

**NEW YORK STATE
RELIABILITY
COUNCIL**

*2019 Reliability
Compliance Program
Highlights*

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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Draft*



NYSRC 2019 Reliability Compliance Program Highlights

Introduction

This report presents the highlights of the 2019 New York State Reliability Council (NYSRC) Reliability Compliance Program, the major process used by the NYSRC to monitor the New York Independent System Operator (NYISO) compliance with the Reliability Rules¹ and related Requirements².

The 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, including 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 Tariffs`. The objective of the compliance program is to encourage compliance with the NYSRC Reliability Rules necessary to preserve the reliability of the New York Control Area.

The NYISO and market participants are responsible for complying with the reliability requirements related to the Reliability Rules. Full compliance with a reliability requirement, as defined by an associated measure, is demonstrated by evidence provided by the NYISO or a market participant. The Reliability Rules also include levels of non-compliance and a description of the compliance process associated with each measure. These compliance elements are described in detail in the Introduction to the RR&C Manual.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-8, *Procedure for Monitoring Compliance with the NYSRC Reliability Rules*, at: <http://www.nysrc.org/policies.asp>.

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- 1 The reliability outcome that is expected to be achieved through compliance with the Requirements.
 - 2 The actions that shall be performed or outcomes achieved by the NYISO or Market Participants in order to comply with an associated Reliability Rule. Each Requirement is a statement for which compliance is required.

In 2017 a three-year NYSRC compliance review plan was adopted by RCMS. The NYSRC 2019 Reliability Review Program described in this report represents the second year of this three-year plan.

2019 NYSRC Reliability Compliance Program

At the beginning of 2019 the NYSRC maintained a total of 88 Requirements related to 26 Reliability Rules. The 2019 Reliability Compliance Program included 34 assessments which reviewed compliance with 62 Requirements or 70% of NYSRC’s Requirements.

As shown in Table 1 below, the 2019 NYSRC Reliability Compliance Program incorporated a total of 34 reliability assessments which included compliance reviews of 47 Requirements having NYISO reporting responsibility and 15 Requirements having market participant reporting responsibility. Table 1 also shows that the NYISO and market participants were in full compliance with all Requirements for which compliance was reviewed in the 2019 NYSRC Reliability Compliance Program.

**Table 1
2019 NYSRC Compliance Program Summary**

	# of Compliance Assessments	Reliability Requirements Found in Full Compliance	Reliability Requirements Found in Non-Compliance
NYISO	19	47	0
Market Participants	15	15	0
Totals	34	62	0

Appendix A is a summary of the 2019 Reliability Compliance Program that depicts the Requirements that were assessed, milestone dates, and compliance findings.

New York Control Area (NYCA) Transmission and Resource Adequacy Assessments

NYSRC Reliability Rules B.2 and A.3 require that the NYISO provide NYCA transmission and resource adequacy assessments, respectively, to demonstrate that the NYISO is in compliance with these Reliability Rules. The timing of the NYISO’s transmission review submissions to the NYSRC are coordinated with that of similar transmission review submissions required by NPCC. In addition to NPCC reporting requirements, the NYSRC requires the NYISO to provide supplemental information as described in the “NYSRC Procedure for NYCA Transmission Reviews.”

The NYISO submitted two NYCA transmission reviews to the NYSRC in 2019. A 2018 Intermediate Transmission Review was submitted in February 2019. This review determined that the New York State Bulk Power System, as planned (including Corrective Action Plans), through year 2023, conforms to the applicable NYSRC Reliability Rules and NPCC criteria.

In October, the NYISO submitted a 2019 Interim Area Transmission Review to the NYSRC. This review, which recognized changes in forecasted NYCA system conditions and planned facilities, concluded that the New York State Bulk Power Transmission Facilities, as planned through the year 2024, conform to the reliability criteria described in the NYSRC Reliability Rules.

To demonstrate compliance with NYSRC resource adequacy assessment requirements, the NYISO prepared the report, *Annual Assessment of Resource Adequacy for the Years 2019-2021*. The assessment concluded that for existing and planned NYCA resources and a baseline forecast of peak load, an NYCA IRM requirements would be met throughout the assessment period, even under an extreme high load case.

RCMS found both the above NYISO transmission assessments, as well as the resource adequacy assessment, in full compliance with NYSRC Reliability Rules.

A rule change is expected in 2020 in which a NYSRC rule that presently requires the NYISO to prepare a 3-year resource adequacy assessment will be replaced by a new rule that will require the NYISO to prepare both an annual "Next Capability Year" resource adequacy assessment and a biennial 10-year resource adequacy assessment.

