

NEW YORK STATE RELIABILITY COUNCIL, L.L.C.
(“NYSRC”)
POLICY 4-78
PROCEDURE FOR MONITORING COMPLIANCE
WITH THE NYSRC RELIABILITY RULES

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1. INTRODUCTION

The mission of the New York State Reliability Council (NYSRC) is to promote and preserve the reliability of the New York State Power System. Achievement of the NYSRC mission requires monitoring and assuring compliance with the NYSRC Reliability Rules (Reliability Rules). NYSRC Policy 4 describes the NYSRC reliability compliance monitoring procedure and the relative responsibilities of the NYSRC and the New York Independent System Operator (NYISO) in order to maintain compliance with the NYSRC’s Reliability Rules.

Compliance monitoring is a comprehensive process to assess, investigate, evaluate and measure compliance with the Reliability Rules. Policy 4 establishes the NYSRC compliance monitoring procedure which is implemented via a number of methods utilized to assess compliance with the Reliability Rules for which the NYISO has compliance responsibility. Further, this policy describes alternate forms of documentation reporting to be used by the NYISO in demonstrating compliance. The procedure is designed to be consistent with North America Electric Reliability Corporation (NERC) and Northeast Power Coordinating Council (NPCC) compliance programs, including related activities and schedules. The various NYSRC compliance monitoring activities described in Policy 4 are intended to be coordinated with these programs, and avoid duplication of NERC and NPCC compliance activities. The compliance monitoring process recognizes that, although economic efficiency is an important operating and planning objective, Reliability Rules must always be observed.

The NYSRC compliance monitoring procedure is intended to achieve the following objectives:

- a) Assessment of NYISO compliance with those NYSRC Reliability Rule Requirements for which the NYISO has a direct compliance responsibility as specified in the Reliability Rules.
- b) Assessment of NYISO compliance with NYSRC Reliability Rule Requirements for which the NYISO must certify market participant compliance with respect to required market participant actions as specified in the Reliability Rules.
- c) Review of NYISO compliance with NERC and NPCC standards and criteria for which the NYISO has a compliance reporting obligation.

Policy 4 includes a process that addresses NYSRC actions when compliance violations are found. This process includes issuance of non-compliance letters that document non-compliance and includes remedial action directives to deter future compliance violations.

The Reliability Compliance Monitoring Subcommittee (RCMS), a standing subcommittee of the NYSRC Executive Committee, manages the implementation of the NYSRC compliance monitoring procedure. RCMS has the responsibility to perform compliance monitoring and oversight review functions, and to report to the NYSRC Executive Committee for approval of its conclusions with respect to compliance reviews, in accordance with the RCMS Work Scope.

2. RESPONSIBILITIES FOR COMPLIANCE WITH NYSRC RELIABILITY RULES

In accordance with the NYSRC Agreement and NYISO/NYSRC Agreement, the NYSRC Reliability Rules must be complied with by the NYISO and all market participants engaged in transactions on the NYS Power System. Further, the NYISO is responsible for the compliance by market participants with all Reliability Rules that require actions by market participants, and has the responsibility of securing market participant compliance with the Reliability Rules via its procedures, tariffs and service agreements. The NYSRC has the responsibility to monitor NYISO compliance with the Reliability Rules. Accordingly, the NYSRC compliance monitoring procedure recognizes the following compliance responsibility principles:

- a. The NYISO must comply with all NYSRC Reliability Rules. Many NYSRC Reliability Rules require market participant actions in order for the NYISO to achieve compliance. Required market participant actions are specified in the NYSRC Reliability Rules. A *Requirement* is an element of a Reliability Rule that describes what the NYISO or market participant shall do, in terms of actions and outcomes and under what conditions, to achieve the specific objective of the Reliability Rule. To secure compliance with a Requirement, the NYISO must certify that required market participant actions and outcomes have been fully achieved.¹
- b. The NYSRC monitors NYISO compliance with the Reliability Rules² and the NYISO's actions to secure market participant compliance. Each Reliability Rule

¹ Section 1.22 of the Reliability Rules and Compliance Manual describes the organization of a Reliability Rule and its elements.

