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NYISO Consumer Interest Liaison Weekly Summary

October 24 – October 28, 2016

Notices:

- A *Class Year 2015 Working Group meeting* has been scheduled for **November 8, 2016** at 10:00 a.m. (EDT). Please note that this meeting will be a conference call.
- On October 27, 2016, the NYISO issued the final AC Transmission Public Policy Transmission Need Viability and Sufficiency Assessment, posted on the [NYISO Website](#).
- On October 28, 2016, the New York Independent System Operator filed with the New York Public Service Commission, the viability and sufficiency assessment and a cost allocation methodology analysis related to the AC Transmission Public Policy Transmission Need.
(Case nos. 14-E-0454, 12-T-0502, 13-E-0488, 13-T-0454, 13-T-0455, 13-T-0456, 13-T-0461, 13-M-0457)
A copy of the filing can be viewed on the [NYISO Website](#)

Meeting Summaries:

Monday, October 24, 2016

Market Issues Working Group

Distributed Energy Resources Roadmap Update

James Pigeon of the NYISO presented an update on the Distributed Energy Resources (DER) Roadmap. Mr. Pigeon led a review of the DER Roadmap workshop held on September 22, 2016 and the stakeholder comments received at and after the workshop. Approximately 140 people attended the workshop, from a broad range of sectors. The DER Roadmap is a plan for the next 3-5 years for integration of DER and evolution of existing Demand Response (DR) programs. Mr. Pigeon provided an illustration of the DER Roadmap process, including four DER Roadmap dedicated MIWG meetings before the end of 2016. The NYISO will publish the DER Roadmap in December 2016 for 2017 and going forward. Mr. Pigeon assured stakeholders that the



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current DR programs will remain in place and flow as seamlessly as possible into any new market design, with no interruption of participation. Other comments included:

- Clarification of definitions
- Focus on DER concepts without technology specifics
- Flexibility of performance obligations
- Inclusion in the NYISO Planning process
- Dual participation: Wholesale and Retail
- Ability of resources unable to participate in existing markets to demonstrate potential capability as DER
- The establishment of baselines

These topics will continue to be addressed throughout the process. To see Mr. Pigeon's complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2016-10-24/DER%20Roadmap%20Updates.pdf

Comments on the NYISO DER Roadmap

David Lawrence of CPower presented joint comments prepared by four Market Participant organizations for the development of the DER Roadmap. The companies represented in the comments were; Enerwise Global Technologies, Inc., doing business as CPower, EnerNOC, Inc., Energy Spectrum and Innoventive Power LLC. Mr. Lawrence explained that the organizations contributing to the comments support the overall NYISO objective to provide a 3 – 5 year plan to integrate DERs into the NYISO wholesale markets, and are looking forward to working through the details of the issues with the NYISO. Mr. Lawrence detailed ten recommendations made by the Market Participant group:

- *The NYISO should focus on retaining participation in the SCR program to maintain its current operational flexibility, while developing market rules for DER economic participation.*
- *The NYISO should partner with utilities and providers to take advantage of upcoming AMI deployments, so that those deployments can be used to provide necessary data to NYISO and providers.*
- *Give DER resources the option of being aggregated and dispatched at a single pricing node level or at a more aggregated zonal portfolio level.*
- *The NYISO should consider establishing focus groups based on use case dichotomy included in the DER Roadmap appendix to help identify enhancements and potential barriers to market design.*
- *The NYISO should engage in early discussions (e.g., via focus groups) with potential DERs while formulating the parameters and rule set needed for market participation.*
- *Do not create reference prices for DER, at least for demand response-based DER.*



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- *The issue of separation of wholesale and retail markets should be addressed through a small working group of staff from the NYISO, utilities, and demand response and DER providers.*
- *The NYISO should clarify the language on DER real-time obligations on pages 16-17 of the DER Roadmap. The NYISO needs to keep an open mind to balancing traditional market design axioms with innovative approaches to achieving similar outcomes.*
- *The NYISO should engage in early discussions (e.g., via focus groups) with potential DERs while formulating the parameters and rule set needed for market participation.*

