

2017 Project Prioritization & Budgeting Process

Ryan Smith
Senior Manager
New York Independent System Operator

Budget & Priorities Working Group

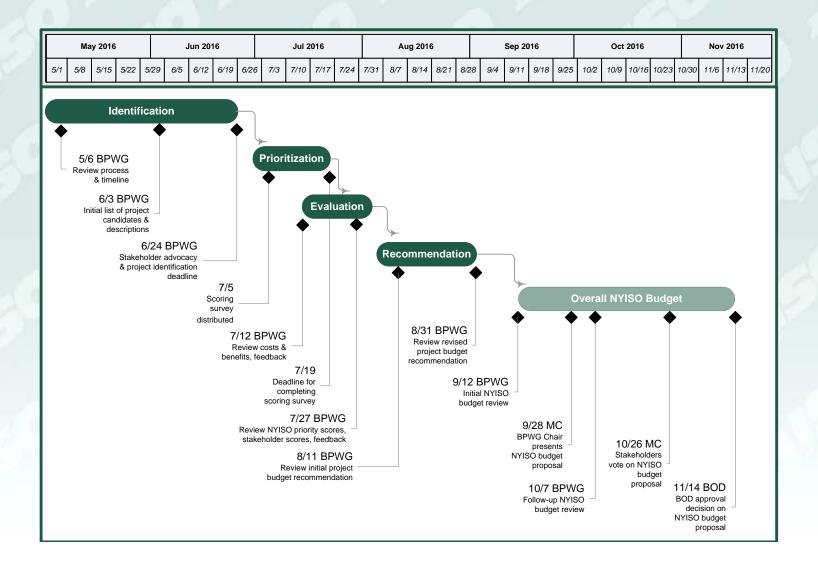
August 11, 2016

Krey Corporate Center

2017 Project Prioritization Process

| Phase | Description |
|----------------|--|
| Identification | This phase involves developing the list of project candidates taking into consideration regulatory obligations, strategic initiatives, State of the Market recommendations, necessary infrastructure enhancements, product plans, stakeholder feedback, etc. |
| Prioritization | The phase involves the NYISO and stakeholder scoring of projects. The NYISO scores projects using objective criteria that reflects strategic alignment, expected outcomes, risks, and ability to execute. Stakeholders score projects based on their organizational priorities via a survey mechanism. |
| Evaluation | This phase involves performing a feasibility assessment based on detailed cost and labor estimates, dependencies, priority scores, and stakeholder feedback. |
| Recommendation | This phase involves proposing a feasible set of project deliverables and related budget requirements. The proposal is refined as needed based on stakeholder feedback. |

2017 Project Prioritization Timeline



Recommended Budget by Product Area

| | | | Estimated Cos | t (in millions \$) | | |
|-------------------------------------|-------|---------|-------------------|--------------------|-----------|------------|
| Product Area | Labor | Capital | Prof. Services | Total | Mandatory | Continuing |
| Business Intelligence Products | 0.97 | - | 0.56 | 1.53 | 0.31 | 0.28 |
| Capacity Market Products | 2.93 | - | 1.42 | 4.35 | 0.70 | 0.55 |
| Demand Response | 0.28 | - | 0.15 | 0.43 | - | 0.18 |
| Energy Market Products | 0.52 | 0.01 | 0.10 | 0.62 | - | 0.39 |
| Enterprise Products | 2.63 | 5.92 | 0.74 | 9.29 | - | 4.73 |
| Finance Products | 1.29 | 0.05 | 0.09 | 1.42 | - | 0.57 |
| Operations and Reliability Products | 4.93 | 1.40 | 9.84 | 16.17 | - | 15.55 |
| Planning Products | 0.47 | - | 0.30 | 0.77 | - | 0.46 |
| TCC Market Products | 0.53 | 0.01 | 0.43 | 0.96 | - | 0.96 |
| Total Cost | 14.55 | 7.38 | 13.62 | 35.55 | 1.01 | 23.67 |

