

2020 RNA Reliability Needs Assessment

Comprehensive System Planning Process

A Report by the New York Independent System Operator

> DRAFT 3 Report For October 5, 2020 ESPWG/TPAS



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Executive Summary

This 2020 Reliability Needs Assessment (RNA) provides an evaluation and review of the reliability of the New York bulk electric grid through 2030, considering forecasts of peak power demand, planned upgrades to the transmission system, and changes to the generation mix over the next ten years. The RNA assesses an actionable "base case" set of assumptions, as well as various scenarios that are provided for information. This RNA base case includes projected impacts driven by limitations on generator emissions, while the scenarios include an in-depth look at certain policy goals from the Climate Leadership and Community Protection Act. The RNA also discusses the reliability risks associated with the cumulative impact of environmental laws and regulations, which may affect the availability and flexibility of power plant operation.

COVID-19 Impacts on Demand

The coronavirus outbreak has had a significant impact on New York's economy due to reductions in commercial and industrial activity as New Yorkers adjust their lives by working from home and limiting social interaction. Due to the rapidly evolving nature of the pandemic, the demand forecasts utilized in this study reflect the NYISO's perspective as of April 2020. The sudden departure from historical behavioral patterns caused by New York's response to COVID-19 is unprecedented and creates unique challenges to forecasting the state's energy needs. As the situation evolves and more data becomes available, the NYISO will continue to monitor these forecasts and adjust course accordingly. As further described in the "Next Steps" section, following approval of the RNA by the Board and prior to any solicitation of solutions, the NYISO will consider updates to the peak load forecasts and determine to what extent the forecasts impact any identified system needs.

Actionable Reliability Needs

This 2020 RNA has identified violations or potential violations of reliability criteria ("Reliability Needs") in the base case throughout the entire study period (2024-2030) due to dynamic instability, transmission overloads, and resource deficiencies.¹ The issues identified are primarily driven by a combination of forecasted peak demand and the assumed unavailability of certain generation in New York City affected by the "Peaker Rule."

In 2019, the New York State Department of Environmental Conservation adopted a regulation to limit nitrogen oxides (NOx) emissions from simple-cycle combustion turbines (referred to as the "Peaker

¹ Effective May 1, 2020, the scope of the RNA is limited to years 4-10 of the planning horizon while the NYISO Short-Term Reliability Process is responsible for years 1-3 and also assesses years 4-5.

Rule²,"). Combustion turbines known as "peakers" typically operate to maintain bulk power system reliability during the most stressful operating conditions, such as periods of peak electricity demand. Many of these units also maintain transmission security by supplying energy within certain constrained areas of New York City and Long Island — known as load pockets. The Peaker Rule, which phases in compliance obligations between 2023 and 2025, will impact turbines located mainly in the lower Hudson Valley, New York City, and Long Island. The Peaker Rule required all impacted plant owners to file compliance plans by March 2, 2020. The plans indicate approximately 1,500 MW of peaker capability would be unavailable during the summer by 2025 to comply with the emissions requirements. A subset of those generators would be unavailable starting in 2023.

With the peakers unavailable, the bulk power transmission system could not securely and reliably serve the forecasted load in New York City (Zone J) throughout the study period. Following the initial phase of the Peaker Rule in 2023, instability of the grid may occur due to a lack of dynamic reactive power capability and inertia available to parts of the New York City grid. These reliability issues include low transient voltage response, loss of generator synchronism, and undamped voltage oscillations. With full implementation of the Peaker Rule in 2025, several 345 kV circuits in the Con Edison service territory would not meet transmission security requirements equating to a deficiency of 700 MW and increasing to at least 1,075 MW by 2030. The duration of the deficiencies range from nine hours in 2025 (3,853 MWh) to 12 hours in 2030 (7,672 MWh). Similar transmission deficiencies would also occur within pockets of Con Edison's non-bulk system (138 kV), ranging in duration from 10 to 14 hours.

In addition to the transmission security issues, overall resource adequacy deficiencies in Zone J would begin in 2027 and increase to at least 350 MW through 2030. Resource adequacy is the ability of the electric systems to supply the aggregate electrical demand and energy requirements of the customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements. The NYISO performs resource adequacy assessments on a probabilistic basis to capture the random nature of system element outages. The New York system is deemed to have sufficient resources if the probability of an unplanned disconnection of firm load (loss of load expectation, or "LOLE") is equal to or less than the standard of once in every 10 years or 0.1 events per year.

Figure 1 below quantifies each Reliability Need through the study period in terms of generic compensatory resources, in megawatts (MW) or megavolt-amperes (MVA). Compensatory MW/MVA amounts are determined by adding generic "perfect capacity" resources to NYISO zones or substations to effectively satisfy the needs. "Perfect capacity" is a term used to describe resources that are always able to

² <u>https://www.dec.ny.gov/regulations/116131.html</u>

produce energy on demand, without any limitations due to factors such as equipment failures or lack of fuel, without energy duration limitations, and without consideration of transmission security or interface impacts. Actual resources would need to be larger in order to achieve the same impact as perfect-capacity resources. The Reliability Needs could be met by combinations of solutions including generation, transmission, energy efficiency, demand response measures, or changes in operating protocols. All Reliability Needs occur within Con Edison's transmission district in New York City (Zone J). Therefore, Con Edison is the Responsible Transmission Owner for regulated backstop solutions, as defined by the NYISO OATT.

		Bulk Facilities	Non-Bulk Facilities			
Study Year	Resource Adequacy (Zone J, MW)	Transmission Dynamic Loading Instability (Zone J, MW) (Zone J, MVA)		ConEdison Astoria East/ Corona 138 kV (MW)	ConEdison Greenwood/Fox Hills 138 kV (MW)	
2024	below criterion	below criterion	490	115	below criterion	
2025	below criterion	700	1,020	110	360	
2026	below criterion	760	1,080	115	350	
2027	100	820	1,140	120	360	
2028	150	900	1,210	125	360	
2029	300	990	1,300	170	370	
2030	350	1,075	1,390	180	370	

Figure 1: Summary of Reliability Needs (Compensatory MW/MVA)

In addition to the base case set of assumptions and findings, the RNA provides an assessment of risks to the bulk electric grid under certain scenarios to inform stakeholders and policymakers of potential alternate outcomes. Scenarios are variations on key base case assumptions such as higher load forecast, capacity removal, or deviations from assumed system plans. If they occurred, the events analyzed in the scenarios could change the timing, location, or degree of reliability issues identified in the base case. Each of these variations of the base case for this 2020 RNA indicates potential increased risks of reliability criteria violations in the future. The scenarios include higher peak load than forecasted, additional generator retirements, and "status quo" in which major transmission and generation plans fail to come to fruition.

"70x30" Scenario

The Climate Leadership and Community Protection Act (CLCPA) mandates that New York consumers be served by 70% renewable energy by 2030 ("70x30"). The CLCPA includes specific technology based targets for distributed solar (6,000 MW by 2025), storage (3,000 MW by 2030), and offshore wind (9,000 MW by 2035), and ultimately establishes that the electric sector will be emissions free by 2040. Significant shifts are expected in both the demand and supply sides of the electric grid, and these changes will affect how the power system is currently planned and operated. Beginning with the 2019 Congestion Assessment and Resource Integration Study (<u>CARIS</u>), the NYISO conducted a production cost simulation of a "70x30" scenario of two potential load levels and corresponding resource mixes in order to examine potential system constraints, generator curtailments, and other operational limitations. This *2020 RNA*, along with the *Climate Change Impact and Resilience Study*, build upon the findings of the *2019 CARIS*, and provide further insight focusing on system reliability aspects, such as transmission security and resource adequacy.

As policymakers advance the implementation plan of the CLCPA, the NYISO assessments are intended to complement their efforts, and are not intended to define the specific steps that must be taken to achieve the policy goals. Additional refinements in assumptions, models, and methods in the following years will be necessary as more information becomes available from the perspective of policy implementation.

This 70x30 scenario utilizes the same load forecasts and renewable resource mixes from the 2019 CARIS 70x30 scenario. Approximately 110 sites of land-based wind, offshore wind, and utility-scale solar were added to the system model along with additional behind-the-meter solar across the system. Initial resource adequacy simulations did not identify a measurable loss-of-load expectation in either the higher energy 'Base Load' case or lower energy 'Scenario Load' case. This result indicates a significant surplus of generation resources in the model, equivalent to an installed capacity margin of 210% for the Base Load case and 235% for the Scenario Load case.

In an electric grid with such excess capacity resources, it is reasonable to expect less efficient generation would retire. For this scenario, the NYISO conducted an age-based retirement analysis by removing fossil fuel generators, starting with the oldest, until the New York system is at the resource adequacy reliability criteria. This age-based method is a simple analytical approach as a proxy to represent unit retirements that may occur as surplus resources increase over time. In reality, many factors will affect specific generator status decisions. For the Base Load case approximately 2,800 MW of fossil generation could be removed before the resource adequacy criteria is exceeded, resulting in an installed capacity margin of 191.8%. For the Scenario Load case the installed capacity margin is173.4% following approximately 12,300 MW of fossil generation removals. Additional analysis demonstrated that alleviating renewable generation pocket transmission constraints, while beneficial from an energy perspective as demonstrated in the 2019 CARIS, would not materially impact the reliability-based need for additional generation resources. Figure 2 and Figure 3 show the resulting resource mix for each case.



Figure 2: Resource Mix in the 70x30 'Base Load' Case at Reliability Criterion





The NYISO also conducted sensitivity analysis of these resource mixes for the retirement of the nuclear fleet, and for the consideration of energy storage resources. Retirement of nuclear plants would result in less surplus capacity and therefore more conventional generation (currently fossil-fueled) would need to be retained in order to maintain a reliable system. Energy storage resources may provide a benefit to the system from a reliability standpoint by assisting in meeting peak load (benefits depending on the size, location, and duration of capacity shortfalls), thus allowing for additional fossil units to be retired. Energy storage resources with a duration longer than four hours would provide additional benefit to the system.

The NYISO performed transmission security analysis for the 70x30 Base Load case considering various load levels and coincident intermittent renewable resource generation for a sample hours throughout the year. The results conclude that certain transmission constraints are observed during times of high renewable output, while other constraints would occur under peak load conditions if the intermittent renewable resources are not generating. Dispatchable resources would be needed to fill the gaps created when intermittent renewable resources are not producing energy. Even with a large amount of installed capacity of renewable resources, there would still be a need for significant dispatchable generation to meet reliability requirements at various times throughout the year, including peak load. To maintain system transmission security, approximately 750 MW of dispatchable resources would be needed in addition to the 24,700 MW of dispatchable resources remaining in the model *(i.e.* after age-based removals and peakers).

The NYISO will continue to monitor and track system changes. Subsequent studies, such as the Comprehensive Reliability Plan, the next Reliability Planning Process and Economic Planning Process cycles, and the Climate Change Impact and Resilience Study, will build upon the findings of this 70x30 scenario.



Next Steps

The RNA is the first step of the NYISO Reliability Planning Process. Following NYISO Board approval of the RNA, additional steps are taken, as necessary, to mitigate the identified Reliability Needs. These steps are undertaken to minimize unnecessary solicitations of solutions to the Reliability Needs. Under this process, the NYISO requests updates to the status of proposed projects such as Local Transmission Owner Plans (LTPs), proposed generation and transmission, and demand response. As part of this step, the NYISO will consider updates that meet the inclusion rules, and if necessary, will solicit solutions to the remaining Reliability Needs. The NYISO would then proceed to assess the viability and sufficiency of each of the solutions, as well as to evaluate and select the more efficient and cost effective transmission solution(s) to satisfy the needs, leading to the development of the Comprehensive Reliability Plan (CRP).

The Comprehensive Reliability Plan provides the plan to maintain system reliability and documents the solutions determined to be viable and sufficient to meet any identified Reliability Needs. If applicable, the Comprehensive Reliability Plan ranks any regulated transmission solutions submitted for the Board to consider for selection of the more efficient or cost effective transmission project. If built, the selected transmission project is eligible for cost allocation and recovery under the NYISO's tariff. Other nontransmission solutions, if built, will recover their cost under state law, such as through retail tariffs established by the New York State Public Service Commission (PSC) and the rates established by the New York Power Authority and the Long Island Power Authority.

Additionally, the needs identified in the Short Term Reliability Process in year 1 through year 3 will be addressed in the applicable quarterly Short Term Assessment of Reliability (STAR), while the needs identified in years 4 and 5 will only be addressed using the Short-Term Reliability Process if the identified Reliability Need cannot timely be addressed through the Reliability Planning Process.



1. Introduction

This report sets forth the NYISO's 2020 RNA and scenario findings for the newly redefined Study Period of years 4 through 10 (*i.e.*, years 2024 through 2030). The RNA is the first of two main components of the Reliability Planning Process, which is one of the three processes that comprise the NYISO's Comprehensive System Planning Process (see Figure 4). The RNA is performed to evaluate electric system reliability according to resource adequacy and transmission security criteria over the Study Period.



Figure 4: The NYISO's Comprehensive System Planning Process (CSPP)

The RNA is developed by the NYISO in conjunction with stakeholders and all interested parties as the first step in the Reliability Planning Process. The RNA assesses the reliability of the New York Bulk Power Transmission Facilities (BPTFs) as the foundation study used in the development of the NYISO Comprehensive Reliability Plan (CRP). Two major study types are performed: resource adequacy and transmission security, over the RNA Study Period (*i.e.,* year 4 through year 10, 2024-2030). If the RNA identifies any violation of reliability criteria³ for BPTFs, the NYISO will report a Reliability Need quantified by an amount of compensatory megawatts (MW) in a location that would resolve that need. After the

³ A condition identified by the NYISO in the RNA as a violation or potential violation of Reliability Criteria as defined by the OATT.

NYISO's Board approval of the RNA and if any Reliability Needs are left after the post-RNA Base Case updates process, the NYISO will solicit market-based solutions, designate one or more Responsible Transmission Owners (TOs) to develop regulated backstop solutions to address each identified Reliability Need, and solicit alternative regulated solutions from interested parties.

The CRP details the NYISO's plan for continued reliability of the BPTFs during the Study Period and identifies additional resources, or combinations of resources, that resolve any identified criteria violations in the RNA. New or proposed resources included in the CRP may be provided by market-based solutions developed in response to market forces, and by the request for solutions. If the market does not adequately respond, reliability will be maintained by either regulated backstop solutions developed by the Responsible TOs, which are obligated to provide reliable service to their customers, or alternative regulated solutions being developed by Other Developers. To maintain the long-term reliability of the BPTFs, these additional resources must be readily available or in development at the appropriate time to address the identified need.

