ATTACHMENT I

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ATTACHMENT II

THE NYISO TRANSMISSION PLANNING PROCESS

OVERVIEW

The transmission planning process proposed by the New York Independent System Operator ("ISO") provides a comprehensive program for the coordinated planning and construction of transmission facilities in the ISO control area. The ISO proposal establishes a new transmission planning committee, a permanent joint subcommittee of the Business Issues Committee ("BIC") and the Operating Committee ("OC"), to consider and coordinate all transmission expansion proposals in the ISO control area and develop a Consolidated Transmission Plan ("CTP") that would include transmission facilities necessary to ensure the continued reliability of the New York transmission system.

To ensure that the transmission planning committee considers all aspects of proposed transmission expansions, the proposal provides for review and action on the CTP by the Business Issues Committee ("BIC") the Operations Committee ("OC") and approval by the Management Committee ("MC"). The ISO Board will have final approval authority over the CTP. Under the ISO proposal, responsibility for the construction of new transmission facilities and expansion of existing facilities is clearly defined. Each Transmission Owner ("TO") will accept responsibility to construct reliability-based projects included in the CTP, provided that specified conditions are met, including assurance of full recovery of its investments, an appropriate rate of return, a reasonable amortization period, and recovery of other fixed costs. The Transmission Planning Committee ("TPC") also will have the responsibility to consider incentives for the construction of reliability-based transmission facilities. The primary benefit of the CTP process is that it will provide a forum for market participants representing all segments of the New York State electricity industry and the ISO staff and the PSC to play a role in the development of the CTP.

The ISO proposal also provides for the review of economic based transmission projects proposed by market participants for the purpose of integrating such projects into the CTP, when appropriate. The TPC will consider market-based mechanisms to facilitate economic transmission expansions. The TOs have agreed to negotiate with market participants requesting construction of economic-based projects to facilitate their construction.

I. Transmission Planning Committee

A. Responsibilities

The TPC's responsibilities will include:

The development of a CTP that will specify transmission facilities needed to maintain minimum system reliability ("Reliability Project" or "RP") after considering and including existing facilities, planned system expansions, and proposed generation interconnections, where appropriate. The TPC will evaluate the various alternatives for meeting reliability requirements. The CTP shall be updated no less than every two years. Reliability Project shall mean a project, included in the CTP, that is essential to maintain the

minimum reliability requirements of the New York Control Area established by NERC, NPCC and NYSRC Reliability Rules, based on a TPC determination that it cannot reasonably be expected that reliability requirements will be met by (a) developing new supply resources, (b) modifying transfer limits, (c) developing new demand-side resources or (d) economic-based transmission projects;

The assessment of generation and transmission expansion activities;

Working closely with neighboring Regional Transmission Organizations ("RTO"s) and state regulatory agencies to coordinate regional transmission expansion planning;

Facilitating the development of rules, procedures, and cost allocation methodologies for transmission expansion, and the adoption of generator interconnection requirements and cost allocation methodologies for generator interconnections (it is anticipated that the relevant work products of current ISO committees, working groups and task forces would be adopted as part of the TPC's initial rules, procedures and methodologies);

The development of a review process for reliability-based transmission projects that are identified during the plan review cycle;

All transmission planning-related functions, including, but not limited to, those specified above, that are assigned to the ISO in the ISO OATT, ISO-TO Agreement, ISO Agreement and in any other ISO rule or procedure;

Determination, under the SRIS process, of whether economic-based transmission projects proposed by market participants can be integrated reliably into the CTP;

Consideration of appropriate incentives for the construction of reliability--based transmission facilities identified in the CTP; and

Oversight of the development of, and approval responsibility for, reliability related analyses and reports, including:

— NPCC area transmission reviews conducted by ISO staff and the TOs;

— System Reliability Impact Studies;

— Requests by the PSC or market participants for the consideration of reinforcement options;

— Studies performed to incorporate TO planned upgrades to the bulk power system;

— Analysis of neighboring control area facilities, changes and conditions affecting the New York Control Area;

— Other similar studies.

The TPC shall limit studies undertaken on its own initiative to those that are needed for reliability purposes. ISO staff, in cooperation with the TPC, shall perform the studies. Studies related to a Reliability Project will be funded by the ISO. Studies performed at the request of a market participant related to an economic based project will be funded by the requesting market participant.

B. TPC Relationship With Other Committees

The TPC will be a joint subcommittee of the BIC and the OC. It will report jointly to the BIC and the OC with respect to transmission planning policy matters and related methodologies, including the development of the CTP, the Objective Allocation Criteria, any market-based mechanisms to foster economic-based transmission expansion projects, and the rules, procedures and cost allocation methodologies for transmission expansions and generator interconnections. With respect to actions related to the application of policies and methodologies to specific transmission expansion and generator interconnection projects and the development and approval of reliability related reports, the TPC shall report only to the OC. The TPC shall solicit the input of the BIC, OC, and ISO staff[1] in developing the CTP. The TPC shall periodically brief the MC regarding the status of CTP development.

The TPC shall submit a draft CTP, including any Reliability Projects and associated cost allocation determinations, to the BIC, OC and ISO staff for review and comment. The BIC, OC and ISO staff shall review the draft CTP and, within 60 days of the transmittal date, submit written recommendations to the TPC.

The TPC shall revise the CTP, to the extent it deems appropriate, to reflect the recommendations of the BIC, OC and ISO staff. The TPC shall then submit its completed CTP to the BIC and the OC. The BIC and the OC will review the CTP prepared by the TPC and shall act on the plan within 60 days. If the BIC and the OC concur on a revision to the CTP, the CTP will be revised as determined by the BIC and the OC and the revised CTP will be sent to the MC for action. The TPC may submit separate comments to the MC, including comments concerning any revision jointly adopted by the BIC and the OC. If the BIC or the OC approves a revision that is not concurred in by the other committee, the CTP will be forwarded to the MC with the positions of the BIC and the OC presented to the MC for resolution. The TPC may submit comments to the MC on the positions taken by the BIC and the OC. If the BIC and/or the OC fail to act in the CTP within 60 days, the CTP will be sent to the MC for action.

