

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

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| Item | Information |
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| 1. PRR No. & Title of Reliability Rule or Requirement change | PRR 143 Fuel Storage |
| 2. Rule Change Requester Information | |
| Name | RRS |
| Organization | NYSRC |
| 3. New rule or revision to existing rule? | <p><u>New Requirements R6 and R7</u> New rule, under G. Local Area Operations G.2 Loss of Gas Supply – New York City, that establishes a requirement on a Generator Owner of a dual fuel unit that is part of the MOB program that it shall have available alternate fuel on site and/or guaranteed delivery of alternate fuel (guaranteeing continued coverage). The alternate fuel shall allow operation of the dual fuel unit for a minimum of 24 hours.</p> |
| 4. Need for rule change, including advantages and disadvantages | <p>The NYSRC Reliability Rules require Con Edison and NYISO to have procedures and to operate the system so that “[...] loss of a single gas facility does not result in the loss of electric load within the New York City zone”. There are NYSRC Reliability Rules that require Generator Owners of combined cycle units that are part of the Minimum Oil Burn program to test their fuel swap capability.</p> <p>However, there is no requirement on a Generator Owner of a dual fuel unit to actually have the alternative fuel on site or under a guaranteed delivery. Without this requirement the MOB program is simply ineffective.</p> <p>***</p> <p>Advantage: The Local Area Operations Reliability Rule Loss of Gas Supply – New York City, which calls for “The NYS Bulk Power System shall be operated so that the loss of a single gas facility does not result in the loss of electric load within the New York City zone”, can be continuously achieved.</p> <p>Disadvantage: None</p> |
| 5. Related NYSRC rules | |
| 6. Section A – Reliability Rule Elements | |
| 1. Reliability Rule | G.2: Loss of Gas Supply – New York City (no change) The NYS Bulk Power System shall be operated so that the loss of a single gas facility does not result in the loss of electric load within the New York City zone. |
| 2. Associated NERC & NPCC Standards and Criteria | None |
| 3. Applicability | NYISO, Con Edison, Generator Owners of dual fuel units , and Generator Owners of combined cycle units that are part of the Minimum Oil Burn program |
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| 7. Section B – Requirements | |
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| Requirements | <p>(the 'red-line' is the addition)</p> <p>R1. The NYISO shall document, maintain, and publish requirements for operating the New York City zone to comply with G.2. These requirements shall include:</p> <p style="padding-left: 40px;">R1.1 A requirement for Con Edison to prepare procedures and studies for implementing actions for complying with G.2. The NYISO shall review and approve these Con Edison procedures and studies.</p> <p style="padding-left: 40px;">R1.2 A requirement for Con Edison to submit to the NYISO the dates when actions in accordance with R.1.1 procedures are invoked.</p> <p style="padding-left: 40px;">R1.3 A requirement for the NYISO to submit dates and descriptions of R1.2 required actions – when implemented by Con Edison – to the NYSRC when requested.</p> <p>R2. Con Edison shall have in place procedures for operating its system to comply with G.2 and NYISO procedures in accordance with R1.1. Con Edison shall notify the NYISO when actions are taken in accordance with R1.2.</p> <p>R3. The NYISO shall document, maintain and publish the current list of dual fuel units that are part of the Minimum Oil Burn (MOB) program.</p> <p>R4. The NYISO shall have procedures requiring Generating Owners of combined cycle units that are part of the MOB program, which have the ability to automatically swap from natural gas to a liquid fuel source in the event of the sudden interruption of gas fuel supply or loss of gas pressure or unavailability of gas supply to the generator, to test to ensure those units are able to perform their intended function.</p> <p style="padding-left: 40px;">R4.1 The NYISO procedures shall require a unit to complete a successful test of the automatic swap from natural gas to a liquid fuel during each Capability Period.</p> <p style="padding-left: 40px;">The requirement for a test can be substituted by a real-time automatic fuel swap, if that fuel swap was successful and occurred during the current Capability Period.</p> <p style="padding-left: 40px;">R4.2 The NYISO procedures shall identify the appropriate parameters for a test to be considered successful.</p> <p>R5. Each Generator Owner of a combined cycle unit that is part of the MOB Program, which has the ability to automatically swap from natural gas to a liquid fuel source in the event of the sudden interruption of gas fuel supply or loss of gas pressure or unavailability of gas supply to the generator, shall develop and implement test procedures in accordance with requirement R4 to ensure those combine cycle units are able to perform their intended functions. These procedures shall be provided to the NYISO and Con Edison.</p> |

