

## T&D Ops Manual—Select Energy Comments

My comments are keyed to the 12-1-04 redline of the T&D Operations Manual that was circulated.

### 1. Overview

The ISO created a summary document – spreadsheet I believe – that contained the Bulk Power Facilities, A1 and A2 and NYISO Secured System lists. It would be more efficient and less error prone to incorporate that combined table by reference.

2. Section 1.1.3 – The reference in the first paragraph comparing to NYPP and the following two bullets (divestiture and unit commitment) should be struck.
3. Section 1.1.3 last paragraph. The words: “Incremental costs associated with such Applications shall generally be borne by the Locality.” This could be imprecise. The Tariff definition of Locality is aimed at resource adequacy issues not application of uplift. For example, a request by CH for action by the ISO could be construed to apply also to O&R – same zone but different Transmission Districts. Suggested wording: “Incremental costs associated with such Applications shall generally be borne by the zone or zones of the Transmission Owner making the request.”
4. Section 1.2.1 – same comment as in #1 above. Same under NYISO Secured Transmission System.
5. Section 1.2.2 2<sup>nd</sup> paragraph: stike “much like the previous NYPP”.
6. Section 1.2.3 last paragraph – see #1 above
7. Section 1.2.4 – liberally sprinkled throughout – see #1 above
8. Section 1.2.4 – last paragraph. Is the concern only for a *generation* Affiliate? Would not such information be useful to say just a marketing Affiliate?
9. Section 1.2.4 – 11<sup>th</sup> paragraph. While the investigation is fine what are the requirements for and the appropriate entity(ies) to report to?
10. Generator Response During Reserve Activation appears as if it is part of Section 1.2.4 (TO Responsibilities and Authorities). Since most generation has been divested, it would appear that such a section fall under Generator Owner/Operator or some such title; currently appears to be misplaced.
11. Same section, item 2. It seems that On Control units may not be able to return to a base point consistent with LBMP within 3 intervals as AGC may well keep such a unit from being able to do so... They may well be able to get to their AGC BP but that may not necessarily be consistent with LBMP at their location.

Note: this section just seems to be randomly dropped into the manual...

12. Definition of Normal State: suggest rewording to “The Normal state exists when all *relevant telemetered, calculated or observed parameters* or conditions are within their normal boundaries, *ratings* or limits or when facilities have returned to within their normal operating limits. Imminent or immediate operator action is not necessary.”
13. Exhibit 1(?) Energy Market Operations refers to BME and SCD not RTC and RTD.
14. Page 31 or so – there are diagrams of the markets inserted in apparently the incorrect location(s). Also they are not consistent with SMD2 – BME and SCD still used.
15. From Exhibit 1-3, Item 16. “The SE is used to verify metered data and to estimate conditions that are not metered.” Substitute “data values” for “conditions”.
16. Section 1.3.2 Initiated by NYISO Shift Supervisor. Is the last sentence – about who usually speaks - really useful?
17. Section 1.3.4. “Analog data” suddenly appears without even a brief explanation of the separate system of telemetry of key data values provided by the analog system opposed to the bulk of the data being scanned in from the TO Control Centers.  
  
A brief introduction to this separate system would seem appropriate.
18. Section 1.3.5; Item 2.b Use “Line ratings and transfer limits” instead of current wording.
19. Section 1.3.6 Last paragraph. This indicates carrying enough 10 Min reserve to cover “...the loss of energy purchased from another control area,..”. Since the TTC with PJM is in the range of 2500 Mws (normally) this implies that NY has to have that much 10 Min reserve. Is this actually correct?
20. Section 1.3.7 Regulation Requirement; 1<sup>st</sup> paragraph. This seems to ignore the in place process for setting the reg reqt we now use. It is no longer just cap period based.
21. Section 1.4.1 Item 1. “Coordinate with *Eligible Customers* and other Control Areas”. With direct gen control some of the listed actions do not involve the TO directly. Same issue under Section 1.4.2
22. Section 1.4.1 Other Considerations. The words “these criteria” appear several times. Perhaps a clearer wording would be “Normal State criteria”.

Item 4 in this section should clarify that TO’s coordinate actions to maintain voltage levels with generators (or perhaps Eligible Customers). Most control comes from

gens that the TOs do not own or directly control. This idea applies in Section 1.4.2 as well. Section 1.4.3 AVR/PSS coordination refers to coordination efforts with generators so it seems that inclusion in the other referenced sections is appropriate.

Item 5 in this section allows for import of energy for security reasons – does this constitute an Emergency Energy Purchase? If so, it should so indicate as there are market implications to that action. It appears that such a purchase is not a defined term in the OATT or MST; at least there should be reference to the Interconnection Agreements with adjacent Control Areas...

23. Section 1.4.2 Item L. Consider use of Eligible Customer load opposed to Market Participant load? Or, simply use end user load (unfortunately end user is not a defined term...)
24. Section 2.2.5 Should this section indicate that the operating capability portion of the assessment is based upon supplier submitted bids (UOLn or UOLe)? The ISO may know about planned and scheduled outages but the available cap would seem to be driven by that offered to the market in any given day...
25. Exhibit: Corrective Control Strategies (page 53) This shows use of Pumped Storage in Pump mode for under-frequency conditions as well as in Generate mode for over-frequency conditions. This appears to be counter-intuitive.
26. Section 3.2.4 PARs ConEd/PSEG. The last paragraph under the ConEd/PSEG Responsibilities likely should be struck until such time the FERC filings over the settlement agreement are filed and accepted by FERC. Further, saying PSEG can “transfer 1000 Mws” without defining source and sink seems ludicrously under-defined.
27. Section 3.2.5 PAR Operations. To my recall the ISO now does day ahead PAR optimization for many PARs and the schedules are NOT determined by the TO. Also, while the TO’s may have physical control over the PAR settings, the section should make it clear that the ISO determines (or must agree to a determination) of a schedule. As it reads, it sounds as if two or more TOs can shift PARs around on their own.
28. Section 3.2.6 Implementing Special MCEs. Item 1. There appears to be a legacy concern in being able to model some contingencies. At least in real time it would seem that the State Estimator would eliminate these concerns. Perhaps this wording needs some review.
29. Section 3.2.9. Item 1 under procedure. Should read “...facility exceeds its applicable *rating*...”. The context here is thermal concerns for which elements have ratings; limits are applied to transfers on groups of lines comprising interfaces.

