New York State Reliability Council

2019 Reliability Rules Subcommittee Report

January 20, 2020

NYSRC 2019 Reliability Rules Subcommittee Report

Introduction

The Reliability Rules Subcommittee ("RRS") manages the review, development, and modification of the NYSRC Reliability Rules to maintain or enhance the reliability of the NYS Bulk Power System. Reliability is monitored in accordance with the NYSRC and NYISO/NYSRC Agreements, NYSRC Policy 1, *Procedure for Reviewing, Modifying, and Disseminating NYSRC Reliability Rules,* and other processes and procedures established by the NYSRC Executive Committee. RRS is an open subcommittee whose meetings are open to all interested parties who wish to attend. Meetings are publicly posted on the NYSRC website.

The responsibilities of RRS include:

1. Recommend to the NYSRC Executive Committee processes and procedures, including Policy 1 revisions, for reviewing, developing, and modifying the NYSRC Rules.

2. Consider requests by the Executive Committee for development of new Reliability Rules or modifications of existing Reliability Rules, and recommend to the Executive Committee whether such requests should be accepted or denied.

3. For those Reliability Rule change requests approved by the Executive Committee, recommend to the NYSRC Executive Committee Reliability Rule additions or modifications. The process of developing new reliability rules and modifying existing rules, when the change is intended to enhance reliability, should consider the economic and environmental implications of the proposed rule change.

4. When requested by the Executive Committee, review and comment on requests for exceptions to the Reliability Rules.

5. Recommend to the NYSRC Executive Committee revisions to the NYSRC Reliability Rules Manual when appropriate.

6. Conduct self-assessments of the NYSRC Rules to ensure consistency with NERC and NPCC standards and criteria.

7. Participate in NPCC, NERC, or other related open processes for developing and approving new reliability standards or modifications of existing standards. Review and comment on proposed standards, when appropriate. Address issues associated with the potential impact of proposed NPCC, NERC, or other standards on New York Control Area reliability.

8. Maintain a data base for the tracking of new and revised NERC and NPCC standards and criteria.

9. Review Reliability Rule disputes and recommend potential solutions to the NYSRC Executive Committee.

10. Prepare and submit status reports requested by the NYSRC Executive Committee. Also prepare, on request, reports for the NYSRC Executive Committee to disseminate to FERC and the PSC.

11. Review system operations trending information collected by the Reliability Compliance Monitoring Subcommittee (RCMS) when requested by the Executive Committee or RCMS.

12. Develop interpretations of the Reliability Rules when requested by the Executive Committee.

2019 Highlights

NYSRC Reliability Rules and Compliance Manual

The initial NYSRC rules, adopted in 1999, were based on former New York Power Pool criteria. Since then, these rules have been revised numerous times to reflect the need for: new and modified NYSRC rules; NERC and NPCC standards; and criteria changes.

The NYSRC has always worked towards improving its Reliability Rules by introducing new Rules, revising existing Rules and retiring existing Rules when appropriate. Potential Reliability Rule (PRR) changes are considered by RRS to ensure that the NYSRC Reliability Rules and related requirements are consistent with, or more specific, or more stringent than the corresponding NERC and NPCC reliability standards and criteria.

2019 New & Revised NYSRC Reliability Rules

The following is a list of major new or revised Reliability Rules considered in 2019:

1. RR 144 C.3 Outage Coordination
   Reliability Rule Revision C.3 Outage - Coordination Requirement 4 and Requirement 6
   The intent of existing R4 will be incorporated into the procedures stipulated in existing R6 of this Rule so that facility owners are aware of their obligation to restore maintenance outages expeditiously in the case of an emergency. Existing R4 will be retired, and subsequent Requirements will be renumbered.
   Normal Process Review
   Posted on February 12, 2019
   Comments were due on March 29, 2019
   No comments were received.

Several PRRs were considered in 2019 for 2020 action:

