

# **NYISO Consumer Interest Liaison Weekly Summary**

# **April 27 – May 1, 2020**

# Notices:

- The 2020 Load and Capacity Data Report (also known as the "Gold Book") is now available and has been posted to the NYISO website.
- The Redline and Clean versions of **UG-01 Market Participants User's Guide** have been posted to the **Manuals, Technical Bulletins & Guides webpage**, under the User's Guides > Under Review folder. The proposed revisions to the UG-01 include language to describe:
  - o Responsibilities of Market Participants engaged in dual participation;
  - Bidding for Resources engaged in dual participation.

# **Meeting Summaries:**

# **Monday, April 27, 2020**

Joint Market Issues/Installed Capacity/Price Responsive Load Working Group

Reserves for Resource Flexibility: SENY Reserve Region Enhancements

Ethan Avallone of the NYISO updated the Reserves for Resource Flexibility proposal. The NYISO is proposing to procure an additional 500 MW of 30-minute reserves in the SENY reserve region (zones G-K). The NYISO's proposal would increase the portion of the total statewide reserve requirement carried in SENY from 1,300 MW to 1,800 MW. The proposal contemplates shifting of current locational reserve procurements only and does not propose to increase the 2,620 MW level of 30-minute total reserves procured statewide (NYCA). The 1,800 MW 30-minute reserve requirement would be reduced to zero MW during a Thunder Storm Alert (TSA). The NYISO additionally proposes to reduce the NYC 10-minute and 30-minute reserve requirements to zero during a TSA.

Some stakeholders asked the NYISO to provide additional information regarding the proposed 500 MW reserve requirement increase. The NYISO will consider the request for a future ICAPWG/MIWG meeting. In response to a question on how other new reserve products would meet

the requirement for this project, the NYISO explained that no other product offerings currently under development would satisfy this specific requirement.

Another stakeholder asked if the pending AC Transmission Project that is anticipated to add 900 MW of transfer capability would change the SENY requirement in the future. The NYISO explained that an evaluation would be made closer to when the new line is in service to determine whether there will be any impacts on the SENY reserve requirement. The NYISO proposes a reserve price value of \$25/MWh for the 500 MW increase in the SENY 30-minute reserve requirement. This lower reserve price recognizes that reserves procured for restoring the system to Emergency Transfer Criteria are more valuable than reserves procured for restoring the system to Normal Transfer Criteria. Given that reserves are effectively carried on the transmission system during a TSA, maintaining the otherwise applicable reserve requirements for SENY and NYC may result in pricing outcomes that do not accurately reflect grid conditions. Consistent with current procedures, the NYISO proposed to reduce the revised SENY 30-minute reserve requirement (1,800 MW) to zero MW during a TSA. The NYISO also proposes to extend this logic to reduce the NYC 10-minute and 30-minute reserve requirements, to zero MW during a TSA.

Mr. Avallone led a discussion of the tariff language required for the change to reserves procurement while noting stakeholder feedback for consideration. To see the complete presentation, please go to: https://www.nyiso.com/icapwg?meetingDate=2020-04-27

### **Ancillary Services Shortage Pricing**

Pallavi Jain of the NYISO reviewed the proposed reserve demand curve enhancements. This project consists of two primary components; revisions to the current reserve demand curves and procurement of additional reserves beyond minimum reliability requirements. In a future presentation, this project will also evaluate the structure of the NYCA 30-minute reserve demand curve that applies in real-time during SCR/EDRP activations of less than all zones.

Ms. Jain provided a matrix of the proposed enhancements to reserve demand curves with the rationale for each product change and discussed the MW levels and prices with stakeholders. In response to a stakeholder question on the increase from \$625/MW at 655 MW to \$750/MW for 1965 MW, Ms. Jain explained that a stepped approximation of an exponential curve was used because, as available reserves approach 1,965 MW, the operators are more likely to take actions to maintain system reliability. The cost of various operator actions that may be taken to maintain reliability were utilized in developing the exponential curve construct. The NYISO is also continuing to evaluate the appropriate timeframe for implementing additional reserve procurement requirements, potentially modifying such requirements over time as the grid evolution continues to unfold.