"As Required" Compliance Review Reports

The NYSRC has rules that require the NYISO to submit reports to the NYSRC when critical voice and/or data systems are lost or when major emergencies are declared.

The NYISO reported on an event on July 18, 2019 when the NYISO primary ICCP server lost connectivity to all ICCP partner entities. Also, the NYISO reported that on September 3, 2019 a major emergency was declared when the power flow on H-Q Cedars exceeded its transient stability limit by more than 105%. This event was caused by the trip of the Marcy 345kV North Bus. The NYISO has made modifications to its existing internal procedures to address this situation if it were to occur again.

NYISO Compliance Documentation Submissions

The success of the NYSRC Compliance Program depends on timely and complete submissions of compliance documentation prepared by the NYISO. In 2019 all required compliance certifications and related compliance documents were submitted to RCMS by the NYISO in accordance with compliance documentation due dates, and all submissions were found to be complete.

NERC and NPCC 2019 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 the NYISO's compliance with these standards and criteria. NPCC has direct responsibility and authority to implement a Compliance Monitoring and Enforcement Program (CMEP) for NERC and regional standards, as well a Compliance Criteria Enforcement Program (CCEP) for NPCC-specific reliability criteria. During 2019, as a part of the CCEP, NPCC reviewed and found the NYISO in full compliance with ___ NPCC directories. In addition, in ____, NPCC performed an on-site comprehensive Audit of the NYISO's compliance with ___ Requirements contained in ___ NERC's _____.

Conclusions

The following conclusions were reached by RCMS with regard to the NYSRC 2019 Reliability Compliance Program:

1. The NYISO staff continued to provide valued assistance during the NYSRC reliability compliance review process.
2. The NYISO and market participants were in full compliance with all 62 NYSRC Requirements that were assessed by RCMS in the 2019 NYSRC Reliability Compliance Program. In addition, NPCC found the NYISO in full compliance with all NERC reliability requirements and NPCC directories that were assessed during 2019.
3. All required NYISO compliance documentation associated with the 2019 Reliability Compliance Program was submitted to RCMS during a reasonable time period and found to be complete.

APPENDIX A
NEW YORK STATE RELIABILITY COUNCIL
2019 RELIABILITY COMPLIANCE PROGRAM

REQUIREMENT(S)	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE 1	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE Level 2
Resource Adequacy						
A.2:R1	2019 Locational Capacity Requirements	M1	3/28/19	3/28/19	4/4/19	FC
A.2:R2	LSE ICAP obligations	M2*	11/26/19	11/26/19	12/3/19	FC
A.3:R1	2019-21 NYCA resource adequacy review	M1	5/30/19	5/30/19	6/6/19	FC
Transmission Planning						
B.1: R1 to R4	Transmission planning system performance requirements	M1	2/21/19	2/21/19	2/28/19	FC
B.2: R1	2018 NYCA transmission review	M1	2/21/19	2/21/19	2/28/19	FC
B.2: R1	2019 NYCA transmission review	M1		10/24/19 4	10/31/19	FC
B.3: R1 to R3	List of NYS BPS Facilities	M1	6/20/19	6/20/19	6/27/19	FC
Transmission Operation						
C.1: R1, R2	Establishing operating transfer capabilities	M1	2/21/19	2/21/19	2/28/19	FC
C.3: R1 to R.6	Outage coordination	M1	2/21/19	2/21/19	2/28/19	FC
C.4: R1 to R3	Extreme weather and severe solar magnetic disturbance operations	M1	2/21/19	2/21/19	2/28/19	FC
C.5: R1, R3	2019 fault current assessment	M1	6/20/19	6/20/19	6/27/19	FC
C.5: R2	Equipment Owner fault current assessment actions	M2*	6/20/19	6/20/19	6/27/19	FC
C.6: R1, R2	Applications of the NYSRC Rules	M1	4/25/19	4/25/19	5/2/19	FC
C.7: R1	Exceptions to the NYSRC Rules	M1	4/25/19	4/25/19	5/2/19	FC
C.8: R1	Real-time operations of the NYS BPS	M1	Monthly	12/5/19	1/2/20	FC 3
Emergency Operations						
D.1: R1 to R8	Mitigation of Major Emergencies	M1	4/25/19	4/25/19	5/2/19	FC
D.1: R10	Annual statewide voltage reduction tests	M3	7/25/19	7/25/19	8/1/18	FC

