

September 7, 2006

### **CRP – LESSONS LEARNED**

**The following comments on the lessons learned from the initial CRP are submitted on behalf of the New York Transmission Owners, LIPA and NYPA.**

1. The mismatch between the timing of the Reliability Needs Assessment (RNA) and the Comprehensive Reliability Plan (CRP) has resulted in confusion and in the use of out-dated information in the CRP. The CRP and RNA processes should be reconciled with no overlap between successive plans.
2. The NYISO should ensure that all information relevant to the NYISO planning process is included in the CRP. For example, if an action is pending that may affect the CRP but does not meet the criteria for inclusion in the RNA base case, the CRP should make reference to the action and to its potential to affect the RNA.
3. All TO plans to upgrade their systems, including both local and bulk power system upgrades, should be included in the CRP, as provided for in the NYISO tariff. If the NYISO decides not to include any of the planned upgrades in the RNA base case, the NYISO should perform and publish as part of its RNA a sensitivity analysis showing these planned upgrades and their potential to affect the needs identified in the RNA. Providing this sensitivity analysis is necessary to inform market participants of the net needs for the system based on the TO's plans for their own systems.

4. The NYISO should provide a prompt response to any regulated backstop solution proposed by a Responsible TO. If the NYISO concludes that there are deficiencies in the proposed solution, it should promptly provide the specific, rather than general, reasons for its conclusion and clearly identify the information needed from the Responsible TO to revise the proposed solution.
5. The NYISO should work closely with the TOs to ensure that all modeling issues are properly accounted for in the RNA. At the request of a TO, the NYISO should furnish backup information in the form of appropriate computer calculation cases regarding emergency transfer limits. The NYISO should provide to the TOs in advance a list of assumptions that it will make (or changes from the previous base case) in the new RNA/CRP.
6. The NYISO should provide more detail in the RNA regarding limiting elements and contingencies.
7. The NYISO should update the base case and provide to all TOs a list of changes made to their systems in addition to providing the PSS/E raw data or saved case file. This change verification process should be repeated every time the TOs submit changes to the base case. The NYISO should provide the TOs the revised base cases at least two weeks prior to a scheduled coordination meeting.
8. The NYISO should review its process to request TO regulated backstop solutions, market-based solutions and alternate regulated solutions, to ensure consistency with the provisions of Attachment Y of the NYISO OATT.

