

**Initial Comments from NYPA on the Draft  
NYISO Comprehensive Planning Process for Reliability Needs.**

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- Section 6 – Why the need for request for solutions? Isn't the process of setting out the needs assessment report supposed to be the medium by which the market is informed that an opportunity/ need exist.
- In Sect 6.2- the first sentence states: “ The NYTO s will assume the obligation to prepare a regulated response to meet the reliability needs identified by the NYISO’s needs assessment – should also say “ based on there acceptance that there is a need and if so, based on the scheduled provided which assumes adequate lead-time to respond.” How is this section assumed to be done? I was under the impression that this would be done under the auspices of the Art.VII filing.
- Section 7. – How does the ISO presume to evaluate that a Market-based solution can fix reliability need? If for instance it is a generator, does this now require that the generator become a must run unit? Or will multiple generators be required to respond to the reliability need – what criteria will be used?
- Section 7.3 – If it is determined that neither Market based nor regulatory responses can respond in a timely fashion I believe it would have to defer to the regulated response and therefore for continuity the gap solution should be proposed by the TO developing the regulatory response which should be rolled in as part of the permanent regulated response.