

The Tariff and Manual changes as they stand...

From the Tariff 5.11.4:

When owned by the holder of the UDRs or contractually combined with UDRs, Unforced Capacity ~~under contract or ownership located outside, but~~ must be deliverable to, a the NYCA Locality may interface with the UDR transmission facility in order for it to be counted ~~towards~~ toward an LSE's Locational Unforced Capacity Requirement.

See Manual 4.14.3

When an entity combines External UDRs with acceptable Unforced Capacity, the resulting product, when supplied to an LSE in ~~the appropriate NYCA Locality~~, will be treated as Unforced Capacity located in the NYCA Locality and will ~~contribute to that LSE's~~ qualify as Locational Unforced Capacity ~~Requirement~~, provided that the energy is deliverable to the NYCA interface with the UDR transmission facility.

See Tariff Definition for NYCA (jes added emphasis):

**1.26b New York Control Area (“NYCA”):** The Control Area that is under the control of the ISO which includes transmission facilities listed in the ISO/TO Agreement Appendices A-1 and A-2, as amended from time-to-time, and Generation located outside the NYS Power System that is subject to protocols (e.g., telemetry signal biasing) **which allow the ISO and other Control Area operator(s) to treat some or all of that Generation as though it were part of the NYS Power System.**

and

**1.14o Interconnection or Interconnection Points (“IP”):** The point(s) at which the NYCA connects with a distribution system or adjacent Control Area. The IP may be a single tie line or several tie lines that are operated in parallel.

I believe it is important that the point defining the UDR is the SAME point as where we meter the facility for purposes of operation. If you look at the NYCA definition above, the point is to treat it as PART OF the NYS Power System. If we were to define the UDRs (as an example here) for the CSC at Shoreham and the energy were to be injected at New Haven, I believe that we would have a Tariff violation. Hence, the NYCA interface for UDRs can be anything it wants to be – one end or the other of the line or at the state boundary under LI Sound – AS LONG AS the energy is metered at the same point.

I submit the following in order to clarify that the UDRs are defined at the same point as which energy will in fact be metered by the NYISO:

Proposed Changes:

Tariff Definition:

When owned by the holder of the UDRs or contractually combined with UDRs, Unforced Capacity must be deliverable to the NYCA Interconnection (“IP”) interface with the UDR transmission facility in order for it to be counted toward an LSE’s Locational Unforced Capacity Requirement.

Manual Change:

When an entity combines External UDRs with acceptable Unforced Capacity, the resulting product, when supplied to an LSE in, will be treated as Unforced Capacity located in the NYCA Locality and will qualify as Locational Unforced Capacity, provided that the energy is deliverable to the NYCA Interconnection (“IP”) interface with the UDR transmission facility.

This needs to be conformed into other locations as well.