

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

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| Item  | Information   |
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| <b>1. PRR No. &amp; Title of Reliability Rule or Requirement change</b> | <b>PRR 132</b> I.4 Transmission Data  |
| <b>2. Rule Change Requester Information</b>                             |   |
| Name  | Reliability Rules Subcommittee (RRS)  |
| Organization  |   |
| <b>3. New rule or revision to existing rule?</b>                        | Revision  |
| <b>4. Need for rule change, including advantages and disadvantages</b>  | <p>The New York State Reliability Council (NYSRC) Executive Committee adopted NYSRC's Reliability Compliance Monitoring Subcommittee (RCMS) recommendation for the NYSRC's Reliability Rules Subcommittee (RRS) <i>"to review and modify Reliability Rule I.4 and the related Requirements and to propose modifications, to the extent necessary, to clearly and objectively identify non-compliant data error submissions, and to consider any other modifications the RRS deems necessary;"</i></p> <p>This recommendation came from RCMS review of Market Participant compliance violation of Transmission Data requirement (I.4). RCMS members noted the difficulty in interpretation of Requirement I.4 as follows:</p> <ul style="list-style-type: none"> <li>• The impossibility of perfect data accuracy [is unachievable] based upon the thousands of data items and repetitive updating of data sets. [Therefore,] it would be imprudent and impracticable to find every instance of an erroneous data submission to be noncompliant.</li> <li>• While all data errors require correction, most do not adversely affect reliability and judgment is required to assess materiality. It is noted that I.4, as currently written, does not require that the potential impact on reliability of the data errors be established.</li> </ul> |
| <b>5. Related NYSRC rules</b>   | None  |
| <b>6. Section A – Reliability Rule Elements</b>                         |   |
| 1. Reliability Rule   | <del>Accurate</del> Load flow, short circuit, and stability data bases required for planning and operating studies of the NYS Bulk Power System shall be developed and maintained. The data shall include appropriate detail from adjacent control areas.   |
| 2. Associated NERC & NPCC Standards and Criteria                        | NPCC: Directory 1<br>NERC: MOD-010, <del>-011</del> , 012, <del>-032</del> ; IRO-010  |
| 3. Applicability  | NYISO, Market Participants <del>and Developers</del>  |
| <b>7. Section B – Requirements</b>                                      |   |
| Requirements  |   |

R1. The NYISO shall establish and maintain procedures for the development and maintenance of load flow, short circuit, and stability data bases. These procedures shall:

R.1.1 Require an annual process to be followed by the NYISO and Market Participants to review and update the existing load flow, short circuit, and stability data bases.

R.1.1-2 Require Market Participants ~~and Developers~~ to report to the NYISO ~~accurate~~ equipment data characteristics for equipment additions or modifications that are identified outside the annual process, including changes, which affect these data bases. ~~The procedure shall address appropriate time requirements for reporting such data.~~

R.1.3 Require Market Participants to report to the NYISO modeling discrepancies that are identified outside the annual process. The procedure shall address appropriate time requirements for reporting such discrepancies.

R.1.42 Include guidelines for checking the reasonableness of equipment data (load flow, short circuit and stability data) to identify Suspect Data. The guidelines shall specify reasonable data parameters.

~~R.1.35~~ Require the NYISO to apply the guidelines in R1.42 to data provided to the NYISO.

~~R.1.46~~ Require the NYISO to request verification or corrections of any Suspect Data from the Market Participant ~~or Developer~~ that provided the data.

R2. Load flow, short-circuit, and stability data bases shall be updated by the NYISO on an annual basis or whenever system changes warrant an update, as specified by NYISO procedures required under R1. These data bases shall be made available per NYISO procedures.

R3. Market Participants ~~and Developers~~ shall:

R.3.1 Review and update the existing load flow, short circuit, and stability data bases as specified by NYISO procedures required under R1.1.

R.3.2 Report to the NYISO equipment data characteristics for equipment additions or modifications as specified by NYISO procedures required under R1.2.

