

# **NYISO Initial Planning Process Summary of Comments**

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**ESPWG Meeting  
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Albany**

# Comments Received From:

➤ **Con Edison**

➤ **LIPA**

➤ **National Grid**

➤ **Charlie Pratt**

# Con Edison

- **Section 3.2.1: Reliability Needs Assessment**
  - *CE Question: regarding the sufficiency of the ATRA study?*
  - *NYISO Answer: The reliability analyses for the first five year baseline case is—in fact—the most recent ATRA analysis.*
- **Section 4.2.1.3: Short Circuit Data**
  - *CE Question: regarding the short circuit base case assumptions for the initial round of the planning process*
  - *NYISO Answer: NYISO intends to use the most recent NPCC ATR data base since the ATRA is not available*
- **Section 4.3.1.2: Congestion Cause Analysis**
  - *Added footnote regarding data security concerns*
- **Various**
  - *Clarifications/editorial revisions*

# National Grid: General Comments

- **Initial planning process Needs Assessment should be a regional analysis of the reliability and market efficiency of the NYCA system**
  - *NYISO Response: The general consensus of the ESPWG was that the Initial Planning Process Needs Assessment would be limited to reliability issues; economic needs will be the subject of the Phase II discussions*
- **The Needs Assessment should not be merely a reliability check on separate non-coordinated project proposals**
  - *NYISO Response: The intention is to start with the Base Case developed for the ATRA for the first five years and to develop scenarios, with stakeholder input, for future system expansion plans*

# National Grid (Cont'd)

## ➤ **Section 4.2.4: Baseline**

- *NGrid Comment: Only projects with a high likelihood of implementation should be included in the baseline expansion scenario*
- *NYISO Comment: Agree. Criteria will be established during the implementation phase, with input from the ESPWG, to determine which future resources should be included in the Baseline scenario*

## ➤ **Section 4.3.1.1: Historic Congestion Summary Reports**

- *NGrid Comment: Historic congestion costs should consider all costs borne by customers due to congestion*
- *NYISO Response: Agree. The impact of congestion on energy costs is readily available. The degree of consideration for other factors may vary with the availability of data.*

# National Grid (Cont'd)

- **The Initial Planning Process should be a clear lead-in to the Phase 2 Comprehensive Planning Process**
  - *NYISO Response: Agree*
  
- **Comments on what should be included in the Phase II Planning Process**
  - *NYISO Response: Issues listed by NGrid are consistent with the ESPWG Scope for Phase II, which is anticipated to begin immediately following approval of the Initial Planning Process.*

# LIPA: General Comments

- **Add a “Definitions” Section**
  - *NYISO Response: Add a Definitions Section which references the NYISO Tariff*
- **Add a reference to the methodology used in the conduct of the study**
- **How will the reliability needs study be performed?**
  - *NYISO Response: Section 3.1 lists and references the applicable reliability criteria; Section 4.2.1.2 lists the existing reliability assessments that will be used for the initial planning study*

# LIPA: General Comments (Cont'd)

- **Will the NYISO Short-Circuit procedure use the NPCC database? Are neighboring CA's represented? Is this database sufficient?**
  - *NYISO Response: NYISO intends to use the most recent NPCC ATR database since the ATRA is not available. This database includes neighboring systems.*
  
- **Consider including the “Drivers” graphic in the Initial Planning Process**
  - *NYISO Response: Agree. Will add as Attachment D*
  
- **How frequently will the plan be developed?**
  - *NYISO Response: The Planning process is envisioned as a 12-18 month cycle*

# LIPA

## ➤ **Section 3: Add the objective to coordinate the reliability assessment with neighboring Control Areas**

- *NYISO Response: Agree. Discussions already underway*

## ➤ **Section 3.2.1: Reliability Needs Assessment**

- *LIPA Question: Will the risk be quantified or will the assessment just evaluate whether criteria is met?*
- *NYISO Response: Needs assessment will determine whether the reliability criteria has been met under various future scenarios. Individual stakeholders may assess the degree of risk attributed to these various scenarios.*

# LIPA (Cont'd)

## ➤ Section 4.1: Process Overview

- *LIPA Question: Should there be a recognition that the procedures may be refined during the implementation of the first study? How will such modifications be approved by stakeholders?*
- *NYISO Response: Certainly, there are implementation issues which must be worked out during the conduct of the first round process. It is intended that such issues will be resolved by consensus among the ESPWG and TPAS members as appropriate.*

## ➤ Section 4.2.3: Input from Stakeholders

- *LIPA Question: What is criteria for inclusion of new resources?*
- *NYISO Response: Criteria will be established during the implementation phase, with input from the ESPWG,*

# LIPA (Cont'd)

## ➤ **Section 4.3.1: Historic Congestion**

- *LIPA Question: Will historic congestion be analyzed in DA, RT or both?*
- *NYISO Response: Initially, historic congestion will be analyzed as DA, since the PROBE methodology was developed to analyze SCUC output data only*

## ➤ **Section 4.3.1.2: Selective Cause Analysis**

- *LIPA Question: What is the criteria for selective cause analysis? Expand on the quantification of congestion costs.*
- *NYISO Response: As previously noted, the methodology for congestion analysis is still under development as part of the ESPWG's consideration of the use of the PROBE model*

# LIPA (Cont'd)

## ➤ **Section 4.3.4: Report Preparation**

- *LIPA Question: Can a Table of Contents be provided for the initial planning report?*
- *NYISO Response: This will be developed with ESPWG and TPAS input during the implementation phase*

## ➤ **Add a Disclaimer: that the initial process does not determine what the final process will be and noting that neither the stakeholders nor Board are giving up any rights in relation thereto.**

- *NYISO Response: Disclaimer is not needed. The Initial Planning Process merely implements the current requirements of the ISO Agreement/NYISO Tariff*

# LIPA (Cont'd)

## ➤ Attachment C: Timeline

- *LIPA Comments: Various comments on Gantt chart based upon prior ESPWG discussions*
- *NYISO Response: Agree and will make revisions*

# Charlie Pratt

- **Suggests various structural changes to separate the Reliability Analyses from the Historic Congestion**
  - *NYISO Response: Discuss with ESPWG*
- **Question: Does the initial planning process need to address the impact of adjacent control areas on reliability in New York?**
  - *NYISO Response: An Inter-Regional Planning Protocol is under development among the Northeast ISOs/RTOs which will address this issue. It is intended that the draft protocol will be reviewed with stakeholders and ultimately be included in each ISO/RTO's planning procedures/Tariff.*

# Discussion/Next Steps

- **NYISO Staff will revise Initial Planning Process based upon comments received/discussion at this meeting**
- **Sept 4 Final version will be distributed by COB**
- **Sept 10 Presented to OC for approval**
- **Sept 17 Presented to MC for approval**
- **Oct Begin first round study**
- **Oct ESPWG to begin Phase II development**