

# *Strategic Tariff Review: Operations*

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*February 24, 2011*



## ***Overview***

- ◆ The NYISO is identifying inconsistencies, ambiguities, and outdated material in the NYISO's Tariffs and proposing amended tariff language to resolve them.
- ◆ This presentation proposes changes to the OATT and Services Tariffs pertaining to operations.

## Tariff Changes

- ◆ This presentation will highlight proposed modifications to:
  - *Open Access Transmission Tariff*
  - *Open Access Transmission Tariff – Attachment C*
  - *Market Services Tariff*
  - *Open Access Transmission Tariff – Attachment CC*

## OATT

### ◆ Definition for Available Transmission Capability

- *In the Commission's September 16 Order, (North American Electric Reliability Corp., 132 FERC ¶ 61,239 (2010) which accepted a NERC interpretation of MOD-029, the Commission encouraged the NYISO to work through its stakeholder process to update its OATT's definition of "ATC" to more accurately reflect the different nature and function of ATC under a financial reservation model.*
- *The NYISO modified Attachment C of the OATT reflective of the new NERC MOD-029 and made a compliance filing on November 8, 2010. In this compliance filing the NYISO indicated it intended to present a tariff amendment to clarify the NYISO OATT's definition of "ATC" for its stakeholders' consideration.*

## OATT

### ◆ Definition for Available Transmission Capability

#### ■ *Eliminate*

- **Available Transfer Capability (“ATC”)**: A measure of the Transfer Capability remaining in the physical transmission network for further commercial activity over and above already committed uses. ATC is defined as the Total Transfer Capability, less Transmission Reliability Margin, less the sum of existing transmission commitments, (which includes retail customer service) less the Capacity Benefit Margin. The amount reserved to support existing transmission commitments is defined in the Existing Transmission Agreements and Existing Transmission Capacity for Native Load in Attachment L.

#### ■ *Proposed*

- **Available Transfer Capability (“ATC”)**: An advisory projection of the transfer capability on Internal and External Interfaces and on Scheduled Lines calculated using the methodology described in Attachment C to the OATT.

## OATT

### ◆ Section 2.12.1 Back-Up Operation

- *Replace “maintain” with “develop”*
  - “The ISO shall ~~develop~~ maintain Back-Up Operation procedures that will carry out the intent and purposes of this ISO OATT, to the extent practical, in circumstances under which the normal communications or computer systems of the ISO are not fully functional.”
- *Remove Term “Market Participants”*
  - “Such procedures shall include testing requirements and training for the ISO staff and, Transmission Owners, s. ~~staff, and Market Participants.~~”

## OATT

### ◆ Section 2.13 Emergency Notification

- *Replace “Commission” with “FERC”*
- *Replace the phrase “when an Emergency State exists” with “one business day after declaring a Major Emergency”*
  - The ISO shall notify the **FERC** ~~Commission~~ and the PSC **one business day after declaring a Major Emergency** ~~when an Emergency State exists.~~

### ◆ Section 4.61 Load Shedding and Curtailments

- *Remove “Prior to the Service Commencement Date”*
- *Remove “the Network Customer”*
- *Replace “establish” with “maintain”*
  - ~~Prior to the Service Commencement Date~~ **The ISO and the Network Customer] Transmission Owners shall establish maintain** Load Shedding and Curtailment procedures pursuant to the Network Operating Agreement with the objective of responding to contingencies on the NYS Transmission System.”

## OATT

- **Section 4.6.2 Transmission Constraints**

- *Missing verb: Insert "will dispatch"*
- *Eliminate inference that LEER Procedure is executed first.*

- "During any period when the ISO determines that a transmission Constraint exists on the NYS Transmission System, and such Constraint may impair the reliability of the NYS Transmission System, the ISO **will dispatch** generation resources on a least-cost basis in accordance with the provisions of Attachment J." When applicable, the ISO will follow the LEER Procedure, referenced in Section 3.1.6, which is incorporated by reference herein. ~~The LEER Procedure is intended to prevent the necessity of implementing the curtailment procedures contained in the FERC and NERC tariffs and policies.~~ If the ISO is required to Curtail Transmission Service as a result of a TLR event, the ISO will perform such Curtailment in accordance with the NERC TLR Procedure.