² Policy 4 refers in different sections to "compliance (or non-compliance) with the Reliability Rules" or "compliance (or non-compliance) with a Requirement." Because a Requirement is an element of a Reliability Rule that specifies required NYISO or market participant actions or outcomes, when an entity is in compliance (or non-compliance) NYSRC Policy 4-7.8 "Procedure for Monitoring Compliance with the NYSRC Reliability Rules" 2

includes one or more Requirements. The Reliability Rules and its Requirements state whether the required actions must be taken by the NYISO or a market participant.

3. MONITORING METHODS

The NYSRC has six monitoring processes to collect information to assess and make a determination of compliance: (A) The Annual Reliability Compliance Monitoring Program; (B) Compliance Audits; (C) Self-Reporting, (D) Spot Checking; (E) Implementation of New or Modified Reliability Rules; and (F) Monitor NYISO Compliance with NERC and NPCC Standards and Criteria.

A. The Annual Reliability Compliance Monitoring Program

NYSRC compliance monitoring is implemented primarily through an annual NYSRC Reliability Compliance Program developed by the RCMS. Generally, each year's Reliability Compliance Program includes compliance reviews of most NYSRC Requirements. Factors used for selecting the group of Requirements to be reviewed each year include: (1) All Requirements that require annual or monthly review, (2) All Requirements for which compliance has not been reviewed in the past three years, (3) All Requirements that have been adopted or modified during the previous year, including the Requirement's Implementation Plan, and (4) Requirements that were found in non-compliance during the previous year or if there are other compliance issues requiring a follow-up review. Section 5, further describes the procedure for preparing the Annual Reliability Compliance Monitoring Program.

B. Compliance Audits

The NYISO is subject to two types of audits: (1) Audits that accompany self-certifications, and (2) comprehensive audits.

Audits accompanying self-certifications – Examples of this type of audit include requests to submit certain NYISO procedures, reports, or data that relate to the Requirement for which compliance self-certification is requested; or references to where this information may be found on the NYISO web site. NYISO staff may attend RCMS meetings to review this information. The information that is subject to this type of audit may cover a portion of a Requirement. Conduct of this type of audit shall follow RCMS review of the related self-certification.

Comprehensive audits – From time to time RCMS may initiate a comprehensive audit of NYISO compliance with a Requirement or group of Requirements. The NYSRC shall provide at least 60 days notice of the pending audit. The initial notification shall include

with a Requirement, the entity is also considered to be in compliance (or non-compliance) with its related Reliability Rule.

NYSRC Policy 4-7.8 "Procedure for Monitoring Compliance with the NYSRC Reliability Rules"

the audit scope and proposed key audit dates. The NYISO or the NYSRC may request a meeting to review the scope, logistics, and other pertinent coordination matters. A pre-audit questionnaire to the NYISO may accompany this notification. The NYISO shall respond to this questionnaire 10 days before the audit. A comprehensive audit will include review of data, procedures, and other documentation that is not normally requested in other types of compliance reviews. During an audit, members of RCMS and/or others appointed by RCMS will meet with appropriate NYISO staff to review information requested by RCMS. A confidentiality agreement may be required to prevent disclosure of market sensitive data or other confidential information.

C. Self-Reporting

The NYISO is required to report any Reliability Rule violation, including a Reliability Rule violation resulting from the action or inaction of a market participant that it detects through scheduled compliance assessments or during normal operations. The NYISO will submit a self-assessment report to the NYSRC within five business days of the NYISO's determination that there has been a violation. RCMS will review the information provided by the NYISO to determine NYISO compliance with the Reliability Rules. RCMS may request clarification or additional data and/or information from the NYISO in sufficient detail to enable RCMS to determine if a violation has occurred and the non-compliance level, and to develop an appropriate mitigation plan.

The NYISO shall have 30 days from becoming aware of a possible NYSRC Reliability Rule violation to conduct an investigation to determine if a violation has occurred. If the NYISO has not completed its investigation after 30 days, it shall provide a report to RCMS to inform RCMS that there is an on-going investigation of a possible Reliability Rule violation and identify the Reliability Rule or Rules that are the subject of the investigation. The NYISO shall provide updates on its investigation to the RCMS every 30 days while the investigation is on-going. The RCMS will report the pendency of the investigation to the Executive Committee. Upon completion of its investigation, the NYISO will inform RCMS of its determination as to whether or not there was a Reliability Rule violation and the basis for its determination. If the NYISO concludes that there was a Reliability Rule violation, it shall follow the reporting process described above; except that the five business days shall run from the date the NYISO's investigation was concluded.

