

**Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-7)**

Submit request to [raymond40@aol.com](mailto:raymond40@aol.com) via the NYSRC site [www.nysrc.org](http://www.nysrc.org)

| Item  | Information   |
|---|---|
| <b>1. PRR No. &amp; Title of Reliability Rule or Requirement change</b> | PRR 135 Revised G.4(R2) Compliance Elements   |
| <b>2. Rule Change Requester Information</b>                             |   |
| Name  | RRS   |
| Organization  |   |
| <b>3. New rule or revision to existing rule?</b>                        | G.4 (R2) compliance element revisions   |
| <b>4. Need for rule change, including advantages and disadvantages</b>  | Measure 2, which specifies the evidence needed to demonstrate Con Edison compliance with R2, needs to be revised to clarify – when a study for identifying <i>Eligible Black Start Resources</i> has not been performed – that Con Edison must certify that the study is not required because there were no changes to system conditions that would have affected the results of the previous study. Other M2 and related levels of non-compliance changes were made to be more specific with regard to R2 compliance requirements.   |
| <b>5. Related NYSRC rules</b>   | G.4 (R1)  |
| <b>6. Section A – Reliability Rule Elements</b>                         |   |
| 1. Reliability Rule   | G.4 No changes  |
| 2. Associated NERC & NPCC Standards and Criteria                        | No changes  |
| 3. Applicability  | No changes  |
| <b>7. Section B – Requirements</b>                                      |   |
| Requirements  | <p><b>No Changes</b></p> <p><b>R2.</b> Con Edison shall have procedures and implement actions for the identification of <i>Eligible Black Start Resources</i> in accordance with R1 and NYISO procedures, as follows:</p> <p><b>R2.1.</b> Con Edison shall perform and document studies to identify <i>Eligible Black Start Resources</i> that would provide a <i>Material Benefit</i> to its SRP if included. These studies shall be conducted whenever changes to relevant system conditions may affect the results of the previous study.</p> <p><b>R2.2.</b> If Con Edison identifies an <i>Eligible Black Start Resource</i> that would provide a <i>Material Benefit</i> to its SRP if included based on a study pursuant to R2.1, it shall designate the <i>resource</i> for participation or continued participation in its SRP. Con Edison shall notify the NYISO and the applicable generator owner that the <i>resource</i> has been designated for participation or continued participation as a black start <i>resource</i> in its SRP. This notification shall be accompanied by supporting rationale and documentation, including a Con Edison study, subject to appropriate confidentiality protections. If requested, Con Edison shall provide</p> |

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|  | <p>additional documentation to the NYISO.</p> <p><b>R2.3</b> If, after being notified that it has been designated as a <i>Eligible Black Start Resource</i> for participation or continued participation in the Con Edison SRP, the owner of the <i>resource</i> does not want to participate or continue to participate, Con Edison shall prepare supplemental information, if requested by the NYISO, for use in a NYISO review to determine whether an exemption for the <i>resource</i>.</p>   |
| <b>8. Section C – Compliance Elements</b>        |  |
| 1. Measures                                      | <p><b>M2</b> (Applicable to Con Edison)</p> <p><del>Con Edison has procedures and has implemented actions for the identification of Eligible Black Start Resources for participation or continued participation in its SRP, in accordance with R2.1. In accordance with R2.2, Con Edison has submitted its methodology and/or study for identifying Eligible Black Start Resources that provide a Material Benefit to its SRP to the NYISO and/or NYSRC when requested.</del></p> <p><u>Con Edison provided evidence that: (1) Con Edison has prepared procedures for identifying Eligible Black Start Resources, in accordance with R2; (2) Con Edison performed and documented a study for identifying Eligible Black Start Resources conducted during the past 12 months, or certified that a study was not required because there were no changes to relevant system conditions that would have affected the results of the previous study, in accordance with R2.1; (3) Con Edison submitted to the NYISO its methodology and/or study that identified a Eligible Black Start Resource that would provide a Material Benefit to its SRP, in accordance with R2.2; and (4) when a Eligible Black Start Resource that was designated to participate in the Con Edison SRP did not want to participate or continue to participate, Con Edison prepared supplemental information requested by the NYISO, in accordance with R2.3.</u></p> |
| 2. Levels of Non-Compliance                      | <p><b>For M2:</b></p> <p>Level 1: Not applicable</p> <p>Level 2: Con Edison has procedures for identifying <i>Eligible Black Start Resources</i> for inclusion or continued inclusion in its SRP, but the procedures were incomplete.</p> <p>Level 3: Con Edison did not submit its black start <i>resource</i> identification methodology or study <u>or other information</u> to the NYISO <del>or NYSRC</del> when requested, <u>in accordance with R2.2 and R2.3.</u></p> <p>Level 4: Con Edison failed to conduct a study for determining the need to include or continue to include any <i>Eligible Black Start Resources</i> in its SRP when required <u>and did not certify that the study was not needed because there were no changes to relevant system conditions that would have affected the results of the previous study,</u> as required by R2.1.</p>   |
| 3. Compliance Monitoring Process (See Policy 4): |  |
| 3.1 Compliance Monitoring Responsibility         | No changes.  |
| 3.2 Reporting Frequency                          | No changes   |
| 3.3 Compliance Reporting Requirements            | No changes   |
| <b>9. Implementation Plan</b>                    | The revised compliance elements in PRR 135 will be implemented for the 2017 NYSRC  |

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|                               | Reliability Compliance Program. |
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| <b>10. Comments</b>           |                                 |
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| <b>11. Date Rule Adopted</b>  |                                 |
|                               |                                 |
| <b>12. PRR Revision Dates</b> | 8/7/16                          |