

DRAFT New
York State
Reliability
Council

*2024 Reliability
Rules
Subcommittee
Report*



*January 5December
15, 20254*

NYSRC 202~~43~~³⁴ 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 the 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 Rules¹.
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

¹ Includes removal of and modification to existing Exceptions

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.

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.

2023~~4~~ 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.

2023~~4~~ NYSRC Reliability Rules - New, Revised & In Development

One new Reliability Rule was approved in 2024. ~~No new or revised Reliability Rules were approved in 2023.~~ In February 2024 PRR-151, *Establish minimum interconnection standards for Large Inverter Based Resources (IBR) Generating Facilities* was approved by the NYSRC Executive Committee hence resulting in B.5 R1 & 2.

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

- The Inverter Based Resources Working Group (“IBRWG”) continues to meet, monitor and review IEEE-2800.2 developments (as-built IBR model validation) activity.

Formatted: Font: 12 pt

Formatted: List Paragraph, Bulleted + Level: 1 +
Aligned at: 0.25" + Indent at: 0.5"

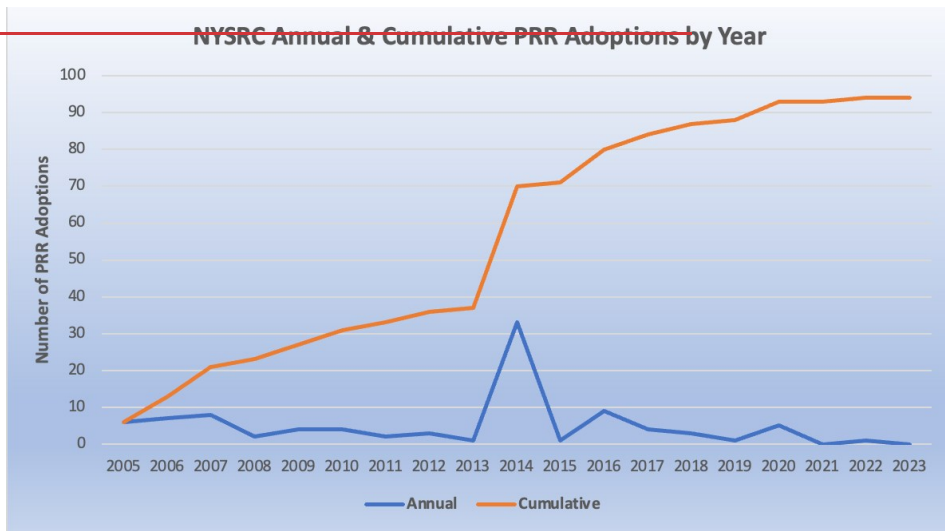
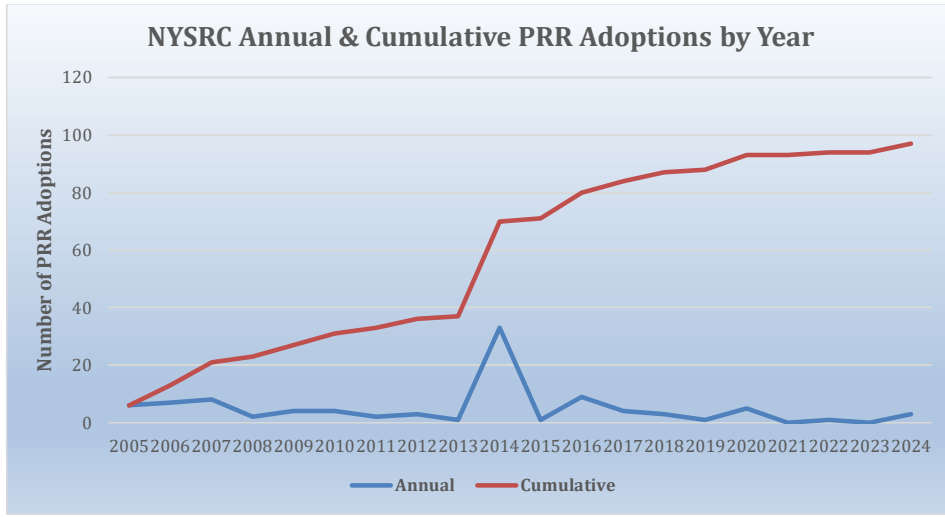
- The IBRWG is reviewing the details associated with the recently approved NERC Standards, PRC-024 & PRC-029 for consistency with PRR-151 along with the November NERC filing to FERC requesting FERC approval of the two NERC Standards.
- The IBRWG reviewed and commented on the new, NYISO Electromagnetic Transient (EMT) Modeling Guideline.
- Considerable effort was applied in 2023 in developing PRR 151: *Establish minimum interconnection standards for Large Inverter-Based Resource (IBR) Generating Facilities*. The effort included:
 - Meetings of the IBR Working Group
 - Drafting and posting revision 1 of PRR 151
 - Working with stakeholders to revise the rule in response to comments received
 - Posting revision 2 of PRR 151
 - Final revision of PRR 151 in response to comments received
- Other PRRs in development include:
 - PRR 150: *Resource Adequacy Requirements for Mitigating the Threats of Extreme Weather*
 - PRR 153: *Sudden Loss of Fuel Delivery System to Multiple Solar and Wind Plants*
 - PRR 153a: *Sudden Loss of Gas Fuel to a Plant for Common Mode Failure of gas Delivery System*
 - PRR 154: *Peak Load Resulting from Extreme Weather and Generating Unit Fuel Shortages under Expected Weather*
- The Extreme Weather (EW) Working Group met monthly to discuss the PRRs noted above and other extreme weather conditions
 - DNV renewable load shape analysis showed significant frequency & durations of combined production lulls.
 - Continued discussion on PRR 153 which covers sudden loss of renewables as transmission planning contingencies.
 - Discussion on need for a companion PRR defining new system conditions for transmission planning based on long duration renewable production lulls.

Formatted: List Paragraph, Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5"

Formatted: Font: 12 pt

Formatted

The annual and cumulative adoption of Potential Reliability Rules by NYSRC through 2024³ is shown below.



Exceptions to Reliability Rules

The RRS received and reviewed a request from the New York Power Authority for modification to the NYSRC Exception to Reliability Rules, Exception Reference No. 1, “Post Contingency flows on Marcy – New Scotland”. NYPA followed the process defined in NYSRC Policy I-12, “Procedure for reviewing, developing, modifying, and disseminating NYSRC Reliability Rules.

Formatted: Font: 12 pt, Not Bold

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

Formatted: Font: (Default) Times New Roman, 12 pt

Upon discussion and a split recommendation to the NYSRC Executive Committee, the NYPA Exception No.1 was rescinded on November 15, 2024. RRS has a 2025 NYSRC Goal to review and consider changes to Policy 1-12 Procedure for Reviewing, Developing, Modifying, and Disseminating NYSRC Reliability Rules.

Conclusions

The Reliability Rules Subcommittee reached the following conclusions with regard to its 2024~~3~~ activities:

1. NYISO Staff continued to provide timely and valued assistance to RRS during 2023~~4~~.
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 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 No~~ PRR (PRR 151) ~~was s~~ were adopted by the Executive Committee in 2024~~3~~. The average PRR adoption rate since NYSRC inception is 4.95 PRRs per year and the cumulative total of adopted PRRs is 94.
5. ~~RRS has developed~~ PRR 153~~4~~: *Establish minimum interconnection standards for Large Inverter Based Resource (IBR) Generating Facilities is under development pending technical input from the EWWG. ready for final approval in 2024. Four other PRRs are in development.*
6. 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.