Proposed solutions that are submitted in response to an identified Reliability Need are evaluated in the development of the CRP and must satisfy reliability criteria. However, the solutions submitted to the NYISO for evaluation in the CRP do not have to be in the same amounts of MW or locations as the compensatory MW reported in the RNA. There are various combinations of resources and transmission upgrades that could meet the needs identified in the RNA. The reconfiguration of transmission facilities and/or modifications to operating protocols identified in the solution phase could result in changes and/or modifications of the needs identified in the RNA.

This report begins by highlighting the changes to the Reliability Planning Process recently implemented in the NYISO's tariffs and procedures. Next, this report summarizes the prior Reliability Planning Process findings and reliability plans. The report continues with a summary of the load and resource forecast for the RNA Study Period, the RNA Base Case assumptions and methodology, and the RNA findings. Detailed analyses, data and results, and the underlying modeling assumptions are contained in the appendices.

Along with addressing reliability, the Reliability Planning Process is also designed to provide information that is both informative and of value to the New York wholesale electricity marketplace and federal and state policymakers. For informational purposes, this RNA report reviews activities related to environmental regulatory programs and other relevant developments. The RNA report also provides the latest historical information for the past five years of congestion, and related data is posted on the NYISO's website.



An overview of the Reliability Planning Process is illustrated in Figure 2 in **Appendix B** and is described in the Reliability Planning Process Manual.



2. Overview of Reliability Planning Process Changes

The current Reliability Planning Process was approved by the Federal Energy Regulatory Commission (FERC) and its requirements are contained in Attachment Y of the NYISO's Open Access Transmission Tariff (OATT). A detailed process description is contained in the Reliability Planning Process Manual.

In 2019, a major planning process was carved out of the Reliability Planning Process and defined as the Short-Term Reliability Process (STRP). This process was approved by the FERC and its requirements are contained in Attachments Y and FF of the NYISO's OATT. With this process in place, the Reliability Planning Process's Study Period changes from a year 1 to year 10 analysis, into a year 4 to year 10 look ahead. At the same time, the STRP evaluates year 1 through year 5 from the Short Term Assessment of Reliability (STAR) Start Date, with a focus on Short-Term Reliability Needs arising in years 1 through 3 of the Study Period. Each quarterly STRP concludes if the STAR or Generator Deactivation Assessment does not identify a STRP Need, and states whether a STRP Need will be addressed in the Reliability Planning Process or in the STRP.

Short-Term Reliability Process Needs that arise in the Near Term (within three years) will be addressed using the Short-Term Reliability Process (STRP). Short-Term Reliability Process Needs that are not Near-Term needs on the BPTF will only be addressed using the STRP if an identified Reliability Need cannot timely be addressed through the ISO's Reliability Planning Process. If the Reliability Need is handled through the STRP, the NYISO will solicit market-based solutions of all types, a regulated transmission solution(s), and service offers from Generators, as appropriate. The NYISO will select a solution(s) consistent with the STRP process which may include selecting Generators to remain in service under temporary reliability must run (RMR) agreements until the transmission solution is complete.

One of the changes to the Reliability Planning Process, which was first implemented in the *2016 RNA*, is providing initial ("1st pass") RNA results to stakeholders, usually in June of the first year of the biennial planning process. The stakeholders can provide project updates focused on reducing or eliminating the initial Reliability Needs, such as:

- Updated LTPs
- Changes in BPTFs
- Changes in available resources such as generating unit status or authority to operate in current equipment configuration past a date certain (*e.g.*, due to a new or amended environmental laws or regulations)⁴

⁴ This change was implemented in the RPP Manual in 2019.



• Changes in load forecast or demand response resources.

If the NYISO determines that an update does not meet the inclusion rules and/or does not impact the preliminary Reliability Need, the NYISO will not incorporate the change into the final RNA Base Case.

After the NYISO Board of Directors approves the RNA Report, and before NYISO issues a solicitation for regulated backstop, market-based, and alternative regulated solutions, the NYISO will request updated LTPs, NYPA transmission plans, and other⁵ status updates relevant to reducing, or eliminating, the Reliability Needs, as timely received from Market Participants, Developers, TOs, and other parties. Changes that would tend to increase the scope of Reliability Needs after the RNA lockdown date will be handled in the STRP or a future RNA, as appropriate. The NYISO will then request solutions for the remaining Reliability Needs, if any.

The 2018 version of the Reliability Planning Process Manual reflected a change in the "RNA Base Case Development Process" section, mainly related to the Base Case inclusion rules applicable to proposed projects, and also to the treatment of generation deactivations in the RNA Base Case. Specifically, additional considerations were added in 2019 to reflect situations in which a Generator Owner lacks authority to operate in its current equipment configuration past a date certain (*e.g.*, due to a new or amended environmental law or regulation).

Further details of the Reliability Planning Process and STRP are contained in **Appendix B** of this report, and also in the <u>Reliability Planning Process Manual</u> located on the NYISO website.

⁵ This change was implemented in the RPP Manual in 2019.



3. Summary of Prior Comprehensive Reliability Plans

This RNA is the tenth RNA the NYISO has conducted since the reliability planning process was initially approved by FERC in December 2004. The first three RNA reports identified Reliability Needs and the first three CRPs (2005-2007) evaluated the market-based and regulated backstop solutions submitted in response to those identified needs. The *2009 RNA* and the *2010 RNA* indicated that the system did not exhibit any violations of applicable reliability criteria. Accordingly, the NYISO did not solicit solutions under the Comprehensive Reliability Plan (CRP) process. The *2012 RNA* identified Reliability Needs, and the *2012 CRP* evaluated market-based and regulated solutions in response to those needs.

The *2014 RNA* identified both resource adequacy and transmission security related Reliability Needs, which were subsequently eliminated by the system updates received during the 2014 CRP process.

The *2016 RNA* identified two transmission security Reliability Needs beginning in 2017: the New York State Electric & Gas Corp. (NYSEG) Oakdale 345/115 kV transformer, and the Long Island Power Authority (LIPA) East Garden City to Valley Stream 138 kV line. Subsequent to the October 2016 approval of the RNA, and prior to the start of the CRP, NYSEG and LIPA provided updates to their LTPs. With these updates the two identified Reliability Needs were resolved, and there was no solicitation of solutions under the 2016 Reliability Planning Process cycle.

The *2018 RN*A concluded that the New York State Bulk Power Transmission Facilities will meet all applicable reliability criteria over the 2019 through 2028 study period.

The NYISO has not previously triggered any regulated backstop solutions to meet previously-identified Reliability Needs due to changes in system conditions and the sufficiency of market solutions coming into service.

Figure 5, below, presents the market solutions and TOs' plans that were submitted in response to previous requests for solutions.



Figure 5: Current Status of	Tracked Market-Based Solutions and TOs' Plans
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Queue #	Project	Submitted	Zone	Original I/S Date	Proposal Type	Target I/S	Included in the 2020 RNA Final Base Case
339	RG&E Station 255	CRP 2012	В	N/A	TO Plan	W 2020	Yes
N/A	National Grid Clay-Teall #10 115kV	CRP 2012	С	N/A	TO Plan	W2020	Yes
N/A	NYSEG Terminal upgrades, on Stolle Road- Gardenville 230 kV Line #66	RNA 2016	A	2019	TO Plan	I/S	Yes
N/A	RG&E Terminal upgrades, on Clay- Pannell PC1 and PC2 345 kV lines.	RNA 2016	С	2019	TO Plan	S2019	Yes
N/A	NYSEG Oakdale 345/115 kV 3rd transformer and substation reconfiguration.	CRP 2016	С	2021	TO Plan	W2021	Yes
N/A	National Grid Clay-Dewitt #3 115kV	CRP 2014	С	2017	TO Plan	W2020	Yes
N/A	Orange and Rockland West Haverstraw 345/138 kV transformer addition	RNA 2018	G	S2021	TO Plan	S2021	Yes
N/A	Brookhaven to Edwards Ave 138 kV line ratings increase, addressing the overload in Eastern Long Island from Y2028	RNA 2018	К	2019	TO Plan	S2019	Yes



4. Regulatory Policy Activities

At the federal, state, and local levels, public policy initiatives are shaping the grid of the future. How the grid is operated to maintain reliability and economic efficiency while achieving these policies requires careful and informed operations, market design, and planning. From this perspective, the NYISO is examining a number of public policy initiatives, and engaging stakeholders and policymakers to identify the challenges and opportunities these initiatives may present to bulk power system reliability and efficiency.

Two initiatives in particular will lead to large changes in the type of resources available to serve the demand in New York. First, the New York State Department of Environmental Conservation (NYSDEC) "Peaker Rule" requires significant emission reductions from older high-emitting gas turbines, or "peakers," such that affected units may be unavailable as early as 2023. The RNA base case accounts for potential impacts from the unavailable generation.

Second, the Climate Leadership and Community Protection Act (CLCPA) is a state law shaping how energy will be supplied in New York State. The CLCPA calls for growing the portion of consumed energy served by renewable resources to 70% by 2030. Looking beyond 2030, the CLCPA requires a zeroemission grid by 2040. The RNA 70x30 Scenario in conjunction with other studies being performed by the NYISO, such as the *Climate Change Impact & Resilience Study*, takes an initial review of the reliability implications of the CLCPA targets.

PUBLIC POLICY INITIATIVE	POLICYMAKING ENTITIES	PUBLIC POLICY GOALS	PUBLIC POLICY IMPLICATIONS
"Peaker Rule" Ozone Season Oxides of Nitrogen (NOx) Emissions Limits for simple cycle and regenerative combustion turbines	New York State Department of Environmental Conservation (DEC)	Reduce ozone-contributing pollutants associated with New York State-based peaking unit generation. Compliance obligations phased in between 2023 and 2025	DEC rule impacts approximately 3,300 MW of peaking unit capacity in New York State. The NYISO is analyzing compliance plans through its Reliability Needs Assessment (RNA) to determine whether they give rise to reliability needs. Current compliance plans indicate 1,500 MW of capability will be unavailable in 2025.
Indian Point Deactivation	Agreement between New York State and Entergy	Deactivate Indian Point units 2 and 3 by 2020 and 2021, respectively	The NYISO issued a deactivation assessment finding no reliability need associated with deactivation of Indian Point's 2,311 MW assuming the addition of certain expected resources. Subsequently, unit 2 deactivated on April 30, 2020. Unit 3 is scheduled to deactivate in April 2021

Figure 6: Summary Table of Key Environmental Regulations and Energy Policies



PUBLIC POLICY Initiative	POLICYMAKING ENTITIES	PUBLIC POLICY GOALS	PUBLIC POLICY IMPLICATIONS
New York City Residual Oil Elimination	City of New York	Eliminate combustion of fuel oil numbers 6 and 4 in New York City by 2020 and 2025 , respectively	2,946 MW of installed capacity affected by rule
CO2 Performance Standards for Major Electric Generating Facilities	New York State Department of Environmental Conservation (DEC)	Establish restrictions on carbon dioxide emissions for fossil fuel- fired facilities in New York by 2020	As of April 2020 , all coal-fired generation facilities supplying the bulk power system deactivated. NYISO generator deactivation assessments found no reliability needs associated with these deactivations
Regional Greenhouse Gas Initiative (RGGI)	New York and other RGGI states	Reduce carbon dioxide emissions cap by 30% from 2020 to 2030 and expand applicability to currently exempt "peaking units" below current 25 MW threshold	The NYS DEC proposed to expand applicability in NYS to generators of 15 MW or greater, whereas current rules do not apply to generators less than 25 MW
Climate Leadership and Community Protection Act	New York State Public Service Commission, New York State Energy Research and Development Authority, New York State Department of Environmental Conservation, Climate Action Council	6,000 MW of distributed solar installed by 2025, 185 trillion BTU reduction in total energy consumption, including electrification to reduce fossil fuel use in buildings by 2025, 3,000 MW of storage installed by 2030, 70% of load supplied by renewable resources by 2030, 9,000 MW of Offshore Wind Installed by 2035, 100% of load supplied by zero- emissions resources by2040	Transformation of the power grid, necessitating examination of market structures, planning processes, flexible load, and investment in bulk power system infrastructure
NYS Accelerated Renewable Energy Growth and Community Benefit Act	Office of Renewable Energy Siting (ORES) within the NYS Department of State, New York State Public Service Commission, New York State Energy Research and Development Authority (NYSERDA)	Provides for an accelerated path for the permitting and construction of renewable energy projects instead of through the Article 10 power plant siting law. Requires a comprehensive study to identify cost-effective distribution, local and bulk electric system upgrades to support the state's climate goals, and filing of the study with the New York State Public Service Commission	Intended to help accelerate siting of eligible renewable resources in support of state policy goals. Intended to establish new transmissioninvestmentpriorities to facilitate the achievement of state policies

Peaker Rule: Ozone Season Oxides of Nitrogen (NO_x) Emission Limits for Simple Cycle and Regenerative Combustion Turbines

In December 2019, the DEC issued requirements to reduce emissions of smog-forming pollutants from peaking generation units. Combustion turbines known as "peakers" typically operate to maintain bulk power system reliability during the most stressful operating conditions, such as periods of peak electricity demand. In addition, these units are often called upon at any time, seven days a week and 24 hours a day, to be able to respond to contingencies or other near real time changes on the electric system. By being

available on call, the peakers provide value to system reliability even when not actually generating power. Many of these units also maintain transmission security by supplying energy within certain areas of New York City and Long Island — known as load pockets. Load pockets represent transmission-constrained geographic areas where electrical demand can only be served by local generators due to transmission limitations during certain operational conditions.

The Peaker Rule⁶, which phases in compliance obligations between 2023 and 2025, will affect approximately 3,300 MW of simple-cycle turbines located mainly in the lower Hudson Valley, New York City and Long Island. The rule required peaking unit owners to submit compliance plans to the DEC in March 2020. These generator compliance plans informed the NYISO's *2020 Reliability Needs Assessment* (RNA) base case assumptions for years 2024-2030. The proposed plans are also being examined in the NYISO Short-Term Reliability Process for the years 2021-2025. The rule provides a phased reduction in emission limits, in 2023 and 2025, during the ozone season (May 1-September 30) and allows several options for achieving compliance with the new lower limits applicable during the ozone season.

Compliance plans submitted to the NYSDEC were provided to the NYISO for assessment and inclusion in the base case. The plans indicate approximately 1,800 MW of nameplate capacity (approximately 1,500 MW of net operating capability) are proposed to ultimately be unavailable during the summer to comply with the emissions requirements. Remaining units stated either that they comply with the emission limits as currently operated, or proposed equipment upgrades to achieve the emissions limits. A summary of the individual generator plans is provided in the Figure 7, Figure 8 and Figure 9.