D. Spot Checking

Spot checks may be conducted by RCMS to address issues such as trends in negative performance of compliance, to follow-up any previous non-compliance findings, verify or confirm self-certifications, or responses to operating problems or system events. The NYSRC shall allow at least 20 days for the NYISO to submit the requested information for the pending spot check review. RCMS will review the information submitted by the NYISO to verify compliance with the Reliability Rules.

E. Implementation of New or Modified Reliability Rules

When a new or revised Reliability Rule is adopted by the NYSRC, an Implementation Plan will be prepared by the RCMS. The Implementation Plan will be made part of the Proposed Reliability Rule (PRR) template (see Policy 1). The Implementation Plan will describe the actions to be taken by the NYISO in order to implement the new or revised Rule and indicate when initial NYSRC compliance reviews will be scheduled. These reviews may be included in the Annual Compliance Monitoring Program.

F. Monitor NYISO Compliance with NERC and NPCC Standards and Criteria

RCMS will monitor the NYISO's compliance with NPCC and NERC standards and criteria and follow up on any mitigation requirements established by NPCC.

4. COMPLIANCE REPORTING

The NYISO is responsible for supplying the documentation to the NYSRC necessary to demonstrate its compliance with the Reliability Rules. Depending on assessment requirements, compliance submittals for an applicable Requirement may take one of the following forms, as determined by the NYSRC:

- **Self-Certification Reporting of NYISO Compliance:** The NYISO self-certifies compliance or non-compliance with the applicable NYSRC Requirement, in lieu of submitting complete compliance documentation, data, or test results to demonstrate compliance. After reviewing a self-certification, RCMS may request additional data and/or information if necessary. A self-certification may be accompanied by an audit as described in Section 3.
- **Certification Reporting of Market Participant Compliance:** For Requirements applicable to market participants, a compliance certification may be prepared in which the NYISO certifies, based on information received from one or more market participants, that the market participant(s) is compliant or non-compliant with the Requirement. After reviewing a certification, RCMS may request additional data and/or information if necessary.
- **Complete Documentation:** The NYISO may report compliance by submitting complete documentation such as data, assessments, or reports for an applicable Requirement. NYISO staff may be requested to review and answer questions related to this documentation.

5. PREPARATION OF THE ANNUAL COMPLIANCE MONITORING PROGRAM

The Compliance Program is developed in the form of a matrix which includes the following information:

- The Requirement and related Reliability Rule for which compliance will be reviewed. The guidelines for selecting the Requirement to be included in a given year are set forth in Section 3, Monitoring Methods.
- Required compliance documentation for each Requirement. These Requirements specify the type or types of reporting documentation to be submitted by the NYISO for each Requirement to demonstrate compliance.
- Date the compliance documentation is due to be submitted to the NYSRC. The due date is normally seven days before the date the documentation is to be reviewed by RCMS.
- Date compliance documentation was received by RCMS.
- Date compliance documentation was reviewed by RCMS.
- NYISO compliance level, as described in Section 7.

The annual Compliance Monitoring Program will be completed and implemented in February of each year following approval by the Executive Committee. Prior to the Compliance Monitoring Program's finalization, NYISO staff will be given an opportunity to meet with RCMS to request changes to the compliance documentation requirements and due dates.

6. COMPLIANCE ASSESSMENT ADMINISTRATION

The administration of compliance assessments is conducted by RCMS to review NYISO compliance with the Reliability Rules using one of the monitoring processes described in Section 3, Monitoring Methods. Following receipt of compliance documentation from the NYISO, RCMS will first verify its completeness and accuracy.

There are three components of compliance assessment administration. They are all elements of a Reliability Rule.¹

1. Measure. A Measure describes the evidence needed to demonstrate compliance with one or more associated Requirements in order to achieve full compliance. There may be one or more Measures associated with a Reliability Rule.

2. Levels of Non-Compliance. There are four non-compliance levels which are defined by increasing degrees of Requirement violation severity due to actions or inactions by the NYISO or market participants.
3. Compliance Monitoring Process. There are three components of the compliance monitoring process: those entities responsible for compliance monitoring, compliance documentation reporting frequency, and compliance documentation reporting requirements.

