

# Mitigation Procedures: Where We Are, and Where We Are Going

**Presented To the AMP / In-City Task Force  
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# Current Status of Mitigation: Key Elements

- Manual Mitigation
  - ***Direct substitution of bids.***
  - ***Watch-list.***
- AMP: Automated Mitigation Procedure
  - ***Statewide DAM.***
  - ***In-City Real-time, including OOM.***
- Special Circumstances in NYC
  - ***Original FERC-ordered mitigation (1998).***
    - ▶ In-City DAM.
  - ***FERC order in response to the Comprehensive Filing.***
    - ▶ SRE

# Manual Mitigation

- Direct Substitution of Bids
  - ***With Watch-list and AMP in place, rarely used.***
  - ***Used for startup and minimum generation.***
  - ***Needs to be done continually.***
- Watch-list
  - ***Used for energy and ancillary services.***
  - ***Can apply to DAM and BME.***
  - ***Conduct in an hour (DAM or BME), given previous conduct, impact, and system conditions, implies impact if system conditions and conduct persist.***
    - ▶ **Automatic bid substitution in MIS.**
    - ▶ **Remains in place until behavior or system condition changes.**

# Automated Mitigation Procedure

- Statewide DAM
  - ***Basis is conduct and impact.***
  - ***Applies to incremental energy.***
  - ***Telescoping superzones***
  - ***Temporally and zonally selective.***
  - ***LBMP threshold before AMP arms.***
  - ***Certain exceptions.***
    - ▶ Hydro units
    - ▶ Imports
    - ▶ Up to 50 MW of a portfolio.

# In-City DAM Mitigation

- Applies to all in-City units.
- Arms in the presence of congestion between Indian Point 2 and a generator's bus.
- In the presence of congestion, conduct only; no impact.
- Applies to startup, minimum generation, and incremental energy.
  - ***Cost-based reference levels determined by MMP pursuant to the Comprehensive Filing Order.***
- Applies to units committed via the SRE process.
- Mitigation for in-City 10-spin.
  - ***Spin must be offered.***
  - ***Bid is capped at \$0.***

# The Future

- DAM AMP will address additional bid parameters.
  - ***Startup and minimum generation will become subject to AMP.***
    - ▶ **Startup mitigation will be sensitive to minimum run-time requirements up to midnight.**
- In-City DAM mitigation will move into the AMP environment.
  - ***An intra-zonal congestion test will be analogous to the AMP's LBMP arming threshold.***
  - ***Conduct and impact will form the basis for mitigation.***
  - ***Energy mitigation will be temporally selective.***
- Real-time AMP capability will exist outside NYC.

# Issues Needing Committee Exploration

- In-City DAM
  - ***Approach to determining load pocket thresholds.***
    - ▶ MMP staff is gathering data on extent of DAM intra-zonal congestion.
    - ▶ Application of thresholds to startup and minimum generation offers.
  - ***Efficacy of in-City 10-spin bid cap.***
- RT-AMP outside NYC
  - ***Level of the arming threshold.***
  - ***Consultation process in the operating day.***
  - ***Resources against which to test impact.***