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New York State Reliability Council

2022 Reliability Rules Subcommittee Report

March 7, 2023

NYSRC 2022 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[1].

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.

[1] Includes removal of and modification to existing Exceptions

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.

2022 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.

2022 New & Revised NYSRC Reliability Rules

One Reliability Rule was approved in 2022:

Reliability Rule #149
RR #149 4-8-22
Reliability Rule Revision - RR 149 Clarify the Interpretation of the LOLE Reliability Risk Metric in the NYSRC Resource Adequacy Criterion and the Application of Multiple Reliability Risk Metrics in IRM and Resource Adequacy Assessments

This rule change has two components: (1) To express the NYSRC's LOLE criterion's quantification of resource adequacy in terms of "loss of load event-days per year" instead of "days per year," in order to avoid a possible misinterpretation that the NYSRC 's LOLE criterion allows a loss of load duration of 2.4 hours per year, and (2) to require IRM and resource adequacy assessments to include multiple reliability risk metrics in order to more fully describe loss of load events.

The proposed LOLE criterion change is consistent with recommendations in the IEEE Resource Adequacy WG 's paper, Clarifying the Interpretation and Use of the LOLE Resource Adequacy Metric, presented at NERC's Probabilistic Analysis Forum on October

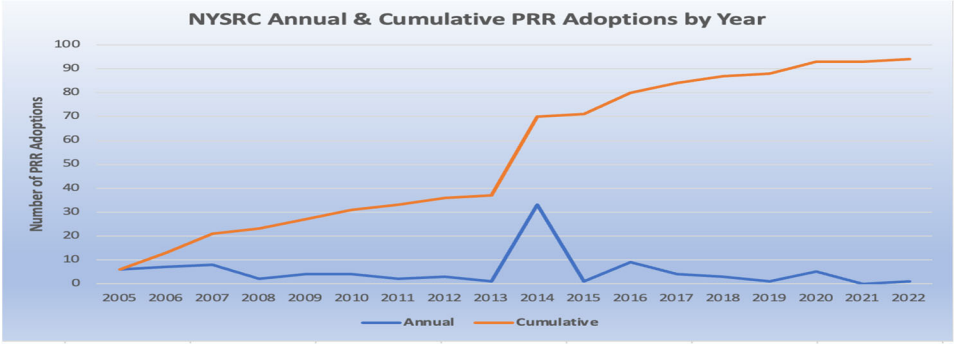
5, 2021. This change would not affect in any way present ICS and NYISO procedures and models for IRM and resource adequacy assessments -- it brings the resource adequacy criterion in line with present study applications and criterion interpretations.

Normal Process Review
Posted on April 12, 2022
Comments were due on May 26, 2022
No comments were received
Approved by the NYSRC Executive Committee on June 10, 2022

RRS continued to monitor issues potentially affecting NYCA long-term reliability including:

- National and regional reports and conferences
  - Provided comments on FERC NOPR "Transmission System Planning Performance for Extreme Weather"
- Lessons Learned
  - ERCOT June 4, 2022 Odessa II IBR Disturbances
  - Monitored FERC, NERC, ERCOT, ISO-NE Inverter Based Resource (IBR) regulatory activity
- Status report on RRS's 2022 NYSRC Goals & Actions - Appendix 1
  - Inverter Based Resources
    - Developed IBR White Paper & IBR Work Scope - EC Approval 7/8/22
    - Hosted IBR Workshop on adoption of IEEE Standard 2800-2022 9/8/22
    - Established IBR Working Group to support development of new IBR Reliability Rule(s) - Initial meeting 11/8/22
    - Developed initial draft PRR 151 - Establishing Minimum Interconnection Standards for Large Facility Inverter Based Resources
  - Extreme System Conditions
    - Developed Extreme System Conditions White Paper and Work Scope - EC Approval (7/8/22)
    - Established Extreme Weather (EW) Working Group to support development of new EW Reliability Rule(s) - Initial meeting 12/22/22
- Development of 2023 NYSRC Goals & Actions - Appendix 2

The annual and cumulative adoption of Potential Reliability Rules by NYSRC through 2022 is shown below.



Conclusions

The Reliability Rules Subcommittee reached the following conclusions with regard to its 2022 activities:

1. NYISO Staff continued to provide timely and valued assistance to RRS during 2022.
2. 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 with a corresponding increase in renewable resources and with extreme weather conditions.
3. 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.
4. One PRR was adopted by the Executive Committee in 2022. The average PRR adoption rate since NYSRC inception is 5.2 PRRs per year and the cumulative total of adopted PRRs is 94.
5. RRS provides an active technical forum for discussion of NYS reliability matters. All parties including New York State DPS staff, 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.

Dedication

Mr. Alan Adamson retired from NYSRC in 2022 after 23 years of outstanding service to the Reliability Council. He worked for the New York Power Pool prior to NYSRC and was instrumental in the establishment of the NYISO and the transition to NYSRC. His experience and energy will be sorely missed but the administrative foundation that he established for the Reliability Rules Subcommittee and other committees will continue to be of invaluable service.