The MC will consider the CTP, along with any written comments by the BIC, the OC, the TPC and ISO staff. If the MC determines that revisions are necessary that change the design or technical

[1] ISO staff shall keep the ISO Board apprised of the developing CTP and shall relay to the TPC the ISO Board's comments concerning the CTP. The ISO Board shall use ISO staff to convey its comments to the TPC as early as possible during development of the CTP to enable the TPC to provide a comprehensive CTP for committee review.

specifications to any modification or upgrade, the MC will provide the TPC with an opportunity to review and comment on any such revision prior to its adoption, to ensure that reliability requirements will be met. The MC will adopt a CTP, including any revisions it deems appropriate, and submit the CTP to the ISO Board within 60 days of its receipt from the BIC and the OC. If the MC does not adopt a CTP within 60 days, the CTP, as submitted to the MC, will be sent to the ISO Board for action; provided that the 60 day period may be extended by the ISO Board in its discretion.

The ISO Board shall either adopt the CTP or, if it determines that modifications are needed, remand it to the MC, with an explanation of the reasons for the proposed modifications. The MC, in consultation with the BIC, OP and TPC, will submit its analysis and comments on the proposed modifications directly to the ISO Board for final action.

C. Membership and Voting

The TPC will have the same membership rules and voting structure as the BIC and the OC. Committee membership will be open to any party eligible to participate in the NYISO's governance.

II. Construction of Reliability Projects Included in the Consolidated Transmission Plan

A. TO Commitment to Construct

The TOs agree to construct Reliability Projects included in the CTP, subject to satisfaction of the conditions set forth below. It is reasonable to expect that the CTP process will achieve a broad consensus among the TOs, other market participants, the PSC and the ISO Board as to the Reliability Projects included in the CTP.

In addition, each TO retains the right to expand or modify its facilities, either on its own initiative or in response to a lawful order of an appropriate regulatory authority. Such projects shall be inputs into the CTP and shall be reviewed by the TPC with regard to their conformance with reliability criteria.

B. TO Cost Recovery

The TO commitment to construct Reliability Projects included in the CTP, other than transmission projects that are constructed pursuant to a lawful order of an appropriate regulatory authority, is contingent upon and subject to the satisfaction of each of the following conditions:

The TO is assured of full recovery by the appropriate regulatory authorities of its reasonably incurred costs ("Full Recovery") which shall include:

— Recovery of all reasonably incurred expansion costs, including an amortization period, as determined by the appropriate regulatory authorities, that reflects the risk inherent in the construction of transmission projects in a restructured electricity industry, and that is no longer than the amortization periods authorized by the FERC for TOs in neighboring regions;

— A return on investment, as determined by the appropriate regulatory authorities, that reflects the risks inherent in investments in new transmission facilities in a restructured electricity market, and sufficient to provide an adequate incentive for capital investments in transmission facilities;

— The recovery of the reasonably incurred expansion costs and return to commence immediately upon completion of the project;

— Recovery of all reasonably incurred costs of operating, maintaining and owning the facilities; and

— Recovery of all reasonably incurred costs associated with a TO's efforts to satisfy the requirements necessary to proceed with a project identified in the CTP if, through no fault of the TO, the project is not completed.

C. Recovery Mechanisms For TOs

— Cost recovery mechanisms for a TO constructing a transmission project, and for a non-constructing TO allocated project costs, include, without limitation, the following:

- An ISO or TO-specific FERC-jurisdictional rate schedule change or surcharge;

- A distribution surcharge that would not be subject to a retail price cap;

- Provisions contained in a bilateral agreement;

- An ISO or TO-specific TSC-like charge targeted at the customers that benefit from the expansion (not recovered through a general uplift); and

- Any combination of the above recovery mechanisms.

— The ISO shall cooperate with the affected TOs to effectuate Full Recovery, including recovery of the cost to prepare regulatory filings.

D. Receipt of Necessary Approvals

The TO commitment to build facilities also is contingent upon satisfying all TO expansion technical requirements, and receipt of all federal, state and local approvals. Such approvals include:

— Receipt by the TOs, including non-constructing TOs who are allocated project costs, of regulatory approval at the federal and state level providing each TO reasonable assurance that it will receive Full Recovery, in the aggregate, at the wholesale and retail levels. Recovery at the retail level must expressly allow for

the current recovery of such costs through retail rates (e.g., and not be subject to a retail rate cap);

— Receipt of all necessary federal, state and local approvals or authorizations to construct the project;

— Securing any necessary real property rights, including rights of way and easements;

— Receipt of board of trustees or directors approvals, as applicable, to the extent required; and

— Receipt by the TO of adequate financing.

E. Cost Allocation

— The CTP shall address cost allocation associated with each Reliability Project that a TO must construct.

— TPC to establish Objective Allocation Criteria.

— The TPC will facilitate development of generic cost allocation principles and criteria ("Objective Allocation Criteria" or "OAC") to apply to each RP case-by-case. The principles and criteria must allocate costs based primarily upon market participant reliability benefits and obligations, and, to the extent they exist, economic benefits. Until the OAC is developed, the TPC will, at the request of affected parties, attempt to facilitate a consensus allocation case-by-case.

The TPC will vote on the OAC. The OAC approved by the TPC shall be forwarded to the BIC and the OC. The BIC and the OC will review and act on the OAC within 60 days. If the BIC and the OC concur in a revision to the OAC, the OAC will be revised as determined by the BIC and the OC, and the revised OAC sent to the MC for action. If the BIC or the OC approves a revision that is not concurred in by the other committee, the OAC will be forwarded to the MC with the positions of the BIC and OC presented to the MC for resolution. The TPC may submit comments on the positions taken by the BIC and OC. If the BIC and/or the OC fail to act on the OAC within 60 days, the OAC will be sent to the MC for action. The MC will consider the OAC, along with any written comments by the BIC, the OC, the TPC and ISO staff. The MC will adopt an OAC, including any revisions it deems appropriate, and submit the OAC to the ISO Board within 60 days of its receipt from the BIC and OC. If the MC does not adopt the OAC within 60 days, the OAC, as submitted to the MC, will be sent to the ISO Board for

action; provided that the 60 day period may be extended by the ISO Board in its discretion.