To see Mr. Lawrence's complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2016-10-24/Comments%20on%20the%20NYISO%20DER%20Roadmap.pdf

Measurement and Verification of Dispatchable DER

Akshay Kasera presented an update on the measurement and verification of Dispatchable DER. The object of this portion of the DER Roadmap is to provide appropriate, reliable information allowing NYISO to dispatch DER in the Real-Time Market. Mr. Kasera explained the approach the NYISO is taking to evaluate the aggregation of resources. In response to a stakeholder comment, Mr. Kasera acknowledged that the NYISO is looking into minimum and maximum aggregation MW values, but has not made a determination on the upper or lower limits. The NYISO is evaluating the metering requirements, realizing that burdensome requirements could act as a barrier to market entry, while balancing the need for accurate performance verification. Real-time telemetry is also critical to support real-time operations. The NYISO will work closely with Transmission Operators (TOs) to develop applicable requirements. Mr. Kasera explained the importance of After-the-Fact metering from individual resources to verify performance values received via real-time telemetry. The NYISO is encouraging stakeholders to develop presentations for the upcoming DER Roadmap dedicated MIWG meetings to facilitate a robust discussion of all the issues to be worked through. To see Mr. Kasera's complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_miwg/meeting_materials/2016-10-24/DER%20Roadmap%20Updates.pdf

Tuesday, October 25, 2016

Electric System Planning Working Group

New York State Resource Planning Analysis

Jeff Archibald of ICF Consulting presented the background and assumptions for the New York State Resource Planning Analysis (NYSRPA). The study was initiated by the New York State Department of Public Service (DPS) to evaluate the mix of resources that will need to be deployed by 2030 to meet various public policies and regulations while maintaining reliability. Mr. Archibald listed and explained the scenarios that were studied. There were three steps performed for each identified scenario:

1. Initial Modeling



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- a. *Develop Capacity Resource Mixes using IPM*
- b. *Transfer Analysis using TARA*
- c. *Resource Adequacy using GE MARS*
- 2. *Address Resource Adequacy violations if any are identified*
 - a. *Examine Potential Options – Generation Shifts, Transmission Upgrades, and Combinations of the two*
 - b. *Run GE MARS to determine which solutions solve the violation*
 - c. *Select the least cost viable solution*
- 3. *Production Simulation*
 - a. *Model the Final Reliable System in GE MAPS*
 - b. *Generate System Data (Wholesale Energy Prices, Emissions, Production, etc.)*

Mr. Archibald led a discussion of the assumptions to be used for the study. Three forecasts would be used, including; (1) the Base Case forecast used in CARIS I, (2) a forecast based on the PSC Clean Energy Standard Policy Case peak load (2,507MW lower than the Base Case by 2030), and (3) the PSC Clean Energy Standard Policy Case energy load (13,346GWh lower than the Base Case by 2030).

Wes Hall of GE led a review of the results and discussed the capacity additions, retirements, and reliability throughout the study period.

The DPS will accept stakeholder comments on the study and evaluate the need for additional analysis prior to the distribution of a final report. To see the complete presentation, please go to: http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_espwg/meeting_materials/2016-10-25/DRAFT%20SRP%20slides%20for%20ESPWG%2010212016%20WAH.pdf

Review of key study assumptions for the Shoreham units 3 & 4 Deactivation Assessment

Kevin DePugh of the NYISO presented a review of the assumptions to be used for the Shoreham units 3 and 4 Deactivation Assessment. The cases used for the analysis will be the Final 2017 and 2021 RNA cases. NYISO will consider impacts from updated load forecasts. The NYISO is performing the analysis on the Bulk Power Transmission Facilities (BPTF) facilities and PSEG-Long Island is performing the analysis on the non-BPTF.

Wednesday, October 26, 2016

Management Committee

Motion #1:

The Management Committee hereby recommends that the Board of Directors approve the proposed Rate Schedule #1 Revenue Requirement for the 2017 budget year as described in the presentation materials for the October 26, 2016 Management Committee meeting, subject to the following provisions:

Revenue Requirement – The Revenue Requirement is \$148.2 million.