R.3.3 Report to the NYISO modeling discrepancies that are identified outside the annual process as specified by NYISO procedures required under R1.3.

~~R.3.1 Provide to the NYISO accurate load flow, short circuit and stability~~

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|  | <p><del>data in the time frame and format as specified by NYISO procedures required R1. This data will be used to maintain up-to-date data bases required under R2.</del></p> <p><del>R.3.42</del> Respond to NYISO requests for data verification or correction of Suspect Data.</p> <p><u>R4. The NYISO shall maintain procedures that ensure that appropriate actions are taken when Market Participant provides modeling discrepancies to existing load flow, short circuit, and stability data bases. These procedures shall:</u></p> <p><del>R.4.1 Require the NYISO to assess the impact of the modeling discrepancies on the reliability of the Bulk Power System, and to review the results of its assessment with the affected Market Participants.</del></p> <p><del>R.4.2 Require the NYISO to issue a non-compliance letter to the Market Participant responsible for the modeling discrepancy, if:</del></p> <p><del>R.4.2.1 The assessment identifies a current system reliability violation on the NYS Bulk Power System, or</del></p> <p><del>R.4.2.2 The assessment identified that, within the past year, the system had been operated in an in-secured state.</del></p> <p><del>R.3.3 Review and check their equipment data (load flow, short circuit and stability data) within data bases provided by the NYISO to ensure accuracy.</del></p>   |
| <p><b>8. Section C – Compliance Elements</b></p> |   |
| <p>1. Measures</p>                               | <p>M1. The NYISO had in place procedures for the <u>annual</u> development and maintenance of load flow, short-circuit and stability data bases, including Market Participant <del>and Developer</del> requirements to <u>review existing data bases and report accurate equipment data characteristics for equipment additions and modifications</u>, including <del>changes which affect these data bases modeling discrepancies</del>, to the NYISO, in accordance with R1. These procedures also addressed time requirements for reporting such data. In addition, the NYISO applied data reasonableness guidelines for all data provided to the NYISO for identifying Suspect Data, as described in R1, and requested verification or corrections of Suspect Data from the Market Participant <del>or Developer</del> that provided the data.</p> <p>M2. Load flow, short-circuit, and stability data bases were updated as specified by NYISO procedures and schedules, in accordance with R2.</p> <p>M3. The NYISO certified that all Market Participants <u>reviewed and</u> <del>and Developers</del> provided <u>updates to the NYISO with</u> load flow, short circuit, and stability data bases in accordance with R3.1. <u>The NYISO also certified that all Market Participants provided equipment data characteristics for equipment additions</u></p> |

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|                                    | <p><u>or modifications in accordance with R3.2. The NYISO also certified that it had received from Market Participants modeling discrepancies in accordance with R3.3.</u> In addition, the NYISO certified that all Market Participants <del>and Developers reviewed their data bases for accuracy and</del> responded to NYISO requests for data verification or correction of Suspect Data.</p> <p><u>M4. The NYISO had in place procedures that ensured that appropriate actions are taken when Market Participant provides modeling discrepancies to existing load flow, short circuit, and stability data bases, including NYISO requirements to conduct assessment in order to establish the impact on the reliability of the Bulk Power System due to the identified modeling discrepancy. In addition, the procedures also address NYISO requirement to issue a non-compliance letter to the Market Participant responsible for the modeling discrepancy, if the assessment identified current system reliability violation on the NYS Bulk Power System, or the assessment identified that, within the past year, the system had been operated in an in-secured state.</u></p> |
| <p>2. Levels of Non-Compliance</p> | <p>For Measure 1</p> <p>Level 1: Not applicable.</p> <p>Level 2: NYISO procedures for development and maintenance of load flow, short-circuit, and stability data bases have been prepared, but were incomplete in one or more areas.</p> <p>Level 3: <u>It was determined that the NYISO and/or Market Participant did not follow the established annual process, or</u> <del>it</del> was determined that the <del>NYISO</del> NYISO did not adequately apply its guidelines for identifying Suspect Data <del>for certain data provided by Market Participants and Developers</del> <del>after a review of equipment data used in a planning or operating study indicated that the data fell outside the range of reasonable data parameters.</del></p> <p>Level 4: NYISO procedures for development and maintenance of load flow, short-circuit, and stability data bases have not been prepared, or the NYISO has not prepared guidelines for identifying Suspect Data.</p> <p>For Measure 2</p> <p>Level 1: Not applicable.</p> <p>Level 2: Load flow, short-circuit, or stability data bases were not updated as specified by NYISO procedures and schedules.</p>                 |