| | | Dric | ority Sco | oros | | | Ectima | ted Cos | · /in mil | lione ¢\ |
|--|-------|---------------|---------------|------|-----------------|-------------------------|--------|---------|-----------|----------|
| Project | NYISO | Stake- | | Org | Sector Count | | | Capital | Prof. | Total |
| Business Intelligence Products | | | | | | | | | | |
| NAESB PKI Phase 2 | | MA | NDATC | RY | | Deploy | 0.31 | 0.00 | 0.00 | 0.31 |
| Enterprise Information Management - Data Integration Phase III | | CC | NTINUI | NG | | Development Complete | 0.28 | 0.00 | 0.00 | 0.28 |
| Customer Relationship Management Tool | 237 | 51 | 24 | 6 | 3 | Deploy | 0.08 | 0.28 | 0.00 | 0.36 |
| Public Website Calendar | 193 | 15 | 21 | 4 | 2 | Architecture Design | 0.05 | 0.00 | 0.00 | 0.05 |
| Secure Communications | 186 | 16 | 17 | 3 | 2 | Deploy | 0.14 | 0.00 | 0.00 | 0.14 |
| Public Website Refresh | 181 | 36 | 24 | 4 | 2 | Architecture Design | 0.15 | 0.00 | 0.26 | 0.41 |
| eTariff Webviewer Enhancements | 175 | 53 | 38 | 10 | 2 | Deploy | 0.04 | 0.00 | 0.02 | 0.06 |
| Key Topics Tracking for Public Website | 160 | 21 | 18 | 4 | 2 | Deploy | 0.07 | 0.00 | 0.00 | 0.07 |
| Mobile Applications | 146 | 15 | 20 | 3 | 2 | Deploy | 0.08 | 0.00 | 0.15 | 0.23 |

| Project | NYISO | Stake- | ority Sco Weight | Org | Sector Count | | | ted Cost | Prof. | lions \$) Total |
|---|----------------|--------|---------------------|-----|-----------------|---------------------------|------|----------|-------|---------------------------|
| Capacity Market Products | | | | | | | | | | |
| RMR Cost Recovery Phase II | | MA | NDATO | RY | | Functional Requirements | 0.28 | 0.00 | 0.00 | 0.28 |
| Demand Curve Reset | | MA | NDATO | RY | | Study | 0.04 | 0.00 | 0.06 | 0.10 |
| Demand Curve Reset Annual Updates | | MA | NDATO | RY | | Deploy | 0.25 | 0.00 | 0.09 | 0.34 |
| Elimination of Capacity Zones (SOM) | | CC | NTINUI | NG | | Market Design Complete | 0.55 | 0.00 | 0.00 | 0.55 |
| Alternative Methods for Determining LCRs (SOM) | 759 | 278 | 236 | 20 | 4 | Market Design Complete | 0.41 | 0.00 | 0.64 | 1.05 |
| Integrating Public Policy | 732 | 422 | 402 | 27 | 5 | Study | 0.31 | 0.00 | 0.35 | 0.66 |
| Treatment of Capacity Exports from Localities (SOM 8) | 723 | 41 | 69 | 7 | 4 | Market Design Complete | 1.02 | 0.00 | 0.00 | 1.02 |
| Performance Assurance | 546 | 54 | 70 | 7 | 2 | Study | 0.15 | 0.00 | 0.21 | 0.36 |
| ICAP AMS Redesign & Testing Improvements Phase 1 | 479 | 77 | 47 | 9 | 4 | Deploy | 0.46 | 0.00 | 0.00 | 0.46 |
| Automate ICAP Import Rights | 454 | 25 | 15 | 3 | 2 | Deploy | 0.10 | 0.00 | 0.00 | 0.10 |
| Modifications to GADS Reporting Software for IIFO | 449 | 1 | 0 | 1 | 0 | Deploy | 0.02 | 0.00 | 0.09 | 0.11 |
| GADS Reporting | 364 | 61 | 33 | 7 | 2 | System Design | 0.08 | 0.00 | 0.00 | 0.08 |