The regulations include a provision to allow an affected generator to continue to operate up to two years, with a possible further two-year extension, after the compliance deadline if the generator is designated by the NYISO or the local transmission owner as needed to resolve a reliability need until a permanent solution is in place.

⁶ https://www.dec.ny.gov/regulations/116131.html



Figure 7: Status Change due to DEC Peaker Rule, Zone G

Units	Nameplate MW	CRIS (MW)		Capability (MW)		2023 Ozone Season	2023 non-Ozone Season	2024 Ozone Season	2024 non-Ozone Season	2025 Ozone Season	2025 non-Ozone Season
		Summer	Winter	Summer	Winter	May 2023 -	October	May 2024 -	October	May 2025 -	October
						September	2023 - April	September	2024 - April	September	2025 - April
						2023	2024	2024	2025	2025	2026
Coxsackie GT	22	20	26	20	24	0/S	0/S	0/S	0/S	0/S	0/S
South Cairo	22	20	26	18	23	0/S	0/S	0/S	0/S	0/S	0/S
Unavailable MW =	43	40	52	38	46						
Impacted MW											

0/S - Out-of-service

Figure 8: Status Change due to DEC Peaker Rule, Zone J

Units	Nameplate MW	CRIS (MW)		Capability (MW)		2023 Ozone Season	2023 non-Ozone Season	2024 Ozone Season	2024 non-Ozone Season	2025 Ozone Season	2025 non-Ozone Season
		Summer	Winter	Summer	Winter	May 2023 -	October	May 2024 -	October	May 2025 -	October
						September	2023 - April	September	2024 - April	September	2025 - April
Astoria GT1	16	16	21	14	19	2023 1/S	2024 1/S	2024 1/S	2025	0/S	2020
						,, 0	., 0	,, 0	,, 0	0,0	., 0
Gowanus 1&4 (1-1 through 1-8, and 4-1 through 4-4)	320	279	364	274	365	0/S	I/S	0/S	I/S	0/S	I/S
Gowanus 2&3 (2-1 through 2-8 and 3-1 through 3-8)	320	300	391	278	373	I/S	I/S	I/S	I/S	0/S	I/S
Narrows 1&2 (1-1 through 1-8, and 2-1 through 2-8)	352	309	404	287	380	I/S	I/S	I/S	I/S	0/S	I/S
Ravenswood GTs (01, 10, 11)	69	50	64	41	57	0/S	0/S	0/S	0/S	0/S	0/S
Arthur Kill GT1	20	17	22	12	15	I/S	I/S	I/S	I/S	0/S	0/S
Astoria GTs (2-1 through 2-4, 3-1 through 3-4, 4-1 through 4-4)	558	504	621	415	543	0/S	0/S	0/S	0/S	0/S	0/S
Con Ed 59th St	17	15	20	16	20	I/S	I/S	I/S	I/S	0/S	0/S
Con Ed 74th St	37	39	49	35	41	0/S	0/S	0/S	0/S	0/S	0/S
Con Ed Hudson Ave 5	16	15	20	14	20	0/S	0/S	0/S	0/S	0/S	0/S
Unavailable MW (Summer Capability)						779	506	779	506	1,385	533
Available MW (Summer Capability)						606	880	606	880	0	852
Impacted MW	1,725	1,544	1,975	1,385	1,834						

0/S - Out-of-service

I/S - In-service



Figure 9: Status Change due to DEC Peaker Rule, Zone K

Units	Nameplate MW	CRIS	(MW)	Capability (MW)		2023 Ozone Season	2023 non-Ozone Season	2024 Ozone Season	2024 non-Ozone Season	2025 Ozone Season	2025 non-Ozone Season
		Summer	Winter	Summer	Winter	May 2023 -	October	May 2024 -	October	May 2025 -	October
						September	2023 - April	September	2024 - April	September	2025 - April
						2023	2024	2024	2025	2025	2026
Glenwood GT1	16	14.6	19.1	11.4	14.5	0/S	0/S	0/S	0/S	0/S	0/S
Northport GT	16	13.8	18.0	11.7	15.1	0/S	0/S	0/S	0/S	0/S	0/S
Port Jefferson GT1	16	14.1	18.4	12.9	16.6	0/S	0/S	0/S	0/S	0/S	0/S
Unavailable MW =	48	42.5	55.5	36.0	46.2		1				•
Impacted MW											
0/S - Out-of-service						-					
I/S - In-service											

Notes:

1. The service pattern in the last two columns repeats in subsequent years of the RNA Study Period

2. Other compliance plans were submitted in addition to what is shown on this table. The table lists the plants with compliance plans that resulted in a change of status (*i.e.*, as also listed in the 2020 Gold Book Table iV-6)

Indian Point Deactivation

On January 9, 2017, Entergy and New York State announced an agreement to close Indian Point units 2 and 3 in 2020 and 2021, respectively. Following receipt of a deactivation notice from Entergy on November 13, 2017, the NYISO evaluated the proposed deactivation as part of the required generator deactivation assessments it performs for proposed generator retirements. In its analysis, the NYISO assumed that certain power plants then under construction would enter into service. Based on the study's assumptions, the NYISO concluded that the proposed Indian Point deactivation did not result in a Reliability Need. Subsequent reliability planning studies have not altered this outlook. Additional resources identified in the assessment have entered into service, including the CPV Valley and Cricket Valley generators, and, on April 30, 2020, the Indian Point unit 2 deactivated. The NYISO anticipates that Indian Point unit 3 will deactivate by April 30, 2021 without causing a Reliability Need.

New York City Residual Oil Elimination

New York City passed legislation in December 2017 to prohibit the combustion of fuel oil Numbers 6 and 4 within utility boilers in New York City by 2020 and 2025, respectively. The rule is expected to impact 2,946 MW nameplate of generation in New York City. Many Generators in New York City that are connected to the local gas distribution network are required to maintain alternative fuel combustion capabilities and storage capacity.

In addition, the New York State Reliability Council (NYSRC) has a minimum oil-burn requirement rule that is intended to maintain electric system reliability in the event of gas supply interruptions.

Generators have taken steps to convert their facilities to comply with the law. While oil accounts for a relatively small percentage of the total energy production in New York State, it is often called upon to fuel generation during critical periods, such as a gas pipeline break, when severe cold weather limits access to or increases the price of natural gas. Dual-fuel capability serves as both an important tool in meeting reliability and an effective economic hedge against high natural gas prices during periods of high demand for natural gas.

Carbon Dioxide Performance Standards for Major Electric Generating Facilities

The DEC adopted regulations that limit carbon dioxide emissions from existing fossil fuel-fired generators beginning in 2021. As a result, approximately 860 MW of coal-fired generation exited the market by April 2020, eliminating coal-fired generation as a supply resource on the bulk power system in the state. New York's coal-fired generation accounted for less than 1% of the total energy produced in the state in 2019. The NYISO assessed these deactivations and concluded⁷ that they would not result in reliability needs.

Regional Greenhouse Gas Initiative (RGGI)

RGGI is a multi-state carbon dioxide emissions cap-and-trade initiative requiring affected fossil fuel generators to procure carbon dioxide emissions allowances. The costs for these allowances are factored into the costs of operating fossil fuel-fired generators. Suppliers seek to recover these costs through competitive offers in the wholesale electricity markets. Through this initiative, each participating state determines a set number of allowances, the majority of which are collectively auctioned to generators or other stakeholders. The level of available allowances is established in advance and lowered over time to encourage generators to invest in emissions reduction strategies.

The New York State DEC issued proposed RGGI regulations that would cap New York's carbon dioxide emissions at approximately 21 million tons by 2030.⁸ In 2019, New York generators emitted approximately 24.6 million tons of carbon dioxide. The proposed rule seeks to expand applicability to certain generators of 15 MW or greater, whereas currently RGGI rules do not apply to generators less than 25 MW nameplate. New Jersey re-joined the initiative in 2020, Virginia will be joining in 2021, and Pennsylvania has pending legislation to join RGGI. The expansion of the RGGI region and anticipated

⁷ See 'Generator Deactivation Assessments' at <u>https://www.nyiso.com/cspp:</u>

Cayuga 1 and 2 Generator Deactivation Assessment (Retirement)

Somerset Generator Deactivation Assessment

Cayuga 1 Generator Deactivation Assessment

⁸ https://www.dec.ny.gov/regulations/120061.html



changes to program design features may affect the dynamics of CO₂ emission allowance costs and availability going forward. Tighter requirements through RGGI, however, are not likely to trigger reliability concerns because of program design features such as the Cost Containment Reserve and multi-year compliance periods.

Climate Leadership and Community Protection Act (CLCPA)

On July 18, 2019, the CLCPA was signed into law, codifying the following measures:

- 70% of electricity delivered in New York State must be derived from renewable resources by 2030;
- 100% of the electricity consumed in New York State must be derived from zero-emissions resources by 2040;
- 9,000 MW of offshore wind installed by 2035;
- 6,000 MW of distributed solar energy resources installed by 2025; and
- 3,000 MW of energy storage installed by 2030.

The CLCPA created a 22-member Climate Action Council (CAC) to establish a roadmap for how the state will work towards these goals. The CAC will develop many of the implementation details of the CLCPA. The CLCPA establishes that the CAC should develop a draft scoping plan by the end of 2022 and deliver a final plan to the Governor and the Legislature by the end of 2023.

Accelerated Renewable Energy Growth and Community Benefit Act

In an effort to speed up the siting and construction of large-scale clean energy projects, New York State approved the Accelerated Renewable Energy Growth and Community Benefit Act in April 2020. The act provides an accelerated path for permitting and constructing renewable energy projects by establishing a new Office of Renewable Energy Siting (ORES) within the New York State Department of State.

The act also directs the New York State Department of Public Service, in consultation with NYSERDA, the New York Power Authority (NYPA), the Long Island Power Authority, the investor-owned utilities, and the NYISO, to conduct a comprehensive study to identify cost-effective distribution, local and bulk electric system upgrades to support the state's climate and clean energy policies. This State Power Grid Study is targeted to be completed by end of 2020. The PSC has commenced a proceeding leading to a transmission investment plan utilizing the NYISO's Public Policy Process to select projects, while enabling the PSC to designate NYPA, either on its own or with others, to carry out projects needed expeditiously to achieve the CLCPA goals.⁹ NYPA and DPS Staff have petitioned the PSC proposing criteria for ranking transmission

⁹ http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=20-E-0197&submit=Search



needs to qualify as Priority Projects. NYPA has proposed the "Northern NY Project" and the "Western NY Energy Link" as meeting these criteria.¹⁰



5. Base Case Assumptions

The NYISO has established procedures and a schedule for the collection and submission of data and for the preparation of the models used in the RNA. The Reliability Planning Process procedures are designed to allow planning activities to be performed in an open and transparent manner. The Reliability Planning Process is conducted under a defined set of rules that are aligned and coordinated with the related planning activities of the North American Electric Reliability Council (NERC), the Northeast Power Coordinating Council (NPCC), and the New York State Reliability Council (NYSRC). The assumptions underlying the RNA were reviewed at the ESPWG and TPAS and are shown in **Appendix D** of this report.

This section highlights the key assumptions and modeling data updates for the RNA. These include the load forecast model, the forecasted level of special case resources, the change in generation resource status, LTPs, and bulk power transmission projects. As described above, the newly defined RNA Study Period is from 2024 (year 4) through 2030 (year 10).

Both the transmission security and resource adequacy studies in the RNA Base Case use a peak demand and energy forecast originating from the baseline forecast reported in the *2020 Gold Book*. The baseline forecast from the *2020 Gold Book* is derived from energy and peak models that are built based on projections of end-use intensities and economic variables. End-use intensities modeled include those for lighting, refrigeration, cooking, heating, cooling, and other plug loads. The baseline forecast includes the projected impacts of energy efficiency programs, building codes and standards, distributed energy resources, behind-the-meter energy storage, behind-the-meter solar photovoltaic power, electric vehicle usage, and electrification of heating and other end uses. Economic variables considered include gross domestic product (GDP), households, population, and commercial and industrial employment. The baseline forecast also considers the near-term economic impacts of reduced energy consumption resulting from the state's response to COVID-19. For the resource adequacy study, the baseline load forecast was modified by removing the behind-the-meter solar PV impacts in order to model the solar PV explicitly as a generation resource to account for the intermittent nature of its availability.

The RNA Base Cases were developed in accordance with NYISO procedures using projections for the installation and deactivation of generation resources and transmission facilities that were developed in conjunction with Market Participants and TOs:

 For the transmission security evaluations, the power flow RNA Base Case uses the NYISO 2020 FERC 715 filing as a starting point, adding and removing resources consistent with the base case inclusion screening process provided in Section 3 of the Reliability Planning Process Manual. Representations of neighboring systems are derived from interregional transmission planning coordination conducted under the Northeast Power Coordinating Council (NPCC) and the Eastern Interconnection Reliability Assessment Group (ERAG) Multiregional Modeling Working Group (MMWG) processes, and pursuant to the Northeast ISO/RTO Planning Coordination Protocol.

• For the resource adequacy evaluations, the models are developed starting with prior resource adequacy models, and are updated with information from the *2020 Gold Book* and historical data, with the application of the inclusion rules. Information on modeling of neighboring systems is based on the input received from the NPCC CP-8 working group.

Annual Energy and Summer Peak Demand Forecasts

This section reports the baseline forecast, the high load scenario forecast, the behind-the-meter solar PV forecast, and the baseline forecast with projected behind-the-meter solar PV added back. These forecasts are fully detailed in the *2020 Gold Book*. The baseline forecast reflects the expected impacts of energy efficiency, distributed energy resources, and behind-the-meter solar PV on annual energy use and peak loads. The high load scenario forecast reflects faster adoption of electric vehicles and other electrification, and slower adoption of behind-the-meter solar PV and energy efficiency measures. The baseline energy forecast reflects a moderate recession due to COVID-19 impacts, and assumes typical economic growth in the year 2022 and beyond. The high load scenario energy forecast reflects a slight recession and assumes somewhat higher than typical economic growth in the year 2022 and beyond. The baseline and high load scenario peak forecasts do not account for any potential economic impacts associated with COVID-19. The baseline forecast, which already reflects the solar PV behind-the-meter reductions, was modified to add back those impacts. The modified baseline forecast is used for the resource adequacy study to model behind-the-meter solar PV as a generating resource.

The demand-side management impacts included or accounted for in the 2020 Base Case forecast derive from actual and projected spending levels and realization rates for state-sponsored programs such as the Climate Leadership and Community Protection Act (CLCPA), Clean Energy Standard (CES), the Clean Energy Fund (CEF), the NY-SUN initiative, the energy storage initiative, and earlier programs developed as part of the Reforming the Energy Vision (REV) proceedings. The NYISO reviewed and discussed with Market Participants, during meetings of the ESPWG and TPAS, projections for the potential impact of energy efficiency, solar PV, electric vehicles, and other demand-side management impacts over the Study Period. The factors considered in developing the 2020 RNA Base Case forecast are included in **Appendix C** of this report.

