

MEMORANDUM

To: Chris Wentlent, NYSRC EC
From: Roger Clayton
Subject: Notes on guidance to IBR Developers seeking exceptions to RR B.5
Date: June 25, 2024

RR B.5 has two parts, the rule itself and a procedures document. The procedures document has an addendum containing Background Notes and Comments to memorialize factors in the development of PRR 151. The last item in the addendum deals with the exception process:

- NYSRC Policy 1, Section 5: Exceptions to Reliability Rules covers exception procedures <https://www.nysrc.org/wp-content/uploads/2023/03/POLICY-1-11-Final-2-7-17.pdf>. A request for a new exception to a Reliability Rule, or the removal or modification of a current exception to a Reliability Rule (an Exception Change) must be submitted to the Executive Committee for approval. An Exception Change request to the Executive Committee shall be initiated in one of three ways: (1) a request by a transmission owner following an annual transmission owner review of current exceptions, (2) a request made at any time by a market participant, (3) a request by the NYISO or any member of the Executive Committee¹.

It is proposed to add text covering guidance to IBR developers seeking an exception to RR B.5. I believe this is a necessary addendum to our exception process because of the unique technical nature of IBR Plant and their potential impact on NYCA reliability. The following text is suggested to be placed on our webpage.

The NYSRC will be guided by general principles² and the following specific considerations in evaluating non-compliant exceptions to the as-designed IEEE 2800 requirements covered in Reliability Rule B.5:

- *The burden of attestation rests solely with the applicant*
- *Scope of supporting documentation:*
 - *IBR Developer shall provide and attest that the models and data provided for use in NYISO's Interconnection Studies accurately simulate the performance of their non-compliant IBR plant*
 - *Description of non-compliant elements of IBR plant & rational for exception*
- *Approved exceptions will be conditional based on one or more of the following events:*
 - *NYISO's finding of Material Change in the IBR Project will void any approved exception*

¹ Note that the NYISO Tariff defines "Interconnection Customer" as a new category of project developer eligible to participate in Interconnection Studies. It is recommended that Policy 1 be amended to include "Interconnection Customer" as a fourth entity permitted to initiate an Exception Change.

² *Risk Assessment Considerations during NERC Review of Exception Requests*": https://www.nerc.com/pa/RAPA/BESDL/Risk_Assessment_Method_Exception_Requests.pdf.

- *Election by the IBR Developer to move their IBR Project to a later cluster study will void any approved exception*
- *If planning or operations studies identify an adverse impact to reliability with an IBR Plant that has been granted an exception then the plant will be obligated to remediate the adverse impacts or other action per applicable study requirements.*
- *Approved exceptions will solely apply to as-designed IBR plant interconnection studies covered by Reliability Rule B.5*
- *Compliance with as-built studies required by IEEE 2800: Section 10 - Modeling data; Section 11 Measurement data for performance monitoring and validation; and Section 12 - Test and verification requirements will be subject to a later PRR and exception process*

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