| Project | NVICA | Stake- | | Org | Sector | | | ted Cost | Prof. | , |
|---|----------------|-----------------|----------------|-------|--------|---------------------------|-------|----------|-------|--------------|
| Project Capacity Market Products | <u>INTISU</u> | <u> noider</u> | <u> weignt</u> | Count | Count | Deliverable | Labor | Capital | Serv. | <u>Total</u> |
| Forward Capacity Market | 350 | 149 | 110 | 11 | 4 | Concept Proposed | 0.23 | 0.00 | 0.00 | 0.23 |
| BSM to Address Other Price Suppression Actions (SOM 5) | 349 | 70 | 72 | 5 | 2 | Concept Proposed | 0.76 | 0.00 | 0.00 | 0.76 |
| Capacity Transfer Rights for Internal Transmission Upgrades (SOM) | 337 | 14 | 20 | 4 | 2 | Concept Proposed | 1.05 | 0.00 | 0.00 | 1.05 |
| Economically Allocate Import Rights | 330 | 1 | 0 | 4 | 0 | Concept Proposed | 0.83 | 0.00 | 0.00 | 0.83 |
| Fuel Assurance - Dual Fuel Requirements for Gas-Fired Generators | 299 | 21 | 40 | 2 | 1 | Concept Proposed | 0.63 | 0.00 | 0.00 | 0.63 |
| On Ramps and Off Ramps for Zones | 295 | 61 | 35 | 6 | 2 | Concept Proposed | 0.47 | 0.00 | 0.00 | 0.47 |
| Incremental External CRIS Rights | 263 | 61 | 25 | 3 | 1 | Market Design Complete | 0.57 | 0.00 | 0.00 | 0.57 |
| Incremental Enhancement to BSM Forecasts of ICAP Prices (SOM) | 246 | 71 | 66 | 8 | 4 | Concept Proposed | 0.31 | 0.00 | 0.00 | 0.31 |
| Dynamic Creation of Zones | 215 | 91 | 72 | 7 | 2 | Concept Proposed | 0.71 | 0.00 | 0.00 | 0.71 |

| | Priority Scores Stake- Org Sector | | | | | | Estima | ited Cost | t (in mil Prof. | lions \$) |
|--|-----------------------------------|-------|---------------|----|---|---------------------------|--------|-----------|--------------------|-----------|
| Project | NYISO | | Weight | | | Deliverable | Labor | Capital | | Total |
| Demand Response Products | | | | | | | | | | |
| Distributed Energy Resource Program Design | | CC | NTINUI | NG | | Concept Proposed | 0.18 | 0.00 | 0.00 | 0.18 |
| NYISO Pilot Framework | 498 | 306 | 189 | 13 | 4 | Market Design Complete | 0.01 | 0.00 | 0.07 | 0.08 |
| Granular Pricing & Market Price Delivery | 373 | 61 | 52 | 7 | 3 | Concept Proposed | 0.03 | 0.00 | 0.00 | 0.03 |
| Meter Data Policy | 346 | 83 | 65 | 9 | 3 | Study | 0.06 | 0.00 | 0.09 | 0.14 |
| Limited Resource Performance Obligations: Evaluate Minimum Performance Obligation for Capacity Resources | 344 | 183 | 184 | 13 | 5 | Market Design Complete | 0.06 | 0.00 | 0.00 | 0.06 |
| Business Objects Enhancements for DRIS Data | 289 | 30 | 20 | 2 | 2 | Deploy | 0.06 | 0.00 | 0.00 | 0.06 |
| State of Charge Management for Energy Storage | 281 | 126.5 | 52 | 11 | 4 | Development Complete | 0.08 | 0.00 | 0.00 | 0.08 |

