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January 22, 2018

VIA ELECTRONIC MAIL

Mr. Herb Schrayshuen  
Secretary, New York State Reliability Council

**RE: Removal Request of Con Edison Exceptions #8, #17, and #18 to the NYSRC Reliability Rules**

Dear Herb:

The purpose of this letter is to request the Executive Committee of the New York State Reliability Council, LLC (“NYSRC”), pursuant to NYSRC Policy 1-11 Section 5 Exceptions to the Reliability Rules, Item 5.2 #2, dated February 8, 2017, for a removal of the following three exceptions to the NYSRC Reliability Rules: Exception #8, Exception #17, and Exception #18 (“Exceptions”) (see attached Appendix A).

Con Edison’s request follows New York Independent System Operator, Inc. (“NYISO”) determination that Entergy Nuclear Power Marketing, LLC (“Entergy”) had submitted a complete Generator Deactivation Notice on November 13, 2017 of the Indian Point Energy Center Units 2 & 3. Entergy intends to deactivate Indian Point 2 unit on April 30, 2020 and Indian Point 3 unit on April 30, 2021. The NYISO’s Generator Deactivation Assessment of the Indian Point Energy Center (dated December 13, 2017) did not identify any reliability needs following the deactivation of the Indian Point Energy Center Units 2 & 3 for the Study Period under base case assumptions.

These Exceptions were originally implemented due to operation of Indian Point Energy Center Units 2 & 3. As the asset owner of these transmission facilities, without the operation of Indian Point 2 & 3, Con Edison does not want to expose them to unnecessary risk.

Con Edison's request for a removal of the Exceptions is conditional with the deactivation of Indian Point Energy Center Units 2 & 3. The request is being made at this time in order to notify the NYISO and other Market Participants that utilization of the Exceptions shall end with the retirement of Indian Point Energy Center Units 2 & 3. As such the Exceptions shall not be used in any studies past the retirement of Indian Point Energy Center Units 2 & 3. Specifically, Con Edison requests:

Indian Point 2 (Intended deactivation date: April 30, 2020):

- Remove Exception #17 to the NYSRC Reliability Rules at the effective date of Indian Point 2 retirement;
- Remove Exception #18 to the NYSRC Reliability Rules at the effective date of Indian Point 2 retirement;

Indian Point 3 (Intended deactivation date: April 30, 2021):

- Remove Exception #8 to the NYSRC Reliability Rules at the effective date of Indian Point 3 retirement.

Sincerely,



Copy to:

Roger Clayton, Chair of the NYSRC Executive Committee  
Zach Smith, NYISO  
Kevin DePugh, NYISO  
Jim Grant, NYISO  
Mayer Sasson, Con Edison  
Martin Paszek, Con Edison  
Sofia Gadea Omelchenko, Con Edison

# Appendix A

## 1. Exception #8

Transmission Owner: Con Edison

Exception Category: Special Protection System

NYSRC Reliability Rules: B.1 and C.1

Approved NYPP Operating Committee May 30, 1985

*“Post Contingency Flow on Buchanan-Millwood W97 or W98*

*The post-contingency flow on line W97 for the loss of W98 may exceed its LTE rating up to its STE rating if the contingency loss of lines W98 and Y88 does not cause resultant flows on any other feeder to exceed Normal Transfer Criteria.*

*The post-contingency flow on line W98 for the loss of W97 may exceed its LTE rating up to its STE rating if the contingency loss of lines W97 and Y88 does not cause resultant flows on any other feeder to exceed Normal Transfer Criteria.*

*This exception does not apply if either W97, W98, Y88, Indian Point 3, or the overload relay system is out of service.”*

## 2. Exception #17

Transmission Owner: Con Edison

Exception Category: Special Protection System

NYSRC Reliability Rules: B.1 and C.1

Approved by the NYSRC Executive Committee May 9, 2003

Revision Approved by the NYSRC Executive Committee June 10, 2016

*“Post-Contingency Flow on Buchanan Transformer TA-5*

*The post-contingency flow on the Buchanan 345/138 kV transformer TA-5 is allowed to exceed LTE and STE ratings for the non-simultaneous loss of two transmission feeders. If the stated outages occur, and if the flow on transformer TA-5 is above LTE rating but below STE rating, local generation will be adjusted to reduce the flow below LTE rating within 15 minutes. If the flow on transformer TA-5 is above STE rating, there is an automatic overcurrent relay that trips Buchanan 138 kV breaker F7 taking transformer TA-5 out of service. This exception does not apply if either W97, W98, Y88, Indian Point 3, or the overload relay system is out of service.”*

3. **Exception #18**

Transmission Owner: Con Edison

Exception Category: Applicable Rating Run Back of Generators

NYSRC Reliability Rules: B.1 and C.1

Approved NYRSC Executive Committee May 10, 2002

*“Eastview to Sprainbrook 345 kV Feeder W79 Outages*

*During an outage to either feeder Y94/95891 or feeder W79, post-contingency loadings shall be allowed to exceed the STE rating of Eastview transformer 2N for the loss of W79 or Y94/95891, respectively, provided Indian Point #2 generation can and will back down post-contingency to reduce flows through transformer 2N within applicable limits, i.e., less than STE within 5 minutes and less than LTE within 10 minutes from the initial overload.”*