

VSS Rate Schedule 2 Tariff Cleanup Changes

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Purpose of Tariff Amendment

- Outdated language in the NYISO's services tariff can lead to confusion.
- Language on Voltage Support Service left over from mandatory power purchase agreements between Non-Utility Generators (NUGs) or Qualifying Facilties (QFs) and Transmission Owners (TOs) under Federal and State Law.
- Removing the outdated language will clean up the Services Tariff and avoid confusion.



Derivation of Tariff Provision

- Public Utility Regulatory Policy Act (PURPA) and New York Public Service Law required TOs to purchase electric output of NUGs.
- Tariff drafted at NYISO formation to prescribes treatment of Voltage Support Service (VSS) and resulting payments for VSS provided by NUGs that had power purchase agreements with the TOs.
- Addressed agreements that existed when NYISO Services Tariff was approved.



Current Tariff Language

*See proposed tariff amendment for complete text

- For NUGs operating under existing PPAs, the TO purchasing energy or capacity shall be contacted by the ISO when ISO requires VSS from that generator;
 - Reflected the fact that, before competition, TOs nominated output of NUGs to the New York Power Pool, then NYISO, for real power and reactive power.



Current Tariff, Continued

- ISO pays TO for VSS provided by NUGs operating under PPAs;
 - Unless TO agrees that VSS payments will go directly to NUGs;
 - Until PPA expires, and then payments go directly to NUGs.
 - Compensation paid to TOs for VSS reflected the fact that under PPAs entered into before NYISO markets, TOs paid NUGs for all of their electrical output.



Proposed Deletion from Tariff

These provisions no longer apply.

- Generators supply VSS to the bulk transmission system, not a TO system.
- For the most part, PPAs under PURPA and New York State Law have expired or have been restructured, and VSS payments go directly to the generator.
- TOs that retain control over NUG operations, and related NYISO payments for NUG output, become Financially Responsible Parties for the NUG.



Recommendation:

Delete surplus language to clean up tariff and avoid confusion.

Questions?