

Section 1.1 Background

While having an exception at market inception may have been okay, it is now nearly 6 years later. Continuation of a statement that metering that does not conform to the standards is not acceptable.

This is particularly egregious given the statements at the beginning of Section 2.

Section 1.2 Definitions/Terminology

Are any of these in the Tariff (I have not checked) and if so are they identical? Also should we have definitions in a Manual opposed to the Tariff? I don't recall us doing this with other Manuals.

Section 2 METERING EQUIPMENT STANDARDS AND SPECIFICATIONS

Second sentence: This should read "...legacy-metering infrastructure..." as it reads now one would think we settle NYISO based on NYPP billing!

Section 2.1.2 Accuracy

"Billing data values obtained from meters meeting this specification will be transmitted to the NYISO's Web-Based Reconciliation (WBR) application with zero error."

Meaning the metering has no error (zero-error) or the transfer via WBR shall have no error? How does one ensure this? Generally a file is either sent and received as complete or this is a problem that totally prevents its use. Partial data corruption is unlikely. What is this "zero error" trying to convey?

Section 2.2.1 Meters

I have no problem with the statement "Proper compensation for line and transformer losses and for instrument transformer errors will be adjusted in the final revenue metering data."

This does raise a question: many tie lines were compensated to a particular point e.g. state boundary or to some percentage length of a line. The purpose was to ensure the proper party "owned the losses". Has anyone looked into the relevance of that in today's world? It would seem that by adjusting boundaries to specific metering locations the likelihood of errors in compensation calculations would be avoided. Since transmission level losses are no longer a cost of doing business for a utility (as it was in the past), we could set aside this medieval practice.

Section 2.2.2 Instrument Transformers; second set of bullets; 1st bullet

Should this read "...services of 0.3% or better."

Section 2.2.2 Instrument Transformers; last bullet

Since CCVTs are not to be used, does the meter database indicate which revenue meter points are using CCVTs for voltage inputs?

Section 3.1 Responsibilities

This section lays cost responsibility on MPs who are “not retail customers”. This appears overly broad and may be intended for generating units. However, given its broad nature, could it not be construed to apply to other suppliers such as LSEs and ESCOs? In which case, what circumstances would such metering costs apply? These should be delineated.

Section 3.2 Installation

Second paragraph: note comment on Section 2.2.1 above. If it possible to avoid compensating meters we should do so.

Third paragraph: Putting in a “must comply” but then adding in the grandfathered metering words up front just do not cut it. No one, least of SENY, has indicated that anyone has to replace meters within a certain time or even what meters (and by meters I mean the entire end to end scheme from VT and CT to RTU) should be replaced. However, we cannot allow language intot he standard that is a call for inaction.

3.3.1 Calibration and Maintenance Standards; 1 Calibration Interval

Given the grandfathered nature of metering (in this Manual’s current form), does this also excuse compliance with the calibration intervals? (It should not.)

Before BIC is asked to approve this Manual, we should have an updated meter database that would show the current status of the calibration. If there is significant non-compliance then we need to have a transition period over which MAs would agree to bring themselves into compliance.

3.3.3 Metering System Inspection and Testing; 3rd paragraph

I expect this was written with generators in mind however, laying the expense of any metering investigation off on a party who challenges a meter component is an egregious burden especially on smaller LSEs.

On a macro level, it raises the question of what metered data is available to MPs. Is there any reason why the sub-zone tie flow data along with aggregate generator metering (totaled by sub-zone) not be made available to other MPs? We are told there are few changes to the TOL files over time but have no evidence of that except what has been said to us.

Section 4.2 Digital and Analog Telemetry

While these means are cited as backup sources for revenue metering, we also should consider use of the ISO’s State Estimation Program, the ouput flows of which could be integrated for hourly energy purposes. This should be included as a backup possibility now.

Section 4.4.1 Generator and Tie-Line Meter Data Tasks

2nd Sentence

Shouldn’t this read “...review telemetered revenue meter data...” Also, what corrections would be made and why? The conditions under for which correction are allowed should be identified. Further, if the WBR uploads do not have flags to identify such corrections, we should have them added in so parties know that manual interventions have occurred.

Select Energy NY Comment on the RMR Manual

4th Sentence

This would read better if it simply said that “This process occurs daily for the current month, for all days of the month, to insure accurate settlements for the initial run.” From the 1st of the month to current day-2 doesn’t add anything...

2nd Paragraph

There are very large amounts of PTS data. Taken on 6 second intervals by generator it would seem that this data could not possibly reviewed in detail by the MA every day. Either there are monitoring programs that look for potential anomalous data or a supplier or TO control room operator sees a problem which results in substitution or correction. This section should reflect likely practice.

Section 4.4.2 Tasks Concerning the Metering Authority TOL Process

Either this section needs to detail the methods used to make the indicated comparison (that should be exact) or refer to the appropriate documentation for how this is accomplished.

Section 4.4.3 NYISO Meter Data Process

6th paragraph

This refers to locking down data. When is this done?

Section 5.12 Procedure

(1) Do non-TO LSEs have enough data in their possession to effectively make a challenge? If not we need to allow access to enough WBR data so they can challenge if they choose to and (2) does this process involve the costs that can be allocated to those challenging a meter’s accuracy (see 3.3.3)?

5.2 Loss of Metering Data

Refer to comments made under Section 4.2 above. Again, can integrated State Estimator based flows be effectively used as a backup?