

Attachment Y Clean Up

This document summarizes the changes that the NYISO is proposing to make to Sections 31.1, 31.2, and 31.4 of Attachment Y and the companion Rate Schedule 10. These fall into three general categories.

The first category consists of edits intended to improve the overall consistency of the terms used. The majority of these changes are substitutions of OATT-defined terms wherever applicable, such as “the ISO” instead of “the NYISO” and “the Commission” for “FERC.” Where Attachment Y includes a new defined term, changes are proposed to ensure the term is used consistently within the Attachment. Most of these changes are not specifically noted in this summary.

A second category consists of changes intended to improve the organization of the document. Some subsections have been moved and redundant language has been deleted. Paragraphs are then renumbered and internal section references are updated, to accommodate the amendments.

The third group of changes includes amendments that are intended to clarify the intent of the text or to conform the text to actual practice.

Changes to Attachment Y

Section 31.1

-Delete “General/Overview” heading and make New York Comprehensive System Planning Process (“CSPP”) lead title of 31.1. Section numbers renumbered accordingly.

31.1.1

- Move all definitions to beginning of section. Add language to specify that these definitions apply to sections 31.1 through 31.6, and to state that other capitalized terms, not defined here, have the meaning provided for them in the ISO’s tariffs.

- Definitions added -- terms already capitalized in Attachment Y: Affected TO, Bounded Region, LCR, Load and Capacity Data Report, Loss of Load Expectation (“LOLE”), LTP Dispute Resolution Process (“DRP”), Net CONE, NPCC, Trigger Date.

- Definitions removed – defined elsewhere in the tariffs: ATRA, ESPWG.

- Definitions revised: CARIS—add reference to specific section of Attachment Y.

- CRP—add reference to Attachment Y; delete “this tariff.”

- Responsible Transmission Owner- revise to cite Section 31.2.4.1 of the tariff, delete “the NYISO Planning Process.”

- RNA and TPAS – replace “this tariff” with “this attachment.”

- Definition moved: Put “Other Developers” in alphabetical order.

31.1.2

- Capitalize defined term “Reliability Needs” and delete expanded form of defined term BPTF.

31.1.3

- Delete expanded form of defined term LTPP.

31.1.4

- Delete redundant reference to New York State.

- Delete expanded form of defined term CSPP.

31.1.5

- Redundant language is deleted; the same language appears in section 31.1.6.

31.1.6

- Correct manual title.

31.1.6.4

- Update references to dispute resolution process.

Section 31.2

31.2.1.2.1

- Replace manual reference with the defined term “ISO Procedures.” This change is made throughout the document.

31.2.1.3.1

- Delete expanded form of defined term “DRP.”

- Use defined term “Affected TO,” delete Transmission Owner.

31.2.1.3.5

- Substitute defined term.

31.2.2.

- Delete reference to congestion analysis.
- Substitute defined term.

31.2.2.2

- Remove capitalization on undefined term “staff.”

31.2.2.3.2

- Substitute FERC 715 Base Case for ATRA.

31.2.2.3.3

- Replace “expected first year” with defined term “Target Year.”
- Capitalize defined term “Reliability Needs.” This term is used throughout the document.

31.2.2.3.4

- Clarify the ISO role in determining the Target Year for each Reliability Need.

31.2.2.4.1

- Capitalize defined term “Developers.”

31.2.2.4.2

- Ministerial change- “related” should be “relate.”

31.2.2.7

- Remove capitalization on undefined term “staff.”

31.2.3.1

- Clarify ISO obligations with respect to replicating studies. Identical changes appear in other sections of the document.
- Specify TPAS and ESPWG reviews rather than “that review.”

31.2.3.2

- Delete redundant reference to the OATT and add reference to Attachment O.

31.2.4.1

- In this and the following sections through 31.2.4.6, the changes are intended to clarify how projects will be distinguished, in terms of the level of project detail that is required, and to clarify the role of the NYISO in determining the time frame for acting on a backstop solution. The time of certain TO actions is also specified, within the overall framework. Other changes address the scope of the NYISO's review of proposed market-based and alternative regulated projects.

31.2.4.1.1

- Add cross-reference to Section 31.2.4.2.1 to clarify existing exception information requirements.
- Reference defined term "Study Period."
- Use defined term "Responsible Transmission Owner."
- Delete incorrect cross-reference to Section 31.2.5.7.
- Solicitation language moved to end of section.

31.2.4.2.1

- Replace "projected" with "identified" for consistency.
- Use defined term "Trigger Date" to clarify timeframes.
- Replace "one year" with "one planning cycle."

31.2.4.2.2

- Add cross-reference to an existing exception in another section and delete redundant parenthetical.
- For clarity, add a reference to the RNA Study Period

31.2.4.4

- Use defined term "Trigger Date" to clarify the NYISO's responsibilities.

31.2.4.6

- Incorporate “Trigger Date” to clarify the NYISO’s responsibilities.
- For clarity, add a reference to the CRP.
- Add language to clarify term “viable.”

31.2.5.5

- Remove capitalization of undefined term - “staff.”

31.2.5.7

- This language is moved from existing sections 31.2.6.4 through 6.4.3. Internal changes are noted below.

31.2.5.7.1

- Add the phrase “at any time” in the first line, to clarify that the NYISO may make this determination outside a particular CRP cycle. Add language to clarify that the section applies only to a previously-reviewed regulated backstop solution.

31.2.5.7.2

- Add term “backstop” and clarify that section applies only to a regulated backstop solution previously evaluated in the planning process.

31.2.5.8

- Replace “finding” with “determination” for consistency.
- Correct reference to Responsible Transmission Owner.
- Remove capitalization of undefined term “alternative regulated solution.”

31.2.5.9

- Add “backstop.”