The assumptions for the 2020 economic growth, energy efficiency program impacts, and behind-the-

meter solar PV impacts were also discussed with Market Participants during meetings of the ESPWG and TPAS in March and April of 2020. The ESPWG and TPAS reviewed and discussed the assumptions used in the 2020 RNA Base Case forecast in accordance with procedures established for the RNA.

The baseline energy forecast for the 2020 RNA is lower than the 2018 RNA baseline forecast, including a 4.2% decline in 2020 and 1.7% decline in 2028. The baseline peak forecast for the 2020 RNA is also lower than the 2018 RNA baseline forecast, including a 1.4% decline in 2020 and 1.1% decline in 2028. The lower energy forecasts are attributed to both economic factors and the continued impact of energy efficiency and behind-the-meter solar PV.

Figure 10 on the next page summarizes the three forecasts used in the 2020 RNA. Figure 12 shows a comparison of the baseline forecasts and energy efficiency program impacts contained in the 2018 RNA and the 2020 RNA. Figure 13 and Figure 14 present actual, weather-normalized forecasts of annual energy and summer peak demand for the 2020 RNA. Figure 15 and Figure 16 present the NYISO's projections of annual energy and summer peak demand in the 2020 RNA for energy efficiency, distributed generation, and behind-the-meter solar PV.



Figure 10: 2020 RNA Load and Energy Forecast: Baseline Forecast, and Baseline with BtM Solar PV Forecasts Added Back In

Annual GWh	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2020 End-Use Energy Forecast	154,380	158,431	161,852	162,477	163,897	165,132	166,331	167,305	168,188	168,789	169,249
Energy Efficiency and Codes & Standards	1,885	3,959	6,200	8,599	11,081	13,582	15,937	18,057	19,921	21,563	23,016
BtM Solar PV	2,631	3,274	3,899	4,563	5,193	5,738	6,205	6,591	6,893	7,130	7,289
BtM Non-Solar Distributed Generation	1,252	1,416	1,059	940	818	852	877	900	931	956	973
+ Storage Net Energy Consumption	19	43	67	99	130	160	189	221	254	281	309
+ Electric Vehicle Energy	199	345	538	781	1,085	1,456	1,889	2,407	3,031	3,765	4,506
+ Non-EV Electrification	190	457	815	1,289	1,884	2,591	3,337	4,163	5,055	5,997	6,988
2020 Gold Book Baseline Forecast	149,020	150,627	152,114	150,544	149,904	149,167	148,727	148,548	148,783	149,183	149,774
+ BtM Solar PV	2,631	3,274	3,899	4,563	5,193	5,738	6,205	6,591	6,893	7,130	7,289
2020 RNA Base Case Forecast ¹	151,651	153,901	156,013	155,107	155,097	154,905	154,932	155,139	155,676	156,313	157,063

Baseline and Adjusted Baseline Energy Forecasts

Baseline and Adjusted Baseline Summer Peak Forecasts

Annual MW	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2020 End-Use Peak Demand Forecast	33,319	33,599	33,978	34,220	34,555	34,861	35,208	35,524	35,848	36,108	36,324
Energy Efficiency and Codes & Standards	296	591	943	1,322	1,709	2,108	2,488	2,825	3,116	3,360	3,579
BtM Solar PV	555	707	841	986	1,102	1,204	1,287	1,351	1,392	1,411	1,411
BtM Non-Solar Distributed Generation	218	251	189	169	148	154	158	164	170	174	177
BtM Storage Peak Reductions	5	14	26	44	63	91	125	159	206	250	292
+ Electric Vehicle Peak Demand	40	68	103	147	201	261	333	418	513	625	748
+ Non-EV Electrification	11	25	46	72	104	146	187	230	279	327	379
2020 Gold Book Baseline Forecast ²	32,296	32,129	32,128	31,918	31,838	31,711	31,670	31,673	31,756	31,865	31,992
+ BtM Solar PV	555	707	841	986	1,102	1,204	1,287	1,351	1,392	1,411	1,411
2020 RNA Base Case Forecast ¹	32,851	32,836	32,969	32,904	32,940	32,915	32,957	33,024	33,148	33,276	33,403

¹ For the resource adequacy study, the Gold Book baseline load forecast was modified by removing the behind-the-meter solar PV impacts in order to model the solar PV explicitly as a generation resource to account for the intermittent nature of its availability.

² The transmission security power flow RNA base cases use this Gold Book baseline forecast.



Figure 11: 2020 RNA Load and Energy for High Load Scenario: High Load Scenario Forecast, and High Load Scenario Forecast with BtM Solar PV

Added Back In

nigh Luau Scenario anu Aujusteu nigh Luau Scen	and Energy	y FUIECasi	3								
Annual GWh	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2020 High Load End-Use Energy Forecast	157,619	160,258	164,181	164,969	166,559	167,968	169,339	170,492	171,550	172,327	172,962
Energy Efficiency and Codes & Standards	2,021	4,234	6,612	9,111	11,635	13,768	15,078	15,950	16,557	17,037	17,511
BtM Solar PV	2,560	3,079	3,645	4,233	4,794	5,301	5,716	6,052	6,298	6,479	6,612
BtM Non-Solar Distributed Generation	1,252	1,416	1,059	940	818	852	877	900	931	956	973
+ Storage Net Energy Consumption	19	43	67	99	130	160	189	221	254	281	309
+ Electric Vehicle Energy	199	345	538	781	1,085	1,456	1,889	2,407	3,031	3,765	4,506
+ Non-EV Electrification	389	996	1,890	2,815	3,897	5,122	6,462	7,873	9,362	10,907	12,588
2020 Gold Book High Load Scenario	152,393	152,913	155,360	154,380	154,424	154,785	156,208	158,091	160,411	162,808	165,269
+ BtM Solar PV	2,560	3,079	3,645	4,233	4,794	5,301	5,716	6,052	6,298	6,479	6,612
2020 RNA High Load Scenario ³	154,953	155,992	159,005	158,613	159,218	160,086	161,924	164,143	166,709	169,287	171,881

High Load Scenario and Adjusted High Load Scenario Energy Forecasts

High Load Scenario and Adjusted High Load Scenario Summer Peak Forecasts

Annual MW	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2020 High Load Scenario End-Use Peak Demand	33,452	33,912	34,500	34,778	35,156	35,501	35,887	36,244	36,613	36,915	37,174
Energy Efficiency and Codes & Standards	313	629	1,000	1,396	1,791	2,142	2,372	2,534	2,641	2,720	2,800
BtM Solar PV	539	658	779	904	1,006	1,101	1,176	1,229	1,260	1,271	1,268
BtM Non-Solar Distributed Generation	218	251	189	169	148	154	158	164	170	174	177
BtM Storage Peak Reductions	5	14	26	44	63	91	125	159	206	250	292
+ Electric Vehicle Peak Demand	52	85	126	183	248	328	426	537	671	828	994
+ Non-EV Electrification	23	57	111	163	227	300	381	468	555	648	749
2020 Gold Book High Load Scenario	32,452	32,502	32,743	32,611	32,623	32,641	32,863	33,163	33,562	33,976	34,380
+ BtM Solar PV	539	658	779	904	1,006	1,101	1,176	1,229	1,260	1,271	1,268
2020 RNA High Load Scenario ³	32,991	33,160	33,522	33,515	33,629	33,742	34,039	34,392	34,822	35,247	35,648

³ The high load scenario forecast will be used for the high load resource adequacy scenario.



Figure 12: Comparison of 2018 RNA & 2020 Baseline Forecasts

Annual GWh	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2018 RNA Base Case Forecast ¹	158,370	157,746	157,375	157,279	157,351	157,487	157,669	157,993	158,346		
2020 RNA Base Case Forecast ¹	151,651	153,901	156,013	155,107	155,097	154,905	154,932	155,139	155,676	156,313	157,063
Change from 2018 RNA	-6,719	-3,845	-1,362	-2,172	-2,254	-2,582	-2,737	-2,854	-2,670	NA	NA

Comparison of Base Case Energy Forecasts - 2018 & 2020 RNA (GWh)

Comparison of Base Case Summer Peak Forecasts - 2018 & 2020 RNA (MW)

Annual MW	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2018 RNA Base Case Forecast ¹	33,318	33,225	33,182	33,173	33,204	33,262	33,332	33,420	33,507		
2020 RNA Base Case Forecast ¹	32,851	32,836	32,969	32,904	32,940	32,915	32,957	33,024	33,148	33,276	33,403
Change from 2018 RNA	-467	-389	-213	-269	-264	-347	-375	-396	-359	NA	NA

Comparison of Energy Efficiency and Codes & Standards and BTM Non-Solar Distributed Generation Energy Impacts - 2018 & 2020 RNA (GWh)

Annual GWh	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2018 RNA Base Case Impacts ²	2,193	3,846	5,071	6,365	7,248	8,681	10,041	10,874	11,354		
2020 RNA Base Case Impacts	3,137	5,375	7,259	9,539	11,899	14,434	16,814	18,957	20,852	22,519	23,989
Change from 2018 RNA	944	1,529	2,188	3,174	4,651	5,753	6,773	8,083	9,498	NA	NA

Comparison of Energy Efficiency and Codes & Standards and BTM Non-Solar Distributed Generation Summer Peak Impacts - 2018 & 2020 RNA (MW)

Annual MW	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2018 RNA Base Case Impacts ²	373	653	869	1,097	1,252	1,504	1,742	1,886	1,971		
2020 RNA Base Case Impacts	514	842	1,132	1,491	1,857	2,262	2,646	2,989	3,286	3,534	3,756
Change from 2018 RNA	141	189	263	394	605	758	904	1,103	1,315	NA	NA

¹ For the resource adequacy study, the Gold Book baseline load forecast was modified by removing the behind-the-meter solar PV impacts in order to model the solar PV explicitly as a generation resource to account for the intermittent nature of its availability.

² 2016 Gold Book values have been adjusted to include only those impacts from 2018 forward, so as to compare directly to the 2018 Gold Book values.





Figure 13: 2020 Baseline and High Load Scenario Energy Forecasts with Solar PV Added Back

Figure 14: 2020 Baseline and High Load Energy Scenario Summer Peak Demand Forecasts with Solar PV Added Back









Figure 16: 2020 Baseline Summer Peak Demand Forecast Impacts



For the 2020 RNA resource adequacy assessments, the NYISO uses behind-the meter (BtM) solar PV production data. For General Electric's Multi Area Reliability Simulations (GE-MARS) modeling, the BtM solar PV component is added back in the baseline forecast in order to discretely model the BtM solar PV. The load shapes used in the study were adjusted from the historic shapes to a shape that meets the forecasted zonal peak, NYCA peak, Zones G through J Locality peak, and NYCA Energy Forecast. The combination of the load shapes with the solar shapes results in a set of net load shapes that, at time of NYCA peak, meets the baseline forecast. Discretely modeling BtM solar PV as a resource provides for flexibility to adjust the amount of resource available across the system.

Year	Α	В	С	D	E	F	G	Н	I	J	К	NYCA
2020	34	18	49	4	35	89	78	11	12	74	151	555
2021	49	24	67	4	51	111	96	13	14	90	188	707
2022	67	30	85	5	70	132	111	15	16	106	204	841
2023	88	37	104	5	91	152	125	16	18	122	228	986
2024	112	43	123	6	112	171	135	17	19	136	228	1,102
2025	136	49	138	8	131	187	142	17	21	148	227	1,204
2026	158	55	150	9	147	199	146	17	22	158	226	1,287
2027	176	59	158	11	159	208	147	17	23	168	225	1,351
2028	190	62	162	12	165	214	147	17	24	175	224	1,392
2029	199	63	164	14	168	216	145	16	24	180	222	1,411
2030	203	63	163	15	169	215	143	16	24	180	220	1,411

Figure 17: Forecast of BtM Solar PV Coincident Summer Peak Demand Reductions (MW)

2020 RNA Resource Additions and Removals

Since the 2019-2028 CRP assumptions were finalized, new resources have been added to the system, some deactivation notices have been withdrawn and the associated facilities have returned to the system, and some other resources have been removed from the 2020 RNA Base Case:

- A total of approximately 543 MW of proposed generation (wind and solar) has been added to the 2020 RNA Base Case as compared with the 2019 - 2028 CRP;
- A total of approximately 2,582 MW of generation have been removed as compared with the 2019 – 2028 CRP Base Case either due to being in a deactivated state (*e.g.*, retired, mothballed, or in an ICAP-Ineligible Forced Outage (IIFO), or proposed to retire or mothball), or as operationally impacted by the DEC Peaker Rule.

The comparison of generation status between the 2019 – 2028 CRP and 2020 RNA is detailed in Figure 18, Figure 19, and Figure 20. The MW values represent the Capacity Resources Interconnection Service (CRIS) MW values from the 2020 Gold Book.


The 2020 RNA special case resource¹¹ (SCR) MW levels are based on the *2020 Gold Book* value of 1,282 MW, adjusted for their performance for the resource adequacy evaluations. Transmission security analysis, which evaluates normal transfer criteria, does not consider SCRs.