The ISO Board shall either adopt the OAC or, if it determines that modifications are necessary, remand it to the MC with an explanation of the reasons for the proposed modifications. The MC, in consultation with the BIC, the OC and the TPC, will submit its analysis and comments on the proposed modifications directly to the ISO Board for final action. When approved by the Board, the OAC will be filed with FERC.

The OAC is subject to FERC acceptance or approval.

Revisions to the OAC are subject to the same review process described above.

— Application of OAC Case-By-Case

During the development of an RP, the parties affected by the RP may first attempt to apply the OAC and reach agreement upon an allocation. If the parties reach agreement on cost allocation, then the TPC, during its review of the CTP, shall accept the allocation unless (a) the allocation is clearly inconsistent with the OAC and (b) the proposed allocation will materially and adversely affect third parties that did not participate in allocation decision. Market participants that would be obliged to pay all or some of the allocation may appeal the TPC's determination to the OC in accordance with applicable ISO procedures. The OC shall apply the same criteria applied by the TPC.

If the parties cannot reach agreement, then the TPC shall apply the OAC and develop an allocation. The TPC's allocation will be developed during the CTP review process. Market participants that would be obliged to pay all or some of the allocation may appeal the TPC-determined allocation to the OC in accordance with applicable ISO procedures. The OC shall accept the allocation unless the allocation is clearly inconsistent with the OAC.

Parties to whom expansion costs have been allocated ("Allocatee") retain the right to contest the allocation at FERC.

Each Allocatee that is a TO shall have the right to recover the allocated costs through rates, surcharges or other mechanisms filed with any applicable regulatory authority to the extent required to achieve recovery consistent with the requirements described above.

III. Economic Projects

— The TPC shall examine whether the current system provides inadequate incentives or impediments to the construction of economic-based transmission

expansions. If the TPC finds that there are inadequate incentives or impediments to the construction of such projects, the TPC shall develop and recommend appropriate market-based mechanisms that foster economic transmission expansion projects. The TPC also will develop rules to address the allocation of TCCs in connection with the construction of economic-based transmission facilities.

— The TOs will negotiate all relevant issues with market participants requesting economic-based transmission expansions or modifications, including ownership, in order to facilitate construction and maintenance of such projects. The ISO and the TOs will maintain the same physical and operational control over an economic-based transmission facility as they exercise over the transmission facilities owned by the TOs, unless otherwise agreed to by the ISO and the affected TO.

IV. Effectiveness and Changes to the Planning and Expansion Procedures

— The ISO Transmission planning process set forth herein and the RTO filing as a whole, were negotiated in an open process with the participation of all interested market participants. The RTO filing is subject to FERC acceptance or approval as a package without material modification.

— The preconditions for the construction of transmission facilities set forth in the CTP shall not be subject to modification absent the unanimous written agreement of the TOs.

— A TO may waive a specific precondition on a project-specific basis.

— The ISO tariffs and agreement shall be modified to the extent necessary to give effect to the CTP process outlined herein.

— Nothing in this document will preclude the TOs from pursuing alternative transmission asset ownership approaches or structures.

ATTACHMENT IV

Agreement on Interregional Market Plan

The NYISO and ISO-NE have agreed, subject to the governance requirements of each ISO, to undertake initiatives to jointly address interregional market performance and market seams issues on an expedited basis. These initiatives draw upon concepts and proposals presented in the respective stakeholder processes for development of a response to FERC's RTO Order and also build upon and expand the efforts in support of the Memorandum of Understanding among PJM, NYISO, ISO-NE, and IMO.

Market Participants and the ISOs believe that much can be done to improve the ability of our respective markets to facilitate transactions that cross ISO boundaries. While such concerns are the focus of the MOU, Market Participants and the public will benefit significantly from acceleration of this process. For this reason, the NYISO and ISO-NE have agreed on these additional initiatives, which include the establishment of a task force, whose principal objective is to speed the advent of an expanded marketplace for the Northeast.

To garner the benefits of these initiatives as soon as possible (while still pursuing broader-reaching efforts to include PJM and IMO), ISO-NE and NYISO propose to undertake the following:

Establish and staff a joint task force to expedite activities addressing seams issues and conforming market rules. The two ISO's will each provide initial funding as required to support this endeavor in 2001. The task force will be funded and in place by the beginning of the 3rd quarter of 2001. The joint task force will develop and support initiatives that result from the MOU process as well as expedite the high priority projects identified for the New York and New England regions as listed below and as subsequently may be identified.

a) Development of uniform rules for a day-ahead market ("DAM") for (at a minimum) energy transactions: Target Date to Establish Coordination Team: 2/1/01;

b) Development of compatible schedules for interpool energy transactions in real time: Target Date: 6/1/01;

c) Development of Reserve Sharing protocols for ten-minute non-spinning reserves and thirty-minute operating reserves (NPCC and NERC cooperation will be necessary, but indications are that these two organizations will assist in this initiative): Target Date for initial implementation: 2/1/01;

d) Development of Uniform Standards for Generation Interconnection. (This initiative necessitates application of Minimum Interconnection Standards applicable to New England and New York.): Target Date for Identification of Issues: 4/1/01; Target Date for recommending ways to resolve differences: 9/1/01.

ISO NE will establish an independent Market Advisor reporting directly to the ISO-NE Board of Directors. The Market Advisor will assist the independent board of ISO-NE to carry out its responsibilities to assure market efficiency. The NYISO Board has already established an independent Market Advisor to fulfill this function for the NYISO Board. The Market Advisors of NY and NE will share information about potential market power issues internal to each of the ISO's to prevent propagation of abuses across ISO boundaries. Additionally, the Market Advisors of the two ISO Boards will comprise a joint monitoring committee (JMC) to address interregional market monitoring efforts. The responsibilities of the JMC may include recommending market-rule reforms and issuing periodic reports to the Boards and market participants in both regions, as the respective Boards may determine. The Market Advisor of the NE Board will have sufficient staff and expertise to fulfill the duties described herein including the efforts of the JMC with New York. The activities of the Market Advisors to the NY and NE boards and the JMC will be complementary to the market-monitoring and mitigation activities that are the purview of each ISO. This joint structure – consisting of the Market Advisors and JMC — will serve to satisfy the principal objectives of some Market Participants who proposed an Independent Market Monitoring Unit (IMMU) for the New York-New England region. In particular, this structure will assure that: (a) for each market that is subject to JMC evaluation the free interplay of market forces is sufficient to produce prices consistent with competitive markets; (b) rules, practices and procedures affecting the markets rely upon market mechanisms to the maximum extent possible; and (c) both the price-formation and mitigation activities affecting markets are sufficiently transparent to warrant the confidence of market participants in the free functioning of competitive market forces.