Rate Schedule #1 – The budgeted Rate Schedule #1 is \$0.936/MWh.



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Spending Under-runs – If a spending under-run occurs, the related funds should be utilized to pay down the principal amount of outstanding debt or reduce anticipated debt borrowings.

Volume Over-collections – If an over-collection on Rate Schedule #1 occurs, the related funds should be utilized to pay down the principal amount of outstanding debt or reduce anticipated debt borrowings.

Motion passed unanimously with abstentions.

Motion #2:

The Management Committee hereby approves tariff language not inconsistent with the following paragraph.

The Management Committee hereby approves the proposed tariff language to the extent it is not inconsistent with the following proposal, the methodology in the NYISO’s Export Capacity Proposal as presented to the Management Committee on October 26, 2016 on an interim basis, due to the lack of sufficient time to adequately analyze the NYISO’s methodology and pending further analysis of the methodology and possible alternatives; provided, however, that due to a very large and sudden impact of ISO-NE rule changes on New York consumers that gave rise to the NYISO proposal, the NYISO proposal will be phased in so that for ISO-NE’s 2017/2018 Capability Year, the NYISO will set the Locality Exchange Factor for exports from the G-J Locality to ISO-NE to 80% to offset the impact of capacity exports, if any, rather than modifying the ICAP demand curve to offset the portion of exported capacity identified in the NYISO proposal. ICAP demand curves for the NYCA will remain unmodified; consequently, capacity exports to neighboring control areas will be fully reflected in capacity prices set using the NYCA ICAP demand curve, just as under the NYISO’s proposal. The NYISO’s Export Capacity Proposal, as presented to the Management Committee on October 26, 2016, will be fully implemented starting in the 2018/2019 Capability Year and continuing until and unless the NYISO receives FERC approval to implement a different treatment of capacity exports from a locational capacity zone to a neighboring region.

Additionally, the NYISO commits to work with Stakeholders further on this issue in 2017. The ISO will conduct an evaluation with its stakeholders of additional modifications to the rules addressing Locational Export Capacity from Import Constrained Localities presented at the October 20, 2016 BIC meeting. The NYISO shall report on its progress at the January and April BIC meetings in 2017, and to the NYISO Board at its January and April 2017 meetings. On or before June 1, 2017, the ISO will file with the Commission either an informational report on the evaluation or a filing proposing to amend the ISO Tariffs

The motion passed by 63.62% affirmative votes

Motion #2a:

Motion to amend Motion 2b:

~~The Management Committee (MC) hereby approves the NYISO’s Locational Export Capacity~~



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~~Proposal, including the tariff provisions, as presented and discussed at the October 26, 2016 MC meeting and recommends that the NYISO Board of Directors authorize NYISO staff to file such revisions under Section 205 of the Federal Power Act.~~

The Management Committee hereby approves tariff language not inconsistent with the following paragraph.

The Management Committee hereby approves the proposed tariff language to the extent it is not inconsistent with the following proposal, the methodology in the NYISO's Export Capacity Proposal as presented to the Management Committee on October 26, 2016 on an interim basis, due to the lack of sufficient time to adequately analyze the NYISO's methodology and pending further analysis of the methodology and possible alternatives; provided, however, that due to a very large and sudden impact of ISO-NE rule changes on New York consumers that gave rise to the NYISO proposal, the NYISO proposal will be phased in so that for ISO-NE's 2017/2018 Capability Year, the NYISO will set the Locality Exchange Factor for exports from the G-J Locality to ISO-NE to 80% to offset the impact of capacity exports, if any, rather than modifying the ICAP demand curve to offset the portion of exported capacity identified in the NYISO proposal. ICAP demand curves for the NYCA will remain unmodified; consequently, capacity exports to neighboring control areas will be fully reflected in capacity prices set using the NYCA ICAP demand curve, just as under the NYISO's proposal. The NYISO's Export Capacity Proposal, as presented to the Management Committee on October 26, 2016, will be fully implemented starting in the 2018/2019 Capability Year and continuing until and unless the NYISO receives FERC approval to implement a different treatment of capacity exports from a locational capacity zone to a neighboring region.

