

NEW YORK STATE RELIABILITY COUNCIL

2020 Reliability Compliance Program Highlights

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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NYSRC 2020 Reliability Compliance Program Highlights

Introduction

This report presents the highlights of the 2020 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.html>.

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- 1 The reliability objective that is expected to be achieved through compliance with a set of related Requirements.
 - 2 The actions that shall be performed or outcomes that shall be achieved by the NYISO or Market Participants in order to comply with the reliability objective of an associated Reliability Rule. Requirements are material to reliability and are measurable.

In 2020 a three-year NYSRC compliance review plan covering the 2021-23 period, prepared by RCMS, was approved by the Executive Committee.

2020 NYSRC Reliability Compliance Program

In 2020 the NYSRC maintained a total of 92 Requirements associated with 27 Reliability Rules. The 2020 Reliability Compliance Program included 33 assessments which reviewed NYISO and market participant compliance with a total of 42 Requirements or 46% of NYSRC’s Requirements.

As shown in Table 1 below, the 2020 NYSRC Reliability Compliance Program incorporated a total of 33 reliability assessments which included compliance reviews of 26 Requirements having NYISO reporting responsibility and 16 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 2020 NYSRC Reliability Compliance Program.

**Table 1
2020 NYSRC Compliance Program Summary**

	Number of Compliance Assessments	Reliability Requirements Found in Full Compliance	Reliability Requirements Found in Non-Compliance
NYISO	17 ¹	26	0
Market Participants	16	16	0
Totals	33	42	0

The Appendix is a summary of the 2020 Reliability Compliance Program that depicts the Requirements that were assessed and related compliance 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

¹ Twelve NYISO monthly real time operating report submissions in 2020 are counted as a single assessment.

supplemental information as described in the “NYSRC Procedure for NYCA Transmission Reviews.”

The 2019 NYCA transmission review, which normally would have been submitted to the NYSRC in early 2020, was submitted late in 2019. Therefore, the 2020 Reliability Compliance Program did not include any transmission reviews.

A reliability rule change was implemented in 2020 in which Reliability Rule A.3, which previously required the NYISO to prepare a 3-year resource adequacy assessment was replaced by two new requirements: one requiring the NYISO to prepare an annual “Next Capability Year” resource adequacy assessment, and a second rule requiring NYISO submission of a ten-year resource adequacy assessment every two years.

To demonstrate compliance with the “Next Capability Year” resource adequacy assessment requirement, the NYISO prepared the report, *Annual Assessment of Resource Adequacy for the Capability Year 2020-21*. This assessment concluded that for existing and planned NYCA resources and a baseline forecast of peak load, NYCA IRM requirements would be met during the 2020-21 capability year period, even under an extreme high load case. RCMS found the 2020-21 resource adequacy assessment in full compliance with NYSRC Reliability Rules.

A ten-year resource adequacy assessment will be required to be submitted in February 2021.

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 2020 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 2020 Reliability Compliance Programs

In addition to complying with the NYSRC Rules, the NYISO must comply with all applicable NERC reliability standards and NPCC reliability standards and criteria. Compliance with NERC standards is mandatory. NPCC has direct responsibility and authority to implement a Compliance Monitoring and Enforcement Program (CMEP) for NERC and regional standards, as well as a Compliance Criteria Enforcement Program (CCEP) for NPCC-specific reliability criteria.

NYSRC Policy 4 requires that RCMS have an oversight responsibility concerning NYISO's compliance with NERC and NPCC standards and criteria. Accordingly, all RCMS meetings include an agenda item to review the NYISO's NERC/NPCC compliance schedule and compliance status.

During 2020, NPCC reviewed and found the NYISO in full compliance with two NPCC Directories. The NYISO had no certifications due to NERC in 2020.

Conclusions

The following conclusions were reached by RCMS with regard to the NYSRC 2020 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 42 NYSRC Requirements that were assessed by RCMS in the 2020 NYSRC Reliability Compliance Program. In addition, NPCC found the NYISO in full compliance with all NPCC criteria that were assessed during 2020.
3. All required NYISO compliance documentation associated with the 2020 Reliability Compliance Program was submitted to RCMS during the scheduled time period and found to be complete.