This arrangement would allow the near-term critical focus on unique issues that will emerge in the developing markets within each control area due to the differences in physical system parameters and differing stages of market development. At the same time it establishes a dedicated team to focus on interregional issues to guide market rules and procedures being developed for each region and to monitor market behavior across the combined region. This interregional focus will include:

a) review and assessment of the product markets (ICAP, energy, reserves, AGC, TCC and FCR and other products as they are introduced), and recommendation of changes to the structure and design of those product markets in the interest of attaining and maintaining consistency with the objectives set forth above;

b) review of control area market rules, policies, practices and procedures when these market rules, policies, practices and procedures affect inter-control area transactions and opportunities for trading in market products, and the identification and recommendation of opportunities for improvement of efficiency and cost-effectiveness in those rules, policies, practices and procedures in the interest of attaining and maintaining consistency with the objectives set forth above;

c) consultation with the ISOs and proposals for appropriate actions prospectively to address the potential for abuse of market power; and

d) review of proposed rule changes to assess their competitive impacts.

The Independent Boards of the ISOs have the requisite authority and working in conjunction with the Market Advisors and Market Committees of each, the capability to meet the above requirements. The JMC would have the authority and funding to undertake assessments of the competitiveness and performance of the markets, to be performed at least annually. The JMC will have access to data generated, collected or otherwise acquired by the ISOs subject to appropriate non-disclosure rules, and te ability to acquire information from entities performing transmission functions, market participants and private power exchanges subject to appropriate confidentiality and non-disclosure agreements. The JMC would publish reports on the "Status of the Competitiveness of the Markets" at least annually and more frequently as circumstances warrant. The initial report would be issued following the Summer 2001 capability period.

The market monitoring authority of the ISO Boards as carried out through the proposed JMC shall be complementary to the market monitoring and mitigation functions performed individually by the ISOs. The ISOs' staffs will continue their day-to-day authorities, practices and procedures, including the authority to flag (reserve) prices, mitigate offers and bids, and correct settled prices in any of the markets in accordance with FERC approved market rules and procedures, subject to review, after the fact, by the JMC. The JMC's examination of operational policies, practices and procedures will not limit the ISOs' ability to act in accordance with market monitoring and mitigation rules approved by FERC.

The Independent Boards of the ISOs will also hire independent auditors to undertake periodic performance audits of the ISOs, transmission providers and other Market Participants. Special performance audits would be undertaken as circumstances warrant. The results of the performance audits would be published and made available to the ISOs, transmission providers and other market participants. The purpose of the performance audits would be to assess the effects of market rules, and the ISOs', transmission providers' and other Market Participants' policies, practices and procedures on the competitiveness of the markets. Such audit procedures are already in place at both ISOs under the auspices of the Board audit committees, which would continue to have this responsibility.

A stated objective during the RTO collaborative process in New England was that an interregional market monitoring unit should encompass all of the control areas in the Northeast, including PJM at a minimum. Initially establishing the New England---New York JMC will provide the benefits of integrated market monitoring in these regions. Furthermore, the results of the ongoing Northeast Regional Day-Ahead Market Study, the first phase of which is scheduled for completion in May 2001, will influence the appropriate structure for a greater Northeast regional undertaking.

Each ISO affirms that implementation of this Agreement shall not supercede the governance process of either ISO, and that each ISO shall consult with Market Participants on implementation of this Agreement.

ATTACHMENT V

Northeast Power Coordinating Council (NPCC) Activities in Support of RTO Requirements

Participation in NPCC provides major support for many of the FERC-prescribed RTO characteristics and functions. Membership and participation in NPCC by the New York Independent System Operator (NYISO) and ISO-New England (ISO-NE) helps satisfy three of the four FERC RTO characteristics. These are:

Scope and Regional Configuration (Characteristic #2)
Operational Authority (Characteristic #3)
Short-Term Reliability (Characteristic #4)

The FERC RTO functions, which NPCC participation also helps satisfy are:

Congestion Management (Function #2)
Parallel Path Flow (Function #3)
Planning and Expansion (Function #7)
Inter-regional coordination (Function #8)

NPCC is the regional entity responsible for coordinating the reliability of the bulk power system in the Northeastern United States and Eastern Canada. Reliability is achieved through the establishment of reliability criteria, coordination of system planning and operations, and monitoring and assessment of compliance with such reliability criteria. In the development of reliability criteria, NPCC, to the extent possible, facilitates attainment of fair, effective and efficient competitive electric markets. NPCC is one of the ten regional reliability organizations that make up the membership of the North American Electric Reliability Council ("NERC").

NPCC is an international, voluntary, non-profit organization. Its membership is diverse. It includes electric utilities, transmission owners/providers, non-utility generators, power marketers, transmission customers, Independent System Operators ("ISOs"), the New York State Reliability Council, an Independent Electricity Market Operator, and provincial and state authorities. The geographic area covered by NPCC includes New York, the six New England states, Ontario, Quebec, and the Maritime Provinces. The total population served by NPCC's members is approximately 49 million. The area covered is approximately 1 million square miles.

The NPCC *Membership Agreement* provides for open, inclusive membership and fair and non-discriminatory governance. Full membership is available to all entities that participate in the interconnected electricity market in Northeastern North America. Two voting classes exist, each consisting of several sectors. Full Members are classified as either Transmission Providers or Transmission Customers and have one vote within their voting class. Through this non-discriminatory governance structure NPCC precludes the possibility of either voting class exercising undue control.