To see the complete presentation, please go to:

 $\frac{https://www.nyiso.com/documents/20142/12170360/Ancillary\%\,20Services\%\,20Shortage\%\,20Pricing\%\,20MIWG\%\,2004272020.pdf/9e1730e1-c8d2-33eb-b3c4-8e2e7574534a}{2004272020.pdf/9e1730e1-c8d2-33eb-b3c4-8e2e7574534a}$ 

## Consumer Impact Analysis: Methodology for Reserves for Resource Flexibility

Tariq Niazi of the NYISO presented the methodology for conducting the Consumer Impact Analysis (CIA) for the Reserves for Resource Flexibility proposal.

The analysis will use the NYISO's Day-Ahead Market (DAM) software, and re-run select market days from the past six months. The revisions proposed by the NYISO will be included in the market software re-runs, including:

- Increasing the SENY 30-minute reserve requirement to 1,800 MW
- Assigning a \$25/MWh shortage pricing value to the additional 500 MW of SENY 30-minute reserves; current 1,300 MW requirement will retain a shortage price value of \$500/MWh.

In response to a stakeholder comment, Mr. Niazi noted that the current cost of Ancillary Services as compared to anticipated future costs, will be included in the analysis, along with the energy cost impact.

The NYISO acknowledged prior requests to provide information regarding the combined impact of various ongoing reserve enhancement projects (More Granular Operating Reserves, Reserves for Resource Flexibility, and Ancillary Services Shortage Pricing), and is continuing to assess how best to assess and provide information regarding the combined impact of these various project initiatives. The NYISO will compare prices from re-run cases to the original prices to determine representative price delta value(s). The price delta value(s) will be used to estimate the consumer impact due to changes in DAM energy prices.

The analysis will also seek to estimate the potential reduction in DAM BPCG (Bid Production Cost Guarantee) payments resulting from the proposed additional SENY 30-minute reserve procurements. To illustrate the cost impact to the Installed Capacity market, the analysis will use the 2020-2021 ICAP Demand Curve inputs and parameters, calculating the revised net energy and ancillary services revenue offset values to develop the impact on reference price values.

Mr. Niazi also explained the process for the analysis to reflect long term cost impacts. As always, the analysis will include impacts to the reliability of the system, environmental impacts and impacts to process transparency.

To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/12170360/CIA%20Methodology%20for%20Reserves%20for%20Resource%20Flexibility.pdf/a994ee00-e91b-1e70-44c8-7eba40645503

# NYCA Peak Load Forecast and Minimum Unforced Capacity Requirements for LSEs

Ying Guo of the NYISO presented the NYCA Peak Load Forecast and the Minimum Unforced Capacity Requirements for LSEs. Ms. Guo began with a review of the procedure to determine the minimum capacity requirement (NYCA Minimum Unforced Capacity Requirement), using the NYCA Peak Load Forecast, pursuant to 5.10 and 5.11 of the MST and ISO Procedures. The NYISO expects ICAP market "design conditions" to occur on a non-holiday weekday in July or August. Each LSE's share of the minimum capacity requirement is determined by its consumption on the highest hourly actual Load in the NYCA, regardless of whether consumption on that hour is consistent with consumption at "design conditions." Ms. Guo noted that consumption patterns when the highest hourly actual Load occurs outside the NYISO's "design conditions" may be very different than consumption patterns at "design conditions".

The NYISO is proposing tariff revisions that would require the use of the highest NYCA Load hour occurring on a non-holiday weekday during July or August when calculating the NYCA Peak Load Forecast pursuant to sections 5.10 and 5.11 of the MST.

- The change will ensure that each LSE's share of the minimum capacity requirement will be consistent with the "design conditions" used to calculate the minimum capacity requirement
- The NYCA Peak Load Forecast will continue to be consistent with "design conditions"

This revision will not statistically change the NYCA Peak Load Forecast used to determine the minimum capacity requirement (NYCA Minimum Unforced Capacity Requirement) because the current process already aligns the peak load forecast with "design conditions". Instead, the NYISO believes the change will ensure the incentive to reduce peak demand aligns with when the peak demand is expected to occur.

