# Joint Meeting of the New York State Reliability Council, L.L.C. (NYSRC) Reliability Rules Subcommittee (RRS) / Reliability Compliance Monitoring Subcommittee (RCMS) Thursday, January 3, 2019

Minutes of RRS Meeting No. 233

#### **RRS** Members and Alternates:

Roger Clayton, Electric Power Resources (Chairman) Larry Hochberg, NYPA (Vice Chairman) Zoraini Rodriguez, PSEGLI/LIPA Rahul Pandit, PSEGLI/LIPA Brian Shanahan, National Grid (Secretary) Dan Head, Con Edison Martin Paszek, Con Edison Sal Spagnolo, NYPA

#### **Non-Voting Participants**:

Al Adamson, Consultant Jim Grant, NYISO Chris Sharp, NYISO Mark Capano, NYISO

#### **Guests**:

Paul Gioia, NYSRC Counsel Richard Quimby, DPS

RRS Meeting No. 232 was called to order by Mr. Clayton at 10:00 AM.

# 1. Introduction

1.1 Executive Session

None requested.

#### 1.2 Requests for Additional Agenda Items

Mr. Clayton announced that he has three additional agenda items to discuss at today's meeting. The items are as follows:

- 5.3 NERC IRM Reference of 15% (Al to discuss)
- 6.2 RRS Annual Report
- 6.3 Report on 2019 IRM / Selkirk issue

# 2. Approval of Minutes / Action Items

2.1 Approval of RRS Minutes No. 232

RRS reviewed the Minutes from the last RRS meeting and adopted comments by Mr. Paszek and Mr. Clayton. The Minutes were then accepted as final.

2.2 RRS 232 Status Report to EC

Mr. Clayton presented to the RRS, a copy of the 'RRS 232 Status Report' which was developed for the purpose of summarizing the prior meeting of the RRS, at the next Executive Committee (EC) meeting.

2.3 RRS 232 Action Items List

Action Item 232-7: Deferred to February.

Action Item 232-6: ICS Task, changed to an "Ongoing" item to monitor developments.

Action Item 232-5: Develop a matrix on Public Appeal data submitted by each TO for the past 20 years was completed.

Action Item 232-4: Distribute "Winter 2018-2019 Capacity Assessment Winter Preparedness" presentation to RRS was completed.

Action Item 232-3: Prepare a PRR on Fuel Storage for RRS review was completed. A new follow-on Action Item (233-6) was created in this meeting.

Action Item 232-2: Prepare a PRR on SPS/RAS for RRS review was completed. A new follow-on Action Item (233-1) was created in this meeting.

Action Item 230-4: Rewrite C3 Outage Coordination measure was completed.

Action Item 230-2: Inform RRS of the findings on the LIPA's 80MW Public Appeal was completed.

Action Item 228-1: This action item remains as "Ongoing".

Action Item 83-8: There was nothing new reported. The status remains as 'Ongoing'.

### 3. NYSRC Reliability Rules Development

3.1 PRR List

3.1.1 PRR Outstanding List

No changes. PRR-128 is being tabled, still awaiting NPCC's A-10 definition.

3.2. PRRs for EC Final Approval after Posting

3.2.1 None.

3.3. PRRs for EC Approval to Post for Comments

3.3.1 PRR 142 - B.2 Transmission Planning Assessments (SPS/RAS)

Mr. Paszek presented the PRR 142, which would maintain both RAS & SPS terms as both terms are used by NERC and NPCC. Mr. Paszek stated that the main driver for this PRR is concern over the quality of new SPS reviews and changing system conditions that could invalidate previous SPS reviews.

Mr. Clayton expressed concern that NYISO may have to perform 2 separate tests due to differing definitions between NERC RAS and NPCC SPS and the differing definitions could become a source of confusion in performing analysis.

A discussion ensured regarding how this PRR will add a new requirement for NYISO to assess interaction of existing and proposed SPS's on NYCA system. The main issue is coordination with NPCC for detailed SPS reviews as a part of comprehensive transmission reviews, not necessarily every (interim) annual transmission review.

Mr. Paszek stated that he will provide a presentation to the next RRS, which includes comparison of SPS to RAS, a list of SPS's, and the exception list, for the next meeting (New RRS Action Item 233-1). This will also include justification for including RAS in the PRR.

Mr. Adamson summarized administrative concerns with the PRR 142 formatting and will provide preliminary comments to Mr. Paszek prior to next RRS meeting. (New Action Item 233-2).

3.3.2 PRR 143 - G.2 Loss of Gas Supply (Fuel storage/supply)

Mr. Paszek presented a proposed new rule, under G. Local Area Operations, G.2 Loss of Gas Supply – New York City, which would establish a minimum fuel oil storage requirement on Generator Owners of a dual fuel unit that are part of the MOB program. The Rule would require applicable generators to have alternate fuel available on site

and/or guaranteed delivery of alternate fuel (guaranteeing continued coverage). The alternate fuel storage quantity shall allow operation of the duel fuel unit for a minimum of 24 hours.

Mr. Gioia requested that IPNY be notified of PRR 143 and request/suggest attendance at the next meeting where this PRR is discussed.