As an integral part of a Reliability Rule, the above compliance components are prepared under the NYSRC Reliability Rule open review process described in NYSRC Policy 1. Because they are part of a Reliability Rule, compliance elements are included in the Reliability Rules & Compliance Manual (posted on the NYSRC Web site, “www.nysrc.org”).

RCMS compliance assessments will result in findings either of full compliance with the Reliability Rules by the NYISO, or one of the four levels of non-compliance by the NYISO, and may include a mitigation plan in situations in which the NYISO is found to be non-compliant. The RCMS compliance review process shall recognize that, although economic efficiency is an important operating and planning objective, Reliability Rules must always be complied with.

7. FINDINGS OF COMPLIANCE VIOLATIONS

This section describes NYSRC actions in the event the NYISO is found in non-compliance with a Reliability Rule as determined by the compliance assessment process described in Section 6.

Non-monetary sanctions for NYISO violations of NYSRC Requirements are imposed in the form of non-compliance letters to NYISO officers. Copies of certain letters, depending on designated level of non-compliance, are sent to regulatory bodies. The distribution of non-compliance letters by the NYSRC, as described in Appendix A, becomes increasingly broad depending on the level of non-compliance. The non-compliance letters shall: (1) disclose details of non-compliance findings according to the level of non-compliance, (2) direct the NYISO to come into compliance within a period determined by the NYSRC, and (3) state actions to be implemented by the NYISO to ensure future compliance. The non-compliance letters will be signed by the chairman of the Executive Committee.

The Executive Committee will provide the NYISO with the RCMS report and the draft non-compliance letter, and will inform the NYISO of the basis for the proposed non-compliance finding and any proposed mitigation plan covering remedial actions to deter future compliance violations. The type of letter used to communicate non-compliance will be based on the level of non-compliance.

Non-Compliance Due to Actions or Inactions of the NYISO

If RCMS concludes that the NYISO is in non-compliance with a Reliability Rule due to the action or inaction of the NYISO, in accordance with guidelines in the Compliance Template

Manual, RCMS will report its finding to the Executive Committee along with a draft non-compliance letter.

If the NYISO informs the Executive Committee that it believes that the draft non-compliance letter is not justified or should be modified, the NYISO will be accorded a reasonable opportunity to present its position to the Executive Committee before the Executive Committee acts on the draft non-compliance letter. After considering any information provided by the NYISO, the Executive Committee will decide if a non-compliance letter should be issued.

As described in Sections 4 and 5, the NYISO must submit self-certifications or documentation to demonstrate compliance to the NYSRC in accordance with due dates established by the NYSRC. If a compliance report is not received after a grace period has expired, the RCMS will assess a level of non-compliance for overdue reports in accordance with Appendix B.

Non-Compliance Due to Actions or Inactions of a Market Participant

Certain Requirements define market participant responsibilities required for maintaining compliance with related Reliability Rules. NYSRC Reliability Rules require the NYISO to establish procedures where appropriate to secure compliance by market participants with these Requirements.

If the NYISO cannot certify that a market participant has taken the actions required of it by the Reliability Rules to achieve full compliance, the NYISO is subject to a finding of non-compliance. The RCMS will report its preliminary non-compliance finding to the Executive Committee along with a recommendation as to whether a non-compliance letter should be issued to the NYISO, and the basis for its finding. The RCMS report will indicate whether the non-compliance condition has been addressed or is continuing, and whether the NYISO has taken all reasonable action to secure market participant compliance with the Reliability Rules. The latter will be judged based on whether the NYISO has implemented the procedures and actions set forth below. The RCMS report will be provided to the NYISO and the NYISO will be accorded a reasonable opportunity to present its position to the Executive Committee before the Executive Committee acts on the RCMS report. If, after considering the RCMS report and any comments provided by the NYISO, the Executive Committee concludes that the NYISO has not implemented the procedures and actions set forth below for securing market participant compliance, a draft non-compliance letter will be provided to the NYISO indicating the level of non-compliance. If the NYISO informs the Executive Committee that the draft non-compliance letter is not justified or should be modified, the NYISO will be accorded a reasonable opportunity to present its position on the Executive Committee before the Executive Committee acts on the draft non-compliance letter.