The NYISO will seek governance approval in Q2 2020, followed by a FERC filing, for a Summer 2021 implementation. To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/12170360/NYCA%20Peak%20Load%20Forecast%20and

 $\frac{\%20 Minimum\%20 Unforced\%20 Capacity\%20 Requirements\%20 for\%20 LSEs.pdf/f9cc918f-9204-527c-c45c-1b2e4fc93ed0$ 

# Uses of Reserves and Impacts to ESR Scheduling

Aaron Markham of the NYISO led a review on the importance of reserves to electric system operations. With all the focus on reserve products in the NYISO market, Operations felt it would be valuable to discuss with stakeholders why reserves are required.

Mr. Markham reviewed the Northeast Reliability Council (NERC) and New York State Reliability Council (NYSRC) requirements for securing reserves in the event of a resource loss or transmission loss.

Mr. Markham next presented the timeline of operational actions associated with event recovery for up to 60 minutes from the time of the loss. Several steps must be taken, based on the time from the loss, to restore the system to the pre-contingency state. Mr. Markham explained each of the steps per time period.

The Northeast Power Coordination Council (NPCC) Directory 5 mandates that for the sustainability of Operating Reserves, "a Balancing Authority's synchronized reserves, ten-minute reserves, and thirty-minute reserves, if activated, shall be sustainable for at least one hour from the time of activation." It is the expectation of the NYISO that resources in the market today manage this through bidding and/or derating. Examples were provided to demonstrate the method for different types of resources to manage the sustainability requirement.

Energy Storage Resources (ESRs) will also be required to meet the NPCC requirement as well. An example of a potential issue with ESRs during a Reserve Pickup (RPU) was presented and discussed. To assist in meeting sustainability issues, the NYISO is implementing software changes to not award a reserves schedule to a unit that cannot sustain a 60 minute recovery period. During an RPU, the NYISO currently accounts for this requirement in the Limited Energy Storage Resource (LESR) market design by not scheduling regulation during RPUs. Additionally, an energy limited ESR that was dispatched before an RPU may see a reduction in basepoints during a RPU.

Mr. Markham reviewed the proposed tariff change with stakeholders. To see the complete presentation, please go to:

 $\frac{https://www.nyiso.com/documents/20142/12170360/Reserve\%20Presentation\%20042320\_v2.pdf/fb78d4e1-1d78-bd46-3f81-757a4090dc8c$ 

#### Wednesday, April 29, 2020

# **Management Committee**

## **Motion #1**

Motion to approve the draft March 20, 2020 Management Committee meeting minutes.

The motion passed unanimously.

#### Motion #2

The Management Committee ("MC") hereby approves revisions to the MC Bylaws as presented at the April 29, 2020 MC meeting.

The motion passed unanimously with abstentions.

#### Motion #3

The Management Committee ("MC") hereby: (i) approves changes to the NYISO's Market Administration and Control Area Services Tariff with regard to the modifications for the Tailored Availability Metric project as presented to the MC on April 29, 2020; and (ii) recommends that the

NYISO Board of Directors authorize NYISO staff to file such revisions under Section 205 of the Federal Power Act.

The motion passed unanimously with abstentions.

#### Thursday, April 30, 2020

# **Budget and Priorities Working Group**

Disposition of Funds Remaining from 2019 Budget Cycle

Patrick Kelly of the NYISO informed stakeholders that the 2019 financial statement audit was completed in March 2020 and the Final 2019 budget vs. actual resulted in \$6.4M of funds remaining from the 2019 budget cycle. The Management Committee (MC) motion, which recommended the 2019 budget, indicated that in the event of a Rate Schedule 1 over-collection and/or a spending underrun, the related funds should be utilized to pay down the principal amount of outstanding debt or reduce anticipated debt borrowings. At the February 29, 2020, BPWG meeting, NYISO staff discussed with Market Participants the proposal that NYISO retain these funds to pay down principal on outstanding debt.