| Project | NYISO | Pric Stake- holder | ority Sco Weight | Org | Sector Count | Deliverable | | ted Cost | Prof. | lions \$) Total |
|---|-------|--------------------------|---------------------|-----|-----------------|----------------------------|------|----------|-------|---------------------------|
| Energy Market Products | | | | | | | | | | |
| ConEd/PSEG Wheel (SOM) | | CC | IUNITN | NG | | Deploy | 0.26 | 0.01 | 0.10 | 0.37 |
| Hybrid GT Pricing Improvements (SOM) | | CC | NTINUI | NG | | Functional Requirements | 0.03 | 0.00 | 0.00 | 0.03 |
| Energy Storage Integration & Optimization | 748 | 303.5 | 111 | 18 | 5 | Concept Proposed | 0.10 | 0.00 | 0.00 | 0.10 |
| Fuel Assurance - Constrained Fuel Supply Bidding (SOM) | 642 | 44 | 58 | 6 | 4 | Study | 0.09 | 0.00 | 0.00 | 0.09 |
| Model 100+KV Transmission Constraints (SOM) | 568 | 227 | 141 | 13 | 4 | Concept Proposed | 0.05 | 0.00 | 0.00 | 0.05 |
| Graduated Transmission Demand Curves (SOM) | 471 | 146 | 34 | 6 | 2 | Market Design Complete | 0.03 | 0.00 | 0.00 | 0.03 |
| RTC/RTD Forward Horizon Coordination Improvements (SOM) | 454 | 144 | 119 | 12 | 5 | Study | 0.09 | 0.00 | 0.00 | 0.09 |
| Ontario Pricing | 373 | 33 | 8 | 3 | 1 | Market Design Complete | 0.03 | 0.00 | 0.00 | 0.03 |
| Review of RACT Compliance Plans (SOM) | 345 | 9 | 8 | 3 | 1 | Concept Proposed | 0.07 | 0.00 | 0.00 | 0.07 |
| Outage Analysis Tool | 343 | 16 | 24 | 4 | 2 | Study | 0.07 | 0.00 | 0.00 | 0.07 |
| Long Island PAR Optimization & Financial Rights (SOM) | 339 | 36 | 36 | 7 | 3 | Concept Proposed | 0.10 | 0.00 | 0.00 | 0.10 |

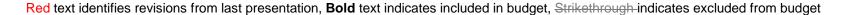
| | | Prid | ority Sco | ores | | | Estimated Cost (in millions \$) | | | | | |
|--|-------|---------------|---------------|---------------|-----------------|---------------------------|---------------------------------|---------|-------|-------|--|--|
| Project | NYISO | Stake- | | Org | Sector Count | Deliverable | | Capital | Prof. | Total | | |
| Energy Market Products | | | | | | | | | | | | |
| Startup Cost Compensation | 311 | 70 | 78 | 6 | 3 | Concept Proposed | 0.03 | 0.00 | 0.00 | 0.03 | | |
| 5-Minute Transaction Scheduling (SOM) | 291 | 90 | 19 | 4 | 2 | Concept Proposed | 0.05 | 0.00 | 0.00 | 0.05 | | |
| Scarcity Pricing Tariff Revision | 275 | 9 | 14 | 3 | 1 | Deploy | 0.06 | 0.00 | 0.22 | 0.28 | | |
| Offer Cap Enhancement for FERC | 254 | 71 | 35 | 3 | 1 | Concept Proposed | 0.05 | 0.00 | 0.00 | 0.05 | | |
| Eliminate Fees for CTS Transactions with PJM (SOM) | 247 | 299 | 130 | 12 | 3 | Concept Proposed | 0.05 | 0.00 | 0.00 | 0.05 | | |
| DAM Scheduling for ICAP Suppliers | 240 | 43 | 42 | 7 | 4 | Deploy | 0.32 | 0.00 | 0.30 | 0.62 | | |
| Quarterly Congestion Reporting | 219 | 26 | 19 | 3 | 2 | Deploy | 0.13 | 0.00 | 0.00 | 0.13 | | |
| Reinstitute Import Guarantees | 209 | 231 | 106 | 7 | 1 | Concept Proposed | 0.10 | 0.00 | 0.00 | 0.10 | | |
| Changes to Selkirk Market Modeling | 206 | 129 | 33 | 5 | 2 | Market Design Complete | 0.13 | 0.00 | 0.00 | 0.13 | | |
| Fractional MW Load Bidding | 195 | 99 | 12 | 6 | 2 | Concept Proposed | 0.05 | 0.00 | 0.00 | 0.05 | | |
| ACD Dataset Reporting | 138 | 1 | 0 | 1 | 0 | Deploy | 0.06 | 0.00 | 0.00 | 0.06 | | |
| Integration of OFO status into SUEDE | 102 | 1 | 0 | 1 | 0 | Development Complete | 0.14 | 0.00 | 0.00 | 0.14 | | |