If, after considering the RCMS report and any comments provided by the NYISO, the Executive Committee concludes that the NYISO has taken all reasonable action to secure market participant compliance with the Reliability Rules, the Executive Committee may exercise its discretion to waive the preliminary non-compliance finding. A letter will be sent by the Executive Committee to the NYISO Vice President of Operations stating its findings and

conclusions. The letter may also include actions to be taken by the NYISO to avoid future non-compliance.

NYISO Procedures and Actions for Reviewing and Securing Compliance by Market Participants with the Reliability Rules

In determining whether the NYISO has taken all reasonable actions to secure compliance by a market participant with the Reliability Rules, the NYSRC will consider whether the NYISO has implemented the following actions:

1. The NYISO shall establish adequate procedures to secure compliance by market participants with the applicable Reliability Rules;
2. When the NYISO determines that a market participant has not acted in accordance with a Reliability Rule, the NYISO shall issue a non-compliance letter to that market participant pursuant to NYSRC requirements and NYISO procedures, with a copy to the NYSRC. The non-compliance letter shall be issued as soon as practical after non-compliance has been confirmed. At a minimum, the non-compliance letter shall include the following elements:
 - References to the Reliability Rule and related Requirement(s) that were found in non-compliance;
 - The specific provision in the Requirement(s) that was violated;
 - A directive that the market participant come into compliance within a period determined by the NYISO to be reasonable and consistent with the reliable operation of the bulk power system;
 - Reference to the market participant’s obligation to comply with the Reliability Rules pursuant to the NYISO’s tariffs, procedures and service agreements, and the possible consequences of non-compliance; and
 - A mitigation plan consisting of actions to be implemented by the market participant and supported by the NYISO to ensure compliance within the compliance period established by the NYISO or to prevent a recurrence of the non-compliance, and a statement as to whether the mitigation plan has been accepted by the market participant.
3. After issuance of the non-compliance letter, the NYISO shall update the Executive Committee and RCMS, as requested, on the status of its efforts to work with the market participant to achieve compliance.

4. Should the market participant not comply within the timeframe established by the NYISO, the NYISO shall send the market participant additional non-compliance letters, as provided for in its procedures, confirming the market participant's continued non-compliance.
5. When a market participant has failed to comply with the NYISO's repeated requests, or when the NYISO concludes that the market participant's non-compliance poses a risk to the reliability of the bulk power system, the NYISO shall report the market participant's non-compliance in writing to RCMS, the Executive Committee, and the New York Public Service Commission (PSC). The report will describe the NYISO's due diligence in seeking to secure compliance by the market participant, including the actions it has taken under its tariffs, procedures and service agreements to secure the market participant's compliance, and a statement that further action by the NYISO is not possible or would be inappropriate. The report will request that the PSC consider appropriate action to bring the market participant into compliance. The report will describe any resolution the NYISO has been able to achieve with the market participant.

Dispute Resolution Process

If the NYSRC and the NYISO have a dispute concerning NYSRC compliance assessment results, the NYSRC Executive Committee will discuss the issue with the NYISO and, if necessary, either party may invoke the Dispute Resolution Process described in Article 5 of the NYISO/NYSRC Agreement. The existence of a dispute concerning NYSRC compliance assessment results will not prevent or delay the issuance of a non-compliance letter by the NYSRC. However, the letter will indicate that the NYISO has disputed the NYSRC's finding of non-compliance.

8. FUNCTIONAL RESPONSIBILITIES

Reliability Compliance Monitoring Subcommittee

The RCMS has the overall responsibility of managing the NYSRC compliance monitoring process. Specific responsibilities include:

- Develop and implement the annual NYSRC Reliability Compliance Monitoring Program (See Sections 3&5).
- Initiate other types of compliance reviews as appropriate (See Section 3).
- Monitor compliance with the NYSRC Reliability Rules. This responsibility includes (1) verification that compliance documentation submittals have been received on time and are accurate and complete, (2) review of compliance documentation provided by the NYISO to establish whether it is fully compliant with the Reliability Rule Requirements, and (3) make a finding as to whether the NYISO is in full compliance or is in a level of non-compliance, as appropriate (See Section 6).