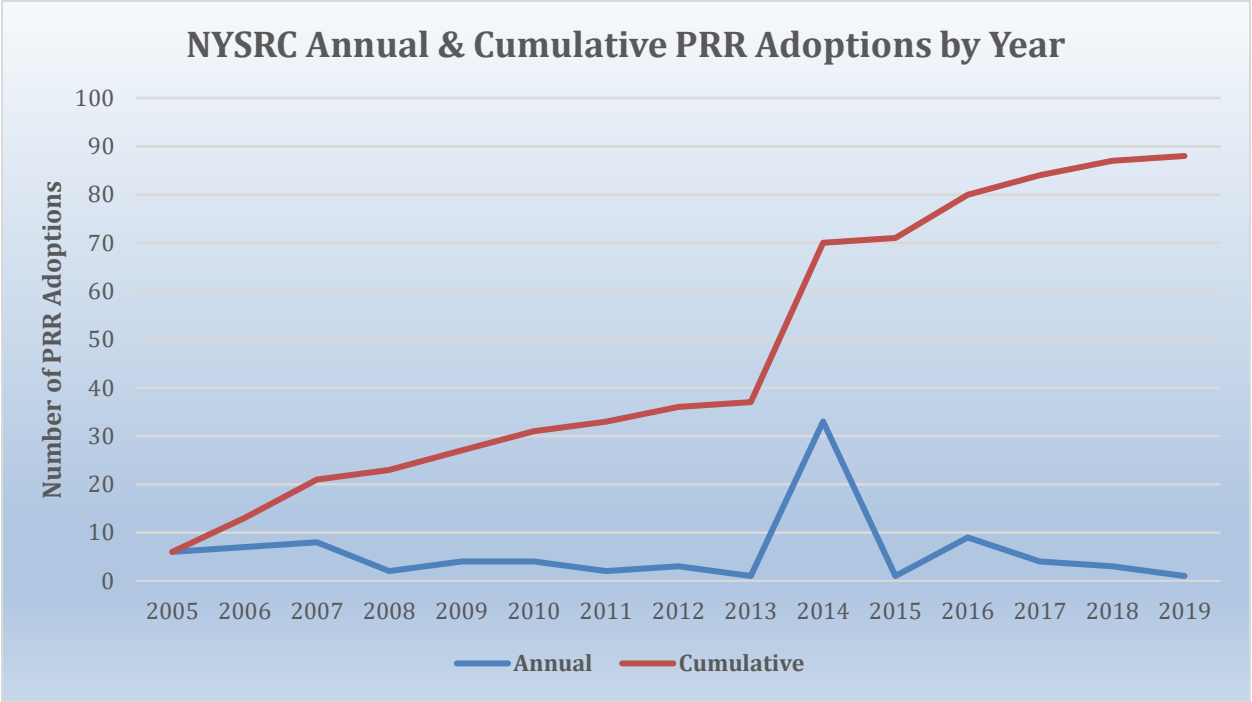
- PRR#128 – Definition of Bulk Power System. Rule to align NYSRC definition with the NPCC A-10 definition.
- PRR#145 - Reliability Rule Revision to Modify A.3: Resource Adequacy Assessments. Replaces the current rule A.3, which now requires a 3-year resource adequacy assessment, with one that requires: (1)an annual "Next Capability Year" Resource Adequacy Assessment, (2) a biennial Long-Term Resource Adequacy Assessment, and

(3) a long-term Resource Adequacy Assessment in order to inform the NYSRC of any significant updates.

- PRR#146 – Transmission System Special Study Assessments. Rule addresses special study requirements for dynamically active devices.
- PRR#147 - Reliability Rule Revision: NYSRC Resource Adequacy Criterion. Rule clarifies that the NYSRC Resource Adequacy LOLE Criterion applies to all resource capacity probability assessments, including resource adequacy analysis (see related PRR145) and IRM requirement studies.

RRS discussed several issues potentially affecting NYCA long-term reliability including:

- On-going retirement of NYCA fossil and nuclear plants
- Impact of a major penetration of renewable resources on NYCA's transmission requirements and installed reserve margin. (Note: New York State's "Climate Leadership & Community Protection Act" legislates: 70% renewable energy target by 2030; 9 GW off-shore wind by 2035; 6 GW solar by 2025; 3 GW energy storage by 2030)
- Data, modeling and study methodologies required to accurately assess system reliability with behind the meter and system connected distributed energy resources.



Conclusions

The Reliability Rules Subcommittee reached the following conclusions with regard to its 2019 activities:

1. RRS considers that the NYCA Bulk Power System will experience significant operating and transmission planning challenges in the next decade with the ongoing retirement of NYCA fossil and nuclear resources, and a corresponding increase in renewable resources.
2. RRS continues to monitor current and predicted reliability trends in the NYCA BPS with the goal of developing new, revised or retirement of individual Reliability Rules.
3. One PRR was adopted by the Executive Committee in 2019. The average PRR adoption rate since NYSRC inception is 5.9 PRRs per year.
4. The NYISO Staff continued to provide valued assistance to RRS during 2019.
5. RRS provides an active technical forum for discussion of NYS reliability matters. All parties including Transmission Owners, Developers, the public and NYISO staff have a platform to develop new or revised Reliability Rules, and continue to do so in a collegial and cooperative manner.