

# NYPA Seeks an Exception to Operate Certain Lines at Higher Levels

NYSRC Executive Committee

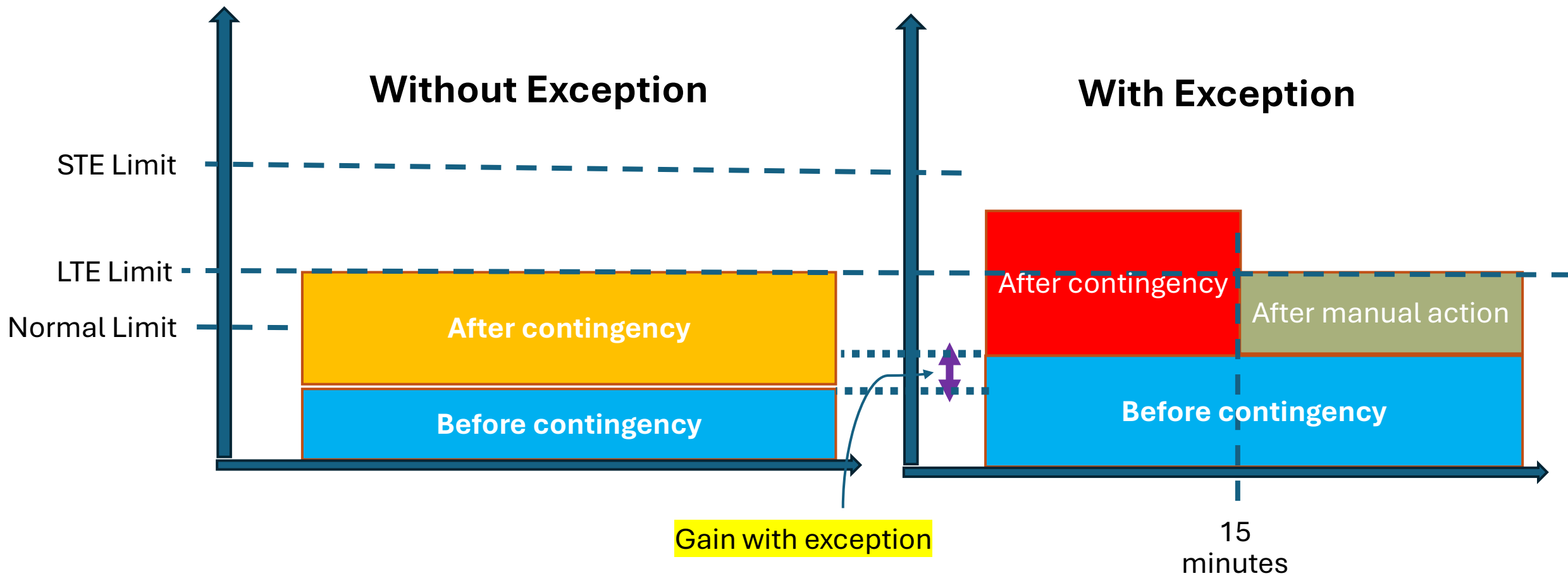
Con Edison

November 15, 2024

# Background

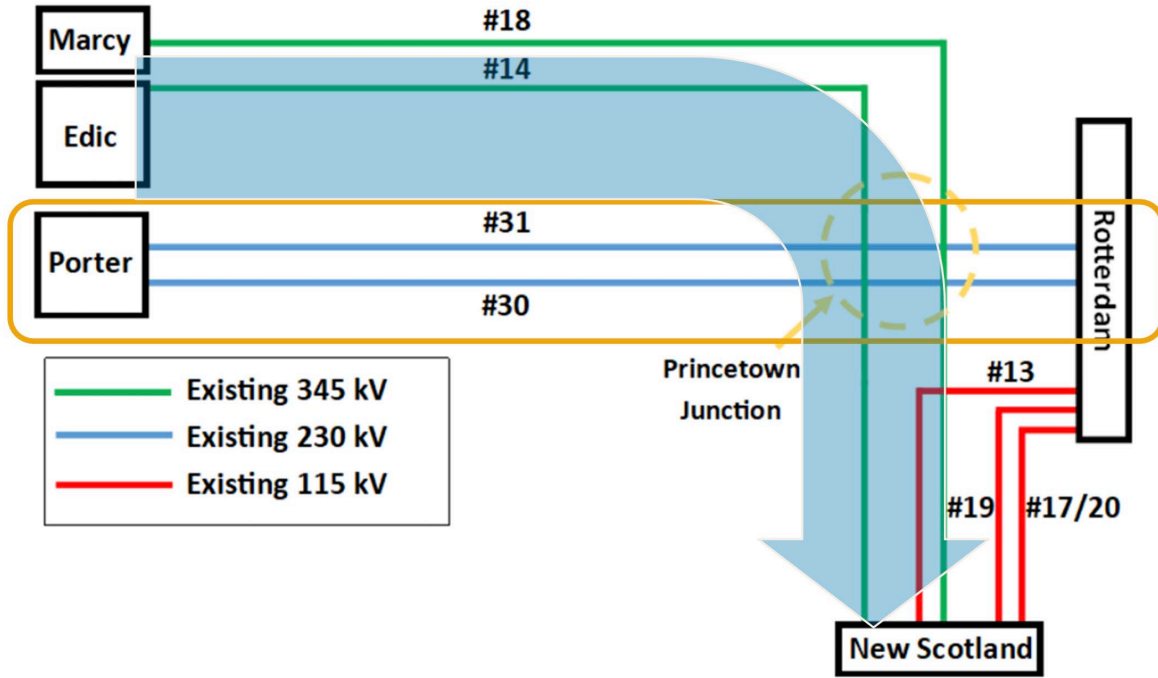
- Prior to existence of NYISO/NYSRC, NYPA had an exception to reliability rules that enabled certain lines to operate at levels where LTE would be exceeded if certain contingencies happen
  - The exception enabled Central East transfer capability to be increased
  - NYPA would prevent conductor degradation by turning off pumps at Gilboa within 15 minutes to reduce flows to below LTE
- After the AC Transmission project went into service, Central East transfer capability increased substantially beyond what was accomplished by the exception
- NYPA is seeking a similar but new exception to allow Central East to operate at even higher levels
- The old (and new) exception enables NYPA to pump more water to Gilboa so it can have the capability of generating more MW
- The contingencies of this exception have seldom happened (last time was in the 90s)