30. Section 4.2.10 RT-AMP In the first three paragraphs the term “significant” is used to describe the potential impacts of bid behavior. The MMP has specific criteria set out for bid behavior that is or is not acceptable. It seems the MMP should be referred to rather than use of the generalized term “significant”.
31. Section 4.3.1 Interchange Scheduling. Change Item2 to read “Instantaneous *Actual* Net Interchange”.
32. Summary Table: Scheduling and Physically Curtailing Firm Bilateral Transactions. Descriptions come asterisked – Price Capped Loads for one – but no asterisked note is provided.

Also, External Load (Export) Column (4). Claims “...total exports limited to ATC” – since this is DA, isn’t it capped by the TTC? Even PSTs go through the DA evaluation. This is in columns (6) and (7) though in (7) it says the “...applicable ATC” (maybe that means the most constraining of the import or export limit on a WT or maybe it infers the ATC could equal the TTC...

33. Section 4.3.12 Scheduling and Dispatching LBMP Suppliers and Loads. Same issue with asterisked items in the table. Why is (3) “*Up to Full Requested Amount of Fixed Mws*” under Day Ahead – these are price taking bids to cover load so why is it up to? The only reason not all of the load were covered would be under some emergency condition – and this should be footnoted this way.

Row B (Hour Ahead), Column (2) – GTs are managed by RTC not RTD.

Does the asterisked comment at the bottom of the table apply to Fixed Load and PCL bids? It seems that there should be a statement at the beginning that binds any financial solution to a physically compatible outcome.

34. Section 4.3.13 CLRs and ELRs. Is this compatible with what we discussed at MSWG on 12-14?
35. Section 4.3.14 Inter-Control Area ICAP Energy. Rather than just indicate the NY requirements if an external ICAP resource is needed in NY, shouldn’t the manual recognize the rules and constraints that may be imposed by neighboring CA? For example, to get a NE unit on with an export at the next RTC interval would likely require a Self Schedule to be submitted and accepted by ISONE etc.
36. Section 4.3.15 EDRP General comment: Should things like the last sentence before Voluntary Participation (the 100kW limit), the payment amounts under NYISO Notification subsections and the last paragraph under NYISO Notification (EDRP program expiration) be in the T&D Ops Manual?

This requires that these Manuals stay in synch with each other. What is important here is the scheduling of EDRP, time notices etc. Settlement should be left to the

EDRP Manual or the Tariff. Same applies to SCRs.

37. Section 4.4.9 Item 3. My recall is the ISO uses fixed reserve requirements so there should not be any updates to the requirement; though maybe to the availability. In any case shouldn't the word "any" be used in place of "the"?

38. Section 4.4.10 Doesn't change to the Conduct and Impact Thresholds require FERC approval as they exist in a FERC approved MMP? This sounds like the MMU could change at their whim...

39. Exhibit 4-11. In the column under Energy it says "On Control or On Dispatcher – Off Dispatch" What does that mean? Also, under SMD2, On Dispatch is now Flexible?

The definition of FRED repeats "FRED" thrice – couldn't one paragraph suffice?

The table structure is unclear (in redline mode anyway) but units that are not Flexible are not permitted to provide reserve – and the table seems to indicate otherwise... The section below the table continues with On-Dispatch terminology.

40. SRE Procedures: Resource Monitoring Procedures. Replace all occurrences of "should" with "shall".

41. SRE Replacement Decision Tables. Seems these simply indicate that (1) you must replace what is missing and (2) that it has to be in the correct location. These tables are overkill.

42. Section 30.2.10 SRE Pricing and Cost Allocations only appears as a heading but with nothing substantive below it – well maybe it begins on page 134. Further, is the T&D Ops Manual the appropriate place for pricing and cost allocation descriptions? Cost allocation, at a minimum seems to be inappropriate for this manual.

43. Section 36.2.10 Locational Reserves. Why are the locations for reserves not given here?

44. Section 5.2.11 – currently struck. LBMP calculations show up as not struck. These calculations should be confined to locations like Att j to the OATT etc.

Same with table of "Summary of Suppliers that can set LBMP"

45. At page 168 we hit Transmission Facilities Lists. See much earlier comment about incorporation by reference the document that Operations prepared that listed facilities and which list they were on A1, A2 etc. Continuation of multiple lists will ensure that disagreements arise.

46. Appendix E LBMP. Inclusion of all of this needs careful scrutiny. Part E.1 which is a repeat of what is in the Tariff likely should be excluded as repetitive and possibly

open to errors being introduced. Same holds for parts E.2 thru E.7. At quick glance I did NOT see reference, for example, to the Demand Curves in the shortage pricing section. That is a bad oversight... They do in fact describe the current shortage pricing rules...

Perhaps we need to consider entirely separate docs for these key provisions and incorporate by reference. Perhaps what is needed should be solely the province of the Tariff section(s) they are now in.