

Comments from Mark Chier of NYSEG
9/22/2005

NYISO / MTF,

It is important that the NYISO Metering Strategy, and the Meter Task Force group agree on the overall NYISO metering strategy and the steps that need to be taken in order to determine, and insure the zone, subzone and generation metering system meets acceptable standards. Realizing that the metering systems components can be complex and in many cases difficult to analyze NYSEG and RG&E would like to propose the NYISO and Meter Task Force group consider the following recommendations.

NYSEG / RG&E highly recommend that the NYISO follow the "New York State Meter Engineer's Committee" recommendations concerning revenue metering requirements. These recommendations should be the bases and starting point for the NYISO Metering Strategy. The attached are the initial recommendations from the "New York State Meter Engineer's Committee" (See attached file: hourly_data_recommendation.pdf)

Some important points included in the NYSEMEC recommendations are:

The NYSEMEC cautions the adaptation of the costly wholesale replacement of instrument transformers. Besides being an expensive, and in some cases unnecessary option, the replacement of instrument transformers may provide the least amount of benefit and should be considered as a last resort. Exceptions to this are in extreme cases where other less expensive options are not applicable (e.g. the use of CCVT's as a source for metering potential).

The degree of error in existing installations that do not meet the above minimum specifications can vary. A number of these installations may indeed meet revenue quality standards. To determine the degree of error, evaluation criteria must be developed and agreed to by all stakeholders.

The NYSEMEC recommends that the NYISO defines the criteria for evaluating non-compliant installations (excluding revenue data processes following gross watt-hour validation). The NYSEMEC will support the NYISO in this endeavor.

NYSEMEC recommends that the NYISO encourage the upgrade of installations that do not meet the minimum requirements especially in cases that involve minimum expense but promise to provide maximum benefit. The NYSEMEC recommends that a program be instituted that prioritizes these sites and at the outset, targets those locations that will provide the highest return on investment. Such a program would need to be implemented over a number of years and include a mechanism for cost recovery. In most cases, these "minimum expense", "high benefit" candidates would involve installation of revenue grade meters. Its reasonable to conclude that because the direction of net error is very difficult if not impossible to predict, such a program should be in the best interest of all the stakeholders.

It is recommended the NYISO and MP's create a list of questions and possibly further recommendations to support the NYISO Metering Strategy and consult with the NYSEMEC. It is also recommended that the NYISO use the NYSEMEC as their consultants for any new metering system installations or meter system upgrade determinations. The next NYSEMEC meeting is scheduled for Oct 25, 2005, and from discussions with a member, are open to support the NYISO in this endeavor. It is recommended that the NYISO contact the NYSEMEC to continue with dialog.

Also recommended is to revise the RMRM manual date (07/29/05). Based on the recommendations from the NYSEMEC, replacement of existing instrument transformers may not justify the costs, compared to the increase in accuracy. The RMRM manual should state that if a metering installation is new than section 2.2.2 would be followed, but for existing installations deemed necessary for upgrades, the NYSEMEC believes "in most cases the meter only" would need to be upgraded. In the case of existing installations a separate section in the RMRM manual would state, "overall accuracy of the metering system to be at a minimum of ((?)NYSEMEC recommendation). This would place the metering system within the tolerances of "Revenue Quality" without the requirement of replacing the metering system to satisfy the "metering accuracy components" nameplate requirements.

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hourly_data_recommendation.pdf
(Attachment posted separately to MTF 9/27/05 Meeting Materials)