Additionally, the NYISO commits to work with Stakeholders further on this issue in 2017. The ISO will conduct an evaluation with its stakeholders of additional modifications to the rules addressing Locational Export Capacity from Import Constrained Localities presented at the October 20, 2016 BIC meeting. The NYISO shall report on its progress at the January and April BIC meetings in 2017, and to the NYISO Board at its January and April 2017 meetings. On or before June 1, 2017, the ISO will file with the Commission either an informational report on the evaluation or a filing proposing to amend the ISO Tariffs

The motion passed by 63.62% affirmative votes

Motion #2b:

Original Motion, moved and seconded

The Management Committee (MC) hereby approves the NYISO's Locational Export Capacity Proposal, including the tariff provisions, as presented and discussed at the October 26, 2016 MC meeting and recommends that the NYISO Board of Directors authorize NYISO staff to file such revisions under Section 205 of the Federal Power Act.

Additionally, the NYISO commits to work with Stakeholders further on this issue in 2017. The ISO will conduct an evaluation with its stakeholders of additional modifications to the rules



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addressing Locational Export Capacity from Import Constrained Localities presented at the October 20, 2016 BIC meeting. The NYISO shall report on its progress at the January and April BIC meetings in 2017, and to the NYISO Board at its January and April 2017 meetings. On or before June 1, 2017, the ISO will file with the Commission either an informational report on the evaluation or a filing proposing to amend the ISO Tariffs

Wednesday, October 26, 2016

Budget and Priorities Working Group

2017 DRAFT Annual Incentive Goals

Emilie Nelson of the NYISO presented an update to the 2017 draft Annual Incentive Goals. Ms. Nelson highlighted goals that have been changed from the prior presentation to the BPWG to incorporate stakeholder feedback. In response to stakeholder input, the NYISO proposes to keep Goal #4, “No Mistakes”, the same as it was in the 2016 program. Goal #6, “Key Project Initiatives”, has been revised to reflect a lower percentage (5%) on the ConEd/PSEG Wheel project and a higher percentage (10%) on the Distributed Energy Resource (DER) program design to reflect the importance of this initiative. A language update was suggested for the “Alternate Methods of Determining LCRs” portion of Goal #6, to clarify the goal. The “Interconnection Process”, Goal #8, was adjusted upward to a weight of 15% to reflect the importance of this project to stakeholders. Goal #11, “Customer Satisfaction Index” was adjusted downward to balance the increase to the “Interconnection Process” goal. Ms. Nelson noted all other goals would remain as presented at the October 7, 2016 BPWG. To see the presentation, please go to:

http://www.nyiso.com/public/committees/documents.jsp?com=mc_bpwg&directory=2016-10-26

Thursday, October 27, 2016

Installed Capacity Working Group

Elimination of Capacity Zones

Randy Wyatt of the NYISO presented an update to the August 23, 2016 presentation regarding Elimination of Capacity Zones. Mr. Wyatt led a review of the written feedback received from stakeholders regarding the 2015 Capacity Zone Elimination Market Design Concept, and alternative Zone Elimination concepts. The comments were separated by supply and load interests to facilitate discussion. Feedback was noted throughout the presentation as the comments were discussed with stakeholders. Mr. Wyatt provided the guidelines the NYISO is considering for the process:

- Provide Market Certainty
 - Minimizes likelihood of eliminating a Locality that will likely be recreated in the near term
 - Results from a rule that is readily predictable far in advance, based on a replicable test, and has a transparent process
- Minimizes inefficient outcomes and barriers to entry
 - Creation occurs after the barrier to investment is evident