Mr. Clayton asked whether there has ever been an event where a MOB unit has ever been requested to burn alternate fuel and could not comply due to lack of storage/supply. Mr. Paszek stated that he will research this and get back to RRS next month (New Action Item 233-3).

Mr. Clayton also referenced a NYISO program/procedures that may address this issue. Mr. Paszek stated that this may be a statewide-based program, and is not specific to LOG/MOB Units or specific fuel requirements. To further understand this, NYISO will provide a presentation on Dual Fuel audit procedures (and comments on this PRR) along with any "avoided cost" recovery procedures/examples for the next meeting (New Action Item 233-4).

Ms. Rodriguez questioned that if this PRR is perceived as needed for NYC, is it also necessary for Long Island? Mr. Gioia requested that Ms. Rodriguez provide existing contract language(s) between LIPA and generators with respect to any fuel supply requirements for dual fuel units (New Action Item 233-5).

Mr. Hochberg questioned the basis for a 24 hour storage requirement, and whether this duration is based on full power operation. Mr. Paszek stated that the suggested 24-hour operation basis was the Day Ahead Market structure. An additional question was whether affected units actually have a fuel storage capacity sufficient to comply with this proposed new requirement. Individual generator storage capabilities are not known at this time although further investigation will be pursued.

3.3.3 PRR 144 - C.3 Outage Coordination (Expeditious restoration)

Mr. Grant presented rationale for elimination of R4 as it is a generalized requirement that is not practical to measure or validate. The language is suggested to be incorporated into the existing R6 which requires NYISO to maintain procedures regarding coordination of outages of transmission facilities. Mr. Gioia questioned whether there should be TO certification that they performed expedited actions rather than eliminate R4. Mr. Grant will rewrite PRR 144 to require TO's to have procedures regarding outage coordination (Action Item 233-6).

### 3.4. Discussion Items

3.4.1 Public Appeal Issue

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Mr. Adamson presented a table of Public Appeal data submitted by TO's for the past 20 years and used in past IRM studies (AI 232-5). A general discussion followed that noted this data had an impact on the IRM determination of 0.2% and was also dependent on location of the 80 MW Public Appeal assumption. Ms. Rodriguez discussed findings from LIPA's 80 MW public appeal process. Mr. Clayton requested NYISO provide an Operations Representative or information on how EOP's (Public Appeals) are incorporated into daily operations. (New Action Item 233-7).

3.4.2 "Emergency transfer capability" references in PRR, RR&CM & Policy 5

Mr. Hochberg previously observed that consistent wording is not used between documents, but no NYSRC definition exists regarding "Emergency Transfer Capability." Mr. Hochberg and Mr. Adamson will collaborate on identifying instances and possible editorial improvements.

# 4. NPCC Directories

No update.

# 5. NERC SARS/Organization Standards

5.1 NERC Standard Tracking

Balloting starts on January 8<sup>th</sup> for BAL-003-1.1 standard changes.

#### 5.2 NYSRC voting process

Mr. Adamson expressed continuing concern regarding the development of an NYSRC Ballot position/vote for NERC Standard Project ballots where there is not consensus (or input), among NYCA TO's.

Mr. Gioia suggested that the Executive Council should provide guidance on how to proceed when TO consensus is not possible. It was observed that it is not practical for the EC to provide guidance in instances of uncertainty due to EC scheduling and ballot deadlines. Mr. Gioia and Mr. Clayton suggested that NYSRC NERC representative (Mr. Adamson) include a deadline for response in email requests to TOs for ballot input which would state that unresponsive TOs recommendations may not be considered.

Mr. Clayton will bring this question to the EC for further guidance.

5.3 NERC IRM Reference of 15% (Additional Agenda Item)

Mr. Clayton explained that when NERC performs a capability analysis they do not use the NYSRC's IRM value. This may result in non-conservative analysis results. This is a long standing issue. Recommendation is for NYSRC to take no action but be aware of differences between NYSRC IRM methods and NERC's.

# 6. Additional Agenda Items

6.1 REV Potential Impact on NYS BPS Reliability

Mr. Clayton reiterated that the DER workshop went very well. All presentations could be found on the NYSRC website. A DER Workshop summary presentation was provided to RRS members.

An EC Member (G. Smith) will be monitoring industry events (NERC etal.) and provide reports to the NYSRC EC regarding DER modeling developments as warranted.

6.2 RRS Annual Report

Mr. Adamson informed that the goal is for the report to be completed for submittal to the March Executive Committee meeting. (New Action Item 233-8).

6.3 Report on 2019 IRM / Selkirk issue

Selkirk withdrew notification of retirement after IRM was determined. Retirement would have lowered the IRM by about 0.2% and would have lowered IRM base case IRM to 16.6 or 16.7%. The Executive Committee was consulted and it was determined that the selected 17.0% IRM would not be changed.

## 7. Reports

7.1 NYSRC EC Meeting Reports

There were no additional RRS items to report.

7.2 NYSRC ICS Meeting Report

Mr. Adamson went thru the various tasks and milestones that need to be completed for the next IRM study and will be presented to the February EC meeting.

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The meeting ended at 12:21 PM.

## 8. Next Meeting No. 234

Friday, February 1, 2019; 10:00 AM @ NYSERDA, 17 Columbia Circle, Albany.