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| | <p>R6. Each Generator Owner of a combined cycle unit that is part of the MOB program, which has the ability to automatically swap from natural gas to a liquid fuel source in the event of the sudden interruption of gas fuel supply or loss of gas pressure or unavailability of gas supply to the generator, shall test its dual fuel capability per requirements R4 and R5.</p> <p>R6.1 If the automatic swap from natural gas to liquid fuel test is not successful, the Generator Owner shall identify the causes of the failure, shall take steps to undertake remedial actions that are necessary to resolve the failure and keep the NYISO and Con Edison informed as to the progress of its remedial actions.</p> <p><u>R87. Each Generator Owner of a dual fuel unit that is part of the MOB program shall have alternate fuel on site and/or guaranteed delivery of alternate fuel. The alternate fuel shall allow operation of the dual fuel unit for a minimum of 24 hours.</u></p> <p><u>R78. The NYISO shall have procedures requiring Generator Owner of a dual fuel unit that is part of the MOB program to have alternate fuel on site and/or guaranteed delivery of alternate fuel. The procedure shall require that the alternate fuel allows operation of the dual fuel unit for a minimum of 24 hours.</u></p> |
| <p>8. Section C – Compliance Elements</p> | |
| <p>1. Measures</p> | <p>Measures M1 to M5 no change.</p> <p><u>M6: The NYISO has procedures in place requiring Generator Owners of a dual fuel unit that is part of the MOB program to meet alternate fuel capability requirements as specified in R7.</u></p> <p><u>M76: The NYISO certified, in accordance with R87, that each Generator Owner of a dual fuel unit that is part of the MOB program had alternate fuel on site and/or guaranteed delivery of alternate fuel. In addition, the NYISO certified that the alternate fuel allowed operation of the dual fuel unit for a minimum of 24 hours.</u></p> |
| <p>2. Levels of Non-Compliance</p> | <p>Measures M1 to M5 no change.</p> <p><u>For Measure 6:</u></p> <p><u>Level 1: N.A.</u></p> <p><u>Level 2: N.A.</u></p> <p><u>Level 3: The NYISO does not have procedures in place requiring Generator Owners of a dual fuel unit that is part of the MOB program to meet alternate fuel capability requirements in accordance with R7.</u></p> <p><u>Level 4: N.A.</u></p> <p><u>For Measure M76:</u></p> <p><u>Level 1: Not applicable.</u></p> <p><u>Level 2: Not applicable.</u></p> <p><u>Level 3: Not applicable. The NYISO certified that a Generator Owner of a dual fuel unit that is part of the MOB program did not have alternate fuel on site and/or guaranteed delivery of alternate fuel, OR the NYISO certified that the</u></p> |

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| | <p><u>alternate fuel did not allow operation of the dual fuel unit for a minimum of 24 hours.</u></p> <p><u>Level 4: The NYISO certified that at the Generator Owner of a dual fuel unit that is part of the MOB program did not have alternate fuel on site and/or guaranteed delivery of alternate fuel, and, in addition, the NYISO certified that the alternate fuel did not allowed operation of the dual fuel unit for a minimum of 24 hours.</u></p> |
| 3. Compliance Monitoring Process (See Policy 4): | |
| 3.1 Compliance Monitoring Responsibility | Changes are not required. |
| 3.2 Reporting Frequency | Changes are not required. |
| 3.3 Compliance Reporting Requirements | Changes are not required. |
| 9. Implementation Plan | The NYISO shall revise appropriate procedures within 90 days of Executive Committee approval of PRR 143. |
| 10. Comments | |
| 11. Date Rule Adopted | |
| 12. PRR Revision Dates | 1/3/2019, 1/5/2019 |

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