## **NYISO GADS Reporting Position**

The Outage Definitions previously proposed by the ICWG are inconsistent with industry standard definitions. The NYISO cannot support definitions that are inconsistent with the industry and standards with which we are obliged to conform. The NYISO must have reliable and consistent forced outage rates to compare with NERC and industry-wide statistics for use in its reliability studies and to calculate actual forced outage rates, unforced capacity, availability and other similar statistics.

## NYSRC 3.1.3.2 states:

"Generating unit availability data required for the analysis of the reliability of the New York Control Area ("NYCA") shall be collected and maintained. This availability data shall include forced, partial, and maintenance statistics for generating units serving the NYCA, covering an appropriate historical period."

The Tariff (5.1) states that the NYISO will provide Control Area Services in accordance with NERC and NPCC and the NYSRC Reliability Rules...including but not limited to...

NERC, NPCC, NYSRC and the NYISO clearly have a responsibility to maintain the reliability of the New York power supply system. The "umbrella" of NERC, NPCC and NYSRC clearly requires the NYISO to administer and comply with the policies, standards and procedures of these oversight bodies.

NERC maintains the GADS ("Generator Availability Data System") database.

"GADS was created to collect, record, and retrieve operating information for improving the performance of electric generating equipment. GADS Services manages this database and provides assistance to those researching the vast amounts of information on power plant outages stored in its database. The information collected and retrieved for use by the industry is key in supporting equipment reliability and the availability analyses and decision-making processes developed by GADS data users.

**2.128b Operating Data** - Pursuant to Section 5.12.5 of this Tariff, Operating Data shall mean GADS Data, data equivalent to GADS Data, CARL Data, metered Load data, or actual system failure occurrences data, all as described in the ISO Procedures.

Bottom Line - NERC/GADS data (NOT NY/GADS DATA) is intended to be compared with NERC GADS Data and in the absence of such data for NY units we (will) use NERC/GADS class average data collected using the NERC/GADS definitions as also proposed by the NYISO.