The *Membership Agreement* also allows for non-voting membership to be extended to regulatory agencies with jurisdiction over participants in the electricity market in Northeastern North America. It also extends membership to public interest organizations expressing interest in the reliability of electric service in Northeastern North America.

The following is an overview of how NPCC's organizational structure, interrelationships, coordination and reliability-related activities provide wide area, regional and inter-regional support to NYISO and ISO-NE's achievement of the RTO requirements:

RTO CHARACTERISTICS

Scope and Regional Configuration (Characteristic #2)

NPCC is the third largest of the ten Reliability Councils, which together comprise NERC. With a total non-coincident load for Summer 2000 of over 97,200 MW, NPCC effectively coordinates the operations of five contiguous control areas: New York, New England, Ontario, Quebec and the Maritimes. Together the load in New York and New England represents over 8% of the total load in the United States and the provincial load within NPCC represents approximately 70% of the total Canadian load. Electric service to the major metropolitan load centers of New York City, Boston, Toronto and Montreal is provided via a highly interconnected bulk power system totaling over 35,000 miles with interconnections to the Mid-Atlantic Area Council (MAAC), East Central Area Reliability Coordination Agreement (ECAR) and Mid-Continent Area Power Pool (MAPP) NERC Regions.

Operational Authority (Characteristic #3)

The NPCC Task Force on Coordination of Operation promotes, and provides a forum for, the active coordination of security and operation among the NPCC control areas and neighboring NERC regions to enhance the reliability of the interconnected bulk power system.

Responsibilities of the Task Force include:

Coordination of the development of operating policies and guidelines affecting the security and operability of interconnected systems in coordination with NERC; conducting seasonal reviews of the overall reliability of the generation and transmission systems in NPCC; reviewing the operational readiness of NPCC and recommending possible actions to mitigate any potential problems identified for the coming operating period; enhancing the effectiveness of NPCC operations; conducting inter-Area and inter-regional studies to enhance reliability and operational effectiveness through the development of common operating policies and guidelines, on such matters as: inter-Area operations, the derivation, application, and interpretation of operating limits, operating reserve criteria, recovery to a secure state following contingencies, the basic principles of operator procedures in emergencies as they affect inter-Area security; and ensuring coordination of operating matters with other Regions.

NPCC Documents that pertain to this characteristic are listed and described in Exhibit 1.

Short-Term Reliability (Characteristic #4)

The existing NPCC structure and processes help ensure system reliability within NPCC and beyond the regional boundaries. The RTO Characteristics and Functions are implemented through the NPCC Committees and Task Forces. The NPCC Committees oversee the actions of the NPCC Task Forces. The NPCC Task Forces that have the primary responsibilities for conducting the work needed to ensure system reliability. The NYISO and ISO-NE have representation on each of the Task Forces including the Task Force on Coordination of Planning, the Task Force on System Studies, the Task Force on Coordination of Operation and the Task Force on System Protection.

The responsibilities of the Task Force on Coordination of Operation are summarized under the RTO Operational Authority Characteristic #2, above. Many of those responsibilities pertain to short-term reliability. The responsibilities of the Task Forces on Coordination of Planning and System Studies are summarized under System Planning and Expansion Function #7, below. Many of those responsibilities also pertain to short-term reliability.

The Task Force on System Protection (TFSP) promotes the reliable and efficient operation of the interconnected bulk power systems through the establishment of criteria and guidelines, and coordination of design, relative to the protection associated with the bulk power systems.

Responsibilities of the Task Force on System Protection related to maintaining reliability include: Monitoring compliance with the *Maintenance Criteria for Bulk Power System Protection* (Document A-4); monitoring compliance with the requirements of the automatic load shedding program as specified in the *Emergency Operation Criteria* (Document A-3); conducting an annual update of the special protection systems listing in cooperation with the Task Force on System Studies; reviewing and analyzing the performance of protection systems following selected major power system disturbances and events; assessing proposed protection systems, including special protection systems, in accordance with the *Procedure for Reporting and Reviewing Proposed Protection Systems for the Bulk Power System* (Document C-22); reporting on the findings with respect to compliance with the NPCC *Bulk Power System Protection Criteria* (Document A-5); providing technical advice on protection issues to the Compliance Monitoring and Assessment Subcommittee (CMAS) and any other NPCC group as required.

The Task Force on System Protection also initiates, and coordinates reviews of protection documents contributing to maintain system reliability including: m*aintenance Criteria for Bulk Power System Protection* (Document A-4); *Bulk Power System Protection Criteria* (Document A-5); *Guide for the Application of Autoreclosing to the Bulk Power System* (Document B-1); *Automatic Underfrequency Load Shedding Program Guideline*

(Document B-7); *Special Protection System Guideline* (Document B-11); *Procedure for Reporting and Reviewing Proposed Protection Systems for the Bulk Power System* (Document C-22); and *Procedures for Task Force on System Protection Compliance Monitoring and Surveys* (Document C-26).

Enforcing compliance within NPCC of reliability standards is also a major part of NPCC's role in maintaining short-term reliability. Compliance with Reliability Standards includes on-going participation in the development and modification of standards and procedures plus the implementation and enforcement of this process. The NPCC Reliability Compliance and Enforcement Program is used to assess and enforce compliance with NPCC reliability criteria. Actions taken by NPCC under the Program, including the imposition of sanctions, where applicable, shall in no way be construed as an acceptable alternative to the Member's continued obligation to comply with NPCC Criteria, Guides and Procedures. The Program is designed to be consistent with the concept that compliance assessment and enforcement is most effectively accomplished by the entities that are closest to the complying party. The Program establishes the following assessment structure: NPCC assesses and enforces compliance to those standards and criteria for which the Areas have the reporting responsibilities, and the Areas assess and enforce compliance to those standards and criteria for which the market participants have reporting responsibilities.

NPCC Documents that pertain to this characteristic are listed and described in Exhibit 1.