- Notify the NYISO of full compliance or the level of non-compliance with the NYSRC Reliability Rules. For non-compliance findings, prepare draft non-compliance letters to the NYISO, including follow-up actions to ensure future compliance, for Executive Committee approval (See Section 7).
- Prepare reports on findings of non-compliance for submission to the Executive Committee. These reports should include a draft non-compliance letter, if appropriate (See Section 9).
- Monitor the NYISO compliance with NERC and NPCC standards and criteria (See Section 3).
- Review NYISO studies, as a part of RCMS compliance programs, examining compliance with NYSRC Reliability Rules of proposed generation and transmission additions and modifications. Reports summarizing these reviews and conclusions will be submitted to the Executive Committee (See Section 6).

Executive Committee

The NYSRC Executive Committee has the responsibility of approving the annual Compliance Monitoring Program and notifying the NYISO when it has determined that the NYISO is in non-compliance with the Reliability Rules. Specific responsibilities include:

- Approve NYSRC compliance monitoring processes and procedures (See Section 3).
- Approve the annual NYSRC Reliability Compliance Monitoring Program (See Section 5).
- Review and approve RCMS recommendations concerning notification of the NYISO of non-compliance actions and issuance of non-compliance letters (See Section 7).
- Approve compliance monitoring reports prepared by RCMS (See Section 9).
- Implement dispute resolution process when appropriate (See Section 7).

NYISO

The NYISO has the responsibility of providing documentation to the NYSRC showing evidence of compliance with the NYSRC Reliability Rules and reviewing market participant compliance with the Reliability Rules. Specific responsibilities include:

- When required by NYSRC timelines, provide to the NYSRC compliance documentation as defined in NYSRC Reliability Rule Requirements (See Section 4).

- Review market participant compliance with those Requirements requiring market participant actions (See Section 4).
- When required by NYSRC timelines, certify compliance or non-compliance of market participants with Reliability Rule Requirements (See Section 4).
- When applicable, in conjunction with providing compliance documentation or certification to NYSRC, compare the NYSRC Requirement to comparable or related NERC Standards and NPCC Criteria to determine if the Requirement is more stringent or specific than those required by NERC or NPCC.”
- When appropriate, submit non-compliance letters to market participants, including future mitigation actions (See Section 7).
- Promptly report suspected NYISO and market participant violations with the NYSRC Reliability Rules to the NYSRC (See Section 3).
- When requested, provide RCMS assistance in preparing compliance programs (See Section 5).
- Participate on the NYSRC RCMS.

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9. COMPLIANCE MONITORING REPORTS

The RCMS prepares the following reports:

- Annual Compliance Monitoring Program
The RCMS prepares an annual Compliance Monitoring Program (see Section 5). The Program matrix is normally updated monthly to record recent RCMS compliance review and compliance/non-compliance actions. This report is submitted to the Executive Committee and reviewed at Executive Committee meetings.
- Annual RCMS Report
The RCMS prepares an annual report that summarizes and presents highlights of the Compliance Monitoring Program for the previous year. This report also provides the results of other types of compliance reviews. This report includes a review of “lessons learned” that is designed to improve the compliance review process.
- NYSRC Web Site Postings
The NYSRC utilizes its web site www.nysrc.org to post many of its compliance review documents. In this way the public is informed about the NYSRC compliance review process and results.

Approved by the NYSRC Executive Committee: August 14, 2015

NYSRC Policy 4-~~7~~8

Issued by: P. Donald Raymond, Secretary

Date Issued: August 17, 2015

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APPENDIX A
**NOTIFICATION LETTERS FOR NON-COMPLIANCE OF
 THE NYSRC RELIABILITY RULES**

<i>Level Of Non-Compliance</i>	<i>Letter Type</i>
1	A
2	B
3	C
4	D

Letter A: To the NYISO Vice President of Operations, with a copy to the NYSRC Executive Committee.

Letter B: To the NYISO CEO, with copies to the NYISO Vice President of Operations and the NYSRC Executive Committee.

Letter C: To the NYISO Board of Directors, with copies to the NYISO CEO, the NYISO Vice President of Operations, and the NYSRC Executive Committee. Post on the NYSRC Web site.

Letter D: The same as Letter C, with copies to the NYS Public Service Commission. Post on the NYSRC Web site.
 Non-compliance letters sent to regulatory bodies shall be redacted to remove any confidential NYISO or market participant information.

APPENDIX B
OVERDUE COMPLIANCE REPORTS

<i>Lateness</i>	<i>Level Of Non-Compliance</i>
Not received within 30 days of established due date.	1
Not received within 90 days of established due date.	4