# Flow on Certain Lines

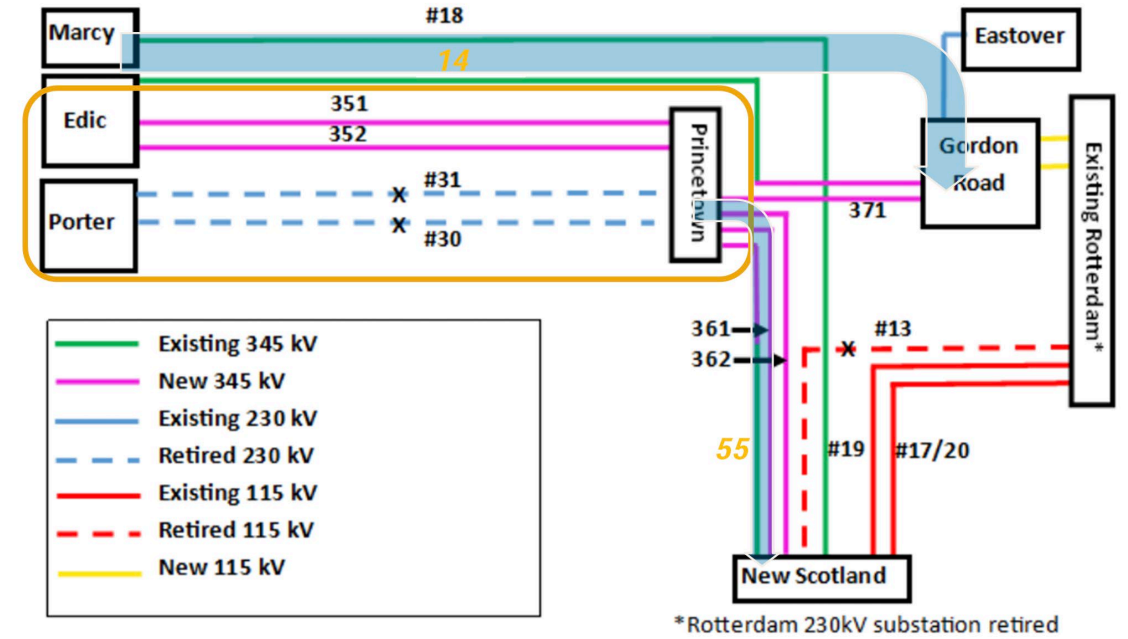


# NYPA First NYSRC Exception Request

## Before



## Current



# Existing and Proposed Exception Actions

## Existing Exception

### 345 kV UNS-18

- Allowed to exceed LTE for the Loss of **ENS-14**

### 345 kV ENS-14

- Allowed to exceed LTE for the Loss of **UNS-18**.
- Or for the loss double-circuit loss of **UNS-18** and **Porter-12** lines

## Proposed Exception

### 345 kV UNS-18

- Allowed to exceed LTE for the Loss of **14**,
- Or for the loss double-circuit loss of **351** and **352** lines.

### 345 kV **14**

- Allowed to exceed LTE for the Loss of **UNS-18**.
- Or for the loss double-circuit loss of **UNS-18** and **Porter-12** lines,
- Or for the loss double-circuit loss of **351** and **352** lines,

### 345 kV **55**

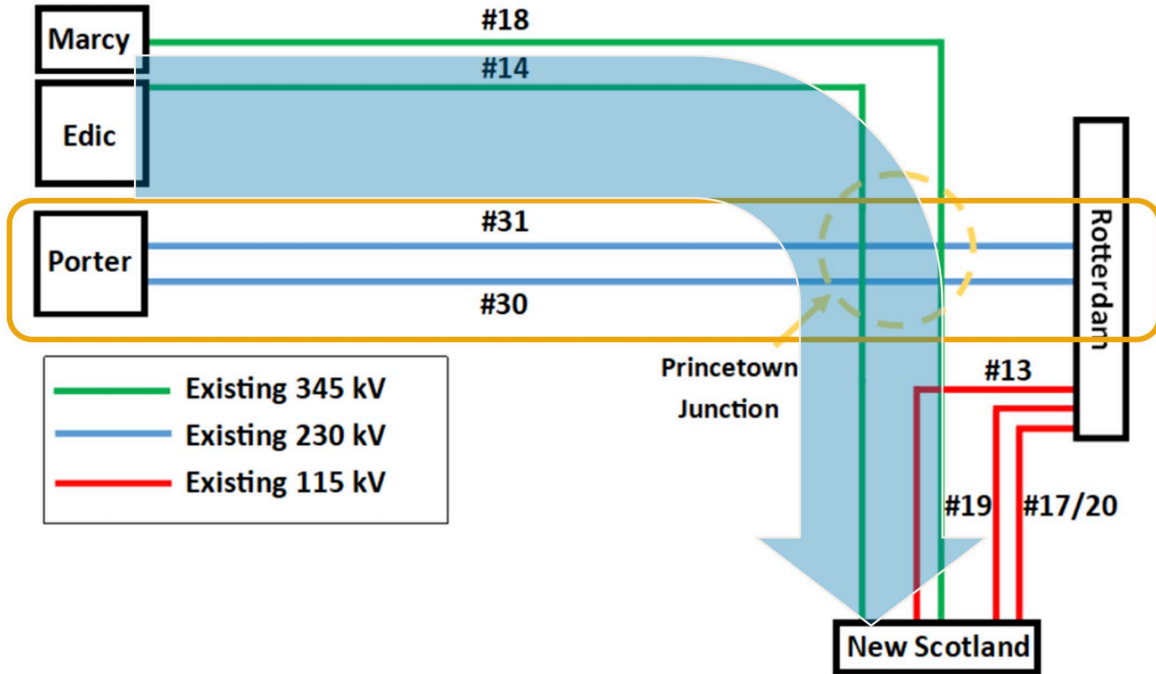
- Allowed to exceed LTE for the Loss of **UNS-18**.
- Or for the loss double-circuit loss of **UNS-18** and **Porter-12** lines,
- Or for the loss double-circuit loss of **361** and **362** lines.

