

**Comments from Mike Cadwalader on the draft T&D Operations Manual are as follows:**

p. A-2-10: 1st para.: "Self-scheduled fixed" is not a term we are using. It should be "self-committed fixed". Check to see if there are other occurrences of "self-scheduled".

Later that page: Need to define "on-control".

pp. A-2-26 and 27: Need to change OH references in text and figures to IMO.

p. A-5-2: Last para.: Prohibition barring ISO-committed units from increasing their incremental bids should only apply to incremental bids for capacity that received a DAM schedule.

p. A-5-3: In bullet 1: I thought that ISO-committed units were not allowed to switch to self-committed status of any sort under any circumstances. This rule should be added, and bullet 1 should only permit shifts to ISO-committed fixed mode of units that were originally committed in ISO-committed flexible mode.

p. A-5-7: Reference to Ex. 4-3 should refer to Ex. 5-3; check other exhibit references.

p. A-5-8: Under price impact, it states, "Ultimately a one-hour granularity will be used..." If a one-hour granularity will be used when SMD 2 goes into effect, "ultimately" should be deleted; otherwise, what will actually be used when SMD2 goes into effect should be described.

p. A-5-19: "Cue" should be "queue". (3 places.)

p. A-5-30: The header for column R1 seems to be garbled. Also, in step 3, what is 3Ld?

p. A-5-31: Step 5 contains a circular reference, as it says, "If steps 3, 4 or 5 are insufficient..."

p. A-5-32: Step 10 contains an outdated reference to "Sections 4.2.3 and 4.2.4"; need to check other section references.

p. A-5-53: The reserve payments section should be deleted. We are instituting a two-settlement procedure for OR.

p. A-6-1 and 2: Both pages state that RTD will dispatch demand-side resources, to the extent it can support their participation. Something stating the extent to which it will be able to support their participation should be added. My recollection is that initially it will not be able to support their participation.

p. A-6-4: The first sentence of 6.2.1 suggests that the ISO will enter RPU mode when "large area control errors occur". Is this the only time it will enter RPU mode? (I think not.) If not, the other circumstances that would cause the ISO to enter RPU mode should also be described. Also, a more concrete description of what constitutes a "large" ACE should be added.

p. A-6-12: In item 2, does the reference to a "reserve availability contract" mean to refer to a "DAM reserve schedule"?

p. A-6-25: In item 1 under SAR procedure, 1st para., who does "its" refer to? I presume the intention is for each control area to keep the NYISO informed. (Is the NYISO the central coordinator for the SAR procedures for all the participating control areas? If not, there are bigger problems in this writeup than I am describing here.) And in the 2nd para., I think the intention is for the NYISO to report these data to the other participants once the area with a problem has reported it to the ISO, but the first step is left out.

In item 2, define "Contingency Area". (I presume it's the area that suffered the loss.)

p. A-6-25: Items 2d, 3a and 5: What does "allocation" mean? Is this the portion of others' reserve requirements that a given control area meets? Item 5 implies this, but items 2d and 3a are less clear. Item 3 also seems to suggest that SAR will ALWAYS kick in whenever any participating control area experiences any loss; is this correct?? In general, the SAR description is not clear.

p. B-10 and following pgs.: First, we need some explanation as to how to use Table B-1. Suppose that, for a given point in time, conditions match the normal box for some criteria, the warning box for others, and the alert box for others. I presume that the system would then be in alert state, but did we say this anywhere? (This description needs to take into account the "N/A" entries and the cases where the same entry appears for more than one state.)

For pre-contingency flows, the table does not cover all situations. Suppose Emergency Transfer Criteria have not been invoked, but flows are greater than the normal rating (but less than or equal to the LTE rating) for more than 30 minutes, but less than 4 hours? This is worse than "warning", but doesn't meet the requirements for "alert" or "major emergency".

Similar concerns that actual voltage and frequency lines are not exhaustive. (E.g., for the latter, suppose we have frequency above 60.10 Hz or less than 59.90 Hz, but it is not sustained. This is worse than "alert" but does not meet the requirements for "major emergency".)

The overgeneration entry should state for how long the problem must persist to cause a major emergency and how close the ACE must approach zero to eliminate the need to go into a major emergency state. (E.g., if we can reduce ACE to 1 MW but can't get it any lower, does that constitute a major emergency? I don't think so, but this definition suggests it is.)

p. B-41: References to TPs should instead be references to TOs.

p. E-1: The bottom line of the table, which states what happens if the answers to the questions in the first two columns are both yes, has been cut off. Consequently, procedures for calculating prices in this circumstance is not defined (although rule A is supposed to apply statewide, per the tariff).

p. E-13: Some words were left off the end of item 3. "Capacity limits in place for that interface" should be added to the end.

p. E-16: In the second paragraph, change "ex ant" to "ex ante".

Also, in the table, there are references to minimum and maximum operating levels. Since some generators will have different UOLNs and UOLEs, the document should clarify just what it means by "maximum operating levels," which presumably is the UOL used in that market. Finally, I think for the last two rows of the table, the external suppliers column should be "N/A". They can't submit minimum operating levels. (And in the 5th row, I think one of the "maximum operating levels" should be a "minimum operating level".

p. E-17: This should be deleted in its entirety, as it is a stopgap that will be replaced under SMD 2.

p. E-18 and 19: First, under Rule A, where's #2? And under Rule B, where are #3, 4 and 5?

Second what are rules A4 and B4?

Third, a number of important references that were included in the original tariff language were eliminated when it was transcribed into the manual, with unfortunate effects. This leaves us with useless tautologies such as the first item under Rule B4 Violation: "The LBMP for each location shall be set to the LBMP calculated for that location." The phrase "calculated using the procedures described in Section E.1", or something to that effect needs to be added in a number of locations:

At the very end of item 5 under Rule A.

After "for that location" in item 1 under Rule A4 Violation.

After "Reference Bus" in items 1, 2 and 6 under Rule B.

After "than the LBMP" in item 7 under Rule B.

At the very end of item 1 under Rule B4 Violation. [Now the sentence quoted above is no longer a tautology.]

After "Reference Bus" in items 2 and 3 under Rule B4 Violation.

p. E-20: The third sentence suggests a zero tolerance for any overgeneration other than circumstances such as RPU's. Is that right?