At the March 31, 2020 BPWG meeting, NYISO staff presented a revised proposal for the disposition of funds remaining from the 2019 budget cycle, recommending that NYISO retain these funds to potentially offset:

- A significant shortfall in 2020 Rate Schedule 1 (RS1) recoveries;
- Unplanned expenditures resulting from NYISO's response to the Coronavirus outbreak
  At the April 15, 2020 MC meeting, a motion to retain \$6.4M remaining from the 2019 budget cycle to
  offset a potential shortfall in 2020 Rate Schedule 1 recoveries and/or unplanned expenditures related
  to NYISO's COVID-19 response in 2020 was approved unanimously with one abstention. On April
  21, 2020, the NYISO's Board of Directors approved the NYISO staff proposal to retain \$6.4M
  remaining from the 2019 budget cycle for the purposes described in the MC motion. Mr. Kelly noted
  that if NYISO finds that these funds are not needed for these purposes, NYISO could still pay down
  principal on outstanding debt in Q4 2020. To see Mr. Kelly's complete presentation, please go to:
  <a href="https://www.nyiso.com/documents/20142/12270400/02%20Disposition%20of%20Funds%20from%2">https://www.nyiso.com/documents/20142/12270400/02%20Disposition%20of%20Funds%20from%2</a>
  02019%20Budget%20Cycle.pdf/5d2ee40c-ada5-b72e-2ef6-6db104374906

#### 2020 Budget vs. Actual Status

Patrick Kelly of the NYISO presented the 2020 year-to-date budget vs. actual status. Rate Schedule 1 recoveries are \$1.5M below budgeted revenues through March. Year-to-date budgeted costs vs. actual costs through March reflect a \$1.1M budget over-run. To see Mr. Kelly's complete presentation, please go to:

https://www.nyiso.com/documents/20142/12270400/03%20Budget%20vs%20Actual%20Results.pdf/6fe21353-26d3-cd6e-b190-7db5075240e6

Estimated Impacts of COVID-19 on Recent NYCA Demand & NYISO RS-1 Energy Forecasts Charles Alonge of the NYISO updated stakeholders on the impacts on RS-1 collections due to lower energy sales as a result of the COVID-19 pandemic. Mr. Alonge began the presentation with a review of recent daily load patterns. Zonal load curves were provided to reflect the impacts to load by zones. Zone J (NYC) showed the largest deficit compared to forecast due to the heavy volume of commercial load in the zone. Weekly energy usage indicates an approximately 8 ½% reduction in NYCA-wide load. Combined with mild weather in January and February and the initial impact of stay-at-home orders in March, the 2020 RS-1 basis is already 2,468 GWh below the budget projection.

In response to a stakeholder request to differentiate the load deficits due to moderate weather and the COVID-19 impacts, Mr. Alonge noted that the NYISO has the data and will make it available at the next update presentation.

The impacts to load in the event of a recession were also presented. Mr. Alonge advised that, should a recession occur in New York State, the likely impact would be lower loads in Zone J due to the high volume of commercial load and lower industrial loads throughout upstate. This decrease in load would be mitigated slightly by higher residential loads and the forecast of an above average summer temperature.

Mr. Alonge provided load forecasts for scenarios based on shallow, deep and extreme recession condition timelines based on potential impact of GDP on energy consumption. The load curves from recession years 2001/02 and 2008/09 were provided for comparison.

Moving forward through 2020, the NYISO anticipates a reduction in the 2020 RS1 forecast of approximately 6%, lowering the forecast from 154,300 GWh to 145,000 GWh.

The NYISO Operations and Demand Forecasting Team will continue to monitor and assess the impacts of the COVID-19 shutdowns and produce an update to the RS-1 Forecast in May-June 2020. To see the complete presentation, please go to:

 $\underline{https://www.nyiso.com/documents/20142/12270400/05\%20COVID19\%20DemandBudgetImpactEstimates.pdf/b6f35b6a-04b8-cecc-b64a-fd7190874997}$ 

### Estimated 2020 Budget Impacts of COVID-19

Cheryl Hussey of the NYISO presented the estimated impacts to the 2020 budget resulting from the COVID-19 pandemic. Ms. Hussey began the presentation with a summary of the budget outlook:

- NYISO's approved 2020 budget totals \$168.0M, allocated across a forecast of 154.3 million MWh, for a Rate Schedule 1 charge/MWh of \$1.089
- Given the impact of the COVID-19 pandemic on NYISO energy demand, the NYISO is anticipating a significant reduction in 2020 MWh throughput and a resulting estimated shortfall in Rate Schedule 1 revenues of \$10.1M
- In addition, NYISO is experiencing unanticipated expenses required to maintain bulk system reliability during the COVID-19 pandemic and anticipates a shortfall in interest income, creating a spending shortfall of \$6.8M
- The estimated total 2020 budget deficit is currently \$16.9M, driven by the combination of a Rate Schedule 1 shortfall and unanticipated budgetary spending

In response to the estimated budget shortfall, NYISO identified certain budget deficit mitigation measures and that consideration of additional measures is ongoing.