| Project | NYISO | Stake- | ority Sco Weight | Org | Sector Count | Deliverable | | ted Cos | Prof. | lions \$) Total |
|--|----------------|--------|---------------------|-----|-----------------|-------------|------|---------|-------|--------------------|
| Enterprise Products | | | | | | | | | | |
| Storage Infrastructure Redesign Phase III | | CC | NTINUI | NG | | Deploy | 0.19 | 3.21 | 0.02 | 3.41 |
| Telephony System Upgrade | | CC | NTINUI | NG | | Deploy | 0.33 | 0.00 | 0.15 | 0.48 |
| Application Platform Upgrade Phase IV | | CC | NTINUI | NG | | Deploy | 0.35 | 0.39 | 0.10 | 0.84 |
| Backup Enhancements | 415 | 1 | 0 | 1 | 0 | Deploy | 0.18 | 1.75 | 0.06 | 1.99 |
| Enterprise Job Scheduling Upgrade | 333 | 6 | 5 | 2 | 1 | Deploy | 0.12 | 0.06 | 0.15 | 0.34 |
| Software AG Upgrade | 322 | 1 | 0 | 1 | 0 | Deploy | 0.26 | 0.27 | 0.08 | 0.61 |
| Marketplace and Webforms Technology Upgrade | 265 | 1 | 0 | 1 | θ | Deploy | 0.16 | 0.00 | 0.02 | 0.18 |
| Database Platform Upgrade Phase II | 254 | 1 | 0 | 1 | 0 | Deploy | 0.32 | 0.24 | 0.00 | 0.56 |
| Identity and Access Management – 2017 | 250 | 1 | 0 | 1 | 0 | Deploy | 0.47 | 0.00 | 0.00 | 0.47 |
| Application Testing Improvements | 214 | 1 | 0 | 1 | 0 | Deploy | 0.42 | 0.00 | 0.18 | 0.61 |

