

Comments submitted by Ho-Chen Chien, Con Edison:
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Comment #1. Section 2. Metering Equipment Standards and Specifications reads rather flimsy. The existing structure of this section makes it difficult to improve it to my liking. I suggest this section be rewritten as follows. I left the Detailed Requirements blank for two reasons. One, old contents of this section can be used. Two, much work is required.

Comment #2. The second paragraph of Section 3 should be moved to Section 2. The first paragraph of the introductory of Section 3 is rather wordy. I suggest it be modified to read: "The NYISO requires accurate metering from all of its market participants to ensure the accurate settlement of its economic markets. This guideline governs the implementation of metering equipment standards outlined in Section 2. This guideline includes responsibilities, installation, calibration and maintenance of all equipment utilized for recording and reporting of electrical generation, transmission, station power consumption, and other energy data to enable the NYISO to settle electric accounts timely and accurately. The NYISO market participants include generation companies, transmission owners (TO), and load serving entities (LSE)."

****Suggested rewrite of Section 2. Metering Equipment Standards and Specifications****

Section 2 Metering Equipment Standards and Specifications

Each revenue metering system that supplies metering data to NYISO for energy settlement purpose shall meet the reliability and accuracy requirements outlined in this section. Components of such revenue metering systems shall comply with the standards detailed in appropriate sections of the industry standards or applicable standards/policies issued by Transmission Owners. These components should include transducers, RTU, instrument transformers, power supply and data transmission sub-system. The installation, calibration and maintenance of the revenue metering equipment is detailed in Section 3 of this manual.

2.1 General Requirements

2.1.1 Reliability

Each revenue metering system shall be capable of supplying revenue metered data to NYISO on a timely and reliably manner. In the events that such data transmission is interrupted, the Metering Authority that is responsible shall provide back-up metering data to NYISO in a time frame that will not impact energy settlement. The Metering Authority shall restore the normal data transmission capability as promptly as possible.

2.1.2 Accuracy

Aggregated error associated with digital data transmission to NYISO from each revenue metering system shall not exceed 0.1 percent. Analog data that must be used to substitute for missing digital data should not exceed 1.0 percent of full scale analog reading.

2.1.3 Documentation

Electrical and schematic diagrams, and documentation associated with revenue metering systems and their components shall be maintained by the Metering Authority in compliance with the New York State Electric Meter Engineers' Committee Guide.

2.2 Detailed Requirements

2.2.1 Meters

2.2.2 Instrument Transformers

2.2.3 Power Supply

2.2.4 Data Transmission Subsystem