

**NEW YORK STATE
RELIABILITY
COUNCIL**

*2022 Reliability
Compliance Program
Highlights*

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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NYSRC 2022 Reliability Compliance Program Highlights

Introduction

This report presents the highlights of the 2022 New York State Reliability Council (NYSRC) Reliability Compliance Program, the major process used by the NYSRC to monitor the New York Independent System Operator (NYISO) compliance with the Reliability Rules¹ and related Requirements.²

The NYSRC Reliability Compliance Program is designed to measure and ensure compliance with NYSRC Reliability Rules in order to provide for a reliable bulk electric supply and delivery system in New York State. The NYSRC Reliability Compliance Monitoring Subcommittee (RCMS) manages the compliance program, which includes conducting reviews to ensure that the NYISO is in compliance with all NYSRC Reliability Rules, including those identified in the Rules as requiring actions by market participants. The NYISO has the responsibility of ensuring market participant compliance through its procedures and Tariffs`. The objective of the compliance program is to encourage compliance with the NYSRC Reliability Rules necessary to preserve the reliability of the New York Control Area.

The NYISO and market participants are responsible for complying with the reliability requirements related to the Reliability Rules. Full compliance with a reliability requirement, as defined by an associated measure, is demonstrated by evidence provided by the NYISO or a market participant. The Reliability Rules also include levels of non-compliance and a description of the compliance process associated with each measure. These compliance elements are described in detail in the Introduction to the RR&C Manual.

Compliance with the NYSRC Reliability Rules is reviewed and evaluated in accordance with NYSRC Policy 4-8, *Procedure for Monitoring Compliance with the NYSRC Reliability Rules*, at: <http://www.nysrc.org/policies.asp>.

In 2020 a three-year NYSRC compliance review plan covering the 2021-23 period, prepared by RCMS, was approved by the Executive Committee. The 2022 NYSRC Reliability Compliance Program represented the second year of this three-year compliance program.

¹ The reliability objective that is expected to be achieved through compliance with a set of related Requirements.

² The actions that shall be performed or outcomes that shall be achieved by the NYISO or Market Participants in order to comply with the reliability objective of an associated Reliability Rule. Requirements are material to reliability and are measurable

2022 NYSRC Reliability Compliance Program

In 2022 the NYSRC maintained a total of 92 Requirements associated with 27 Reliability Rules. The 2022 Reliability Compliance Program included 27 assessments which reviewed NYISO and market participant compliance with a total of 33 Requirements or 36% of NYSRC’s Requirements.

As shown in Table 1 below, the 2021 NYSRC Reliability Compliance Program incorporated a total of 28 reliability assessments which included compliance reviews of 50 Requirements having NYISO reporting responsibility and five Requirements having market participant reporting responsibility. Table 1 also shows that the NYISO and market participants were in full compliance with all Requirements for which compliance was reviewed in the 2021 NYSRC Reliability Compliance Program.

Table 1
2022 NYSRC Compliance Program Summary

	Number of Compliance Assessments	Reliability Requirements Found in Full Compliance	Reliability Requirements Found in Non-Compliance
NYISO	17 ³	19	0
Market Participants	10	14	0
Totals	27	33	0

In addition to compliance certification submissions, compliance with six assessments required the NYISO to submit reports to RCMS, not including 12 monthly operations reports. The Appendix is a summary of the 2022 Reliability Compliance Program that depicts the Requirements that were assessed, related compliance milestone dates, and compliance findings.

New York Control Area Resource Adequacy Assessments

One of the 2022 compliance requirements was for the NYISO to prepare a long-term resource adequacy intervening year assessment to identify reliability needs for the period through 2030. This assessment affirmed the results of the NYISO’s 2020 RNA that there are no reliability needs and LOLE violations through 2030. The assessment further concluded that NYS bulk power system as planned will meet all applicable reliability criteria through 2030 for forecast demand in normal weather. However, the assessment further concluded that reliability margins will narrow or could be eliminated based upon changes in forecast system conditions.

³ Twelve NYISO monthly real time operating report submissions in 2021 are counted as a single assessment.

The assessment also included an extreme weather scenario assuming a wind lull and a review of reliability challenges for meeting the Climate Leadership and Community Protection Act. The wind lull assessment was particularly of interest to the NYSRC because of NYSRC's goal to develop new reliability rules covering extreme weather events.

To demonstrate compliance with the "Next Capability Year" resource adequacy assessment requirement, the NYISO prepared the report, *Annual Assessment of Resource Adequacy for the Capability Year 2022-23*. This assessment concluded that for existing and planned NYCA resources and a baseline forecast of peak load, NYCA IRM requirements would be met during the 2022-23 capability year period, even under an extreme high load case.

New York Control Area Transmission Planning Assessments

NYSRC Reliability Rules require that the NYISO conduct yearly NYCA area transmission reviews (ATRs). The timing of the NYISO's transmission review submissions to the NYSRC are coordinated with that of similar transmission review submissions required by NPCC. In addition to NPCC reporting requirements, the NYSRC requires the NYISO to provide supplemental information as described in the "NYSRC Procedure for NYCA Transmission Reviews."

One annual transmission review (ATR) was submitted to the NYSRC in 2022. The 2022 ATR assessed the year 2027. The 2022 ATR concluded the planned NYCA bulk power transmission facilities, as planned through year 2027, conform to the applicable NPCC and NYSRC Reliability Rules.

NYISO Compliance Documentation Submissions

The success of the NYSRC Compliance Program depends on timely and complete submissions of compliance documentation prepared by the NYISO. In 2022 all required compliance certifications and related compliance documents were submitted to RCMS by the NYISO in accordance with compliance documentation due dates, and all submissions were found to be complete.

NERC and NPCC 2022 Reliability Compliance Programs

In addition to complying with the NYSRC Rules, the NYISO must also comply with all applicable NERC standards and NPCC criteria. Compliance with NERC standards is mandatory. RCMS has oversight responsibility concerning the NYISO's compliance with these standards and criteria. NPCC has direct responsibility and authority to implement a Compliance Monitoring and Enforcement Program (CMEP) for NERC and regional standards, as well as a Compliance Criteria Enforcement Program (CCEP) for NPCC-specific reliability criteria. During 2022, as a part of the CCEP, NPCC reviewed and found the NYISO in full compliance with two NPCC directories.

Conclusions

The following conclusions were reached by RCMS regarding the NYSRC 2022 Reliability Compliance Program:

1. The NYISO staff continued to provide valued assistance during the NYSRC reliability compliance review process.
2. The NYISO and market participants were in full compliance with all 33 NYSRC Requirements that were assessed by RCMS in the 2022 NYSRC Reliability Compliance Program. In addition, NPCC found the NYISO in full compliance with all NPCC criteria and NERC standards that were assessed during 2022.
3. All required NYISO compliance documentation associated with the 2022 Reliability Compliance Program was submitted to RCMS during the scheduled time period and found to be complete.