

NYSRC Policy 6-12  
NYSRC Guidelines for Communications with Policymakers

**Background**

The New York State Reliability Council (NYSRC) was established with the approval of the Federal Energy Regulatory Commission (FERC) in 1999.<sup>11</sup> The NYSRC's basic responsibility is, ~~using to use~~ the standards, regulations, and criteria, ~~and~~, established by state and federal regulatory agencies with jurisdiction over the reliability of the New York State Power System, to establish, maintain and assure compliance with Reliability Rules it deems necessary to meet the unique reliability needs of the New York State electric power system. The NYSRC Reliability Rules must be complied with by the NYISO and entities engaging in electric power transactions on the New York State Power System.<sup>22</sup>

The Executive Committee of the NYSRC is comprised of representatives of each of the major electric utilities in New York State, representatives of Large Commercial and Industrial Consumers, Wholesale Electricity Sellers, and Municipal and Cooperative Electric Systems. In addition, the Executive Committee has four members who are unaffiliated with any participant in the NYISO's wholesale electricity market.<sup>33</sup> Each of the members of the Executive Committee must have substantial knowledge and/or experience in the reliable operation of bulk power electric systems.<sup>44</sup> The NYSRC also retains consultants with extensive experience in the operation of bulk power electric systems. The NYSRC has a close working relationship with the NYISO, which is responsible for providing the NYSRC with assistance if necessary for the NYSRC to carry out its responsibilities.<sup>5</sup>

**NYSRC Policy**

Because the NYSRC's basic responsibilities ~~and because it embodies~~ embody a unique level of expertise and experience concerning the maintenance and preservation of the reliability of New York State's electric power system, it may be appropriate, from time to time, ~~for the NYSRC to communicate with~~ submit written communications to policymakers, including state, local and federal executive, legislative, and regulatory agencies, on matters that may affect the reliability of the ~~state's electric system~~ State's electric system. A list of entities that are policymakers for purposes of this process is provided in Attachment A. ~~As a matter of policy, the~~

The NYSRC will limit such communications to matters that may have ~~a significant~~ an impact on the reliability of New York State's electricity system.

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<sup>1</sup> Central Hudson Gas & Electric Corp, et al., 83 FERC ¶ 61,352 (1998).

<sup>2</sup> NYSRC Agreement, section 3.01.

<sup>3</sup> Id., section 4.01.

<sup>4</sup> Id., section 4.03.

<sup>5</sup> NYISO/NYSRC Agreement, section 3.6.

It also is the policy of the ~~The NYSRC shall not to express views concerning state~~State and/or federal energy policies, except to the extent that they may affect the reliability of New York State's electric system.

NYSRC written communications with policymakers will be drafted by the appropriate appointed Executive Committee members and receive final review prior to submittal by the NYSRC, with the assistance of Executive Committee members or consultants designated by the Executive Committee. The comments will be submitted to the Executive Committee for its review and approval prior to submittal to the policymakers. The Executive Committee members must be provided with an opportunity to review such written communications to policymakers prior to submittal. Prior review is not required by the Executive Committee when such communications are related to certain technical processes as described in Attachment A.

**Adopted by the NYSRC Executive Committee on ~~June 10, 2022~~TBD**

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<sup>5</sup> NYISO/

NYSRC Policy 6-2 Attachment A

Entities Considered Policymakers for Purposes of Communications  
By the New York State Reliability Council

**Federal**

- Federal Energy Regulatory Commission (FERC)
- North American Electric Reliability Corporation (NERC) (except technical matters related to standards development)
- Northeast Power Coordinating Council (NPCC) (except technical matters related to Regional Standards and Regional Criteria development )
- U.S. Environmental Protection Agency (EPA)
- New York Independent System Operator (NYISO)

**New York State**

- New York State Public Service Commission (PSC)
- Department of Public Service (DPS)
- New York State Department of Environmental Conservation (NYS DEC)
- New York State Energy Research and Development Authority (NYSERDA)
- New York State Governor's Office
- New York State Legislature

For the purposes of NYSRC Policy 6-2, technical processes such as the NPCC directory development, the NPCC regional standards development and the NERC standards development are not considered to create policy-related reliability risks and submissions prepared by the NYSRC in relation to these processes are exempt from Executive Committee review. Preparation and submission of comments in response to these technical processes shall be directed and authorized by the Executive Committee Chair, at his or her discretion.