Con Edison Comments – 03/28/06 RAITF Scope of Work

Proposed changes to the 3/23/06 draft of the RAITF Scope of Work

THE LANGUAGE BELOW REPLACES ALL OF SECTION 4.B. AND 4.C. AND INTRODUCES A NEW HEADING, SECTION 4.D., FOR THE REST OF SECTION 4.

B. Recommendation on IRM/LCR Approach

The RAITF will conduct a review of applicable studies and procedures of the NYSRC and NYISO that relate to resource adequacy for the purpose of making recommendations to the NYISO and/or NYSRC for their consideration concerning:

- 1. whether stakeholders support modifying procedures used to address issues raised in the NG complaint to establish, or allocate costs associated with, the IRM and LCRs, and, if so whether the approaches used to develop such modifications should include:
- 2.whether stakeholders support revising modifying resource adequacy policies and the
- 3. procedures used to address NG concernestablish, and allocate costs associated with,
- 4. the IRM and LCRs, and, if so
- 2. whether such revisions the approaches used to develop such modifications should take the form of include:
 - <u>a.</u> revising the procedures used to develop the IRM and LCR; and/or
 - <u>b.</u> revising how costs associated with procuring these requirements are allocated among LSEs and/or
- <u>2. e. determining what priority, if any, the objective of minimizing the total</u> statewide costs for ensuring reliability should be accorded (P24 of the FERC order)

C. Recommendations on Market Design

In addition, the RAITF may make recommendations to the NYISO regarding proposed market design changes relating to the procedures used to establish, or to allocate costs associated with, the IRM and LCRs as stated in the NG complaint that consider such things as cost allocation, market incentives that integrate resource adequacy needs with market signals, short-term and long-term reliability impacts, and the impact of potential changes on existing market designs.

D. Studies that the RAITF will Review and Evaluate