31.2.5.10.1

- Replace “GAP” with “Gap.”

31.2.5.10.2

- Correct reference and use defined term “BPTFs.”

31.2.5.11.1

- Use defined terms “Reliability Planning Process” and “Developer.”

31.2.5.11.3

- Substitute defined term “Developer” for “owner or supplier.”

31.2.5.11.4

- Use defined terms “Reliability Planning Process” and “CRP.”
- Remove capitalization of “megawatts.”

31.2.5.11.5

- Specify that a reference to “the developer” is a Developer of a market-based response.

- Use defined terms “Reliability Planning Process” and “CRP.”

31.2.6

- Use defined term “CRP.”

31.2.6.1

- Remove capitalization of undefined term “staff.”
- Clarify that TPAS and ESPWG conduct the review of the draft CRP.

31.2.6.2

- Clarify reference to Attachment O to the ISO OATT.

31.2.6.4

- This section is moved to section 31.2.5.7 (see note above).

31.2.7.3

- Clarify that section applies to a backstop solution.
- Reorder language for clarity.
- Add necessary cross-reference to governing section.
- Replace “cancelled” with “halted” and “appearance” with “status.”

31.2.7.3.1

- Add reference to specific Rate Schedule.

31.2.7.3.2

- Replace “evaluate” with “monitor” to reflect the fact that the NYISO is not obligated to assess new proposals at this point in the process.

- Delete redundant phrase “in a timely manner.”

31.2.7.3.4

- For clarity, refer to specific Rate Schedule of the tariff.

31.2.7.3.6

- For clarity, refer to specific Rate Schedule of the tariff

- Add “backstop” to clarify subject of section.

- Use defined term “NYPSC.”

31.2.7.4.1

- Use term “Trigger Date” to explain timing and rationale for NYISO review.

- Use term “Target Year” for clarity and consistency.

31.2.7.4.3

- Properly capitalize defined term “Developer.”

- Use defined term “Target Year” rather than “reliability need date.”

31.2.7.4.4

- Replace “that” with “whether” to clarify scope of determination.

31.2.7.4.5

- Use defined term “Developer”, delete “sponsor.”

31.2.7.4.6

- Replace “invoke” with “proceed with.”

- Remove unnecessary reference to “the benchmark timeframe.”

31.2.7.4.7

- Use defined term “Target Year.”

Section 31.4

31.4.1.3

- Delete “and”; insert comma.

31.4.2.1.3

- Replace “Transmission Districts” with “Load Zones.”

31.4.2.1.6

- Delete reference to Transmission Districts.

31.4.2.1.12

- Edits intended to clarify exception language and defined terms.

31.4.2.1.13 & 14

- Delete language now incorporated in definitions; renumber following sections.

31.4.2.2.1

- Deletions and edits intended to improved consistency with Section 31.2.

31.4.2.2.1.1.1

- Correct reference to Soln_Size (this correction is made throughout).

31.4.2.2.1.3.3

- Delete language moved to definitions and use defined term “Bounded Region.”

31.4.2.2.1.3.6

- Formula edited

31.4.4

- Delete redundant language (same is at 31.4.2.2.1).
- Replace “projects” with “solutions” for consistency.
- Add “proposal” to clarify scope of recoverable costs.

31.4.4.1

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- Replace “cancelled” with “halted.”

31.4.4.2

- Reference OATT rather than “this tariff.”
- Use defined term “NYISO/TO Reliability Agreement.”

31.4.4.3

- Clarify projects subject to this Section.

31.4.4.4

- Clarify that a developer must have stakeholder approval before filing at FERC.

31.4.4.5

- Delete capitalization on undefined term “expansion.”

Clarifications of Rate Schedule 10

Section 6.10.1

- Add “proposed in response” and delete “undertaken” to improve consistency with Section 31.2.
- Use defined terms.
- Introduce defined term “RRTP.”
- Substitute “schedule” for “attachment” (change made throughout).
- Number sub-clauses for clarity
- Move language deleted from the end of the paragraph up in the section.

Section 6.10.2

- New section to improve organization of material. This basis for this paragraph is language taken out of the middle of the first paragraph in the existing Section 6.10.1, with modifications.
- Use defined terms.
- Correct internal citations.

- Some rewording to improve clarity and consistency with Attachment Y.

Section 6.10.3 (renumbered)

- Use defined terms.

Section 6.10.3.2

- Add “or if the RRTP is halted pursuant to Section 31.2.7.3 of Attachment Y” to link this section with existing tariff provisions and ensure consistency.
- Change “information” to “informational.”

Section 6.10.3.3

- Add language to correct oversight and to clarify when a Transmission Owner may use the RFC mechanism to recover costs related to non-transmission solutions.

Section 6.10.4

- Various edits to improve clarity of billing process and ISO/LSE obligations.

6.10.5

- Clarify that section applies to LIPA and any other unregulated transmitting utility.

6.10.5.1

- Substitute “obtaining” for “receiving” as more accurate.

6.10.5.2

- Add language to recognize that entities may need certain authorizations.

6.10.5.3

- Wording changed to improve clarity.

6.10.5.4.1

- First sentence revised to clarify and ensure consistency with Attachment Y.

6.10.5.4.2

- Revised wording to clarify and ensure consistency with Attachment Y.
- Delete language not consistent with cost allocation process.

- Align billing with NYISO's billing and settlement procedures.

6.10.5.5

- New language specifies cost recovery mechanism for NYPA projects.

6.10.5.6

- Add "any other Unregulated Transmitting Utility" to clarify that entities other than LIPA and NYPA are covered.

6.10.6.1

- Rewording to improve clarity.

6.10.6.2

- Replace "this Attachment" with "through the RFC," for clarity and specificity.