

Process Improvements in the Communication of Consumer Impact Analyses

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Background

- Over the course of the past several months, the NYISO received extensive feedback on the manner in which it communicates its Consumer Impact Analyses
- Some of this feedback came at the October 30, 2014 MIWG during the presentation of Comprehensive Shortage Pricing Consumer Impact Analysis
- Additional feedback was received at the December 17, 2014 Management Committee meeting during the presentation of the Comprehensive Shortage Pricing proposal



Background, Contd.

- The Consumer Interest Liaison met with representatives of all the sectors to obtain additional feedback:
 - January 14: Generator and Other Supplier
 - January 28: TO and Public Power
 - February 10: DR and Environmental Interests
 - February 12: End-Use Sector
- There was also a meeting on February 5 with DPS staff to get their feedback



Response to Stakeholder Feedback

- Based on feedback from stakeholders, the NYISO is proposing a number of changes/additions to the manner in which Consumer Impact Analyses (CIA) are conducted and presented
- The focus is on actionable suggestions while also taking note of other comments



Proposed Changes

- The Consumer Interest Liaison will continue to maintain its independence in conducting and presenting CIAs
- Provide stakeholders a preliminary indication at the outset of a market design initiative whether a project is expected to have a major consumer impact to exceed \$50 million
- Present to stakeholders a description of the methodology to be used for CIAs before conducting the impact analysis
 - CIA presentations will provide greater detail on how estimates are computed
 - With the exception of confidential information, MPs would have information required to reproduce (duplicate) results
- Present to stakeholders the final CIA at least 30 days prior to submission of the market design initiative to BIC, OC and/or MC for approval



Proposed Changes, Contd.

- Present CIAs as a total package rather than just a focus on numbers
 - The analysis to include, in detail, the reasons why a project is being undertaken
 - List the benefits of the project
 - CIAs will attempt to estimate the impact of major market design changes over both the short-term and long-term, if warranted
 - The presentation will attempt to account for countervailing conditions and opinions from other parties and differing assumptions
- CIAs to clearly state all the assumptions underlying the impact analysis
 - Emphasize that the values presented are strictly estimates based on the assumptions used in the analysis.



Proposed Changes, Contd.

- The time frame over which the estimates are computed to be clearly defined, e.g., estimates are based on a snapshot in time
- The major driver(s) of the impact would be highlighted in the final analysis
- Impact estimates to be presented as a range
- The process of conducting and presenting CIAs to be incorporated into the 2016 project schedule from the outset
- Evaluate alternative implementation options for stakeholder consideration
 - Present the alternative of not doing a project and the consequences associated with it
 - Utilize scenario analysis in reporting the results of CIAs when relevant

Consumer Impact Analysis (IA) Evaluation Areas

 Present the potential impact on all four evaluation areas

RELIABILITY	COST IMPACT/ MARKET EFFICIENCIES
ENVIRONMENT/ NEW TECHNOLOGY	TRANSPARENCY



Impact of Suggested Changes on Project Schedule

- The suggested changes will have a significant impact on both the work load and the project schedule
- The top bar on Slide 10 shows the current timeline for completing a typical consumer impact analysis and the deliverables
- The bottom bar on Slide 10 shows both the lengthening of the project schedule and the increase in the number of deliverable items



Impact on Project Schedule

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Current Process					Internal Identify Projects For CIA	MIWG Present Project List to MPS		<u>Internal</u> Perform Consumer Impact Analysis					<u>MIWG</u> Present CIA Findings	BIC/OC Project Approval Vote	<u>MC</u> Project Approval Vote			
Proposed Process	BPWG Present Project Candidate List to MPs	CIA	MIWG Present CIA Topics and Initial Estimate					<u>MIWG</u> Present CIA Method- ology	<u>Internal</u> Perform Consum Impact Analysis						MIWG Present CIA 30 Days Prior to BIC/OC		BIC/OC Project Approval Vote	<u>MC</u> Project Approval Vote



Consumer Impact Analysis - Process Map

NYISO SHARED GOVERNANCE PROCESS





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