



New York Reliability Council
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NYSRC Comments on FERC Proposed Rulemakings to Boost Grid Reliability Against Extreme Weather Conditions

New York State Reliability Council (NYSRC)

The NYSRC (<https://www.nysrc.org/>) was approved by FERC in 1998 as part of the comprehensive restructuring of the wholesale electricity market in New York State. Under the restructuring, the New York Power Pool (“NYPP”) was replaced by the New York System Independent System Operator (“NYISO”) as the entity with the primary responsibility for the reliable operation of the state’s bulk power system. The NYISO also assumed responsibility for administration of the newly established competitive wholesale electricity markets. The NYSRC was established to promote and preserve the reliability of the New York State Power System by developing, maintaining and, from time to time, updating the reliability rules (“Reliability Rules”) that govern the NYISO’s operation of the state’s bulk power system.

The NYSRC develops Reliability Rules that are more specific or more stringent than and are inclusive of the standards, criteria and regulations of North American Reliability Corporation (“NERC”), Northeast Power Coordinating Council (“NPCC”), FERC, and the Nuclear Regulatory Commission. The NYISO/NYSRC Agreement provides that the NYISO and all entities engaged in transactions on the New York State power system must comply with the Reliability Rules adopted by the NYSRC. The NYSRC Reliability Rules have been adopted by New York State’s Public Service Commission under its Public Service Law authority prescribing reliability rules necessary to ensure safe and adequate service.

NYSRC Comments on the Proposed NOPRs

NYSRC supports the need for the Notice of Proposed Rulemaking “Transmission System Planning Performance Requirements for Extreme Weather” aimed at maintaining reliability in the United States in the event of threats posed by extreme high and low temperature weather. Planning for extreme weather events is now one of the electric industry’s most critical reliability issues.

In addition, the NYSRC recommends that in any resulting rule that FERC allow for and consider regional differences in its final order. The range and type of high and low temperature base

case scenarios to study should not be the same across the entire country because the effects of extreme weather are different in each region. Each region should be required to develop scenarios that are most relevant to that region. Additionally, regions should determine the severity of the impact of the extreme weather and develop regional scenarios to be studied so that corrective strategies are appropriate to the regional risk.

Following extensive review, the NYSRC is now in the process of implementing actions needed to preserve New York Control Area (NYCA) reliability for a variety of extreme weather events. These actions include the development of new planning and operating criteria for ensuring that the New York State electric system's generating resources and transmission system elements continue to deliver reliable performance for New Yorkers in the face of defined extreme events resulting from a changing climate. On July 8, 2022 the NYSRC approved a whitepaper recommending these actions¹.

Major recommendations in the whitepaper include:

- **That the NYSRC should adopt an “extreme weather resource adequacy criterion” -- such as the 1-in-10-year LOLE criterion or a new criterion² -- for mitigating loss of load impacts of extreme weather events.** Development of an “extreme weather resource adequacy criterion” shall include the use of the results of probabilistic resource adequacy assessments of the reliability impacts of a range of types of extreme weather events.
- **That “extreme weather transmission planning criteria” be adopted to plan the NYCA transmission system to mitigate extreme weather reliability impacts.** Such a criterion does not presuppose what events should be included in the criterion. NYSRC will consider alternate transmission extreme weather criteria, including planning the transmission system to maintain reliability at a 90th percentile load forecast criterion, before making a final recommendation.
- **That the NYISO be required to develop a new *Extreme Weather Resilience Operating Plan for withstanding and recovering rapidly from disruptions*.** This operating plan should include measures or solutions for mitigating reliability impacts. Additionally, the plan should have a current and forward-looking strategy to mitigate and minimize recovery time for such types of events.

The basis for these recommendations are detailed in the whitepaper.

The NYSRC respectfully recommends that, in addressing the issues raised in its NOPR on Extreme Weather Conditions, the Commission give careful consideration to the recommendations set forth herein.

¹ [https://www.nysrc.org/PDF/Documents/Extreme Conditions White Paper - EC Approved 7-8-22.pdf](https://www.nysrc.org/PDF/Documents/Extreme%20Conditions%20White%20Paper%20-%20EC%20Approved%207-8-22.pdf)

² One example of a new criterion could be use of a dual LOLE/EUE criterion.