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CC: Jim Parmelee, LIPA

SUBJECT: NYISO BULK POWER SYSTEM IDENTIFICATION PROPOSAL

LIPA respectfully submits the following comments on the NYISO Comprehensive Planning Process for Reliability Needs and Northeastern ISO/RTO Planning Coordination Protocol. Your thoughtful consideration to these issues is appreciated.

NYISO Comprehensive Planning Process for Reliability Needs

1. The dual role for the ESPWG and TPAS should continue through the implementation process. It is essential that both reliability and commercial issues pertaining to the implementation of a comprehensive planning process receive full consideration. The current division of tasks between TPAS and the ESPWG permits the strengths of both groups to be utilized. Complete stakeholder involvement is best assured though retaining the dual process of TPAS and ESPWG review.
2. Additional detail is needed in the Comprehensive Planning Process, as many sections are either skeletal or have not yet been developed. Comments contained herein are only on those sections that were available for review.
3. The diagram on page 5 entitled “Overview of the NYISO Reliability Interfaces should be modified. While it is true that the NYISO must adhere to both NPCC and NYSRC criteria, it is not clear from the diagram that promulgation of the NPCC and NYSRC rules is coordinated, not duplicative. The following revision might make the point more clearly that NPCC provides broad based standards while NYSRC provides consistent, regionally specific standards. The arrow to the left, NPCC to NYISO, should read NPCC Rules. The arrow to the right, NYSRC to NYISO, should read NYSRC rules. The arrow emanating from the NYISO to the market participants correctly indicates a combination of NPCC and NYSRC rules. The arrow between NPCC and NYSRC should indicate that communication is to further coordination of locally specific rules and is not an enforcement path.
4. Section 3.2.1, Reliability Needs Assessment should clarify whether the NYISO intends to identify “needs” by NYCA zone. This section states that “needs” will not be defined in terms of specific facilities yet the quantity of additional transfer capability or MW quantity of additional resources would be specified. It is not clear how these needs will be portrayed.
5. Section 4.1, Process Overview, should clarify that expansion plans used in the reliability assessments for the second five years will be those proposed by market participants and those

regulated solutions for reliability. This correction agrees with the statement that both market and regulated solutions to ensure reliability will be considered within the planning framework.

6. There is a minor typographical error in section 4.2.2.3, Short Circuit Data, that should be corrected. The parentheses should be closed around ATRA.
7. The list of entities in section 4.2.4, Input from Stakeholders, from which supplemental input for the initial planning study is obtained should include public power entities as well.
8. Section 4.3.2, Baseline Reliability Needs Assessment, paragraph 2, should clarify how needs will be portrayed. This section presently states that the study will not seek to identify specific additional facilities but it is not clear whether needs would then be identified by NYCA zone or in some other manner.
9. Section 4.4.1, Stakeholder Review, should clarify whether Business Issues Committee (“BIC”) members who are invited to attend the OC meeting at which the Draft Report is under review have voting rights or are simply observers.
10. Section 5.1, Public Information Sessions, should indicate that the ATRA will be posted in a publicly accessible area, *i.e.*, the NYISO website in PDF format.
11. Section 6.3, Establishment of Lead Time for Responses, should clarify who makes the determination that there is an imminent need for action to ensure reliability. Presumably it will be the NYISO that makes this decision.
12. Section 7.1.1, Market based Responses, states that the NYISO will not select from among the market-based responses if there is more than one response that will meet the identified need. Clarification is needed how projects will proceed if there are several responses, will they all proceed in parallel?
13. Section 7.1.2, Market Based Responses, should be modified to state the NYISO would develop criteria, in conjunction with the ESPWG, to determine the continued viability of market-based projects and how replacement projects will be selected if a project is deemed not viable. Selection of a gap solution may become necessary if there is only a single market-based solution to an identified need that is subsequently deemed not viable.
14. Section 7.1.3, Market Based Responses, should state that criteria for determining the cutoff date of a market-based project would be developed by the NYISO in conjunction with the ESPWG. It should also be clarified that after the cut-off date market-based alternatives will not be selected once a regulated solution has begun pursuant to section 7.2, Regulated Responses.
15. A typographical error in section 7.2.2 should be corrected, “approvals process” should read “approval process”.
16. Section 8.2, Committee Approval, should clarify the voting status of BIC members present at the OC meeting where Draft Report is being considered.

Northeastern ISO/RTO Planning Coordination Protocol

1. Development of the Northeastern planning coordination protocol is somewhat premature, as New York does not yet have a comprehensive planning process and may be disadvantaged negotiating with two other ISOs that already have such processes in place.
2. The introduction, page 2, should be amended to indicate that the activities of the parties would be conducted in coordination with the Regional Reliability Councils (“RRC”) of the northeastern United States and eastern Canada (NPCC, MAAC, ECAR and MAIN). The RRCs listed should recognize that PJM/PJM West spans several RRCs.
3. Section B.I, Inter-area Planning Stakeholder Advisory Committee, should clarify how IPSAC voting will be handled in this group and how this group will communicate/coordinate with the JIPC.
4. Section B.II, Joint ISO/RTO Planning Committee, should clarify how JIPC voting will be handled in this group and how this group will communicate/coordinate with the IPSAC.
5. Section C.I, Data and Information Exchange, should clarify that existing avenues of data exchange will be utilized to the extent possible to satisfy data exchange requirements.
6. Section V, Data Contacts, should be amended to require entities to name a person responsible for the coordination and exchange of data and an alternate contact person.
7. Section D, Northeastern Coordinated System Plan. Care should be taken when developing a NCSP plan that the protocol does not preempt or dictate internal planning processes within a given participant’s system. The objective of the Coordinated System Plan should be to coordinate the conduct of studies and exchange of data, not to supplant a regions planning process. Moreover, the Coordinated System Plan should focus on projects that have a material effect on interregional planning, not a *de minimus* effect.
8. Section D.I.2, should clarify that any criteria to determine the criteria of materiality or the screening process that identifies interconnection requests that impact other parties systems should be developed in coordination with the IPSAC.
9. Section E, Dispute Resolution, should clarify that the costs of invoking an alternate resolution process should be born proportionately by those invoking the process, not by all who are party to the Northeastern Planning Coordination Process.