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|  | <p>Level 3: Not applicable.</p> <p>Level 4: None of the load flow, short-circuit, and stability data bases were updated as specified by NYISO procedures and schedules.</p> <p>For Measure 3</p> <p>Level 1: <del>Not applicable. The NYISO certified that the required data that was provided was complete, but was not submitted to the NYISO by the specified time by one or more designated Market Participants and Developers.</del></p> <p>Level 2: <del>The NYISO certified that the required data that was provided was complete, but was not submitted to the NYISO by the specified time by one or more designated Market Participants. The NYISO certified that the required data was submitted to the NYISO on time, but was incomplete in one or more areas for one or more designated Market Participants and Developers.</del></p> <p>Level 3: <del>The NYISO certified that the required data was submitted to the NYISO on time, but was incomplete in one or more areas for one or more designated Market Participants. The NYISO certified that one or more Market Participants and Developers did not check the accuracy of its data, or did not respond to the NYISO for requests for data verification or correction of Suspect Data.</del></p> <p>Level 4: The NYISO certified that the required data from one or more designated Market Participants <del>and Developers</del> was not submitted to the NYISO.</p> <p>For Measure 4</p> <p><del>Level 1: Not applicable.</del></p> <p><del>Level 2: NYISO procedures to ensure that appropriate actions are taken when Market Participant provides modeling discrepancies to existing load flow, short circuit, and stability data bases have been prepared, but were incomplete in one or more areas.</del></p> <p><del>Level 3: Not applicable.</del></p> <p><del>Level 4: It was determined that the NYISO did not adequately follow its procedures to ensure that appropriate actions are taken when Market Participant provides modeling discrepancies to existing load flow, short circuit, and stability data bases have been prepared, but were incomplete in one or more areas.</del></p> |
| 3. Compliance Monitoring Process (See Policy 4): |  |
| 3.1 Compliance                                   | <ul style="list-style-type: none"> <li>• M1: RCMS</li> </ul>   |

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| Monitoring Responsibility             | <ul style="list-style-type: none"> <li>• M2: RCMS</li> <li>• <del>M3: NYISO/RCMS</del></li> <li>• <del>M4: RCMS</del></li> </ul>  |
| 3.2 Reporting Frequency               | <ul style="list-style-type: none"> <li>• M1: In accordance with NYSRC Compliance Monitoring Program schedule.</li> <li>• M2: In accordance with NYSRC Compliance Monitoring Program schedule.</li> <li>• <del>M3: Annually</del></li> <li>• <del>M4: -In accordance with NYSRC Compliance Monitoring Program schedule.</del></li> </ul> |
| 3.3 Compliance Reporting Requirements | <ul style="list-style-type: none"> <li>• M1: NYISO Self-Certification.</li> <li>• M2: NYISO Self-Certification.</li> <li>• <del>M3: NYISO Certification of Market Participant and Developer compliance.</del></li> <li>• <del>M4: NYISO Self-Certification.</del></li> </ul>  |
| <b>9. Implementation Plan</b>         | The NYISO shall revise appropriate procedures within 90 days of Executive Committee approval of PRR <del>129132</del> .   |
| <b>10. Comments</b>                   |   |
| <b>11. Date Rule Adopted</b>          |   |
| <b>12. PRR Revision Dates</b>         |   |

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