

**DRAFT NEW YORK
STATE
RELIABILITY
COUNCIL**

*2024 Reliability
Compliance Program
Highlights*

*Prepared by the
Reliability Compliance
Monitoring Subcommittee*

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NYSRC 2024 Reliability Compliance Program Highlights

Introduction

This report presents the highlights of the 2024 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 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 require compliance with the NYSRC Reliability Rules necessary to ensure 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 Reliability Rules & Compliance 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 2023 a three-year NYSRC compliance review plan covering the 2024-26 period, prepared by RCMS, was approved by the Executive Committee. The 2024 NYSRC Reliability Compliance Program represented the first 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

2024 NYSRC Reliability Compliance Program

In 2024 the NYSRC maintained a total of 94 Requirements associated with 28 Reliability Rules. The 2024 Reliability Compliance Program included 28 assessments which reviewed NYISO and market participant compliance with a total of 54 Requirements or 57% of NYSRC’s Requirements.

As shown in Table 1 below, the 2024 NYSRC Reliability Compliance Program incorporated a total of 28 reliability assessments which included compliance reviews of 49 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 2024 NYSRC Reliability Compliance Program. In addition to the 2024 NYSRC Reliability Compliance Program, Resource Adequacy Rule A1, Requirement 1 was met by the NYSRC Executive Committee approval of the NYSRC Installed Capacity Subcommittee annual NYCA IRM Study for the May 1, 2025 – April 30, 2026 capability year as described in R1.

Table 1
2024 NYSRC Compliance Program Summary

	Number of Compliance Assessments	Reliability Requirements Found in Full Compliance	Reliability Requirements Found in Non-Compliance
NYISO	23 ³	49	0
Market Participants	5	5	0
Totals	28	54	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 2023 Reliability Compliance Program that depicts the Requirements that were assessed, related compliance milestone dates, and compliance findings.

New York Control Area Resource Adequacy Assessments

2024 NYCA Long-Term Adequacy Assessment (LTRAA)

One of the 2024 compliance requirements (A3.R3) was for the NYISO to provide a report in the Intervening Year between the biennial NYCA Long-Term Adequacy Assessments (LTRAA) to

³ Twelve NYISO monthly real time operating report submissions in 2023 are counted as a single assessment.

inform the NYSRC of any significant updates to assumptions and, if available, findings from the latest final NYISO Comprehensive Reliability Plan or other final NYISO reports which may include solutions to reliability needs identified in the LTRAA. The NYISO did present the “2023 Long Term Resource Adequacy Assessment – Intervening Year Report” on February 1, 2024.

The 2023 Intervening Year Assessment updates the 2022 LTRAA and uses the information from NYISO’s 2023-2032 Comprehensive Reliability Plan (CRP⁴), and the 2023 Q3 STAR⁵.

This assessment reiterates the results of the NYISO’s 2022 RNA and the 2023 Q2/Q3 STAR that there are no base case resource adequacy⁶ LOLE criterion violations through 2032. The NYISO’s 2023 -2032 Comprehensive Reliability Plan identified risks to the plan.

Installed Reserve Margin

To demonstrate compliance with the “Next Capability Year” resource adequacy assessment requirement (A.3 R1), the NYISO prepared the report, *Next Capability Year Resource Adequacy Assessment*. 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 2024-25 capability year period, even under an extreme (90 percentile) high load case, assuming emergency actions could be taken.

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.”

The “2024 Intern Area Transmission Review (ATR)” was submitted to the NYSRC in October 2024. This review assessed the study year 2029 and concluded the planned NYCA bulk power

⁴ 2023-2032 CRP Report: <https://www.nyiso.com/documents/20142/2248481/2023-2032-Comprehensive-Reliability-Plan.pdf> ;
Appendices: <https://www.nyiso.com/documents/20142/41557188/2023-2032-Comprehensive-Reliability-Plan-Appendices.pdf>

⁵ 2023 Q3 STAR Report: <https://www.nyiso.com/documents/20142/16004172/2023-Q3-STAR-Report.pdf>

⁶ To be noted that in the 2023 Q2 STAR [\[link\]](#) the NYISO found a transmission security margin deficiency and therefore a short-term reliability need beginning in summer 2025 within New York City primarily driven by a combination of forecasted increases in peak demand and the assumed unavailability of certain generation in New York City affected by the “Peaker Rule.”

transmission facilities, as planned through year 2029, 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 2024 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 2023 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 2024, 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 2023 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 54 NYSRC Requirements that were assessed by RCMS in the 2024 NYSRC Reliability Compliance

Program. In addition, NPCC found the NYISO in full compliance with all NPCC criteria and NERC standards that were assessed during 2024.

