

ICAP WG – 0124/06
M. Younger comments

Last week's NYSRC Executive Committee meeting showed that the language we recently developed on UDR flexibility may not have been sufficiently explicit in when the flexibility on when the election can be made after August 1st. In particular, a key issue for many of us is that the IRM and LCR analysis be consistent with the decision. I think we need to refine the language to make it clear that the NYISO will not allow late selection unless it can be assured that the analysis will include the ultimate decision and that the analysis can be completed on time.

Consequently, I suggest something along the lines of the following language replace the third paragraph in 4.14.3.

Annually, prior to August 1st, the holder of External UDRs may return to the NYCA a quantity of the External UDRs, up to the maximum amount awarded under Section 14.4.2. The election will be represented by the NYSRC and NYISO in performing the base case and sensitivity cases for the reliability studies that determine the NYCA Installed Reserve Margin and the Locational Minimum Installed Capacity Requirements, respectively, for the next Capability Year. The holder of the External UDRs may return to the NYCA a quantity of the External UDRs after August 1 with the concurrence of the NYSRC and as long as the NYSRC and NYISO can incorporate the decision into the base case and sensitivity cases for the reliability studies.

Any UDR capability that is returned will be considered emergency support capability in these reliability studies to benefit all LSEs when determining the NYCA Installed Reserve Margin and the Locational Minimum Installed Capacity Requirements.

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