

Con Edison Comments to NYISO Blackstart Tariff Enhancements (bold refers to NYISO proposal) for discussion at the April 13 conference call meeting:

- **New category for Combined Cycle testing requirements. Test must be completed in 6 hours.**

Tests for the past three years have been completed in around 1 ½ hours, including synchronization to the transmission system but they did not include starting up the steam generator. A total requirement of 3 hours is ample.

- **More flexibility for steam units achieving a hot status before blackstart test begins.**

Con Edison agrees and states that in response to concerns that had been expressed by one of the blackstart suppliers it was already scheduling and conducting the tests in accordance with the new proposal.

- **Steam units to do a complete test every third year with a less comprehensive test for the intervening two years. The latter test would consist in energizing the L&P bus in blackstart mode followed by adding large internal loads to see if the GT can sustain the load.**

Measurement G-M1, Item 5, of the NYSRC rules requires that blackstart tests shall at a minimum comply with NPCC Directory 8. Con Edison reviewed NPCC requirements for blackstart testing and believes the proposed test does not meet the requirement stated in Section 5.7.2.1 of Directory 8:

“The Generator Owner having generating facilities designated as having blackstart capability shall annually verify the facilities’ blackstart capability without dependencies on power sources unavailable during a partial or complete system blackout. Once the facility has been started, it shall continue to demonstrate its capability to operate in a stable condition while isolated from the power system for a minimum of ten minutes.” (emphasis added)

The test described by the NYISO needs to be extended to include starting up the turbine and having it reach full speed, which is the first part of the test in the current tariff that had a time requirement of 6 hours. This is Con Edison’s proposal for the two off years, maintain the 6 hours requirement.

In addition, in the transition to this new regime, if a unit passed the comprehensive test last year it would be followed with two years with the abbreviated test. If a unit failed last year it would start with the comprehensive test.

- **Triennial test must have been completed successfully within the prior two years in order to qualify for an intervening years test.**

Con Edison proposes that this should be changed to the prior year instead of the prior two years. If a unit failed its test in the prior year the confidence that the unit will successfully start up in blackstart mode in the time required is in question and has to be re-established. The fact that two years prior the unit had tested successfully is no longer relevant. It should be considered that a unit can fail a test and re-test successfully in the prior year. This would be considered as a successful prior year test.

- **Tests do not require test witnesses (Con Edison and NYISO).**

This has not been a significant problem in the past and current provisions should not be changed. It is critical for tests to be witnessed. This also avoids after the fact controversy on whether tests were successful or not.

- **The timeframe for notification of withdrawal from service would be two years instead of the current one year. Commitment would remain at three years. However, withdrawal would be effective only after PSC provides its consent. The NYISO also wants to stagger the units of a single owner so that they cannot all provide notice at the same time.**

Con Edison supports the NYISO's proposal except for proposing that in the transition, the first time around, the commitment period should be six years after which it would revert back to the current three years. This is to provide time for new, repowered or retrofitted units to provide additional blackstart resources.

- **Adding provisions that requires new or repowered units to plan for blackstart early on and must implement it upon a finding that it provides a benefit to system restoration. Units will be assured full recovery of their costs.**

Con Edison would keep them in its blackstart program for the defined period to assure full recovery.

- **New Item:** Con Edison proposes that a new provision be added that explicitly states that for units that Con Edison and the generation owner have agreed to retrofit with blackstart capabilities they too shall also be assured of cost recovery. Con Edison would keep them in its blackstart program for the defined period to assure full recovery.