RTO FUNCTIONS

Congestion Management (Function #2) and Parallel Path Flows (Function #3)

Historically NPCC has played a major role in coordinating large bulk power system addition projects within the northeastern United States and eastern Canada. This includes NPCC involvement in recent activities aimed at relieving bulk power system congestion and addressing parallel path flow problems. Examples of such activities include:

Ontario-Michigan Phase Angle Regulator (PAR) addition studies

NPCC was the primary coordinator for these studies. As part of the on-going responsibility of the inter-regional study committees an Ad Hoc PAR Studies Working Group, under the direction of the MAAC-ECAR-NPCC (MEN) Study Committee, conducted a study to assess the interregional impact of modifications to the Michigan-Ontario interface. This project expands the thermal capability of the ties between Ontario and Michigan by the addition of a 345/230 kV autotransformer, and three 230 kV phase angle regulating transformers to provide control. The normal mode of operation will be to use the PARs to control area interface flows. The Working Group completed and issued a report on the impact of the modifications.

Lake Erie Emergency Re-dispatch

NPCC also had the primary coordination role for this effort. The objective of the Lake Erie Emergency Re-dispatch (LEER) procedure is to facilitate emergency re-dispatch among participating control areas surrounding Lake Erie (AEP, AP, FE, MECS, NYISO, IMO, and PJM) to avoid the shedding of firm load. The LEER procedure is only intended to be implemented for emergency re-dispatch to relieve transmission constraints that could otherwise require another Lake Erie Company to shed firm load. The LEER procedure would only be fully executed when firm load curtailment is imminent.

System Planning and Expansion (Function #7)

The NPCC Task Force on Coordination of Planning promotes bulk power system reliability through the coordination of NPCC Area system planning and expansion processes and activities.

Responsibilities of the Task Force include: initiating reviews of the Basic Criteria for the *Design and Operation of Interconnected Power Systems* (Document A-2), of other NPCC criteria, guidelines, and procedures related to planning, and of those documents which provide for the uniform implementation, interpretation and monitoring of compliance with criteria, guidelines and procedures related to planning; reviewing the adequacy of the NPCC systems to supply load considering forecast demand, installed and planned supply and demand resources and required reserve margins in accordance with *Guidelines for Area Review of Resource Adequacy* (Document B-8); coordinating the review of the compliance of future Area plans with the Basic Criteria including an analysis of resource and transmission system additions, and the potential inter-Area effects of special protection systems; coordinating the review of proposed new or modified special protection systems in accordance with the *Procedure For NPCC Review of New or Modified Bulk Power System Special Protection Systems* (Document C-16); establishing working groups and initiating studies, including joint efforts with other task forces as appropriate, relative to the overall reliability of the planned bulk power system; and assessing requests by member systems for exclusions in accordance with the *Guidelines for Requesting Exclusion to Section 5.1(B) of the NPCC Basic Criteria for Design and Operation of Interconnected Power Systems* (Document B-10).

An example of a Study initiated by the Task Force on Coordination Planning is the Collaborative Planning Study, which involves neighboring NPCC Areas and neighboring Regions. It aims at identifying system impacts affecting other Areas or Regions. It utilizes probabilistic and deterministic study tools (e.g. Multi-Area Reliability Simulation Program (MARS), load flow, dynamic simulation). A scope of work for this wide area study is attached at the end of this document (Exhibit 2).

The NPCC Task Force on System Studies also has a major role in promoting bulk power system reliability through system planning and expansion. This Task Force has responsibility for

active overall coordination of system studies of the reliability of the interconnected bulk power system and for the review of certain NPCC documents.

Responsibilities of the Task Force include: participating with the other Task Forces in reviews of the "Basic Criteria for the Design and Operation of Interconnected Power Systems" and other NPCC criteria, guidelines, procedures and documents which provide for the uniform implementation, interpretation and monitoring of conformance to criteria, guidelines and procedures related to planning; conducting Area Reviews, in accordance with the "Guidelines for NPCC Area Transmission Reviews" which assess the impact of planned transmission and resource additions or modifications, on system reliability and which determine the Area's conformance with the Basic Criteria; performing such load flow, transient stability, and other studies as required to analyze the overall long term reliability of the planned bulk power transmission system of NPCC and the interconnections between NPCC and other regional councils including analysis of potential inter-Area effects of special protection systems; conducting analytical studies appropriate to the coordination of system planning and system protection in NPCC; maintaining a library of load flow base cases and associated dynamics data, for use in Area Reviews and overall NPCC Region transmission assessments; participating in ad hoc reviews of specific projects; reviewing major system disturbances to ascertain the adequacy of the interconnected system; identifying and recommending improved system study techniques; and reviewing the adequacy of the automatic and manual underfrequency load shedding programs.

NPCC Documents that pertain to this characteristic are listed and described in Exhibit 1.

Inter-regional Coordination (Function #8)

Through NPCC, NYISO and ISO-NE participate in various reliability-related activities that involve the other NPCC Areas, neighboring Regions and NERC. This includes participation in MAAC-ECAR-NPCC (MEN) system studies and a large number of NERC activities.

The MEN Study Committee conducts the necessary periodic analyses and reviews of generation and transmission expansion programs over the large MEN Areas. The MEN Study Committee has the responsibility for conducting the studies needed to assess the reliability of the MAAC-ECAR-NPCC regions. This includes appraisal of the anticipated near-term and future performance of the bulk power transmission systems within the MEN regions from an overall interregional standpoint. The Study Committee undertakes studies and analyses utilizing interregional load flows, inertial responses, transient stability studies, and other appropriate program packages which may be available to appraise the ability of the interregional network to withstand representative severe contingencies without causing widespread cascading outages The goal of these appraisals is to provide assurance that system developments and operating procedures within each Region are being properly coordinated so they do not adversely affect other Regions. Studies are based on the most up-to-date plans of the individual systems. An

analysis of any change in protected system development or mode of operation that will significantly affect interregional system performance is also included in the appraisals.