Operating Reserves						
E.1: R1 to R7	Minimum operating reserve levels	M1	6/20/19	6/20/19	6/27/19	FC
System Restoration						
F.1: R2	TO system restoration plans	M2*	11/26/19	11/26/19	12/3/19	FC
F.1: R3	Black Start Provider requirements	M3*	11/26/19	11/26/19	12/3/19	FC
Local Area Operation						
G.1: R7	Con Ed operating procedures and reserves	M3*	7/25/19	7/25/19	8/1/19	FC
G.2: R2	Con Ed loss of gas supply procedures and actions	M2*	7/25/19	7/25/19	8/1/19	FC
G.2: R5	GO procedures for testing dual fuel capability of MOB combined cycle units	M4*	7/25/19	7/25/19	8/1/19	FC
G.2: R6	GO dual fuel capability testing of combined cycle units	M5*	10/24/19	10/24/19	10/31/19	FC
G.3: R2	LIPA loss of gas supply procedures and actions	M2*	8/29/19	8/29/19	9/5/19	FC
G.4: R2	Con Ed identification of Eligible Black Start units	M2*	10/24/19	10/24/19	10/31/19	FC
Modeling and Data						
I.1: R3	GO generation net dependable capacity tests	M2*	5/30/19	5/30/19	6/6/19	FC
I.1: R4	GO generation reactive power capacity tests	M3*	5/30/19	5/30/19	6/6/19	FC
I.2: R2	GO generating unit outage data reporting	M2*	9/26/19	9/26/19	10/3/19	FC
I.2: R3	Generating unit outage statistics	M3	9/26/19	9/26/19	10/3/19	FC
I.2: R4	SCR performance report	M4	8/29/19	8/29/19	9/5/19	FC
I.2: R5	RIP SCR performance data reporting	M5*	8/29/19	8/29/19	9/5/19	FC
I.3: R2	Annual actual and forecast load data	M2	7/25/19	7/25/19	8/1/19	FC
I.4: R3	MP transmission data reporting	M3*	9/ 26/19	9/26/19	10/3/19	FC

*Applicable to Market Participants; NYISO compliance certification is required (see Appendix 1).

Footnotes:

1. Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in Appendix 1.

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. This Full Compliance finding applies to the November 2019 operations report. Monthly operations reports in all previous months were found in Full Compliance.

4. On October 3, 2019 the NYISO requested RCMS to review NYISO compliance with respect to a draft of the 2019 NYCA Interim ATR. RCMS agreed to review ATR compliance at its Nov. 7 meeting. A revised ATR draft was submitted on 10/24/19 and comments provided on 10/31/19.

2019 “As Required” NYISO Compliance Reports

Requirement	Reported Event Summary	Date NYISO Event Report was Received	RCMS Review Date	RCMS Comments	NYISO Compl. Level
<p>H.1:R4 NYISO shall submit a report summarizing loss of critical voice and/or data systems.</p>	<p>On 7/18/19 between 16:36 and 16:38 the NYISO primary ICCP server lost connectivity to all ICCP partner entities. Connections with a majority of those entities automatically re-established by 16:40. The NYISO had intermittent drops of overall connectivity between 16:40 and 17:08 as NYISO resources performed troubleshooting steps to restore Long Island, Con Ed, and Hydro Quebec. Long Island, Con Ed, and Hydro Quebec did not automatically re-establish and remained disconnected until 17:13, 17:17, and 17:49 respectively until additional actions were taken by those entities.</p>	<p align="center">8/29/19</p>	<p align="center">9/5/19</p>	<p align="center">None</p>	<p align="center">FC</p>
<p>D.1:R9 The NYISO shall report to the NYSRC on every instance of a Major Emergency.</p>	<p>On 09/03/2019 a Major Emergency was declared by the NYISO Shift Supervisor when the power flow on HQ Cedars exceeded its Transient Stability Limit by more than 105%. This was caused by the trip of the Marcy 345kV North Bus, removing the Marcy-Coopers Corners UCC2-41, Marcy-Massena MSU-1, Massena-Chateaugay 7040, and Marcy Statcom from service.</p> <p>The NYISO has reviewed the details of this event and has made modifications to the NYISO’s existing internal procedure to address this situation if it were to occur again. The NYISO has shared information with the entities that did not reconnect as designed to assist them in addressing any issues on their systems.</p>	<p align="center">9/4/19</p>	<p align="center">9/5/19</p>	<p align="center">None</p>	<p align="center">FC</p>