3. All required NYISO compliance documentation associated with the 2024 Reliability Compliance Program was submitted to RCMS within the defined schedules and found to be complete.

**NEW YORK STATE RELIABILITY COUNCIL
2023 RELIABILITY COMPLIANCE PROGRAM**

REQUIREMENTS	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE Level ²
A – Resource Adequacy						
A.1: R2	Calculation & reporting of LOLH and EUE metrics in the 2024 IRM Study	M1	1/26/24	1/26/24	02/01/24	FC
A.2: R1	2024 Locational Capacity Requirements	M1	3/29/24	3/28/24	06/06/24	FC
A.2: R2	LSE ICAP obligations	M2*	11/14/24	11/14/24	11/21/24	FC
A.3: R1	Resource Adequacy Assessment for the Capability Year 2024-25	M1	5/31/24	5/30/24	06/06/24	FC
A.3: R3	Long-Term Resource Adequacy Assessment	M3	01/26/24	1/26/24	02/01/24	FC
B.1: R1 – R4						
B.1: R1 – R4	Transmission planning criteria		02/23/24	2/23/24	02/29/24	FC
B.2: R1	2024 NYCA Transmission Review	M1	February 2025 ³	10/24/24	10/31/24	FC
B.3: R1 - R2	List of NYS Bulk Power System facilities.	M1	02/23/24	2/23/24	02/29/24	FC
B.4: R1	Transmission interconnection special studies	M1	5/31/24	5/30/24	06/06/24	FC
C – Transmission Operation						
C.1: R1 – R2	Operating transfer capabilities including Local Area Operation Requirements	M1	03/29/24	3/28/24	04/04/24	FC
C.2: R1 – R2	Post contingency operating actions	M1	03/29/24	3/28/24	04/04/24	FC
C.3: R1-R5	Outage Coordination	M1	05/31/24	5/30/24	06/06/24	FC
C.3: R6	Transmission Owner Coordination	M2	05/31/24	5/30/24	06/06/24	FC
C.4: R1-R3	Operation during Impending Severe Weather	M1	06/21/24	06/20/24	06/27/24	FC
C.5: R1, R3	2024 fault current assessment	M1	06/21/24	06/20/24	06/27/24	FC
C.5: R2	Equipment Owner fault current assessment	M2*	06/21/24	06/20/24	06/27/24	FC
C.6: R1 - R2	Applications of the NYSRC Reliability Rules & associated procedures	M1	08/23/24	08/22/24	08/30/24	FC
C.7 R1	Granting, modifying, or removing exceptions	M1	08/23/24	08/22/24	08/30/24	FC
C.8: R1	Real-time operations monthly reports	M1	Monthly	11/14/24	Monthly	FC

Appendix

REQUIREMENTS	REQUIREMENT DESCRIPTION	MEASURE	COMPLIANCE DOCUMENTATION DUE ¹	DATE RECEIVED	DATE OF RCMS REVIEW	NYISO COMPLIANCE Level ²
D – Emergency Operations						
D.1: R1 – R8	Mitigation of Major Emergencies	M1	08/23/24	08/22/24	08/30/24	FC
D.1: R10	Annual statewide voltage reduction test	M3	11/14/24	11/15/24	11/21/24	FC
E – Operating Reserves						
E.1: R1 – R7	Establishing the minimum level of operating reserves	M1	08/23/24	08/22/24	08/30/24	FC
F – System Restoration						
F.1: R3	Black Start Provider requirements	M3*	08/23/24	08/22/24	08/30/24	FC
G – Local Area Operation						
G.2: R6	GO dual fuel capability testing of combined cycle units	M5*	04/26/24	04/26/24	05/02/24	FC
I – Modeling and Data						
I.2: R3	Generation outage statistics report	M3	11/14/24	11/15/24	11/21/24	FC
I.2: R4.4	SCR performance report	M4	10/24/24	10/31/24	10/31/24	FC
I.3: R2	Annual actual and forecast load data	M2	11/14/24	11/15/24	11/21/24	FC
I.4: R3	MP transmission data reporting	M3*	09/27/24	9/27/24	10/03/24	FC

*Applicable to Market Participants; NYISO compliance certification is required.

Footnotes:

- Compliance documentation due dates are generally scheduled seven days prior to RCMS meetings. Compliance documentation requirements are shown in the Appendix.
- NYISO Compliance Levels
 - FC – Full Compliance
 - NC1 – Non-Compliance Level 1
 - NC2 – Non-Compliance Level 2
 - NC3 – Non-Compliance Level 3
 - NC4 – Non-Compliance Level 4
- All 12 monthly operations reports were found in full compliance.