

**Request to Develop or Modify Reliability Rules and Requirements (NYSRC Policy No. 1-11)**  
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Item	Information
<b>1. PRR No. &amp; Title of Reliability Rule or Requirement change</b>	PRR 146 - B.4: Transmission System Interconnection Special Studies
<b>2. Rule Change Requester Information</b>	
Name	RRS
Organization	
<b>3. New rule or revision to existing rule?</b>	New Reliability Rule and Requirements
<b>4. Need for rule change, including advantages and disadvantages</b>	Studies associated with the interconnection of dynamically active transmission devices have been included in the NYISO's interconnection process and periodic transmission planning/operating studies on an ad-hoc basis. Based on the proliferation of inverter-based resources, as well as applications of active series/shunt compensation and HVDC connections to the NYCA system, it is proposed to include a requirement for special studies in the NYSRC Reliability Rules.
<b>5. Related NYSRC rules</b>	N/A
<b>6. Section A – Reliability Rule Elements</b>	
1. Reliability Rule	NYISO interconnection requirement studies shall include, as applicable, special studies to examine the impacts of dynamically active technologies.
2. Associated NERC & NPCC Standards, Criteria & Guidelines	<a href="#">NPCC: Directory 1</a> <a href="#">NPCC: NPCC Guidance Document— Approaches to Preserve System Resilience &amp; Reliability for a High DER Penetration Future. August 2019</a> <a href="#">NERC: Reliability Guidelines: Improvements to Interconnection Requirements for BPS-Connected Inverter-Based Resources. September 2019</a> <u>Any special studies will consider currently applicable NPCC and NERC Requirements and Guidelines. Other recognized industry guidance, such as IEEE specifications, may also be considered.</u>
3. Applicability	NYISO
<b>7. Section B – Requirements</b>	<b>R1.</b> The NYISO shall prepare and maintain procedures that stipulate that special studies <del>shall may</del> be performed, <del>on a case by case basis as applicable</del> , during the NYISO interconnection studies process to determine the impacts of dynamically active technologies to the NYS Bulk Power System. <u>The procedures should be updated on an annual reviewed annually, and updated as appropriate basis.</u>  [Dynamically active technologies include inverter-based resources (IBR), as well as applications of series and shunt compensation, and HVDC interconnections.]
<b>8. Section C – Compliance Elements</b>	.

**Commented [HS1]:** Listing this single NERC document might imply that it is all that need to be considered. However there are many NERC documents related to dynamically active Transmission already issued and others under development, including NERC standards revisions related to dynamically active DER.

Solution: A more general statement needs to be developed to make it clear that DER must be considered (even if a particular facet of DER reliability risk is not covered by NPCC or NERC mandates) while at the same time avoiding locking in specific documents.

Although "dynamically active" as a subset of resources is important, the system studies and perhaps this rule should not be limited to considering dynamically active technologies.

1. Measures	The NYISO maintains procedures associated with the conduct of special studies during the transmission system interconnection studies process, in accordance with R1.
2. Levels of Non-Compliance	Level 1: NA Level 2: <del>NA</del> The NYISO maintained procedures, but did not revise the procedures to reflect current mndtes and guidance. Level 3: NA Level 4: <del>The NYISO does not maintain procedures</del> Procedures associated with the conduct of special studies during the transmission system interconnection studies process, in accordance with R1, <del>were not provided.</del>
3. Compliance Monitoring Process (See Policy 4):	
3.1 Compliance Monitoring Responsibility	RCMS
3.2 Reporting Frequency	In accordance with NYSRC compliance program schedules.
3.3 Compliance Reporting Requirements	Self-Certification plus, if requested, reference to documents that show the required procedure in R1.
9. Implementation Plan	NYISO procedures in accordance with R1 shall be provided to RCMS for compliance review within 90 days of PRR 146 final approval.
10. Comments	
11. Date Rule Adopted	
12. PRR Revision Dates	8/27/19, 10/24/19, 1/15/20, <u>1/21/20, 4/23/20</u>

**Commented [HS2]:** Having only a level 4 non-compliance option leaves little room for RCMS compliance monitoring to apply its judgement. It also, as stated, makes it a binary compliance hurdle, either the NYISO has a procedure or it does not. There should be some additional levels that allow for the judgement of the NYSRC RCMS to be applied as to how comprehensive the procedures are and how thoroughly the reliability risks of concern are addressed by the procedures.

**Commented [HS3]:** Suggest there be at least an annual review period to take into account the changing nature of the available guidance and standards emanating from IEEE, NERC, NPCC, CIGRE, NAGF, NATF, Others