DMNC Testing and Verification

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DMNC Auditing Period

NYISO has reviewed the time period and the exposures that we and you face

Obstacles to immediate verification of DMNC values at test time

Verification of DMNC Values Would Require use of Revenue Meter Data at Test Time

Problems

- Revenue meter data is locked down on the 6th day of the following month
 - MMP would not be able to verify the test values without 60 days of lead time
 - Could delay selling additional capacity for 3 months
- Revenue meter data can be changed at the 4 month and 12 month true-ups
 - DMNC values may change at true-up times
 - Risk of change in DMNC values is too large

Draft – for discussion purposes only

Solution to Metering Problem

- Real time data collected and stored in the NYISO PI system will be used to verify DMNC value
 - revenue meter improvements may permit revenue reporting to be used as a data source in the future
- FAX copy of MSP calibration letter to MMP
 - This will give MMP some assurance that the meter was tested and is within specifications at the time of the DMNC test.

Other Problems With Immediate Verification of DMNC Testing

- Weather conditions that influence turbine output can not currently be monitored by the NYISO from its headquarters.
 - Temperatures for the past four years at the generator's site is unknown to MMP
 - MMP is concerned about calculation errors
 - Actual temperature during the time of the test is unknown to MMP

Solution to Weather Conditions Obstacle

- Use NYISO collected weather data from one of the 17 locations that is closest to the generator as the actual temperature at the time of the test.
 - This will allow MMP to use NYISO data to verify the output of the machine.
 - This will allow MMP to calculate the average temperature that the generator must correct its output to.

Other Problems to Immediate Verification of DMNC Test Results

- Suppliers that follow Technical Bulletin 75 will speed up their verification process
 - MMP can not determine the operating configurations of units without adherence to the TB
 - Units will not be able to claim temperature corrections without registering their operating curves
 - Units will not be able to claim higher than normal operating levels without requesting CLR classification
- NYISO will include the language from TB 75 in the ICAP manual as part of the registration process

Other Problems With Verification of DMNC Test Results

- MMP is required to administer the tariff approved by FERC
- MMP intends to review DMNC results during physical audits

For MMP to Perform Audits and review outcomes

- MMP suggests that the audit period starts on the day of the test and ends on the day after the next like capability period ends.
 - This ties to the periods that the DMNC value could be used in UCAP calculations and sales of UCAP.
 - After the next like capability period ends there is little reason for reviewing DMNC methodologies.

Summary

- Real time data from PI system will be used for DMNC verification
- The closest weather station reading will be used for the testing temperature
- The closest weather station reading will be used for historical data
- TB 75 will be included in the manual
- Auditing time will be from the date of the test through the end of the next like capability period