# September NYSRC EC Meeting

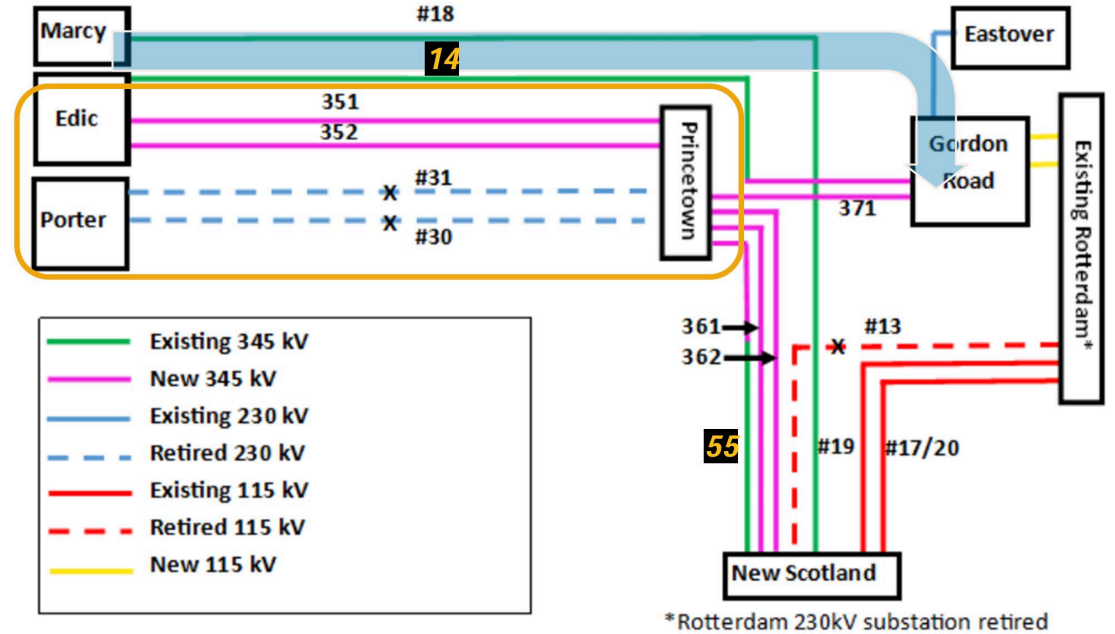
- The issue was discussed at the September Reliability Rules Subcommittee, where participation was limited, and Con Edison was the only member that did not support the exception request
- At the EC, Con Edison objected on the grounds that:
  - The requested exception was not identical to the existing one
  - All exceptions are a risk of degradation of reliability
  - The AC Transmission project already enabled Central East to operate normally at substantially higher transfer levels
  - A longstanding NYSRC principle has been to not approve new exceptions unless they are temporarily needed while a certain project is implemented
- The motion to approve the exception was defeated
  - The issue was sent back to RRS for further consideration

## NYPA Modified Exception Request

## Before



## Current



# Existing and Proposed Exception Actions



## Existing Exception

### 345 kV UNS-18

- Allowed to exceed LTE for the Loss of **ENS-14**

### 345 kV ENS-14

- Allowed to exceed LTE for the Loss of **UNS-18**.
- Or for the loss double-circuit loss of **UNS-18** and **Porter-12** lines