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- Elimination threshold/ criteria should avoid creating barriers to investment
- Attract and retain investment in the resources where they are needed most to preserve the required reliability margin
 - Locational price signals
- Market risk borne by the Market Participant not the consumer
- Design should strive for simplicity, but should not diverge from reality

The NYISO will continue to evaluate stakeholder feedback and determine the next steps in the process. Stakeholders suggested that they expect to see a proposal in the near future. To see Mr. Wyatt's complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2016-10-27/Elimination%20of%20Capacity%20Zones%2020161027.pdf

Alternatives for Determining LCRs

Maggie Shober of Navigant presented an update on the process of studying alternatives for determining the New York Control Area (NYCA) Locational Capacity Requirements (LCRs). Navigant is working with new GE software that works with MARS to minimize the cost of capacity procurement while maintaining a Loss of Load Expectation (LOLE) of 0.1. The GE software shifts capacity from all three NYCA Localities simultaneously, whereas the current Tan45 methodology shifts capacity consecutively. Wes Hall, of GE Consulting was on hand to respond to several stakeholder inquiries regarding the software capabilities. Ms. Shober provided the assumptions for the study and a bubble diagram illustrating the system topography. Navigant will continue to work with the NYISO and stakeholders to compare methodologies prior to presenting final findings in December 2016 or January 2017. To see the complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2016-10-27/LCR%20presentation%2010%2027%2016%20ICAP.pdf

Consumer Impact Analysis: Forecast Enhancements in the Buyer-Side Mitigation Rules

Tariq Niazi of the NYISO presented the consumer impact analysis on the proposed rule changes for enhancing the Buyer-Side Mitigation (BSM) Mitigation Exemption Test (MET) forecast. Under current rules, only generating units that have provided a written retirement notice to the Public Service Commission (PSC) are excluded from Buyer-Side Mitigation (BSM) revenue forecasts. The NYISO has proposed changes to the inclusion rules of this process to exclude units that are unlikely to return to the market from the MET forecast, thereby improving the accuracy of the forecast. An accurate revenue forecast is critical to the (BSM) process to prevent under-mitigation or over-mitigation of new generating units. Mr. Niazi noted that in the most recent completed Class Year process (CY2012), the price impact of each 100MWs of Mothballed units in the MET forecast equaled 11% of the New York City Default Net Cost of New Entry (NYC Default Net CONE), and including the total mothballed UCAP in the ICAP forecast constituted up to 50% of NYC Default Net CONE. The effect of including mothballed units in the revenue forecast makes the level of revenue that a new unit must not exceed lower. A

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hypothetical example was provided illustrating the revenue calculation for the BSM MET and demonstrating the effect of including 200MW of Mothballed units in the MET. The inclusion of the 200MW in the MET forecast resulted in a value of \$147.85 kW/yr. Assuming a Default Net CONE value of \$170 kW/yr, the new unit would be mitigated, and unlikely to enter the market. When the 200MW of Mothballed units are removed from the calculation, it produces a value of \$175.19 kW/yr, which allows the new unit to enter the market without being assigned an offer floor for Capacity sales. Mr. Niazi also explained the potential cost impacts of under-mitigation or over-mitigation. Using a hypothetical 100MW new unit, examples were provided to demonstrate potential auction results with and without the new unit entering the market. If the unit is over-mitigated, and therefore less likely to enter the market, the example illustrated a \$204.5 million increase to the total NYCA Installed Capacity cost. On the other hand, if an uneconomic new unit is under-mitigated and allowed to enter the market, it results in an artificial price suppression of \$204.5 million, which could result in an incorrect price signal and discourage investment, resulting in long term detriment to the market. Examples were provided for the NYC and G-J Locations to illustrate the effects on both Localities. To see Mr. Niazi's complete presentation, please go to:

http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2016-10-27/Consumer%20Impact%20-%20Mothballed%20Units%20in%20BSM%20Determinations.pdf