| | | Pric | ority Sco | ores Org | Sector | | Estima | ited Cost | i (in mil Prof. | lions \$) |
|---|----------------|--------|---------------|-------------|--------|----------------------------|--------|-----------|--------------------|-----------|
| Project | NYISO | holder | Weight | | Count | Deliverable | Labor | Capital | Serv. | Total |
| Finance Products | | | | | | | | | | |
| North Subzone Redistricting | | CC | NTINUI | NG | | System Design | 0.22 | 0.00 | 0.00 | 0.22 |
| Rate Schedule 1 Technology Automation | | CC | NTINUI | NG | | Deploy | 0.10 | 0.00 | 0.00 | 0.10 |
| Day Ahead Margin Assurance Payment (DAMAP) Enhancements | | CC | NTINUI | NG | | Deploy | 0.06 | 0.00 | 0.00 | 0.06 |
| Transmission Service Charges Rate Update | | CC | NTINUI | NG | | Deploy | 0.20 | 0.00 | 0.00 | 0.20 |
| Rate Schedule 12 Settlement | 343 | 1 | 0 | 1 | 0 | Functional Requirements | 0.46 | 0.00 | 0.00 | 0.46 |
| CMS Projected True-up Exposure Study | 265 | 24 | 43 | 4 | 3 | Study | 0.01 | 0.00 | 0.00 | 0.01 |
| Transactions Modifications & Confirmation Tool | 263 | 6 | 9 | 2 | 1 | Functional Requirements | 0.09 | 0.00 | 0.00 | 0.09 |
| CMS/ ConInvoice Data Integration | 263 | 4 | 0 | 4 | 0 | Deploy | 0.14 | 0.00 | 0.00 | 0.14 |
| Settlements Sub Accounts | 229 | 120 | 39 | 7 | 2 | System Design | 0.07 | 0.00 | 0.00 | 0.07 |
| Settlement at Sub-hourly Metering - Study | 214 | 10 | 0 | 2 | 0 | Study | 0.03 | 0.00 | 0.00 | 0.03 |
| Expense Reports Automation | 211 | 1 | 0 | 1 | 0 | Architecture Design | 0.09 | 0.03 | 0.09 | 0.20 |
| Financial Reporting Tools | 193 | 1 | 0 | 1 | 0 | Deploy | 0.09 | 0.03 | 0.00 | 0.11 |
| Contract Management | 178 | 6 | 9 | 2 | 1 | Architecture Design | 0.12 | 0.05 | 0.15 | 0.32 |
| Sub Accounts with Unique Invoicing, Banking and Reporting | 100 | 76 | 29 | 6 | 2 | Deploy | 0.82 | 0.00 | 0.00 | 0.82 |

| | Priority Scores | | | | | | | Priority Scores Estimated Cost (in millions \$) | | | | | | | | | lions \$) |
|--|-----------------|--------|--------|-----|-----------------|-------------------------|------|---|-------|-------|--|--|--|--|--|--|-----------|
| Project | NYISO | Stake- | | Org | Sector Count | | | Capital | Prof. | Total | | | | | | | |
| Operations & Reliability Products | | | | | | | | | | | | | | | | | |
| TOA Platform Upgrade Phase II | | CC | NTINUI | NG | | Development Complete | 0.23 | 0.00 | 0.78 | 1.01 | | | | | | | |
| EMS BMS System Upgrade | | CC | NTINUI | NG | | Development Complete | 4.33 | 1.20 | 8.92 | 14.45 | | | | | | | |
| FERC Funded Rerun - Phase 4 | | CC | NTINU | NG | | Deploy | 0.09 | 0.01 | 0.00 | 0.09 | | | | | | | |
| 2017 Reference Level Software Enhancements | 377 | 11 | 17 | 3 | 1 | System Design | 0.23 | 0.00 | 0.10 | 0.33 | | | | | | | |
| EPG PMU Simulator | 365 | 13 | 8 | 3 | 1 | Deploy | 0.06 | 0.20 | 0.04 | 0.30 | | | | | | | |
| PMU Enhancements | 315 | 13 | 8 | 3 | 4 | Deploy | 0.13 | 0.00 | 0.50 | 0.63 | | | | | | | |
| Gas Balancing Position Reporting | 256 | 6 | 9 | 2 | 1 | Deploy | 0.03 | 0.00 | 0.00 | 0.03 | | | | | | | |
| Smart Grid Visualization | 223 | 19 | 8 | 4 | 4 | Deploy | 0.01 | 0.00 | 0.00 | 0.01 | | | | | | | |
| SUEDE Front End Toolset | 183 | 6 | 9 | 2 | 4 | Deploy | 0.26 | 0.00 | 0.00 | 0.26 | | | | | | | |

