



## NERC STANDARDS GUIDANCE MATRIX

### How NYISO and Its Market Participants Share and Coordinate Responsibilities to Meet NERC Compliance

This document provides Market Participants with supporting explanations and related reference documents on how compliance is achieved for a variety of NERC Standards.

#### **Background:**

The NERC Standards are written for users, owners and operators of the bulk electric system. These standards identify responsible entities through the NERC Functional Model definitions. In some cases, the Functional Model does not consider the fact that the operational and planning aspects of ISO/RTOs are technically and organizationally different from other types of NERC registered entities. In ISO/RTOs, tasks and requirements are coordinated in some instances on an area-wide basis between the NYISO and its Market Participants. NERC Standards do not always clearly align with entity registration in New York and other parts of the country organized under ISO/RTOs. In some cases, NYISO's methods and approach, delineated in its FERC approved Tariffs, require clarification.

The NYISO is providing this guidance matrix to assist NYISO Market Participants who are NERC Registered Entities with their compliance obligations. It should be plainly noted that nothing in this document relieves the Market Participant from the requirements set forth in the NERC Standards. The document does not provide legal advice. Market Participants who have questions about how to interpret NERC Standards should consult NERC or their own counsel. Where Market Participants' compliance obligations are met through NYISO procedures, this document provides references to the applicable policies and procedures as requirements with which Market Participants must comply.

#### **Details of What You Will Find:**

The NYISO and its Market Participants coordinate many planning and operating functions on an area-wide basis. Market Participants have requirements that are being met through coordinated area-specific policies and procedures established by the NYISO. Consequently, the NYISO and its Market Participants must coordinate closely to be able to maintain and demonstrate compliance.

The NERC Standards Guidance Matrix has two tabs, one labeled General Guidance and one labeled IRO-010 Guidance.

The General Guidance provides the following information:

- The requirements marked with a 'Yes' in the last column entitled, "NYISO Action Required to Coordinate Compliance", identifies those requirements that must be coordinated between the NYISO and the Market Participants to both comply and document compliance. Accordingly, marking the requirements "Yes" in this manner identifies which functions the NYISO carries out in fulfilling its responsibilities for Market Participants' requirements through coordinated area-based procedures;
- The requirements marked with a 'No' in the column titled, "NYISO Action Required to Coordinate Compliance", identifies those requirements for which Market Participants must act independently to meet compliance requirements. These are compliance requirements for which

both the NYISO and Market Participants may be obligated to have procedures in place to comply and document compliance for their registrations;

- The columns entitled, “Summary of Actions”, “Action by Market Participant” and “Supporting Documentation”, provide summaries of actions to be taken and identify applicable NYISO documents and procedures that support compliance.

The IRO-010 Guidance provides the more specific information related to IRO-010:

- The IRO-010 Guidance was created pursuant to NERC Standard IRO-010. It describes the data and information needed by the NYISO to perform real-time monitoring and to conduct both real-time and operational planning assessments. The Template identifies data types, their sources, the format in which they must be provided and the timeliness of the data submissions.