## Proposed Exception

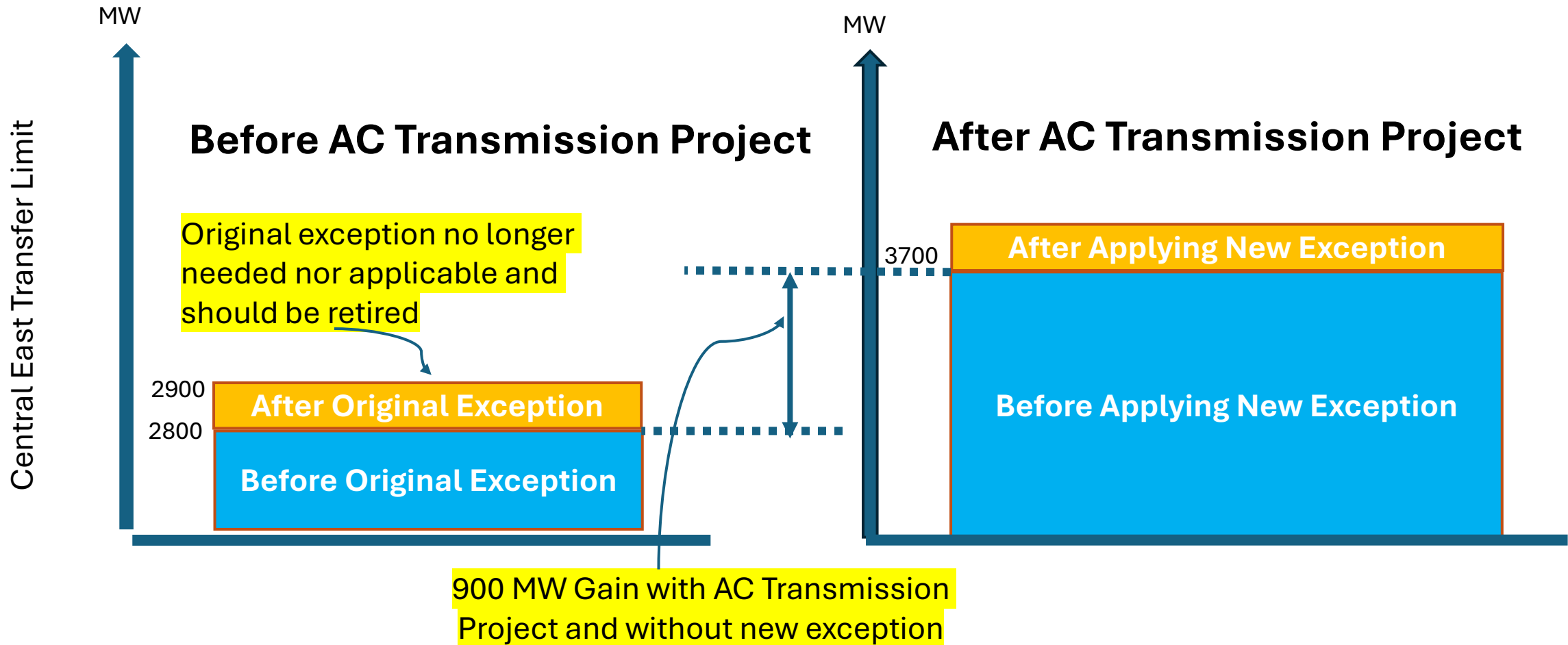
### 345 kV UNS-18

- Allowed to exceed LTE for the Loss of **14**,
- Or for the loss double-circuit loss of **351** and **352** lines.

### 345 kV **14**

- Allowed to exceed LTE for the Loss of **UNS-18**.
- Or for the loss double-circuit loss of **UNS-18** and **Porter-12** lines,
- Or for the loss double-circuit loss of **351** and **352** lines,

# Central East Transfer Limit



The EC Should Not Approve this Exception

- The modified exception was discussed at the October RRS with no clear consensus by RRS members
- The original exception is no longer applicable and should be retired for two reasons:
  - The proposed exception involves contingencies on new AC Transmission Project lines and on reconfigured existing lines: not the same as the original exception
  - The AC Transmission Project Central East flows far exceed the flows with the original exception: no longer needed
- The NYSRC should not be approving **new** permanent exceptions due to the reliability risks they may introduce
  - If a contingency happens that causes LTE to be exceeded, multiple sequential communications must occur quickly to initiate action to shut down pumps
    - NYISO control center must call NYPA control center, which in turn must contact Gilboa operators to shut down pumps, a process that takes several minutes
  - The manual corrective operation introduces the risk of not completing required actions within the NERC System Operating Limit of 15 minutes, thereby causing conductor degradation
- The AC Transmission Project already enables Gilboa to pump more water nighttime so the plant can generate more MW in daytime, without the requested exception
- The new exception, as the original did, creates a risk to the physical integrity of certain line conductors
- ***Conclusion: The modified new exception should not be approved by the EC***