**APPENDIX
NYSRC 2020 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	2020 Locational Capacity Requirements	M1	3/26/20	3/26/20	4/2/20	FC
A.2:R2	LSE ICAP obligations	M2*	11/24/20	11/24/20	12/1/20	FC
A.3:R1 3	2020 resource adequacy assessment	M1	5/28/20	5/28/20	6/4/20	FC 7
A.3:R2 3	2021-30 resource adequacy assessment	M2	1/28/21 5			
Transmission Planning						
B.3: R1 to R3	List of NYS BPS Facilities	M1	6/18/20	6/18/20	6/25/20	FC
Transmission Operation						
C.3: R1 to R5 4	NYISO procedures requiring TO coordination of transmission outages	M1	2/27/20	2/27/20	3/5/20	FC
C.3: R6 4	TO procedures requiring coordination of transmission outages	M2*	2/27/20	2/27/20	3/5/20	FC
C.5: R1, R3	2020 fault current assessment	M1	6/18/20	6/18/20	6/25/20	FC
C.5: R2	Equipment Owner fault current assessment actions	M2*	6/18/20	6/18/20	6/25/20	FC
C.8: R1	Real-time operations of the NYS BPS	M1	Monthly	1/8/21	2/4/21	FC 6
Emergency Operations						
D.1: R.10	Annual statewide voltage reduction tests	M3	8/27/20	8/27/20	9/3/20	FC
System Restoration						
F.1: R2	TO system restoration plans	M2*	3/26/20	3/26/20	4/2/20	FC
F.1: R3	Black Start Provider requirements	M3*	3/26/20	3/26/20	4/2/20	FC
Local Area Operation						
G.1: R7	Con Ed operating procedures and reserves	M3*	7/30/20	7/30/20	8/6/20	FC

G.2: R2	Con Ed loss of gas supply procedures and actions	M2*	7/30/20	7/30/20	8/6/20	FC
G.2: R5	GO procedures for testing dual fuel capability of MOB combined cycle units	M4*	7/30/20	7/30/20	8/6/20	FC
G.2: R6	GO dual fuel capability testing of combined cycle units	M5*	7/30/20	7/30/20	8/6/20	fc
G.3: R2	LIPA loss of gas supply procedures and actions	M2*	4/23/20	4/23/20	4/30/20	FC
G.4: R2	Con Ed identification of Eligible Black Start units	M2*	4/23/20	4/23/20	4/30/20	FC
Control Center Communications						
H.1: R1, R2	NYISO telecommunications with TOs	M1	8/27/20	8/27/20	9/3/20	FC
H.1: R3	Performance data of Control Center telecommunication interfaces	M2	8/27/20	8/27/20	9/3/20	FC
Modeling and Data						
I.1: R1, R2	NYISO procedures for resource capacity Verification testing	M1	5/28/20	5/28/20	6/4/20	FC
I.1: R3	GO generation net dependable capacity tests	M2*	5/28/20	5/28/20	6/4/20	FC
I.1: R4	GO generation reactive power capacity tests	M3*	5/28/20	5/28/20	6/4/20	FC
I.2: R1	NYISO procedures for generating unit outage data reporting	M1	9/24/20	9/24/20	10/1/20	FC
I.2: R2	GO for generating unit outage data reporting	M2*	9/24/20	9/24/20	10/1/20	FC
I.2: R3	Generating unit outage statistics	M3	9/24/20	9/24/20	10/1/20	FC
I.2: R4.4	SCR performance report	M4	9/24/20	9/24/20	10/1/20	FC
I.2: R5	RIP SCR performance data reporting	M5*	8/27/20	8/27/20	9/3/20	FC
I.3: R1	NYISO procedures for actual & forecast load reporting	M1	11/24/20	11/24/20	12/1/20	FC
I.3: R2	Annual actual and forecast load data	M2	11/24/20	11/24/20	12/1/20	FC
I.4: R1	NYISO procedures for transmission data reporting	M1	10/29/20	10/29/20	11/5/20	FC
I.4: R2	NYISO transmission data base updating	M2	10/29/20	10/29/20	11/5/20	FC
I.4: R3	MP transmission data reporting	M3*	10/29/20	10/29/20	11/5/20	FC

*Applicable to Market Participants; NYISO compliance certification is required.

Footnotes

1. Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings.
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 is a revised Requirement in accordance with PRR 145.
4. This Requirement was revised in 2019 per PRR 144.
5. On April 30, 2020 RCMS approved the rescheduling of the compliance documentation due date for **A.3: R2** to the end of January 2021. This change was required after the NYISO announced that the final 2020 RNA report is scheduled to be published in November 2020 and the PRR 145 Implementation Plan for **A.3: R2** requires that compliance documentation must be submitted within 60 days after publication of this report.
6. Although this Full Compliance finding applies specifically to the December 2020 operations report, all previous 2020 operations reports were also found in Full Compliance.
7. This Full Compliance designation was predicated by RCMS receiving, by June 11, NYISO submission of a revised 2020 Resource Adequacy Assessment report. Accordingly, a revised report was submitted by the NYISO on June 8.