| | | Pric | ority Sco | ores | | | Estimated Cost (in millions | | | |
|--|-------|------------------|-----------|------|-----------------|---------------------|-----------------------------|---------|----------------|-------|
| Project | NYISO | Stake- holder | | _ | Sector Count | | Labor | Capital | Prof. Serv. | Total |
| Planning Products | | | | | | | | | | |
| Solar Forecasting Initiatives | | CC | IUNITNO | NG | | Deploy | 0.17 | 0.00 | 0.30 | 0.46 |
| Interconnection Process Review | 258 | 435 | 470 | 24 | 5 | Concept Proposed | 0.20 | 0.00 | 0.00 | 0.20 |
| Public Policy Transmission Planning Process Acceleration | 232 | 417 | 273 | 21 | 5 | Concept Proposed | 0.10 | 0.00 | 0.00 | 0.10 |



| | Priority Scores | | | | Estimated Cost (in millions \$) | | | | | |
|--|-----------------|------------------|----------|----|---------------------------------|-------------|-------|---------|----------------|-------|
| Project | | Stake- holder | | | Sector Count | Deliverable | Labor | Capital | Prof. Serv. | Total |
| TCC Products | | | <u> </u> | | | | | | | |
| TCC Balance-of-Period (TCC AMS, TCC AVS & CMS) | | CC | NTINUII | ٧G | | Deploy | 0.53 | 0.01 | 0.43 | 0.96 |



Next Steps

 We will review a revised project budget recommendation at the August 31st BPWG meeting

Appendix A: Stakeholder Advocacy

| Organization | Advocacy Position |
|---|--|
| Richard P. Felak | The number and gravity of the proposed changes listed under capacity market products is clearly indicative of the long-established fact that the NYISO's capacity market is irretrievably broken, convoluted, inscrutable, inefficient, counterproductive, and beyond help with so many layers of band aids that it has terminal gangrene under them. You're continuing to waste your time and money and most importantly flushing money down the drain that instead should be directed for the benefit of your most important customers i.e., end use consumers and the only way to make improvements is by completely redoing the capacity market from the ground up starting with a clean sheet. Aren't you glad you asked huh |
| Saracen Energy East LP | Utilizing the graduated transmission curves as outlined in the tariff should eliminate all of the constraint relaxation and offline GT practices impairing energy prices. / / Modeling of all 100kV and above facilities will improve energy prices significantly and bring NYISO operations to a standard utilized by neighboring RTO's. It will better manage network issues caused by changes in our future generation fleet. It will lower production costs and improve price transparency. |
| NextEra Energy Power Marketing, LLC | These are all particularly important issues, notably on storage integration and interconnection process review. Thanks for seeking comments on this survey. |
| Citigroup Energy Inc. | I didn't see any FTR or NODAL Virtual projects listed |
| DC Energy LLC | There were no virtual energy product enhancement alternatives in this survey. Many stakeholders favor expanding virtual bidding points to include generation nodes, there had been stakeholder discussion on this subject but that was not included here. We recommend such advancement be included in the next survey. |
| AES ES Holdings, LLC | AES ES Holdings, LLC appreciates the opportunity participate in the survey. We allocated 100% of our points to Energy Storage and Optimization (vs. splitting between multiple storage and DER related projects) because we believe that improving in front of the meter storage project market integration is the most immediate focus priority to maximize the technical capability of in front of the meter storage projects to improve reliability, lower carbon and lower costs on the grid. Once the optimization question is addressed, other "sub topics" such as state of charge management and behind the meter storage/ DER can be detailed. In other words, if budget resources are limited, this project should be the first step before other related projects are launched. |