Queue #	Project Name	Zone	Point of Interconnection	Summer Peak (MW)	2020 RNA Commercial Operation Date
Proposed Tran	smission Additions, other than L	ocal Tra	ansmission Owner Pla	ans	
Q545A [*]	Empire State Line	A	Dysinger - Stolle 345kV	n/a	6/2022
556	Segment A Double Circuit	E,F	Edic - New Scotland 345kV	n/a	12/2023
543	Segment B Knickerbocker- Pleasant Valley 345 kV	F,G	Greenbush - Pleasant Valley 345kV	n/a	12/2023
430	Cedar Rapids Transmission Upgrade	D	Dennison - Alcoa 115kV	80	10/2021
System Deliverability Upgrades [*]	Leeds-Hurley SDU	F,G	Leeds- Hurley SDU 345kV	n/a	summer 2021
Proposed Gene	erations Additions				
387*	Cassadaga Wind	A	Dunkirk - Moon Station 115 kV	126.5	12/2021
396	Baron Winds	С	Hillside - Meyer 230kV	238.4	12/2021
422	Eight Point Wind Energy Center	В	Bennett 115kV	101.8	12/2021
505	Ball Hill Wind	A	Dunkirk - Gardenville 230kV	100.0	12/2022
546	Roaring Brook Wind	Е	Chases Lake Substation 230kV	79.7	12/2021
678	Calverton Solar Energy Center	К	Edwards Substation 138kV	22.9	12/2021
	MW Add	itions f	rom 2019-2028 CRP	543	
	Tot	al MW	generation additions	669	

Figure 18: Proposed Projects Included in the 2020 RNA Base Case

Note: * Also included in the 2019-2028 CRP Base Cases

¹¹ The term "Special Case Resource" is defined in Section 2.19 of Market Services Tariff and also in the Appendix A of this report (Glossary)



Figure 19: 2020 RNA Generation Deactivations Assumptions

2020 Gold Book Table	Owner/ Operator	Plant Name	Zone	CRIS	2020 RNA	2019-2028
					Base Case	CRP Base
					Status*	Case Status
	International Paper Company	Ticonderoga	F	7.6	part of SCR	part of SCR
		-	-		program	program
	Helix Ravenswood, LLC	Ravenswood 09	J	21.7	out	out
Table IV-3: Deactivated Units with Unexpired CRIS Rights Not Listed in Existing Capacity Table III-2	Binghamton BOP, LLC	Binghamton	C	43.8	out	out
	Helix Ravenswood, LLC	Ravenswood 2-1	J	40.4	out	out
		Ravenswood 2-2	J	37.6		
		Ravenswood 2-3	J	39.2		
		Ravenswood 2-4	J	39.8		
		Ravenswood 3-1	J	40.5		
		Ravenswood 3-2	J	38.1		
		Ravenswood 3-4	J	35.8		
	Cayuga Operating Company, LLC	Cayuga 2	С	154.7	out	out
	Lyonsdale Biomass, LLC	Lyonsdale	E	20.2	out	in
	Exelon Generation Company LLC	Monroe Livingston	В	2.4	out	in
	Innovative Energy Systems, Inc.	Steuben County LF	С	3.2	out	in
Lipite Listed in Existing	Consolidated Edison Co. of NY, Inc	Hudson Ave 4	J	13.9	out	in
	New York State Elec. & Gas Corp.	Auburn - State St	С	5.8	out	in
	Cayuga Operating Company, LLC	Cayuga 1	С	154.1	out	in
	Consolidated Edison Co. of NY, Inc	Hudson Ave 3	J	16.0	out	in
	Albany Energy, LLC	Albany LFGE	F	4.5	out	in
Table IV-5: Notices of	Somerset Operating Company, LLC	Somerset	A	686.5	out	in
Proposed Deactivations as	National Grid	West Babylon 4	K	49.0	out	in
of March 15, 2020	Entergy Nuclear Power Marketing, LLC	Indian Point 2	Н	1,026.5	out	out
		Indian Point 3		1,040.4		
		Change in deactivation since 2019	- 2028 CRP**	956		
		Total 2020 RNA MW assumed as	deactivated**	3,522		

change in status

*Consistent with deactivation dates

** does not include peaker retirements



2020 Gold Book Table	Owner/ Operator	Plant Name**	Zone	CRIS	2020 RNA Base Case Status (Deactivate starting from)	2019-2028 CRP Base Case Status
	Central Hudson Gas & Elec. Corp.	Coxsackie GT	G	19.9	2023	in
		South Cairo ¹	G	19.8		
	Consolidated Edison Co. of NY, Inc.	74 St. GT 1 & 2	J	39.1	2023	in
		Hudson Ave 5	-	15.1		
		59 St. GT 1		15.4	Case Status (Deactivate starting from) 2023 2023 2025 2025 2023 2023 2025 2023 2023	
	Helix Ravenswood, LLC	Ravenswood 01	J	8.8	2023	in
		Ravenswood 10	-	21.2		
		Ravenswood 11		20.2	2023	
Table IV-6: Proposed Status Change to Comply with DEC	National Grid	Glenwood GT 1	к	14.6	2023	in
		Northport GT		13.8		
		Port Jefferson GT 01		14.1		
Peaker Rule	NRG Power Marketing, LLC	Astoria GT 2-1, 2-2, 2-3, 2-4	J	165.8	2023	in
		Astoria GT 3-1, 3-2, 3-3, 3-4		170.7		
		Astoria GT 4-1, 4-2, 4-3, 4-4		167.9	 2025 2023 2023 2023 2023 2023 2025 Winter -only 2023 Winter-only 2025 Winter-only 2025 	
		Arthur Kill GT1		16.5		
	Astoria Generating Company, L.P.	Gowanus 1-1 through 1-8	J	138.7	Winter -only 2023	in
		Gowanus 4-1 through 4-8	-	140.1		
		Astoria GT 01	-	15.7	Winter-only 2025	
		Gowanus 2-1 through 2-8	-	152.8		
		Gowanus 3-1 through 3-8	-	146.8		
		Narrows 1-1 through 2-8	-	309.1		
	Additiona	l total 2020 RNA MW assumed as ou	ut of service	1,626		
	change in status				4	

Figure 20: Existing Plants Impacted by DEC's Peaker Rule (Additional Details on Peakers Status by Ozone Season are in Section 4)

Note: NYSDEC's Part 227-3 applies to all simple cycle gas turbines with nameplates equal to or greater than 15 MW. Thus, all simple cycle generators are subject to the rule and all owners of these machines were required to submit compliance plans to the NYSDEC. The compliance plans consist of statements that the generator; (i) already complies with the new NOx limits, (ii) will retire, (iii) will limit operation during the ozone season, and/or (iv) will retrofit emission control technology to meet the emission limits of the new rule. If the plant owners submitted compliance plans that state that the generator will able to operate within the new NOx limits during the ozone season, these generators remain in service in the 2020 RNA base case.

In addition to the projects that met the 2020 RNA inclusion rules (listed in Figure 18), a number of other projects are progressing through the NYISO's interconnection process. Some of these additional generation resources either have accepted their cost allocation as part of a prior Class Year Facilities Study process, or are included in the *Class Year 2019 Facilities Study*, or are candidates for future interconnection facilities studies. These projects are listed in the *2020 Gold Book* and also in **Appendix D**.

Bulk Transmission Projects

The notable bulk transmission projects that met the inclusion rules and are modeled in the *2020 RNA* Base Case are:

- The NextEra Empire State Line Project that was selected by the NYISO Board of Directors in October 2017 to address the Western New York Public Policy Transmission Need. This project includes a new 345 kV circuit and phase angle regulator (PAR) that will alleviate constraints in the Niagara area. The planned in-service date for this project is June 2022.
- The Segment A, AC Transmission joint project, by LS Power and New York Power Authority (NYPA) that was selected by the NYISO Board of Directors in April 2019. The project includes a new double-circuit 345 kV line between Edic and New Scotland substations, two new 345 kV substations at Princetown and Rotterdam, two new 345 kV lines between Princetown to Rotterdam substations, and retirement of the existing Porter to Rotterdam 230 kV lines. The planned in-service date is December 2023.
- The New York Transco Segment B, AC Transmission project, also was selected by the NYISO Board of Directors in April 2019. The project includes a new double-circuit 345/115 kV line from a new Knickerbocker 345 kV switching station to the existing Pleasant Valley substation, 50% series compensation on the Knickerbocker to Pleasant Valley 345 kV line, and retirement of 115 kV lines between Greenbush and Pleasant Valley substations. The planned in-service date is December 2023.

Local Transmission Plans

As part of the NYISO's Local Transmission Planning Process, the New York TOs present their Local Transmission Owner Plans (LTPs) to the NYISO and stakeholders during ESPWG and TPAS meetings. The firm transmission plans presented in the LTPs and reported as firm in the *2020 Gold Book* are included in the 2020 RNA Base Case, with consideration for their in-service dates. A summary of these projects is reported in Appendix D of this report.



Base Case Peak Load and Resources

The 2020 RNA Base Case models the existing generation as adjusted for the unit deactivations listed in the *2020 Gold Book*, and along with the new resource additions that met the base case inclusion rules set forth in Section 3 of the Reliability Planning Process Manual. This capacity is summarized in Figure 21 on the next page, along with the baseline peak load, capacity net purchases and the special case resources (SCRs).



Figure 21: NYCA Peak Load and Resources 2024 through 2030

	Year	2024	2025	2026	2027	2028	2029	2030
	Peak Load (MW	/) - Gold E	3ook 202	O NYCA	Baseline			
	NYCA*	31,838	31,711	31,670	31,673	31,756	31,865	31,992
	Zone J*	11,557	11,552	11,609	11,667	11,747	11,836	11,924
	Zone K*	4,853	4,768	4,692	4,651	4,658	4,670	4,690
	Zone G-J*	15,733	15,715	15,772	15,831	15,916	16,015	16,116
	F	Resources	(ICAP M	W)				
NYCA	Capacity* *	37,155	36,551	36,551	36,551	36,551	36,551	36,551
	Net Purchases & Sales	1,954	1,954	1,954	1,954	1,954	1,954	1,954
	SCR	1,282	1,282	1,282	1,282	1,282	1,282	1,282
	Total Resources	40,391	39,787	39,787	39,787	39,787	39,787	39,787
	Capacity/Load Ratio	116.7%	115.3%	115.4%	115.4%	115.1%	114.7%	114.2%
	Cap+NetPurch/Load Ratio	122.8%	121.4%	121.6%	121.6%	121.3%	120.8%	120.4%
	Cap+NetPurch+SCR/Load Ratio	126.9%	125.5%	125.6%	125.6%	125.3%	124.9%	124.4%
Zone J	Capacity* *	8,795	8,190	8,190	8,190	8,190	8,190	8,190
	Cap+fullUDR+SCR/Load Ratio	83.0%	77.8%	77.4%	77.0%	76.5%	75.9%	75.3%
Zone K	Capacity* *	5,213	5,213	5,213	5,213	5,213	5,213	5,213
	Cap+fullUDR+SCR/Load Ratio	128.8%	131.1%	133.2%	134.4%	134.2%	133.8%	133.3%
Zone G-J	Capacity* *	13,509	12,904	12,904	12,904	12,904	12,904	12,904
	Cap+fullUDR+SCR/Load Ratio	91.7%	88.0%	87.7%	87.3%	86.9%	86.3%	85.8%

	Year	2024	2025	2026	2027	2028	2029	2030		
Resources (UCAP MW)***										
NYCA	Capacity**	32,467	31,947	31,947	31,947	31,947	31,947	31,947		
	Cap+NetPurch+SCR/Load Ratio	110.9%	109.7%	109.8%	109.8%	109.5%	109.1%	108.7%		
Zone J	Capacity**	8,122	7,602	7,602	7,602	7,602	7,602	7,602		
	Cap+fullUDR+SCR/Load Ratio	75.2%	70.7%	70.3%	70.0%	69.5%	69.0%	68.5%		
Zone K	Capacity**	4,728	4,728	4,728	4,728	4,728	4,728	4,728		
	Cap+fullUDR+SCR/Load Ratio	118.4%	120.5%	122.5%	123.5%	123.4%	123.0%	122.5%		
Zone G-J	Capacity**	12,322	11,802	11,802	11,802	11,802	11,802	11,802		
	Cap+fullUDR+SCR/Load Ratio	82.4%	79.2%	78.9%	78.6%	78.2%	77.7%	77.2%		

Notes:

*NYCA load values represent baseline coincident summer peak demand. Zones J and K load values represent non-coincident summer peak demand. Aggregate Zones G-J values represent the G-J locality peak.

**NYCA Capacity values include resources electrically internal to NYCA, additions, re-ratings, and retirements (including proposed retirements and mothballs). Capacity values reflect the lesser of CRIS and DMNC values. NYCA resources include the net purchases and sales as per the Gold Book. Zonal totals include the full Unforced Capacity Deliverability Rights (UDRs) for those capacity zones.

- SCR: forecasted MW ICAP value from the 2020 Gold Book.
- Wind, solar, run-of river and landfill gas summer capacity is counted as 100% of nameplate rating.



*** For UCAP calculation, EFORd from GE-MARS output file are used for thermal units. For renewables, installed capacity intermittent resources derating factors (received from IMO team) are used.

Figure 22: Total Capacity/ Load Ratios (%) ICAP vs UCAP for 2030

Zone	ICAP	UCAP	Delta ICAP-UCAP
NYCA	124.4%	108.7%	15.7%
J	75.3%	68.5%	6.9%
К	133.3%	122.5%	10.8%
G-J	85.8%	77.2%	8.5%

Notes:

1. Total Capacity = Capacity* + full UDR + SCR

- 2. *Capacity = lesser of (CRIS, DMNC). NYCA resources include the net purchases and sales as per the Gold Book.
- 3. ICAP = Installed Capacity
- 4. UCAP = Unforced Capacity (takes into consideration generation unavailability)
- 5. UCAP calculation:
 - For thermal units, average capacity derating factors from the MARS output are used
 - For renewables, installed capacity intermittent resources derating factors are used

As shown in the Figure 21, the total NYCA capacity margin, which is defined as capacity above the baseline load forecast, varies between 24% and 27%. Figure 22 shows a comparison between the total ICAP and total UCAP for 2030; the difference reflects generation unavailability for the resource mix assumed in the RNA Base Case for year 2030.

Figure 23 below shows the relative decrease in the capacity margin, by comparing the details of the capacity margins for year 10 between the 2020 RNA (2030) and the 2019-2028 CRP (2028). The analysis reveals two observations:

- Negative net margin shows deterioration in the relative capability to serve load, when comparing the two studies assumptions; and
- Compared to the *2019 CRP*, the system has less overall net resources.



Figure 23: NYCA Load and Resources Comparison with the 2019 - 2028 CRP

Study Year 10	2020 RNA	2019 - 2028 CRP	Delta
	(2030)	(2028)	
Baseline ¹ Load	31,992	32,469	-477
Total Resources ²	39,787	41,875	-2,089
Net Ma	-1,612		

Notes:

- 1. Includes the reductions due to projected energy efficiency programs, building codes and standards, distributed energy resources and behind-the-meter solar photovoltaic resources; it also reflects expected impacts (increases) from projected electric vehicle usage.
- 2. Includes the total SCRs, and net capacity purchases and sales from the applicable Gold Book.

Figure 24: 2020 RNA Zone J Load and Capacity Comparison with the 2019 - 2028 CRP

Study Year 10	2020 RNA (2030)	2019 - 2028 CRP (2028)	Delta
Baseline ¹ Load	11,924	11,429	495
Capacity ²	8,190	9,562	-1,372
Net Margin: Change i	-1,867		

Notes:

- 1. Includes the reductions due to projected energy efficiency programs, building codes and standards, distribution energy resources and behind-the-meter solar photovoltaic power; it also reflects expected impacts (increases) from projected electric vehicle usage.
- 2. Does not include the total SCRs, and UDRs from the applicable Gold Book.