Forecast Enhancements in the Buyer-Side Mitigation Rules – Draft Tariff

Dr. Julia Popova of the NYISO presented the updated proposal for the forecast enhancements in the Buyer-Side Mitigation rules. The NYISO has made several presentations throughout the development of this proposal, beginning in December 2014, and has progressed to the point of bringing tariff language to the working group for stakeholder discussion. In response to stakeholder requests, Dr. Popova provided a hypothetical example of the proposed inclusion rule with the following guidelines:

Exclude from forecast:

- *Retired if a Generator or a similar status for a UDR project*
- *Generators or UDR projects with expired CRIS*
- *Relinquished and transferred CRIS*
- *Generators and UDR projects that are transferring their CRIS*
- *Other publicly available information indicating that a Generator or UDR project will cease operation*

Include in forecast if “inclusion test” is passed:

- *Generators and UDR projects without “positive indicators” of repair and return to service:*
 - *Any of the existing and noticed (as applicable) IIFO, MO, and Retired (and similar for UDR projects)*
- *RMR Generators with an expiration date during Mitigation Study Period*



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The iterative testing process was demonstrated in the example and stakeholder comments were noted for consideration. Additional comments are encouraged and can be sent to deckles@nyiso.com by November 11, 2016. The next step in the process is to proceed to governance action at the BIC and MC. To see the complete presentation, please go to: http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2016-10-27/Forecast%20Enhancements%20example%20BSM%20102772016.pdf

Enhancements to the Mitigation Study Period for Buyer-Side Mitigation

Dr. Nathaniel Gilbraith of the NYISO presented the proposal to enhance the Mitigation Study Period (MSP) for Buyer-Side Mitigation (BSM). The NYISO had originally used a “reasonably anticipated entry date” when making buyer-side mitigation (BSM) determinations, pursuant to the tariff until the November 2010 revisions of the BSM Rules. In 2010, the NYISO revised the BSM rules so that all Examined Facilities (EFs), regardless of unit technology, are assumed to enter the NYISO’s ICAP markets beginning with the start of the Summer Capability Period that is 3 years from the year of the Class Year. The Class Year Study does not adhere to a specific time frame and therefore it is difficult to predict the length of the process. The Market Monitoring Unit (MMU) has recommended revising the start of the MSP by suggesting that the year of the Class Year may not be the best reference point for timing the MSP, because this does not necessarily represent the developer’s decision to begin construction. Dr. Gilbraith explained four options the NYISO is currently considering to improve the accuracy of the MSP:

1. Permit-based entry rule
 - Based on the EF’s status in the permit process
2. Technology based entry rule
 - Based on the technology of the EF
3. Multi-factor based entry rule
 - Combination of Option 1 and Option 2
4. Revise the start of the MSP
 - Change duration and/or starting point of the current three year outlook period to account for the duration of the Class Year

Dr. Gilbraith highlighted the pros and cons of the proposed options. The NYISO noted and will consider stakeholder feedback received during the presentation and requests additional comments by Friday, November 18, 2016. Comments can be sent to deckles@nyiso.com or ngilbraith@nyiso.com. To see Dr. Gilbraith’s complete presentation, please go to: http://www.nyiso.com/public/webdocs/markets_operations/committees/bic_icapwg/meeting_materials/2016-10-27/MSP%20Enhancement%20Presentation%2010%2019%202016.pdf

FERC Filings

October 28, 2016

NYISO filing of a motion to intervene out of time in NEET New York's formula rate proceeding

October 24, 2016



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NYISO and NYTOs joint filing of a conditional request for rehearing of Opinion No. 550 rendered in Docket Nos. ER11-1844-001 and ER11-1844-002

FERC Orders

October 24, 2016

FERC letter order accepting NMPC notice of cancellation of Cost Reimbursement Agreement between Niagara Mohawk Power Corporation and the Economic Development Growth Enterprises Corporation, designated as Service Agreement No. 1949

October 24, 2016

FERC letter order accepting Niagara Mohawk Power Corporation Notice of Cancellation of Cost Reimbursement Agreement with the New York Power Authority, SA No. 1951

Link to FERC Filings and Orders:

http://www.nyiso.com/public/markets_operations/documents/tariffviewer/index.jsp