and develop mechanisms tailored to those unique geographic needs
- FERC's continued attention will be adequate to ensure that the NYCA system is resilient and reliable
- NYISO to remain the lead entity that assesses and develops market enhancements that address NYCA system resilience and reliability

EEI Comments

- Concept of resilience is broad and impacts issues within and beyond FERC jurisdiction
 - FERC to consider input from and work with other federal agencies and retail regulators as it develops recommendations or proposals
 - There are natural risks to resilience, such as wildfires, earthquakes, hurricanes, droughts, heat waves
 - Entities should not be subject to conflicting, duplicative, or overly burdensome requirements from their regulators
- Electric transmission will continue to play an important role in maintaining system reliability and resilience
- Reliability Standards already address resilience from many manmade and natural threats to ensure the reliable operation of the BPS
- Issues and solutions are regional
- Limits will need to be in place to ensure that sensitive, grid-security information (e.g., grid vulnerabilities) is not widely disseminated
 - FERC, RTOs/ISOs, state commissions, and applicable grid-infrastructure owners need this information to develop and implement solutions

Is there a Role for the NYSRC in the National and Regional Resilience Debate?

- EC to consider if new resilience-based reliability rules are required for the NYCA