The NERC Committees, Working Groups and Task Forces include: **Adequacy Committee (AC);** Reliability Assessment Subcommittee (RAS); Planning Standards Subcommittee (PSS); Load Forecasting Working Group (LFWG); Multi-regional Modeling Working Group (MMWG); System Dynamics Database Working Group (SDDWG); Interconnection Dynamics Working Group (IDWG); Compliance Review Working Group; Seasonal Assessments Contacts (SAC); Data Coordination Working Group; **Operating Committee (OC);** Interconnected Operations Subcommittee (IOS); Operations Planning Subcommittee (OPS); Performance Subcommittee (PS); System Operator Subcommittee (SOS); Telecommunications Subcommittee (OCTS); Security Coordinator Subcommittee (SCS); Telecommunications Working Group (TWG); Data Exchange Working Group (DEWG); Disturbance Analysis Working Group (DAWG); Security Process Support System Task Force ; Distribution Factor Task Force (DFTF); Security Coordinator Subcommittee Y2k Contingency Task Force; Transaction Information Systems Working Group; **Joint EC/OC Subgroups;** ATC Working Group (ATCWG); Interconnected Operations Subcommittee Implementation Task Force (IOSITF); **Market Interface Committee**

Other general examples of reliability coordination activities include:

Coordination of information (operating data, events, facility additions, power transfer capability information, etc.).
Protection Systems: Application of Standards, coordination of additions, modifications and application.
Coordination of underfrequency load shedding application.
Reporting and analysis of major system disturbances and operating incidents.
Coordination of monitoring devices (e.g. phasor measurements, voltage measurements, Geomagnetically induced currents, etc.).

EXHIBIT 1

NPCC DOCUMENTS

The Task Forces are able to fulfill their responsibilities through the development and implementation of system planning and operation criteria, guidelines and procedures. A structure of system planning and operation criteria, guidelines and procedures exists which apply to the areas of system expansion, planning and operations. These are contained in various A (criteria), B (Guideline) and C (Procedures) Documents.

The document that pertains to the Operational Authority and Short-term Reliability Characteristics and the System Planning and Expansion Function is Document A-2:

A-2 Basic Criteria for Design and Operation of Interconnected Power Systems

Description: Criteria are established for proper design and operation concerning **Resource** Adequacy and Transmission Capability.

The documents that apply primarily to the Operational Authority Characteristic include:

A-3 Emergency Operation Criteria

Description: Objectives, principles and requirements are presented to assist the NPCC **Areas** in formulating plans and procedures to be followed in an **emergency** or during conditions which could lead to an **emergency**.

A-6 Operating Reserve Criteria

Description: This Criteria establishes standard terminology and minimum requirements governing the amount, availability and distribution of operating reserve.

B-2 Control Performance Guide During Normal Conditions

Description: Establishes a performance measure of NPCC **Areas** and systems within the **Areas**' ability to

carry out their responsibilities regarding control performance.

B-3 Guidelines for Inter-Area Voltage Control

Description: This document establishes procedures and principles to be considered for occasions where a deficiency or an excess of reactive power can affect **bulk power system** voltage levels in a large portion of an **Area** or in two adjacent **Areas**.

B-9 Guide for Rating Generating Capability

Description: Establishes standards for rating and verifying Net Generating Capability.

B-12 Guidelines for On-Line Computer System Performance During Disturbances

Description: Establishes guidelines for the performance of NPCC **Area** on-line computer systems during a power system disturbance.

B-13 Guide for Reporting System Disturbances

Description: This document establishes the Task Force on Coordination of Operation's (TFCO) requirements and guidelines for reporting system disturbances to enable the TFCO to review, with emphasis on inter-**Area** implications, disturbances which affect a significant part of one **Area.** (This Guide was formerly known as Procedure C-2).

C-4 Monitoring Procedures for *Guidelines for Inter-Area Voltage Control*

Description: This procedural document establishes TFCO's monitoring and reporting requirements for conformance with NPCC's *Guidelines for Inter-AREA Voltage Control* (Document B-3).

C-5 Monitoring Procedures for *Emergency Operation Criteria*

Description: This procedural document establishes TFCO's monitoring and reporting requirements for conformance with NPCC's *Emergency Operation Criteria* (Document A-3).

C-7 Monitoring Procedures for *Guide for Rating Generating Capability*

Description: This procedural document establishes the TFCO's monitoring and reporting requirements for conformance with the NPCC, *Guide for Rating Generating Capability* (Document B-9).

C-8 Monitoring Procedures for *Control Performance Guide During Normal Conditions*

Description: This procedural document establishes a performance measure for NPCC **Areas** and systems and outlines the reporting function for NPCC *Control Performance Guide During Normal Conditions* (Document B-2)

C-9 Monitoring Procedures for *Operating Reserve Criteria*

Description: This procedural document establishes the TFCO's monitoring and reporting requirements for conformance with the NPCC *Operating Reserve Criteria* (Document A-6)

C-11 Monitoring Procedures for Interconnected System Frequency Response

Description: This procedural document defines procedures for monitoring frequency responses to large generation losses.

C-12 Procedures for Shared Activation of Ten Minute Reserve

Description: This procedural document outlines procedures to share the activation of ten minute reserve on an Area basis.

C-13 Operational Planning Coordination
Appendix D - NPCC Critical Facilities List

Description: This document coordinates the notification of planned facility outages among the **Areas**. It also establishes formal procedures for **Area** communications in advance of a period of likely capacity shortages as well as for weekly and emergency NPCC conference call among the **Areas**.

C-15 Procedures for Solar Magnetic Disturbances on Electrical Power Systems

Description: This procedural document clarifies the reporting channels and information available to the operator during solar alerts and suggests measures that may be taken to mitigate the impact of a solar magnetic disturbance.

C-19 Procedures During Shortages of Operating Reserve

Description: This procedure is intended to provide specific instructions for the redistribution of Operating Reserve among the Areas when one or more **Area**(s) are experiencing an Operating Reserve deficiency.

C-20 Procedures During Abnormal Operating Conditions

Description: This procedure is intended to complement the *Emergency Operation Criteria* (Document A-3) by providing specific instructions to the System Operator during such conditions in an NPCC Area or Areas.