6. Base Case Reliability Assessments

Overview

This section provides the methodology and results for the resource adequacy and transmission security of the New York BPTF over the RNA Study Period. If any reliability criteria violations are identified, the NYISO identifies Reliability Needs. Violations of the criteria are translated into MW or MVAr amounts to provide a relative quantification of the Reliability Needs, and to support the development of solutions in the CRP.

Methodology for the Determination of Needs

The OATT defines Reliability Needs in terms of total deficiencies relative to reliability criteria determined from the assessments of the BPTF performed in the RNA. There are two steps to analyzing the reliability of the BPTF. The first is to evaluate the security of the transmission system. The second is to evaluate the resource and transmission adequacy of the system, subject to the security constraints.

Transmission security is the ability of the power system to withstand disturbances, such as electric short circuits or unanticipated loss of system elements, and continue to supply and deliver electricity. Transmission security is assessed deterministically with potential disturbances being applied without concern for the likelihood of the disturbance in the assessment. These disturbances (single-element and multiple-element contingencies) are categorized as the design criteria contingencies, which are explicitly defined in the reliability criteria. The impacts resulting from applying these design criteria contingencies are assessed to determine whether thermal loading, voltage, or stability violations will occur. In addition, the NYISO performs a short circuit analysis to determine if the system can clear faulted facilities reliably under short circuit conditions. The NYISO's "Guideline for Fault Current Assessment¹²" describes the methodology for that analysis.

The analysis for the transmission security assessment is conducted in accordance with NERC Reliability Standards, NPCC Transmission Design Criteria, and the NYSRC Reliability Rules. Contingency analysis is performed on the BPTF to evaluate thermal and voltage performance under design contingency conditions using the Siemens PTI PSS®E and PowerGEM TARA programs. Generation is dispatched to match load plus system losses, while respecting transmission security. Scheduled inter-area transfers modeled in the base case between the NYCA and neighboring systems are held constant.

For the RNA, over 1,000 design criteria contingencies are evaluated under N-1, N-1-0, and N-1-1

¹² Attachment I of Transmission, Expansion and Interconnection Manual.

normal transfer criteria conditions to provide that the system is planned to meet all applicable reliability criteria. To evaluate the impact of a single event from the normal system condition (N-1), all design criteria contingencies are evaluated including: single element, common structure, stuck breaker, generator, bus, and HVDC facilities contingencies. An N-1 violation occurs when the power flow on the monitored facility is greater than the applicable post-contingency rating. N-1-0 and N-1-1 analyses evaluate the ability of the system to meet design criteria after a critical element has already been lost. For N-1-0 and N-1-1 analysis, single element contingencies are evaluated as the first contingency. The second contingency (N-1-1) includes all applicable design criteria contingencies evaluated under N-1 conditions. Certain areas of the Con Edison system are designed and operated for the occurrence of a second contingency. This type of combination can be described as N-1-1-0. For N-1-1-0 analysis, after the second contingency occurs, systems adjustments are allowed to secure the system back to normal ratings. This requirement to plan for a second contingency in the Con Edison system is contained in the <u>NYSRC Reliability Rules, Rule G.1.</u> Accordingly, a violation of the N-1-1-0 criterion on the BPTFs in Con Edison district will be identified as Reliability Need in the NYISO's Reliability Needs Assessment.

The process of successive contingency testing (such as N-1-1) allows for corrective actions including generator re-dispatch, PAR adjustments, and HVDC adjustments between the contingencies. For example, for N-1-1 analysis allowable system adjustments occur between the first (N-1-0) and second (N-1-1) contingencies. These corrective actions prepare the system for the next contingency by reducing the flow to normal rating after the first contingency. An N-1-0 violation occurs when the flow cannot be reduced to below the normal rating following the first contingency. An N-1-1 violation occurs when the facility is reduced to below the normal rating following the first contingency, but the power flow following the second contingency exceeds the applicable post-contingency rating.

Resource adequacy is the ability of the electric system to supply the aggregate electrical demand and energy requirements of the customers at all times, taking into account scheduled and reasonably expected unscheduled outages of system elements. Resource adequacy considers the transmission systems, generation resources, and other capacity resources, such as demand response. The NYISO performs resource adequacy assessments on a probabilistic basis to capture the random natures of system element outages. If a system has sufficient transmission and generation, the probability of an unplanned disconnection of firm load is equal to or less than the system's standard, which is expressed as a loss of load expectation (LOLE). The New York State bulk power system is planned to meet an LOLE that, at any given point in time, is less than or equal to an involuntary firm load disconnection that is not more frequent than once in every 10 years, or 0.1 events per year. This requirement forms the basis of New York's Installed Reserve Margin (IRM) requirement and is analyzed on a statewide basis. If Reliability Needs are identified, various amounts and locations of compensatory MW required for the NYCA to satisfy those needs are determined to translate the criteria violations to understandable quantities. Compensatory MW amounts are determined by adding generic capacity resources to NYISO zones to effectively satisfy the needs. The compensatory MW amounts and locations are based on a review of binding transmission constraints and zonal LOLE determinations in an iterative process to determine various combinations that will result in reliability criteria being met. These additions are used to estimate the amount of resources generally needed to satisfy Reliability Needs. The compensatory MW additions are not intended to represent specific proposed solutions. Resource needs could potentially be met by other combinations of resources in other areas including generation, transmission and demand response measures.

Due to the different types of supply and demand-side resources, and also due to transmission constraints, the amounts and locations of resources necessary to match the level of compensatory MW needs identified will vary. Reliability Needs could be met in part by transmission system reconfigurations that increase transfer limits, or by changes in operating protocols. Operating protocols could include such actions as using dynamic ratings for certain facilities, invoking operating exceptions, or establishing special protection systems.

The procedure to quantify compensatory MW for BPTF transmission security violations is a separate process from calculating compensatory MW for resource adequacy violations. This quantification is performed by first calculating transfer distribution factors on the overloaded facilities. The power transfer used for this calculation is created by injecting power at existing buses within the zone where the violation occurs, and reducing power at an aggregate of existing generators outside of the area.

Transmission Security Base Case Assessments

The following discussion reviews the main findings of the *2020 RNA* transmission security assessments (steady state, stability and short circuit assessments) applicable to the Base Case conditions for the Study Period.

Steady-State Assessments

The RNA requires analysis of the security of the BPTF throughout the Study Period. The BPTF, as defined in this assessment, include all of the facilities designated by the NYISO as a Bulk Power System (BPS) element as defined by the NYSRC and NPCC, as well as other transmission facilities that are relevant to planning the New York State transmission system. To assist in the assessment, the NYISO reviewed previously completed transmission security assessments and used the most recent FERC Form No. 715 power flow cases. The NYISO filed those cases with FERC on April 1, 2020 with updates to the models as



described in earlier sections of this report.

For the 2020 RNA transmission security assessment, several transmission security violations (*i.e.*, Reliability Needs) were identified for the Study Period. The transmission security Reliability Needs include both thermal loading criteria violations on the BPTF. For the thermal loading violations, several 345 kV circuits in the Con Edison service territory are overloaded under N-1-1 conditions beginning in year 2025 and increasing through 2030. Additionally, the Con Edison 345 kV system has 345 kV circuit overloads under N-1-1-0 conditions beginning in 2025 and increasing through 2030. Figure 25 summarizes of the worst overload for each BPTF element with a thermal criteria violation under N-1-1 conditions. Appendix D provides the details of additional contingency combinations that also result in thermal criteria violations for these BPTFs. Figure 26 provides a summary of the BPTF thermal criteria violations under N-1-1-0 conditions. No BPTF steady state voltage violations are observed for this assessment.

Zone	Owner	Monitored Element	Normal	Contingency	1st Contingency	2nd Contingnecy	2025	2030
			Rating	Rating			Summer	Summer
			(MVA)	(MVA)			Peak Flow	Peak Flow
							(%)	(%)
/]	ConEd	Sprainbrook-W49th St 345 kV (51)	844	1029	Sprainbrook- Dunwoodie 345 kV (W75)	Tower F38 & F39	-	112
١/J	ConEd	Sprainbrook-W49th St 345 kV (52)	844	1029	Sprainbrook- Dunwoodie 345 kV (W75)	Tower F38 & F39	-	112
١/J	ConEd	Dunwoodie-Mott Haven 345 kV (71)	785	925	Loss of Ravenswood 3	Dunwoodie-Mott Haven 345 kV (72)	110	118
I/J	ConEd	Dunwoodie-Mott Haven 345 kV (72)	785	925	Loss of Ravenswood 3	Dunwoodie-Mott Haven 345 kV (71)	108	116
J	ConEd	Mott Haven-Rainey West 345 kV (Q12)	785	925	Mott Haven-Rainey 345 kV (Q11)	Loss of Ravenswood 3	-	108
J	ConEd	Mott Haven-Rainey East 345 kV (Q11)	785	925	Mott Haven-Rainey 345 kV (Q12)	Loss of Ravenswood 3	-	108
J	ConEd	Goethals-Gowanus 345 kV (26)	518	738	Loss of Ravenswood 3	Stuck Breaker at Goethals 5	102	130
J	ConEd	Goethals-Gowanus 345kV (25)	518	738	Loss of Ravenswood 3	Gowanus - Goethals 345 kV (26)	103	130
I	ConEd	Sprainbrook/Dunwoodi e 345/138 kV (N7)	366	423	Loss of Ravenswood 3	Tower W89 & W90	106	109
Ι	ConEd	Sprainbrook/Dunwoodi e 345/138 kV (S6)	309	438	Loss of Ravenswood 3	Tower W89 & W90	103	107
I	ConEd	Dunwoodie 345/138 kV (W73)	310	388	Loss of Ravenswood 3	Sprainbrook/Dunwo odie 345/138 kV	-	106

Figure 25: Steady State Transmission Security N-1-1 Violations



Figure 26: Steady State Transmission Security N-1-1-0 Violations

Zone	Owner	Monitored Element	Normal Rating (MVA)	Contingency Rating (MVA)	1st Contingency	2nd Contingnecy	2025 Summer Peak Flow (%)	2030 Summer Peak Flow (%)
I/J	ConEd	Dunwoodie-Mott Haven	785	925	Loss of Ravenswood 3	Dunwoodie-Mott	132	149
		345 kV (71)				Haven 345 kV (72)		
I/J	ConEd	Sprainbrook-W49th St	844	1029	Loss of Ravenswood 3	Dunwoodie-Mott	-	106
		345 kV (51)				Haven 345 kV (72)		
I/J	ConEd	Sprainbrook-W49th St	844	1029	Loss of Ravenswood 3	Dunwoodie-Mott	-	106
		345 kV (52)				Haven 345 kV (72)		

Considering the utilization of all available PAR controls, the observed maximum deficiency (*i.e.,* compensatory MW) for the New York City 345/138 kV Transmission Load Area (TLA) in 2025 is 700 MW. Based on the load duration curve shown in Figure 27, the deficiency in 2025 may be observed for approximately nine hours (3,853 MWh). This deficiency increases to 1,075 MW in 2030 and may be observed for approximately 12 hours (7,672 MWh) as shown in Figure 28.











Steady State Compensatory MW

Transmission security compensatory MW amounts are determined by adding generic resources to combinations of locations of need. The compensatory MW additions are not intended to represent specific solutions, as the impact of specific solutions can depend on the type of the solution and its location on the grid. Rather, the compensatory MW provide a generic order-of-magnitude measure to guide the formulation of solutions. Transmission security needs could potentially be met by combinations of solutions of solutions including generation, transmission, energy efficiency, and demand response measures.

The BPTF transmission security violations begin at 700 MW in year 2025 and increase in magnitude through year 2030. The maximum observed compensatory MW amount needed to address the BPTF thermal issues described above is 1,075 MW in 2030.

System Stability Assessments

The dynamic stability Reliability Needs are observed for the entire study period. Dynamic stability issues observed prior to 2024 will be evaluated in the Short Term Reliability Process. The criteria violations include transient voltage response violations, loss of generator synchronism, and undamped voltage oscillations. The transient voltage response violations arise on transmission facilities owned by Con Edison in its Transmission District and extend into areas adjacent to its service territory. The loss of generator synchronism is observed in generators within or near the Astoria and Greenwood load pockets, and is primarily driven by the transient voltage response in the local area. The undamped voltage oscillations are also primarily in the Con Edison area and are primarily driven by the reduction in dynamic

reactive capability and MW to serve the load. The reduction in system inertia may also play a role in the undamped voltage oscillations. For a few N-1-1 events observed, system collapse occurs due to the low voltages. Figure 29 provides a summary of the generator synchronism and transient voltage response dynamic stability criteria Reliability Needs under N-1 and Figure 30 provides a summary for N-1-1 violations.



Figure 29: Dynamic Stability Criteria N-1 Violations

	D	namic Stability	Criteria N-1 Violat	ions (1), (2)			
		2	024	2	025	2	030
Contingency	Contingency Description	Generator	Transient	Generator	Transient	Generator	Transient
Name	Contingency Description	Synchronism	Voltage	Synchronism	Voltage	Synchronism	Voltage
			Response		Response		Response
ConEd08	Fault at E. 13th St. 138 kV with stuck breaker 4E		non-BPTF		non-BPTF		non-BPTF
ConEd12	Fault at Freshkills 138 kV with L/O Arthur Kill 2					х	non-BPTF
ConEd13	Fault at Freshkills 138 kV with stuck breaker BT1-2						non-BPTF
ConEd14	Fault at Greenwood 138 kV with L/O Gowanus 345/138 (T2) kV and PAR					х	non-BPTF
ConEd15	Fault at Greenwood 138 kV with stuck breaker 7S		non-BPTF	х	non-BPTF	х	non-BPTF
ConEd16	Fault at Hellgate 138 kV with stuck breaker 5				non-BPTF		non-BPTF
ConEd25-Q461- Q462	Fault at E. 13th St. 138 kV with stuck breaker		non-BPTF		non-BPTF		non-BPTF
UC11	Fault at Sprainbrook 345 kV and L/O Sprainbrook - Tremont (X28) 345 kV and Buchanan - Sprainbrook (W93/W79) 345 kV		non-BPTF		BPTF & non-BPTF	x	BPTF & non-BPTF
UC25A	Fault at Ravenswood 3 345 kV and L/O Ravenswood 3		BPTF & non-BPTF	Х	BPTF & non-BPTF	х	BPTF & non-BPTF
UC25B	Fault at Rainey 345 kV and L/O 60L 345 kV circuit			х	BPTF & non-BPTF	х	BPTF & non-BPTF
UC048A_Q510	Fault at Gowanus 345 kV and L/O Gowanus 345/138 kV 14TR			х	non-BPTF	х	non-BPTF
UC049_Q510	Fault at Gowanus 345 kV with stuck breaker 14				non-BPTF	х	non-BPTF
UC5_Q510	Fault at Farragut 345 kV with stuck breaker 11W						non-BPTF

Notes:

(1). Non-BPTF issues are reported for information only.

