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Mr. Don Raymond, Executive Secretary
New York State Reliability Council
p.raymond40@gmail.com

Subject: Request to consider the modification of existing Exception #13 to NYSRC Reliability Rules

Dear Don,

Per NYSRC Policy 1-9, NYPA is requesting the NYSRC Executive Committee to consider the following modification of existing Exception #13 to the NYSRC Reliability Rules. The New York Independent System Operator has been kept in the communication loop. This document provides the existing wording, the proposed modification and the reason for modifying this Exception.

NYSRC RR&CM Exceptions #13 to the Reliability Rules

Exception #: #13
Transmission Owner: NYPA
Exception Category: Run Back of Generators

Existing: Post Contingency Flows on Niagara Project Facilities

For the following Niagara Project facilities, the post-contingency flows are allowed to reach their STE ratings, if NYPA can ensure that sufficient generation can be reduced at Niagara to return the flows to less than their STE ratings within 5 minutes and to less than their LTE ratings within 10 minutes from the initial overload:

- Niagara Project transformers
- Lines connected directly to the Niagara Project

Proposed: Post Contingency Flows on Niagara Project Facilities

For the following Niagara Project facilities, the post-contingency flows are allowed to reach their STE ratings, if NYPA can ensure that sufficient generation can be reduced at Niagara to return the flows to less than their LTE ratings within 15 minutes from the initial overload:

- Niagara Project transformers
- Lines connected directly to the Niagara Project

Exception Reference No.	TO	Exception Category	Exception	NYSRC Reliability Rule
13	NYPA	Run Back of Generators	<p><u>Post Contingency Flows on Niagara Project Facilities</u> For the following Niagara Project facilities, the post-contingency flows are allowed to reach their STE ratings, if NYPA can ensure that sufficient generation can be reduced at Niagara to return the flows to <u>less than their STE ratings within 5 minutes and to less than their LTE ratings within 15 minutes</u> from the initial overload:</p> <ul style="list-style-type: none"> Niagara Project transformers Lines connected directly to the Niagara Project <p><i>Initially Approved by NYPP Operating Committee August 19, 1993. Revision Approved by NYSRC Executive Committee February 12, 2010.</i></p>	C.1

Reason for modifying the Exception #13: This modification is being proposed to make it consistent with the language in Section 2.3.2 of NYISO Transmission and Dispatching Operations Manual and also to eliminate any potential system operator confusion. Along with NYPA, the NYISO is also supporting this proposed modification. NYPA does not see any adverse reliability impact with this proposed change.

Section 2.3.2 of the NYISO Transmission and Dispatching Operations Manual states that “With prior approval of the NYISO and NYSRC, the post-contingency loading of any portion of the NYS Transmission System may exceed its LTE rating, but not its STE rating, provided sufficient operating measures are available to return the loading on the facility to below its LTE rating within 15 minutes, without causing another facility to exceed its LTE rating”.

Also, this proposed modification to NYSRC Reliability Rule Exception #13 aims at easing the job of NYISO and NYPA system operators in differentiating between the Reliability Rules Exceptions that allow for exceeding STE (Exception #18) from those Reliability Rule Exceptions that allow only to reach STE (Exceptions #6 & #23).

Exception #13 (current wording): Post contingency, specific facilities can reach STE rating provided there are measures to alleviate the overload to less than STE rating in 5 min and less than its LTE rating in 10 min.


The source of confusion is the second part of this statement refers to alleviating the overload to **less than STE** (insinuating flows above STE) which conflicts with the first part of the statement that only allows reaching STE.

Exceptions #18: Post contingency, specific facilities can exceed STE rating provided there are measures to alleviate overload to less than its STE rating in 5 min and less than its LTE rating in 10 min.

Exception #6 & #23: Post Contingency, specific facilities can reach STE rating provided there are measures to alleviate the overload to/below its LTE rating within 15 min.

Please feel free to call or email me if you have any questions or need more information.

Sincerely,


Sunil Kumar Palla