

From: Philip Raymond p.raymond40@gmail.com
Subject: RE: NYPA Comments on PRR#131C-16-06
Date: October 26, 2016 at 10:08 AM
To: Palla, Sunil Sunil.Palla@nypa.gov
Cc: Roger Clayton roger.clayton@electricpowerresources.com

RD

Sunil,

I have forwarded your comments to Roger.

Thanks,
Don

From: Palla, Sunil [<mailto:Sunil.Palla@nypa.gov>]
Sent: Wednesday, October 26, 2016 9:13 AM
To: Philip Raymond
Cc: Dahl, Curt (Tran Function) (Curt.Dahl@PSEG.COM); Schuff, Arnie; Hochberg, Larry; Zandes, Tim; Gari, Abhilash; Sipperly, Wayne
Subject: NYPA Comments on PRR#131C-16-06

Don,

Good Morning. New York Power Authority respectfully submits the below comments on PRR# 131C G.2 Loss of Gas Supply – New York City:

1. Why is the New York State Reliability Council (Electric Service Reliability) targeting specific generators for a Natural Gas System reliability issue; why not target the Natural Gas system operator to provide a more robust system to maintain proper service. Specific Electric Generators are being targeted to bear the risk of the Natural Gas Local Distribution Company; there seems not to be an issue with Interstate Gas Transportation.
2. Being a dual fuel unit with automatic fuel swapping capability comes with recurring and inherent costs (Oil Storage, oil storage maintenance, maintenance to/on dual fuel systems, etc.) which are not being borne by other facility owners without the same capabilities. Compensation has to be determined **PRIOR** any ruling can be passed to ensure proper compensation to the TARGETED generators:

Either a differentiated (increased) Capacity Payment or some other cost structure to compensate for:

- i. Recurring Maintenance to maintain the system
- ii. Compensation for testing (variable costs for fuel and other associated costs)
- iii. Compensation for testing failures; held harmless for incremental energy revenue costs and absolution for forced outages caused by testing.

Regards,

Sunil Kumar Palla

Sunil Palla

System Planning Engineer I, Transmission Planning

New York Power Authority

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From: Philip Raymond [<mailto:p.raymond40@gmail.com>]

Sent: Monday, September 12, 2016 12:58 PM

To: 'Melissa Becker'; Paul Gioia

Cc: Paul Gioia; Boyle, Robert; 'Chris LaRoe'; 'Christopher Wentlent'; 'Curt Dahl'; 'David B. Johnson';

DJKimiecik@nyseg.com; ellsworth@conknet.com; fortem@coned.com; fpacer@cenhud.com;

Georgepe5@Aol. Com; gloehr@eLucem.com; 'Jim McCloskey'; Hochberg, Larry;

mmager@couchwhite.com; 'Peter Altenburger'; 'Richard Bolbrock'; rloughney@couchwhite.com;

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sassonm@coned.com; 'Scott Leuthauser'; Palla, Sunil; williamclagett@yahoo.com; 'Edward Schrom';

'Leka Gjonai'; 'Vijay Puran'; 'Carl Patka'; 'Chris Sharp'; Dana Walters; 'Henry Chao'; 'Laura Popa'; 'Rana

Mukerji'; 'Rick Gonzales'; 'Robert Pike'; 'Wesley Yeomans'; eschwerdt@npcc.org; pfedora@npcc.org;

pfedora@verizon.net; skopman@npcc.org; aadamson@nycap.rr.com

Subject: NYSRC - Proposed Reliability Rule "Postings for Comment"

Hi Melissa,

Please post the attached proposed Reliability Rule changes under RELIABILITY RULE REVISIONS/
Draft Reliability Rules – Post for Review & Comments/.

Thanks,
Don

NYPA IT Warning – this is an external email, think before you CLICK to open any links or attachments and NEVER provide IDs or passwords.