(2). Dynamic issues observed prior to 2024 will be evaluated in the Short-Term Reliability Process.



Figure 30: Dynamic Stability Criteria N-1-1 Violations (L/O Ravenswood 3 as First Level Event)

	Dynamic Stability Criteria	N-1-1 Violation	s (L/O Ravens	wood 3 as First I	Level Event) (1	.), (2)	
		202	24	202	25	20	30
Contingency Name	Contingency Description	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response
ConEd01	Fault at Astoria East 138 kV with stuck breaker 3E						non-BPTF
ConEd02	Fault at Astoria West 138 kV and L/O Astoria CC1 and CC2						non-BPTF
ConEd03	Fault at Astoria West 138 kV with stuck breaker 2N						non-BPTF
ConEd08	Fault at E. 13th St. 138 kV with stuck breaker 4E		non-BPTF		non-BPTF		non-BPTF
ConEd12	Fault at Freshkills 138 kV with L/O Arthur Kill 2				non-BPTF	X	non-BPTF
ConEd13	Fault at Freshkills 138 kV with stuck breaker BT1-2					X	non-BPTF
ConEd14	Fault at Greenwood 138 kV with L/O Gowanus 345/138 (T2) 345 kV and PAR				non-BPTF	X	non-BPTF
ConEd15	Fault at Greenwood 138 kV with stuck breaker 7S		non-BPTF	X	non-BPTF	X	non-BPTF
ConEd16	Fault at Hellgate 138 kV with stuck breaker 5				non-BPTF	X	BPTF & non- BPTF
ConEd20	Fault at Queensbridge 138 kV with stuck breaker 7E						non-BPTF
ConEd23_Q510	Fault at Farragut 345 kV with L/O bus tie					X	BPTF & non- BPTF
ConEd25-Q461- Q462	Fault at E. 13th St. 138 kV with stuck breaker		non-BPTF		non-BPTF		non-BPTF



Dynamic Stability Criteria N-1-1 Violations (L/O Ravenswood 3 as First Level Event) (1), (2)									
		202	24	202	:5	20)30		
Contingency Name	Contingency Description	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response		
TE02-UC02	Fault at E. Fishkill 345 kV with L/O E. Fishkill - Pleasantville 345 kV and Dunwoodie - Pleasantville 345 kV lines						BPTF		
TE03-UC03	Fault at Sprainbrook 345 kV and L/O Sprainbrook - Millwood (W64/W99, W79/W93) 345 kV				BPTF & non-BPTF	x	BPTF & non- BPTF		
TE20-UC20	Fault at Dunwoodie 345 kV and L/O Dunwoodie - Pleasantville (W89 and W90) 345 kV				BPTF & non-BPTF	x	BPTF & non- BPTF		
UC11	Fault at Sprainbrook 345 kV and L/O Sprainbrook - Tremont (X28) 345 kV and Buchanan - Sprainbrook (W93/W79) 345 kV		BPTF & non-BPTF	X	BPTF & non-BPTF		System Collapse		
UC19	Fault at Millwood 345 kV and L/O Millwood - Sprainbrook (W82/W65 and W85/W78) 345 kV				non-BPTF		BPTF & non- BPTF		
UC25A	Fault at Ravenswood 3 345 kV and L/O Ravenswood 3			X	BPTF & non-BPTF		System Collapse		
UC25B	Fault at Rainey 345 kV and L/O 60L 345 kV circuit		non-BPTF	X	BPTF & non-BPTF		System Collapse		
UC32_Q510	Fault at Farragut 345 kV and L/O Farragut - Rainey (61) 345 kV					X	BPTF & non- BPTF		
UC33_Q510	Fault at Farragut 345 kV and L/O Farragut - Rainey (62) 345 kV					X	BPTF & non- BPTF		
UC34_Q510	Fault at Farragut 345 kV and L/O Farragut - Rainey (63) 345 kV					X	BPTF & non- BPTF		



Dynamic Stability Criteria N-1-1 Violations (L/O Ravenswood 3 as First Level Event) (1), (2)									
		202	24	202	25	20	30		
Contingency Name	Contingency Description	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response	Generator Synchronism	Transient Voltage Response		
UC35_Q510	Fault at Farragut 345 kV and L/O Farragut - E. 13th St. (45) 345 kV					X	BPTF & non- BPTF		
UC36_Q510	Fault at Farragut 345 kV and L/O Farragut - E. 13th St. (46) 345 kV					X	BPTF & non- BPTF		
UC37_Q510	Fault at Farragut 345 kV and L/O Farragut - E. 13th St. (47) 345 kV					X			
UC38_Q510	Fault at Farragut 345 kV and L/O Farragut - E. 13th St. (48) 345 kV					X	BPTF & non- BPTF		
UC39_Q510	Fault at Farragut 345 kV and L/O B3402 (modeled out-of-service in base case)					X	BPTF & non- BPTF		
UC048A_Q510	Fault at Gowanus 345 kV and L/O Gowanus 345/138 kV 14TR		non-BPTF	X	non-BPTF	X	BPTF & non- BPTF		
UC049_Q510	Fault at Gowanus 345 kV with stuck breaker 14			X	non-BPTF	X	non-BPTF		
UC57_Q510	Fault at Farragut 345 kV (near 63 line) with stuck breaker 11W					X	BPTF & non- BPTF		
UC5_Q510	Fault at Farragut 345 kV (near B44 line) with stuck breaker 11W		non-BPTF	X	BPTF & non-BPTF	X	BPTF & non- BPTF		

Notes:

(1). Non-BPTF issues are reported for information only.

(2). Dynamic issues observed prior to 2024 will be evaluated in the Short-Term Reliability Process

Figure 31 shows the transient voltage response for a 345 kV bus in the Con Edison service territory that passes the stated criteria as observed in assessments that have the peaker units in-service, as compared to the response observed with the peaker units out-of-service. To pass the transient voltage response criteria, the post-fault value must settle to at least 0.9 p.u. voltage five seconds after the fault has cleared for most Transmission Owners. The PSEG Long Island Criteria is to settle to at least 0.9 p.u. voltage one second after the fault has cleared. When the transient voltage response fails the stated criteria (as shown in Figure 31) this is referred to as fault induced delayed voltage recovery (FIDVR). FIDVR events are driven by end-use load behavior and load composition, primarily the induction motor loads. One of the causes of FIDVR is the stalling of induction motors due to low voltages. When an induction motor stalls, the motors draws excessive reactive power from the grid and require five to six times their typical steady-state running current in this locked-rotor condition,¹³ which can eventually lead to a significant loss of generation and load.





During a fault, the observed voltage drop at a bus depends on the location of the fault on the system

¹³ https://www.nerc.com/docs/pc/tis/FIDVR_Tech_Ref%20V1-2_PC_Approved.pdf

relative to the bus and the amount of time the fault remains on the system before it is cleared by protective relaying actions. Following the clearing of a fault on the system by protection system actions, the bus voltage and generator rotor usually enter an oscillatory period. The generator excitation system controls the generator terminal voltage to improve and stabilize the voltages. Nevertheless, depending on the severity of voltages and generator size, the voltages may or may not stabilize. Generator rotor swings after a fault are caused by the accumulation of energy, *i.e.* an imbalance between electrical power and mechanical power, during the fault. After the clearing of the fault, the generator rotor swings (or "oscillations") dissipate that accumulated energy over time. For a stable system response, these oscillations damps out over time to an acceptable post-fault value. For an unstable system response, the system may observe unacceptable damping, system separation, cascading, and generating units losing synchronism with the system.

As shown in Figure 29 and Figure 30, several contingencies result in loss of generator synchronism with the transmission system. A primary driver to the loss of synchronism for these machines is the sustained low voltages following the clearing of the fault. Examples of low voltages as observed from the high-side of the generator step-up (GSU) transformer are shown in Figure 32 in response to a contingency. As can be seen in Figure 32, the sustained low voltages are also observed at the high side of the GSU and remain in the NERC PRC-024 "may trip" zone. In this example, due to the sustained low voltages an equilibrium point for the generators is not reached, and the generators lose synchronism with the system. As shown in Figure 33, Generator 1 loses synchronism and trips off line at about 3.5 seconds and Generator 2 goes out of synchronism and trips off line at about 10 seconds. The rotor angles plotted in Figure 33 are relative to the system average rotor angle.



Figure 32: High Side of GSU Voltage



Figure 33: Generator Synchronism





Stability Compensation

In the pre-fault (N-0) system condition, voltages are maintained with various static (*e.g.* fixed and switched shunt devices, transmission circuits) and dynamic (*e.g.* Generators, FACTS devices, STATCOMS) reactive resources maintaining voltages within prescribed ranges. Manual adjustments to these devices occur as load and other system conditions change in order to maintain the required voltage level.

During the dynamic simulation timeframe, sufficient dynamic reactive resources to sustain transient voltage support during the natural swings of the system are crucial. Generally, the system response to these swings to maintain voltage comes from generator excitation system response, STATCOMs, static VAr compensators (SVCs), wind and solar plant voltage controls, and other fast-acting resources.¹⁴ While pre-contingency voltages can be maintained using static reactive resources, the dynamic system response timeframe focuses primarily on dynamic reactive capability due to the transient nature of large power and voltage swings and the short response time required.

The BPTF dynamic stability criteria violations compensatory values are measured by modeling fictitious generators at the Farragut 345 kV, Astoria East 138 kV, and Greenwood North 138 kV buses with a MW size determined by the compensatory MW for thermal violations. Focusing on the event combination of the loss of Ravenswood 3 followed by event UC11 (as one of the more severe events), reactive capability was added to the fictitious generators to the point where the BPTF transient voltage violations, sustained oscillations, and generator synchronism criteria violations are no longer observed. Figure 34 provides a description of dynamic compensation needed to address the event combination of the loss of Ravenswood 3 followed by event UC11. The impact of the added dynamic reactive capability is highly non-linear and other event combinations and the location of the fictitious generators may cause significant variance to the values stated in Figure 34.

¹⁴ <u>https://www.nerc.com/comm/PC_Reliability_Guidelines_DL/Reliability%20Guideline%20-</u> %20Reactive%20Power%20Planning.pdf

Dynamics Compensatory Resource Values (1)											
	M	lachine MV	Ά	Pgen (MW)							
Location	2024	2025	2030	2024	2025	2030					
Farragut 345 kV	350	400	700	0	230	525					
Astoria East 138 kV	140	170	225	110	110	180					
Greenwood North 138 kV	0	450	465	0	360	370					
Total	490	1,020	1,390	110	700	1,075					

Figure 34: Description of Dynamic MVA Added to System

Notes:

(1). BPTF dynamic issues observed prior to 2024 will be evaluated in the Short-Term Reliability Process

Short Circuit Assessments

The required short circuit assessment in the RNA includes the calculation of symmetrical short circuit current to ascertain whether the circuit breakers at stations connecting the BPTF could be subject to fault current levels in excess of their rated interrupting capability. The analysis was performed for 2025 (year 5), reflecting the study conditions outlined in the **Section 5**. The calculated fault levels do not change significantly after year 5 in the Study Period as no new generation or transmission changes are modeled in the RNA, and the methodology for fault duty calculation is not sensitive to load growth. For this assessment no over-dutied circuit breakers were identified. The detailed results of the short circuit assessment are provided in **Appendix D** of this report.

Transmission Owner Local Criteria Violations

As described in the following sections, Con Edison and Central Hudson each identified transmission security issues in their service territory on their non-BPTF system. The local non-BPTF criteria violations identified below are provided for information only, as the RNA identifies only BPTF Reliability Needs.

Central Hudson Assessment

Central Hudson currently owns and operates two 25 MVA (nameplate) combustion turbines that are subject to the DEC Peaker Rule, namely the Coxsackie and South Cairo generators. Both of these generators provide local substation reserve capacity for transformer outages and post-contingency voltage support for the Westerlo transmission loop. Without these generators, there is no reserve capability for local transformer outages and the Westerlo loop is voltage constrained. These transmission security issues would begin in 2023 and continue through the study period.

Con Edison Assessment

The transmission security criteria violations observed in the Con Edison service territory are primarily

due to deficiencies that are observed in the Astoria East/Corona 138 kV Transmission Load Area (TLA) and the Greenwood/Fox Hills 138 kV TLA.

Astoria East/Corona 138 kV TLA

Figure 35 shows the high-level topology of the Astoria East/Corona 138 kV TLA. The boundary feeders for this TLA include the feeders from the Hell Gate, Astoria Annex, Rainey, and Jamaica substations.

Figure 35: Astoria East/ Corona 138 kV TLA



In 2023, thermal overloads are observed on the Astoria East/Corona 138 kV TLA boundary feeders, which are designed to a second contingency (N-1-1-0) based on the applicable Con Edison local design criteria.

Considering the utilization of all available phase angle regulator (PAR) controls, the maximum observed deficiency (*i.e.*, compensatory MW) within this TLA ranges from 110 MW in 2023 to 180 MW in 2030 as shown in Figure 36. As shown in Figure 37 and Figure 38, the Astoria East/Corona 138 kV TLA does not peak with the coincident system peak. Based on the load duration curves shown in Figure 37 and Figure 38, the TLA may be deficient over 10 hours (659 MWh) on a peak day in 2023, increasing to 13 hours (1,461 MWh) on a peak day in 2030.

Figure 36: Astoria East/ Corona 138 kV TLA Deficiency

Year	2023	2024	2025	2026	2027	2028	2029	2030
Deficiency (MW)	110	115	110	115	120	125	170	180







Figure 38: Astoria East/Corona 138 kV Load Duration Curve for 2030



Greenwood/Fox Hills 138 kV TLA

Figure 39 shows the high-level topology of the Greenwood/Fox Hills 138 kV TLA. The boundary feeders for this TLA include the feeders from the Vernon, Gowanus, and Fresh Kills substations.



Figure 39: Greenwood/Fox Hills 138 kV TLA



In 2025, thermal overloads and voltage violations are observed on the Greenwood/Fox Hills 138 kV TLA boundary feeders in the steady state (N-0) condition, which are exacerbated under N-1 and N-1-1 conditions.

Considering the utilization of all available PAR controls, the maximum observed deficiency (*i.e.*, compensatory MW) within this TLA of 360 MW in 2025 to 370 MW in 2030 as shown in Figure 40. Based on the load duration curve shown in Figure 41, the TLA may be deficient over 14 hours (3,571 MWh) over a 14 hour period on a peak day in 2025. The load duration curve for 2030 in Figure 42 shows that while the amount of hours that the TLA is deficient does not increase compared to 2025, due to the increased deficiency on peak, the total MWh of the deficiency increases to 3,696 MWh.