Ms. Hussey identified and discussed the additional costs incurred by the NYISO and provided a summary of the estimated unbudgeted costs for the remainder of 2020. The NYISO will apply the \$6.4M of funds retained from 2019 budget cycle to the projected shortfall. The NYISO also identified 2020 budgetary spending reductions in the amount of \$7.5M, leaving a projected 2020 budget deficit of \$3.0M at this time. To see the complete presentation, please go to:

 $\frac{https://www.nyiso.com/documents/20142/12270400/04\%20COVID19\%20Impact\%20Projections.pdf}{/2f9c523a-6e86-c1e5-f43e-c49e883b6719}$ 

#### Proposal to Address 2020 Rate Schedule 1 Shortfall

Cheryl Hussey of the NYISO presented the proposal to address the 2020 Rate Schedule 1 (RS1) shortfall, resulting from the COVID-19 pandemic. Closing the budget deficit will require several actions and the NYISO brought the issue to stakeholders for transparency and feedback on options.

Ms. Hussey led a review of the historical changes to OATT Section 6.1.2.5, including the 2010 determination to begin recovering RS1 revenue from customers based on their Non-Physical (Virtual, Transmission Congestion Contract (TCC), Special Case Resource (SCR) and Emergency Demand Response Program (EDRP)) market activity. In 2012, the NYISO implemented a further tariff change to OATT Section 6.1.2.5 that enabled NYISO to withhold the distribution of Non-Physical RS1 revenue, based on a prior year RS1 under-collection.

The NYISO is now proposing to file a tariff waiver request with FERC to use RS1 revenue from Non-Physical market activity to offset shortfalls in RS1 revenue from physical market activity in the current year, 2020. Once the 2020 RS1 shortfall has been recovered from the Non-Physical RS1 revenues, the distributions to customers would resume. An estimate of Non-Physical RS1 recoveries for the remainder of 2020 could range from ~\$2.0M to ~\$4.0M.

Ms. Hussey noted that there are other alternatives that may be avoided if the current proposal is implemented:

- Potential increases to RS1 surcharge during the 2020 budget year
- Potential working capital draw, with increase to RS1 surcharge in the 2021 budget year
- Significant reductions and/or eliminations of project spending during the 2020 budget year The NYISO plans a May 2020 filing to FERC. The NYISO will begin to retain Non-Physical RS1 recoveries upon approval of the waiver by FERC. To see the complete presentation, please go to: <a href="https://www.nyiso.com/documents/20142/12270400/06%20Proposal%20to%20Recover%202020%2">https://www.nyiso.com/documents/20142/12270400/06%20Proposal%20to%20Recover%202020%2</a> ORS1%20Shortfall.pdf/f496cb06-cc99-5260-58ec-385468da40d6

# Ancillary Services from Renewable Generators

Schuyler Matteson of NYSERDA presented a proposal for a project candidate for the 2021 project prioritization process. The proposal would allow wind and solar resources equipped with inverter controls to provide grid services, including regulation, voltage control, frequency response, and ramping.

This project has two primary components. The first component would have the NYISO work with renewable generators to determine what upgrades, if any, are required to typical inverters and controls to allow renewable generators to provide grid services. The second component would evaluate the current NYISO market designs for grid service products to determine what barriers may exist that prevent renewable generators from providing the grid services they are capable of providing. The project would then propose new market designs and accompanying tariff language, if necessary, to allow renewable generators to provide grid services.

To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/12270400/07%20New%20Project%20Candidate\_Ancillary %20Services%20and%20Renewable%20Generation%20(002).pdf/0949116f-3ab5-d4a8-6ec9-c2c2f62931d6

# <u>Calpine Energy Solutions NYISO On & Off Peak TCC – Proposal</u>

Jung Suh of Calpine Energy Solutions (Calpine) presented a proposal to develop On Peak and Off Peak Transmission Congestion Contracts (TCCs) as a project candidate for the 2021 NYISO project prioritization process. The proposal was originally presented at the April 22, 2020 ICAPWG/MIWG meeting where stakeholders provided feedback. Mr. Suh began with a description of TCCs and how Load Serving Entities (LSEs) use TCCs to hedge congestion costs. He explained how the daily load shape variation affects the amount of congestion, especially during periods of high demand. The NYISO currently only offers a 24 hour TCC, which applies the same cost per hour for all hours of the

day. The change in congestion (congestion cost) in the off peak hours makes a TCC non cost-effective for the off peak hours.

