Review Comments

NYISO Revenue Meter Requirements Manual

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- 1. The title should be changed to "NYISO Revenue Metering Requirements Manual." The reason for this change is that this manual should cover the meter, the instrument transformers, the telecommunication etc. not limited to revenue meters.
- 2. More meat should be provided in Section 1.0 Overview to include:
 - a. the objectives of this manual such as to define the accuracy and reliability requirements, data reporting, testing, auditing etc.,
 - b. acknowledgement of the existence of metering systems that were installed prior to the inception of the NYISO, and the policy or approach dealing with these metering systems, and
 - c. the relationship between this manual and the NYISO Control Center Requirements Manual.
- 3. Section 1.1, Terminology, should be merged with Section 3.1.1, Definitions. Revenue Meter in Section 1.1 should be changed to Revenue Metering System. Its definition should be modified to read like: The metering system used by Meter Authorities to provide hourly MW values associated with generation and intercompany or inter-zone tie-lines to the NYISO for settlement purposes.
- 4. Section 3.0 Operating Procedures
 - a. Data Acquisition in "NYISO Guidelines for The Installation, Operation and Maintenance of Data Acquisition Equipment" should be changed to Revenue Metering.
- 5. Suggest to modify the first paragraph of Section 3.1 to read:
 - This policy provides metering standards for participants of the NYISO, including generation companies, transmission owners and load serving entities (LSEs). The NYISO requires accurate metering from all of its market participants to ensure the reliable....These standards provide.....of all equipment utilized for recording and reporting of electrical generation, transmission and station power consumption to enable NYISO to settle electric accounts accurately and timely.
- 6. Section 3.1.1 Definitions
 - a. Data Quality remove ISO Control Center.
 - b. Metering Problem replace "the operation of the power system" with "the accuracy of accounting" and "the metering equipment installed" with "a metering equipment installed."
- 7. Section 3.1.2 Policy Guidance All three versions presented all mean the same.
- 8. With the proposed changes in Section 1.1, the last paragraph of Section 3.1.2 can be modified as follows. "Revenue metering systems must accurately measure energy while....Instrument transformers used for revenue metering purposes must comply with the standards detailed in Section 1.3. However, the document does not seem to contain such a section."

- 9. Section 3.1.5 Maintenance and Calibration.
 - a. NYISO version is more specific than the NatGrid version.
 - b. Remove Audits from this section. Section 3.1.6 Audits is a better place for this.
 - c. Replace all the "are to" with either "shall" or "is required."
 - d. The documentation retention requirement should be specified either 2 or 5 years.
 - e. In Reporting, "Report formats and the NYISO contact for receiving the reports are promulgated in a NYISO Technical Bulletin" should be replaced with specifics. This comment applies to Section 3.1.6 Audits.
- 10. Remove Section 3.1.7 Scan Data List.
- 11. Retain Section 3.1.8 Loss of Metering or Telecommunications.
- 12. Dispute Resolution is such an important issue that it deserves a separate section. Suggest to create a new section to deal with Dispute Resolution including suspected manipulation of metering or metering data, continued negligence in performing required duties, etc.
- 13. Section 3.2 NYISO Guidelines for the Installation, Operation and Maintenance of Revenue Metering Equipment
 - a. This section and its sub-sections are the "main attraction" of the manual. It should be retained, expanded and provided with details. Rewriting of this section should be the major tasks of the Metering Task Force.