Appendix A: Stakeholder Advocacy

| Organization | Advocacy Position |
|--------------------------------|---|
| Long Island Power Authority | > Transmission as reserve (excluded due to software update limitations) - impact should be studied before any software design can be done / > LI PAR Optimization - limit to changes within PAR tap change tolerance, including relative flows on parallel PARs / > Future consideration - measure and reduce systematic difference in DAM and RT gas burn (an effort that will be of increasing relevance as renewable penetration increases). / > For modeling key +100 kV constraints - do not require NYPA to change Niagara dispatch. / |
| CPower | CPower recommends that, in considering demand response projects for 2017, existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. Reviewing a more comprehensive set market rule changes applied to a given set of resources will result in greater market certainty for all stakeholders. |
| | Currently-implemented penalty calculations associated with, but not limited to, Incremental ACL, Provisional ACL, and RIP Portfolio shortfalls do not take into account the ICAP equivalent of UCAP offered, nor do they recognize actual event or test performance. Penalties are based solely upon the inability to demonstrate the enrolled Incremental or Provisional ACL. In many cases, these additional factors would eliminate the need for penalties. The addition of RIP shortfall penalties to individual SCR penalties results in overly punitive treatment of portfolios; consideration should be given to eliminating individual SCR penalties where possible. Minimum SCR kW thresholds for Change of Load/Change of Status (CoL/CoS) rules should be increased to better focus on larger resource performance; aggregate data reporting on the incidence of CoL/CoS violations would also be helpful. This effort would identify tariff and procedure changes needed to establish appropriate penalty calculation formulae. |
| | CPower recognizes that this initiative is not explicitly considered in the ongoing stakeholder prioritization of 2017 projects, but would like the project prioritization process record to indicate the importance of this effort to NY demand response providers. We appreciate the NYISO's consideration of this effort in 2017. |
| EnerNOC, Inc. | I understand that Dave Lawrence representing CPower reached out to you regarding considering existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. For all the reasons Dave provided, we fully support that. The penalty provisions are in serious need of reform and it was disappointing they weren't included in the survey. |

Appendix A: Stakeholder Advocacy

| Organization(s) | Advocacy Position |
|---|---|
| Energy Spectrum Inc. | Energy Spectrum recommends that, in considering demand response projects for 2017, existing penalty provisions for SCRs be reviewed in conjunction with either the Distributed Energy Resource Program Design or the Limited Resource Performance Obligations proposed 2017 projects. Reviewing a more comprehensive set market rule changes applied to a given set of resources will result in greater market certainty for all stakeholders. |
| | Currently-implemented penalty calculations associated with, but not limited to, Incremental ACL, Provisional ACL, and RIP Portfolio shortfalls do not take into account the ICAP equivalent of UCAP offered, nor do they recognize actual event or test performance. Penalties are based solely upon the inability to demonstrate the enrolled Incremental or Provisional ACL. In many cases, these additional factors would eliminate the need for penalties. The addition of RIP shortfall penalties to individual SCR penalties results in overly punitive treatment of portfolios; consideration should be given to eliminating individual SCR penalties where possible. Minimum SCR kW thresholds for Change of Load/Change of Status (CoL/CoS) rules should be increased to better focus on larger resource performance; aggregate data reporting on the incidence of CoL/CoS violations would also be helpful. This effort would identify tariff and procedure changes needed to establish appropriate penalty calculation formulae. |
| | Energy Spectrum recognizes that this initiative is not explicitly considered in the ongoing stakeholder prioritization of 2017 projects, but would like the project prioritization process record to indicate the importance of this effort to NY demand response providers. We appreciate the NYISO's consideration of this effort in 2017. |
| Alcoa, Inc., IBM Corporation, Occidental Chemical Corp., and Wegmans Food Markets | I do not like the description of the "Limited Resource Performance Obligations: Evaluate Minimum Performance Obligation for Capacity Resources." The NYISO needs to evaluate and improve its demand response programs, but I disagree that minimum performance requirements need to be increased, as assumed in the write-up. If anything, those requirements should be relaxed and made more flexible to enhance - rather than impede - participation in the programs. |

The mission of the New York Independent System Operator, in collaboration with its stakeholders, is to serve the public interest and provide benefit to consumers by:

- Maintaining and enhancing regional reliability
- Operating open, fair and competitive wholesale electricity markets
- Planning the power system for the future
- Providing factual information to policy makers, stakeholders and investors in the power system

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