

# **Phase II: NYISO COMPREHENSIVE PLANNING PROCESS FOR RELIABILITY NEEDS Implementation Procedures**

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Albany

*Draft – for discussion purposes only*

# Topics Presented at Sept ESPWG

- **Qualifications for valid market-based response (Section 6.3)**
- **Criteria for continued viability of market-based and regulated responses (Sections 9.0 (a) & (b))**
- **Criteria for halting a regulated solution already underway (Section 9.0(c))**
- **Criteria for cutoff date for starting a regulated project (Section 9.0(d))**

# Comments Received

- NY TOs
  - NRG
  - Howard Fromer
  - Charlie Pratt
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- Draft procedures were revised to reflect comment received
  - Unnecessary to include provisions already in tariff

# Revisions Made

- **Clarification of terms**
  - *Viability (TOs)*
  - *Material Change (Charlie Pratt)*
  - *Halting a regulated backstop (TOs)*
  - *Reasonable period of time (TOs)*
- **Time to cure (Charlie Pratt)**
- **Added major milestone schedule to list of project information requirements (NRG)**

# Issues For Discussion

- **Section 9.0(c): Criteria for halting a regulated backstop project**
  - *Proposed "bright line" criteria (TOs/NRG)*
  - *PSC role (TOs)*
  - *Criteria for market-based proposal too strict? (NRG)*
- **Section 9.0(d): Cutoff date for market-based project**
  - *Timeframe for the implementation of a regulated solution (See TO's comments)*
- **Various Sections: Major milestone schedule**
  - *Discuss critical elements (NRG)*

# Issues for Discussion

## ➤ CRP Timeline Questions (TOs)

- *Request for Solutions period—sequence of events*
- *PSC dispute resolution process—impact on timeline*
- *Relationship between annual RNA and 18 month overall CRP cycle*