C-21 Monitoring Procedures for Conformance with Normal and Emergency Transfer Limits

Description: This procedural document establishes TFCO monitoring and reporting requirements for transfer limits during normal and emergency operations as stipulated in the *Basic Criteria for Design and*

Operation of Interconnected Power Systems (Document A-2).

The documents that apply Primarily to Planning and System Expansion Function include:

B-4 Guidelines for NPCC Area Transmission Reviews

Description: Guidelines to help TFSS ascertain that each Area's transmission expansion plan, based on its proposed generation additions, has been developed in accordance with the NPCC *Basic Criteria for Design and Operation of Interconnected Power Systems* (Document A-2).

B-8 Guidelines for Area Review of Resource Adequacy

Description: Guidelines to help TFCP ascertain that each Area's resource plan is in accordance with the NPCC *Basic Criteria for Design and Operation of Interconnected Power Systems* (Document A-2).

B-10 Guidelines for Requesting Exclusions to Section 5.1(B) and 6.1(B) of the NPCC *Basic Criteria for Design and Operation of Interconnected Power Systems*

NOTE: Member Representatives shall be advised of approvals by the Reliability Coordinating Committee of applications for exclusions.

Description: Establishes procedure for requesting exclusion from a certain contingency in the Basic Criteria (Document A-2).

C-18 Procedure For Testing and Analysis of Extreme Contingencies

Description: This document establishes a procedure for the testing and analysis of Extreme Contingencies.

C-25 Procedure to Collect Real Time Data for Inter-Area Dynamic Analysis

Description: This procedure provides a mechanism to collect real time data following a power system disturbance for the purpose of analyzing the dynamic performance of the NPCC bulk power system.

EXHIBIT 2

SCOPE OF WORK

NPCC Collaborative Planning Initiative

Objective

Perform an NPCC system - wide review to identify potential reliability impacts of projected changes in system facilities associated with each Area's respective transmission plans. This review, to be done on a triennial basis with annual updates, would examine a future year system (five years out), and would address the requirement, contained in the FERC 2000 RTO Notice, which deals with multi-Area planning and the assessment of expansion plans and utilize the efficiencies and synergies that coordinated planning could bring. This review would be done on a collaborative basis among the five Control Areas of NPCC and fully coordinated with neighboring Regions.

Study Process

1. Utilize NPCC working group structure under the Task Force on Coordination of Planning. NPCC Staff will chair the working group.

2. Select study year and develop a base case based on publicly known generation and transmission plans. (Utilize such resources as proposed generation listings or queues, which are part of each Area's planning and expansion process.)

3. Identify different scenarios that could have potential reliability impacts, the on the bulk power system. Examples of possibilities could be:

   Unusual flows on the system leading to oscillatory problems;
   Large wheel-out of NPCC impacting total internal resources;
   Major long term outages of critical facilities;
   Combination of high loads and coincident maintenance;
   Etc.

4. Utilize appropriate techniques (e.g. probabilistic, prospective analysis, risk analysis, etc.) to prioritize and review the scenarios postulated in #3.

5. Summarize results in report to Task Force on Coordination of Planning.

6. Present to other Task Forces and RCC for approval.

ATTACHMENT VI

PLACEHOLDER FOR

JOINT NYISO, ISO-NE AND IMO STUDY

[TO BE PROVIDED]

ATTACHMENT VII

CERTIFICATE OF SERVICE

In accordance with the Commission's July 20, 2000 *Notice of Guidance for Processing Order No. 2000 Filings*, and the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure 18 C.F.R. § 2010 (2000), I hereby certify that I have this day served the foregoing document upon the New York State Public Service Commission, ISO-New England, PJM Interconnection L.L.C. and Ontario Independent Electric Market Operator. An electronic version of this filing will be e-mailed to all subscribers to the New York Independent System Operator, Inc.'s Technical Information Exchange list, which encompasses virtually every party with an interest in the NYISO-administered markets. In addition, a copy of this filing will be posted on the NYISO's web-site, <www.nyiso.com>.

Dated at Washington, D.C. this 16th day of January, 2001.

_____

Ted J. Murphy
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006-1109
(202) 955-1588

ATTACHMENT VIII

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

New York Independent System Operator, Inc.	**)**	
	)	
Central Hudson Gas & Electric	**)**	
Corporation	**)**	
Consolidated Edison Company of	**)**	
New York, Inc.	**)**	**Docket No. RT01-__-000**
Niagara Mohawk Power Corporation	**)**	
New York State Electric & Gas Corporation	**)**	
Orange & Rockland Utilities, Inc.	**)**	
Rochester Gas and Electric Corporation	**)**	

NOTICE OF FILING

(January __, 2001)

Take notice that on January 16, 2001, pursuant to Section 35.34(h) of the Commission's regulations, and the Commission's July 20, 2000 "Notice of Guidance for Processing Order No. 2000 Filings" in Docket No. RM99-2-000, the New York Independent System Operator, Inc., Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation, New York State Electric & Gas Corporation, Orange & Rockland Utilities, Inc. and Rochester Gas and Electric Corporation, jointly submitted an Order No. 2000 compliance filing.

A copy of this filing was served upon New York State Public Service Commission, ISO-New England, PJM Interconnection L.L.C. and Ontario Independent Electric Market Operator. An electronic version of this filing will be e-mailed to all subscribers to the New York Independent System Operator, Inc.'s Technical Information Exchange list, which encompasses virtually every party with an interest in the NYISO-administered markets. In addition, a copy of this filing will be posted on the NYISO's web-site, <www.nyiso.com>.

Any person desiring to be heard or to protest such filing should file a motion to intervene, comments, or protest with the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 385.214). All such motions, comments and protests should be filed on or before _____ __, 2001. Protests will be considered by the Commission to determine the appropriate action to be taken, but will not serve to make protestants parties to the proceedings. Any person wishing to become a party must file a motion to intervene. Copies of this filing are on file with the Commission and are available for public inspection. This filing may also be viewed on the Internet at http://www.ferc.fed.us/online/rims.htm (call 202-208-2222 for assistance). Comments and protests

may be filed electronically via the Internet in lieu of paper. See, 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at http://www.ferc.fed.us/efi/doorbell.htm.

David P. Boergers
Secretary