## OATT

### ◆ Section 4.6.7 System Reliability

- *Replace “not unduly” with “non”*
  - “Notwithstanding any other provisions of this Tariff, the ISO reserves the right, consistent with Good Utility Practice and on a non ~~not unduly~~ discriminatory basis, to Curtail Network Integration Transmission Service without liability on the ISO’s and/or Transmission Owner’s part for the purpose of the Transmission Owners making necessary adjustments to, changes in, or repairs on their lines, substations and facilities, and in cases where the continuance of Network Integration Transmission Service would endanger persons or property.”

## OATT Attachment C

### ◆ Section 9.4 Total Transfer Capability (“TTC”)

- *Replace “TCC” with “TTC”*
  - “Each Scheduled Line is associated with a distinct Proxy Bus for which the ISO separately posts a TTC value.”
- *Replace “MultiRegional Modeling Working Group” with “Eastern Interconnection Reliability Assessment”*
  - “Databases used in the determination of the TTC values include **Eastern Interconnection Reliability Assessment** ~~MultiRegional Modeling Working Group~~ system representations, and the ISO’s Day-Ahead Market and Real-Time Market system representations.”

## MST

### ◆ Section 5.1 Control Area Services

#### ■ *Reposition Reliability Rules*

- “The ISO will provide Control Area Services in accordance with the standards and criteria of NERC and NPCC, the Reliability Rules of NYSRC ~~Reliability Rules~~ and Good Utility Practice.”

### ◆ Section 5.2 Independent System Operator Authority

#### ■ *Replace “effect” with “modify”*

- “The ISO will interact with other Control Area operators as required to ~~effect~~ modify External Transactions pursuant to this Tariff and to ensure the effective and reliable coordination with the interconnected Control Areas.

# OATT Attachment CC

- ◆ Joint Operating Agreement Among and Between New York Independent System Operator Inc. and PJM Interconnection, L.L.C., Schedule A – “Description of Interconnection Facilities”
  - *Add Linden VFT-Linden Cogen VFT, S. Mahwah-Waldwick J3410, and S. Mahwah-Waldwick K3411*
  - *Remove Franklin-Sugar Loaf SJ & SD.*

| <u>PJM</u> | <u>NYISO</u> | <u>Designated</u> | <u>(kV)</u> | <u>Meter Point</u> |
|------------|--------------|-------------------|-------------|--------------------|
| Linden VFT | Linden Cogen | VFT               | 345         | Linden VFT         |
| S. Mahwah  | Waldwick     | J3410             | 345         | Waldwick           |
| S. Mahwah  | Waldwick     | K3411             | 345         | Waldwick           |
| Franklin   | Sugar Loaf   | SJ                | 115         | Sugar Loaf         |
| Franklin   | Sugar Loaf   | SD                | 115         | Sugar Loaf         |

## OATT Attachment CC

- ◆ Add the latest Operating Protocol to Schedule B “Other Existing Agreements” as number 8.

8.0 Joint Emergency Operating Protocol dated September 10, 2009, among PJM Interconnection, L.L.C., New York Independent System Operator, Inc., and Linden VFT, LLC (Filed by PJM on October 1, 2009, in FERC Docket No. ER09-996-000).

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## *Next Steps*

- ◆ March – Seek Board Approval

The New York Independent System Operator (NYISO) is a not-for-profit corporation that began operations in 1999. The NYISO operates New York's bulk electricity grid, administers the state's wholesale electricity markets, and conducts comprehensive planning for the state's bulk electricity system.



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