

**STAKEHOLDER COMMENTS ON  
DRAFT COMPREHENSIVE RELIABILITY PLANNING PROCESS**

**ISSUES LIST**

**GENERAL ISSUES**

<b><u>ISSUE</u></b>	<b><u>SECTION</u></b>	<b><u>MP</u></b>
<b>What transmission facilities are included in the NYISO Planning Process?</b>	<b>GENERAL (Section 3)</b>	<b>NYSEG/ RGE NGrid</b>
<b>Should the dual role of the ESPWG and TPAS continue with respect to the implementation of the Comprehensive Planning Process or should a separate Planning Committee be established?</b>	<b>GENERAL (Section 2)</b>	<b>NYSEG/ RGE</b>
<b>Dual ESPWG/TPAS role should continue through Section 2 Implementation.</b>	<b>Section 2</b>	<b>LIPA Con Ed</b>
<b>Should BIC members have a vote on Needs Assessment or Final Plan?</b>	<b>4.4.1, 8.2</b>	<b>LIPA</b>
<b>Should the reporting of historic congestion costs Be a part of the Comprehensive Reliability Planning Process or memorialized in a separate document?</b>	<b>GENERAL</b>	<b>PSC PSEG</b>

## **SECTION-BY-SECTION ISSUES**

<b><u>ISSUE</u></b>	<b><u>SECTION</u></b>	<b><u>MP</u></b>
<b>Why is there no mention of CETO/CETL for reliability analysis</b>	<b>Section 3</b>	<b>PSEG</b>
<b>A. CETO/CETL analysis are part of the PJM procedures, but are Not Applicable for the NYISO’s planning process</b>		
<b>Will needs be identified by NYCA zone? Not clear how needs will be identified without reference to specific facilities.</b>	<b>3.2.1</b>	<b>LIPA</b>
<b>A. In some cases, the NYCA zone will be identified (e.g. – resource adequacy deficiency). In other cases, specific facilities will be identified (e.g. – a circuit breaker exceeding its fault duty rating). In other cases, the need will be identified with reference to a specific facility(e.g. – thermal overload under normal or contingency conditions) —but the NYISO will not identify a proposed solution to relieve that overload.</b>		
<b>Suggested addition: “At the same time, appropriate sensitivity studies will be performed to determine whether reliability deficiencies (or needs) previously identified may be mitigated through alternate system and/or operational modes.</b>	<b>3.2.1</b>	<b>Con Ed</b>
<b>A. Need to discuss scope implications</b>		
<b>Why is there a need for Section 4.4.2 regarding input from the NYS PSC?</b>	<b>4.4.2</b>	<b>PSEG</b>
<b>A. FERC has given the State PUC’s a special role regarding the ISOs’ planning processes in their SMD NOPR and White Paper, as well as the Pat Wood letter to the NYISO.</b>		
<b>What is need for “request for solutions”? Isn’t issuance of Needs Assessment Report sufficient? No additional request for solutions step is needed.</b>	<b>6</b>	<b>NYPA NGrid</b>

**A. NYISO process must ensure that responses will be prepared in a timely manner to ensure reliability of system. Section 6 indicates that this will be concurrent with the issuance of the Needs Assessment Report.**

**TO's must "accept" the NYISO needs assessment                      6.2                      NYPA**

**A. It is intended that the TO's and all MP's will buy into the NYISO planning process, including the acceptance of its findings**

**There must be adequate lead time to respond to RFS.                      6.2                      NYPA  
Need a timeframe for baseline needs    Con Ed**

**A, Section 6.3 indicates that the lead time for responses will be based upon the lead time for the regulated solution. This section also indicates that the first round of the planning process will be used to establish the benchmarks for regulated solutions.**

**What is the process for PSC review of a regulated 6.2                      NYPA  
response?**

**Strike sections dealing with PSC prior review of                      6.2,7.2.2                      NGrid  
regulated proposals.**

**PSC should not review regulated proposals prior                      6.2                      NYSEG/  
to submission to the NYISO    RGE**

**Need to work on PSC review process                      6.2.1                      Con Ed**

**The NYISO and not the PSC should determine                      6.2.1,6.2.2                      PSEG  
the choice of alternatives**

**A. See comments submitted by PSC and reflected in the revised draft**

**Designation of responsible TO by NYISO                      6.2                      Con Ed  
Needs to be discussed  
What if line is between two TDs?**

**A. NYISO will designate responsible TO or TOs based upon location of the need.  
This will not preclude an adjacent TO from proposing a solution to that need.**

**TO should be responsible for transmission only:                      6.2; 7.2                      CH  
NOT "all feasible alternatives"    NGrid  
Strike "all"    6.2,7.2,7.3                      Con Ed**

**A. PSC will require the TOs to look at alternative resources;  
B. This language was agreed upon at ESPWG meetings**

Strike the development of qualifications for a valid response 6.4 Con Ed

A. This is needed in order for the NYISO to determine that a proposed solution is indeed viable and timely with respect to the identified need.

How will the NYISO determine that a market-based solution can fix a reliability need? 7 NYPA

A. In accordance with established reliability criteria. See Section 3.

How will market-based responses proceed if there are several responses? 7.1.1 LIPA

A. This will be determined by their respective developers. Section 7.1.2 indicates that the NYISO will monitor the status of such projects to assure their continued viability to meet the identified reliability needs.

NYISO to develop the process for how replacement projects will be selected if a market-based project is deemed no longer viable to meet the need. 7.1.2 LIPA

A. This is already addressed in Section 7.2 and 7.3.

Clarify the cut-off date after which market-based solutions will not be selected after a regulated project is underway. 7.1.3 LIPA

A. This is already included in Section 7.2.4

“Gap solution”, if needed, should be proposed by TO and rolled into permanent regulated response 7.3 NYPA

A. Section 7.3.2 indicates that TO will propose the gap solution and Section 7.3.5 indicates that such gap solution will proceed in parallel with a regulated solution—if that is the chosen permanent solution to the identified need in the first place. Otherwise, the gap solution is considered temporary so as not to harm the market-based solution (Section 7.3.4).

TO should be responsible for decision to seek a “gap solution” not the NYISO 7.3 NYSEG

A. The NYISO Planning Process must have a means to ensure the reliability of the system under emergency circumstances. Section 7.3.2 recognizes that it is the

**TO's responsibility to propose a gap solution for consideration by the NYISO and PSC in accordance with the TO's responsibility under PSL.**

**Jpb  
R3/26/04**