By developing TCC products that differentiate between on peak and off peak hours, the cost of hedging can be reduced and the savings passed on to the end user. Offering separate products would better align congestion hedges with load (and generation) profiles, hence reducing cost; which in turn would reduce collateral cost and pre-payment obligations for TCC holders that do not wish to hold a 24-hour TCC.

Additional benefits of developing on peak and off peak TCCs include:

- It could increase TCC auction revenue by better aligning transmission outages and topology with actual system conditions, thereby increasing available transmission capacity and decreasing revenue deficiency
- It increases market transparency by providing further granularity
- Benefits are garnered without adding incremental risk to the system

Additional examples of TCC on-peak and off-peak prices were provided to illustrate the potential benefits of enhancing the TCC product offering.

To see the complete presentation, please go to:

# Proposed 2021 Market Projects

Brian Hurysz of the NYISO presented the proposed market project candidates for 2021.

Mr. Hurysz began with a review of the market project prioritization process, including the timeline for the process. There are a total of 34 projects proposed, consisting of:

- 1 Business & Finance,
- 10 Capacity Market,
- 7 DER,
- 15 Energy Markets,
- 2 TCC Market

Project descriptions were included with the meeting materials providing information on:

- *Problem / Opportunity* 
  - This section describes the business problem to be addressed or opportunity to be studied by the proposed project. Supporting background information, prior work, and analysis to the extent it is available should be included.
- *Project Objective(s) & Anticipated Deliverable(s)* 
  - This section describes what the project should do to address the business problem or opportunity. It summarizes the approach and desired outcome, and may build on project work in a prior year. It includes the expected deliverables to satisfy the project objective and is tied to the proposed project milestone. The NYISO will work with the stakeholder(s) proposing a project to formulate what may be feasibly delivered in a particular time frame based on resourcing estimated for the effort.
- Project Justification
  - This section provides reason(s) why the candidate project should be considered. Examples would include addressing a FERC Order, Tariff requirements, automate manual processes, risk mitigation, market enhancements, State of the Market (MMU) recommendations.

Mr. Hurysz highlighted each of the project candidates, noting stakeholder feedback and providing clarification to stakeholders with questions. Written feedback on project descriptions and project type

categorization may be provided until May 5<sup>th</sup>, for incorporation into May 14<sup>th</sup> presentation. Stakeholder advocacy and the draft scoring survey are scheduled for the May 28, 2020 BPWG meeting.

To see the complete presentation, including the project listing and descriptions, please go to: <a href="https://www.nyiso.com/bpwg">https://www.nyiso.com/bpwg</a>

# **FERC Filings**

April 30, 2020

NYISO filing of proposed tariff revisions re: Enhancements to the "Part A Exemption Test" Under the "Buyer-Side" Capacity Market Power Mitigation Measures

April 30, 2020

Section 205 proposal of tariff revisions to enhance NYISO's Energy Storage Resource participation model

April 28, 2020

NYISO compliance with the requirements of Order Nos. 845 and 845-A, which amended the proforma Large Generator Interconnection Agreement and proforma Large Generator Interconnection Procedures, directed by FERC February 20, 2020 order.

April 29, 2020

NYISO filing on behalf of NYPA of a new OATT Section 6.10.8 regarding the establishment of a Regulated Transmission Facility Charge ("RTFC") to permit NYPA's recovery of its revenue requirement associated with the "AC Projects."

# **FERC Orders**

April 30, 2020

FERC order accepted enhancements to better integrate the Generator Deactivation Process with the Reliability Planning Process.

May 1, 2020

Letter Order accepting a Cost Reimbursement Agreement (SA 2528) between Niagara Mohawk Power Corporation and Lake Placid Village effective February 21, 2020, as requested

# **Filings and Orders:**

http://www.nyiso.com/public/markets\_operations/documents/tariffviewer/index.jsp