

The NYISO appreciates the opportunity to comment on PRR-150 (Resource Adequacy Requirements for Mitigating the Threats of Extreme Weather) and offers the following views and recommendations.

The NYISO strongly supports the NYSRC approach to forming an Extreme Weather Working Group to identify risks associated with extreme weather conditions, including the need to investigate the need to finalize and recommend approval of PRR-150 to address those risks. The NYISO strongly believes that work on PRR-150 should be assigned to the working group.

The NYISO is firmly on board with the need to address the impacts of climate change and anticipated shift in the resource mix and welcomes the opportunity to provide input to potential NYSRC Rules to address the upcoming challenges and opportunities facing the reliability of the NYS BPS. However, we believe it is critical that any new Rules be carefully crafted by RRS and NYISO participants that have the appropriate expertise to take into consideration existing Rules that may address some concerns; that can consider the likelihood and impact of potential extreme weather events and assess the availability or feasibility of probabilistic study methods to evaluate them and whether the technologies exist to address them; and determine whether NYSRC and the NYISO have jurisdiction over certain resiliency matters.

The current draft of PRR-150 illustrates the need for further evaluation before making a serious attempt to draft a meaningful and realistic compliance rule. As described below, NYSRC already has reliability rules that study and respond to severe weather—as the PRR itself notes—and NYISO has numerous existing processes and procedures in place to address severe and extreme weather to the extent possible. The current draft of PRR-150 does not build upon those existing requirements in a targeted way, but rather would require the NYISO to plan for, prepare, and support operations during a broad and divergent range of severe and extreme weather, without differentiating at all between those long-studied in New York, like heat waves, and those which to date were not even relevant to New York, like wind lulls. The result is a rule that is aspirational rather than carefully designed to achieve compliance through known means and capabilities.

Requirement 2, for instance, addresses operation during impending severe weather, and references existing Rule C.4, R1 - recognizing that there is an existing Rule to address impending severe weather. Repeating the Requirement in an additional Rule does not improve reliability. Similarly, proposed Requirement R3 requires a long-term (10 year) resource adequacy assessment. Existing Rule A.3 R2 already addresses a 10-year RA assessment and is constructed so that it could be revised to include extreme weather concerns. The Extreme Weather Working Group should reconcile and build upon the existing Rules to address more-recently identified concerns—***to the extent possible and feasible***—and suggest any needed revisions.

An additional observation is that proposed Requirement 1 is for the NYISO to have an extreme weather resilience operating plan. The NYISO already has Operating Plans to address system emergencies, which can include extreme weather. Several of the Sub-Requirements of R1 are already addressed in existing NYISO procedures. Again, the Extreme Weather Working Group will be well equipped to offer any identified revisions.

Of particular concern, is R 1.1 which would require the NYISO to have procedures that, among other things, predict when and where extreme weather might impact the NYSBPS. Making such predictions is beyond the NYISO's capability and responsibility. The apparent intent of such a Requirement, could, perhaps, be incorporated into a new or revised Rule with the careful consideration and deliberation of the Extreme Weather Working Group.

In closing, we stress that the NYISO remains strongly committed to addressing the changes coming to the NYCA and the NYSBPS and is eager to participate in a joint effort with NYSRC to develop any appropriate Rule additions or revisions to meet the challenges. We believe, however, a PRR such as PRR-150 in its current state is aspirational and premature, and that a collection of SMEs, such as is envisioned by the creation of the Extreme Weather Working Group, will be best suited to identifying the realistic threats to the reliability of the NYSBPS, and developing the appropriate criteria for achieving the goal.