Comments submitted by Duane Wheeler of NYPA: 9/22/2004

3. Guidelines for the Installation, Calibration and Maintenance of Revenue Metering Systems and the Reporting of Revenue Metering Data.

This guideline provides metering standards for all participants of the NYISO, including power suppliers, transmission owners, and load serving entities acting in the capacity of a Meter Authority (MA). The NYISO requires accurate metering data from all Meter Authorities to ensure timely and accurate settlement of its markets. Below are guidelines for the installation and maintenance of all equipment utilized for measuring, recording and reporting of electrical generation, transmission, station power consumption, and other meter data to enable the NYISO to settle the markets.

These guidelines are "minimum standards" concerning NYISO billing and settlements and do not preclude more stringent standards that may be required of the owners of the neighboring transmission system.

• Meter Authority Responsibilities

Generator and Tie-line meter data tasks:

Meter Authorities are responsible for metering equipment installation calibration and maintenance long with providing accurate hourly interval data for a metering point abiding by the Guide for Uniform Practices in Revenue Quality Metering.

The MA is responsible for reporting the highest quality data available them, to allow the NYISO to calculate accurate daily Advisory Billing for the market. The MA shall review reported data and make necessary corrections, then upload the data to the NYISO using the Web Based Reconciliation (WBR) System. The MA shall respond to Market Participants affected by their metering that challenge the accuracy of the hourly interval metering and make every effort to ensure the best available data is reported to the NYISO. This process occurs daily for the current month from the 1st of the month through current day -2 to insure accurate settlements for the initial run. Also meter data review takes place for any historical months the NYISO is preparing to invoice (i.e. the 4 month settlement adjustment or the 1 year final invoice). For an initial invoice the accuracy of generator and tie-line data is important not only for PS billing but also LSE billing since customer loads are calculated by the NYISO based on load forecast and sub-zonal loads.

The MA must review the NYISO Web Based Reconciliation data each day and investigate discrepancies between MA data and NYISO Performance Tracking System (PTS) data using alternate data sources if available. If a discrepancy exists between PTS and reported MA data in WBR, and the MA has confirmed the accuracy of their hourly data then the MA must notify the NYISO that they believe there may be a problem with the PTS data. This enables the NYISO to look into possible problems with PTS data that is being used in the billing calculations.

Tasks concerning the MA TOL Process:

For rebilling or settlement adjustments calculated after an initial monthly invoice the MA is responsible for reporting customer loads calculated from the Sub-zonal loads. Realizing different processes exist from one MA to another it is still expected that the customer data the

MA is posting using WBR, summed for the loads within a sub-zone, is equal to the sub-zonal load scaled for NYISO calculated losses.

• NYISO Meter Data Responsibilities

The NYISO will provide a schedule named "Tie_Gen_TOL_Status" identifying due dates and status related to NYISO invoices for the generator, tie-line and customer load data.

The NYISO is responsible for maintaining all hardware, software and data in the WBR system.

The NYISO will calculate hourly losses per sub-zone and provide the market participants the data in WBR.

The NYISO will maintain all data uploaded from the MA in the WBR system, along with a history of data changes from the MA. The NYISO will also post the hourly integrated real time data (PTS) for comparison to the reported MA data for each hour. The NYISO uses both the PTS and hourly reported MA data to compute SCD interval level and hourly billing. The ISO shall review the posted PTS data daily for possible anomalies that may have occurred during the measurement process. The NYISO will email an error report the MA's meter data contact person if there is there are a large number of discrepancies between MA and PTS hourly interval data.

The generator, tie-line and load data will be "locked" down by the NYISO and Metering Authorities will be unable to make changes as per the "Tie_Gen_TOL_Status" schedule provided by the NYISO to insure to the market participants that the metering and billing data "lines up".

For months that the NYISO is performing a settlement adjustment prior to rerunning the billing system checks will be performed on the MA reported customer loads to insure that it is within tolerance of the WBR calculated sub-zonal load. The NYISO will notify the responsible MA if there is any thing "out of tolerance".

Definitions to be added to section 1.2 terminology.

- Transmission Owner (TO)
- Power Supplier (PS)
- Load Serving Entity (LSE)
- Performance Tracking System (PTS)
- Security Constraint Dispatch (SCD)
- Meter Authority (MA)
- Advisory Files or Data
- Web Based Reconciliation (WBR)
- Transmission Owner Load (TOL)
- MLOAD?
- DLOAD?

List or table of tie-lines and generators and the assigned MA.