Figure 40: Greenwood/Fox Hills 138 kV TLA Deficiency

Year	2025	2026	2027	2028	2029	2030
Deficiency (MW)	360	350	360	360	370	370





Figure 41: Greenwood/Fox Hills 138 kV TLA Load Duration Curve for 2025







Resource Adequacy Base Case Assessments

The following discussion reviews the main findings of the *2020 RNA* resource and transmission adequacy assessments applicable to the Base Case conditions for the Study Period.

Resource Adequacy Model

The NYISO conducts its resource adequacy analysis using the GE-MARS software package, which performs probabilistic simulations of outages of capacity and select transmission resources. The program employs a sequential Monte Carlo simulation method and calculates expected values of reliability indices such as LOLE (days/year) and includes load, generation, and transmission representation. Additional modeling details and links to various stakeholders' presentations are in the assumptions matrix, **Appendix D**. In determining the reliability of a system, there are several types of randomly occurring events that are taken into consideration. Among these are the forced outages of generation and transmission, and deviations from the forecasted loads.

Generation Model

The NYISO models the generation system in GE-MARS using several types of units. Thermal units considerations include: random forced outages as determined by Generator Availability Data System (GADS) — calculated EFORd and the Monte Carlo draw, scheduled and unplanned maintenance, and thermal derates. Renewable resource units (*i.e.*, solar PV, wind, run-of-river hydro and landfill gas) are modeled using five years of historical production data. Co-generation units are also modeled using a capacity and load profile for each unit.

Load Model

The load model in the NYISO GE-MARS model consists of historical load shapes and load forecast uncertainty (LFU). The NYISO uses three historical load shapes in te GE-MARS model (2002, 2006 and 2007) in seven different load levels using a normal distribution. LFU is applied to every hour of these historical shapes and each of the seven load levels are run through the GE-MARS model.

External Areas Model

The NYISO models the four external Control Areas interconnected to the NYCA; (ISO-New England, PJM, Ontario and Quebec. The transfer limits between the NYCA and the external areas are set in collaboration with the NPCC CP-8 Working Group and are shown in the MARS Topology Figure 46. Additionally, the probabilistic model used in the 2020 RNA to assess resource adequacy employs a number of methods aimed at preventing overreliance on support from the external systems. These include imposing a limit of 3,500 MW to the total emergency assistance from all neighbors, modeling simultaneous peak days, and modeling the long-term purchases and sales with neighboring control areas.

MARS Topology

The NYISO models the amount of power that could be transferred across the system in GE-MARS using interface transfer limits applied to the connections between the GE-MARS areas¹⁵ ("bubble-and-pipe" model).

Summary of major GE-MARS topology changes¹⁶ (as compared with the 2019-2028 CRP):

- Marion-Farragut 345kV cables (B and C) assumed out-of-service
- 71, 72, M51, M52 series reactors assumed bypassed after deactivation of Indian Point Unit Nos.
 2 and 3
- Rainey Corona transmission project in-service impacting J to K limits
- AC Transmission Public Policy Segment A and B Projects added starting January 2024
- Removal of Cedars bubble/tie to Zone D model; adding the MW from the bubble to the HQ to D tie limit.
- Updates to Zone K Imports/Exports
- Somerset retirement impacts
- The external areas model for PJM and ISO-NE were simplified by consolidating the five PJM areas (bubbles) into one, and the eight ISO-NE areas into one.

The emergency transfer criteria limits used in the GE-MARS model were developed from an assessment of analysis of the 2020 RNA power flow base cases, and analysis performed for other studies. Figure 43, Figure 44 and Figure 45 provide the thermal and voltage emergency transfer limits for the major NYCA interfaces. The 2018 RNA transfer limits are presented for comparison purposes.

¹⁵ No generation pockets in Zone J and Zone K are modeled in detail in MARS.

¹⁶ Links to related stakeholders' presentations are in the Appendix D, assumptions matrix.



Figure 43: Transmission System Thermal Emergency Transfer Limits

			202	20 RNA				2018	RNA	
Interface	For inf	ormatio	on only	Study Ye	ars: 2024	- 2030	Study	Years:	2019 -	2028
	2021	2022	2023	2024	2025	2030	2021	2022	2023	2028
Dysinger East	1700	2200	2200	2200	2200	2200	1700	2300	2300	2300
Central East MARS	4450	4450	4450	4925	4925	4925	4450	4450	4450	4450
E to G (Marcy South)*	1750	1750	1750	2300	2300	2300	2275	2275	2275	2275
F to G	3475	3475	3475	5400	5400	5400	3475	3475	3475	3475
UPNY-SENY MARS*	5250	5250	5250	7150	7150	7150	5600	5600	5600	5600
l to J	4350	4350	4350	4350	4350	4350	4400	4400	4400	4400
I to K (Y49/Y50)	1293	1293	1293	1293	1293	1293	1293	1293	1293	1293

Notes:

Grey italic font: Limit was not calculated

*change in limit between 2018 RNA and 2020 RNA is due to different modeling method used in GE-MARS. Additional topology changes details are in Appendix D.

Figure 44: Transmission System Voltage Emergency Transfer Limits

			20	2018 RNA							
Interface	For inf	ormatio	on only	Study Ye	ars: 202	4 - 2030	Study Years: 2019 - 2028				
	2021	2022	2023	2024	2025	2030	2021 2022		2023 202		
Dysinger East	2850	2850	2850	2850	2850	2850	2800	2900	2900	2900	
Central East MARS	3100	3100	3100	3925	3925	3925	3100	3100	3100	3100	
Central East Group	5000	5000	5000	5650	5650	5650	5000	5000	5000	5000	
UPNY-ConEd	7000	7000	7000	7375	7375	7375	6250	6250	6250	6250	
I to J & K	5825	5825	5825	6200	6200	6200	5600	5600	5600	5600	

Note: Grey italic font: Limit was not calculated

Figure 45: Transmission System Base Case Emergency Transfer Limits

	2020 RNA															201	8 RNA			
Interface		For	informa	only	nly Study Years: 2024 - 2030								Study Years: 2019 - 2028							
	2021 2022 2023		202	2024 2025		203	2030 2021		2021 2022		22	2023		2028						
Dysinger East	1700	Т	2200	Т	2200	Т	2200	Т	2200	Т	2200	Т	1700	Т	2300	Т	2300	Т	2300	Т
Central East MARS	3100	V	3100	V	3100	V	3925	V	3925	V	3925	V	3100	V	3100	V	3100	٧	3100	V
Central East Group	5000	V	5000	V	5000	V	5650	V	5650	V	5650	V	5000	V	5000	V	5000	٧	5000	V
E to G (Marcy South)	1750	Т	1750	Т	1750	Т	2300	Т	2300	Т	2300	Т	2275	Т	2275	Т	2275	Т	2275	Т
F to G	3475	Т	3475	Т	3475	Т	5400	Т	5400	Т	5400	Т	3475	Т	3475	Т	3475	Т	3475	Т
UPNY-SENY MARS	5250	Т	5250	Т	5250	Т	7150	Т	7150	Т	7150	Т	5600	Т	5600	Т	5600	Т	5600	Т
I to J	4350	Т	4350	Т	4350	Т	4350	Т	4350	Т	4350	Т	4400	Т	4400	Т	4400	Т	4400	Т
I to K (Y49/Y50)	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т	1293	Т
I to J & K	5643	Т	5643	Т	5643	Т	5643	Т	5643	Т	5643	Т	5600	С	5600	С	5600	С	5600	С

Notes:

Grey italic font: Limit was not calculated

T - Thermal, V - Voltage, C - Combined

There are large increases in transfer capability modeled starting in year 2024 in the 2020 RNA. The increases reflect the impact of including the AC Transmission Public Policy projects. Comparing limits in year 2023 to year 2024, increases are represented to the thermal limits of 550 MW for the E to G interface, 1,925 MW for the F to G interface, and 1,900 MW for the UPNY-SENY MARS interface. There are also increases to the voltage limits of 825 MW for the Central East MARS interface, 650 MW for the Central East Group interface, and 375 MW for the UPNY-Con Ed interface.

The NYISO modeled a decrease in the thermal transfer limit for Dysinger East of 100 MW primarily due to the retirement of the Somerset generation unit in Zone A.

Comparing the transfer limits reported for year 2021 through 2023 to the previous RNA, there is an increase of 750 MW on the UPNY-Con Ed voltage limit for the 2020 RNA. The primary cause for this increase is a change in the study assumption for the operation of the series reactors on the Dunwoodie – Mott Haven 345 kV cables (71, 72) and the Sprain Brook – W. 49th Street cables (M51, M52). For the 2020 RNA, these series reactors were modeled as bypassed. This study assumption also resulted in a decrease of 50 MW in the I to J interface thermal limit.

The E to G interface thermal limit was modeled using a dynamic limit table in the 2020 RNA MARS topology. The interface limit ranged from 1,750 MW to a maximum of 2,250 MW based on the availability of the CPV Valley generation units. Starting in year 2024 the dynamic limit table was replaced with a single interface limit of 2,300 MW. The increase in the limit is the result of transmission facility upgrades included in the AC Transmission Public Policy projects. Similarly, the UPNY-SENY MARS interface was modeled using a dynamic limit table ranging from 5,100 MW to a maximum of 5,350 MW. With the large increase in transfer capability when including the AC Transmission projects in 2024, the model was simplified by using a single limit of 7,150 MW, and does not constrain the flow of power in the GE-MARS simulation.

The topology used in the GE-MARS model for the 2020 RNA Base Case is represented in Figure 46.



Figure 46: 2020 RNA Topology Years 4-10 (2024 -2030)



Additionally, for information only, Figure 47 and Figure 48 represent the initial three years preceding the newly-defined RNA Study Period.



Figure 47: Topology Year 1 (2021)





Figure 48: Topology Year 2- 3 (2022- 2023)





Resource Adequacy Base Case Results

The 2020 RNA Base Case resource adequacy studies shows that the LOLE for the NYCA is at or above the criterion of 0.1 days/year starting 2026. The NYCA LOLE results are presented in Figure 49 below.

Study Year	NYCA Baseline Summer Peak Load (MW)	Area J Peak Load (MW) (Non- coincident)	RNA Base Case NYCA LOLE (days/year)
2024	31,838	11,557	0.04
2025	31,711	11,552	0.08
2026	31,670	11,609	0.10
2027	31,673	11,667	0.12
2028	31,756	11,747	0.13
2029	31,865	11,836	0.17
2030	31,992	11,924	0.19

Figure 49: NYCA Resource Adequacy Results

Note: NYCA load values represent baseline coincident summer peak demand. Zones J and K load values represent non-coincident summer peak demand. Aggregate Zones G-J values represent the G-J peak demand.

The LOLE is at or above the criterion of one day in 10 years, or 0.1 days per year, starting year 6 (2026) of the RNA Study Period, and increases through year 10 (2030). Therefore, the NYISO identifies resource adequacy Reliability Needs starting in 2027 (with 2026 being at the 0.10 days/year criterion).

The deficiencies identified in this 2020 RNA are driven by the compound effect of increasing load forecast (*e.g.*, +495 MW in 2030) and loss of generation in Zone J (*e.g.*, -1,372 MW in 2030) see Figure 50. Compared to the 2019 - 2028 CRP, the system has less overall net resources. The Base Case models reflect the application of the generator compliance plans for the DEC's Peaker Rule to affected plants in New York City (Zone J), Long Island (Zone K), and Hudson Valley (Zone G). In Figure 50, the negative net margin shows deterioration in the relative capability to serve load, when comparing the assumptions in the two studies.


Figure 50: 2020 RNA Zone J Load and Capacity Comparison with the 2019 - 2028 CRP

Study Year 10	2020 RNA (Y2030)	2019 - 2028 CRP (Y2028)	Net Delta
Baseline ¹ Load	11,924	11,429	495
Capacity ²	8,190	9,562	-1,372
Net Margin: Change i	-1,867		

Notes:

- 1. Includes the reductions due to projected energy efficiency programs, building codes and standards, distribution energy resources and behind-the-meter solar photovoltaic power; it also reflects expected impacts (increases) from projected electric vehicle usage.
- 2. Does not includes the total SCRs, and UDRs from the Gold Book.

Resource Adequacy Compensatory MW

Resource adequacy compensatory MW amounts are determined by adding generic "perfect capacity" resources to each zone individually, or in combinations of zones, to address the shortfall.

"Perfect capacity" is capacity that is not derated (*e.g.*, due to ambient temperature or unit unavailability caused by factors such as equipment failures or lack of fuel), not subject to energy duration limitations, and not tested for transmission security or interface impacts. Actual resources would need to be larger in order to achieve the same impact as perfect-capacity resources.

The compensatory MW additions are not intended to represent specific solutions, as the impact of specific solutions can depend on the type of the solution and its location on the grid. Rather, the compensatory MW levels provide a generic order-of-magnitude measure to guide solutions. Resource needs could potentially be met by combinations of solutions including generation, transmission, energy efficiency, and demand response measures.

Study	NYCA LOLE		Zones for	Additions	
Year	(dy/yr)	Only in A-F	Only in G-I	Only in J	Only in K
2024	0.04	-	-	-	-
2025	0.09	-	-	-	-
2026	0.10	-	-	-	-
2027	0.12	700	700	100	not feasible
2028	0.14	1,600	1,650	150	not feasible
2029	0.17	not feasible	not feasible	300	not feasible
2030	0.19	not feasible	not feasible	350	not feasible

Figure 51: Compensatory MW Additions for Resource Adequacy Violations

Observations:

- Adequate compensatory MW must be located within, or injected into, Zone J because of transmission constraints into Zone J observed starting in 2029. This result is exemplified by the fact that no compensatory MW in any of the other NYCA zones will help bring the LOLE back below 0.1 days/year.
- Potential solutions to address the 350 compensatory MW resource adequacy deficiency in Zone J by 2030 (100 MW in 2027) could include a combination of additional transfer capability into Zone J and/or resources located within Zone J, and/or demand-side solutions. However, solutions would also need to address the Zone J local¹⁷ transmission load area deficiencies identified in the transmission security evaluations.

Transmission Limit Relaxation Sensitivity

To determine if transmission reinforcements would be beneficial, a "NYCA free flow" test was executed. A free flow simulation is one in which NYCA LOLEs are determined without considering any transmission transfer limitations within the NYCA system. This provides an indication of whether any LOLE violations identified are purely resource related or if they are caused by limitations in the transmission system.

Following removal of the NYCA internal limits, the NYCA LOLE decreased to well below the criterion throughout the Study Period. This result indicates that there is no statewide resource deficiency and that transmission reinforcement to inject resources into Zone J is a potential option to resolve the identified resource adequacy Reliability Need.

The results are in Figure 52 below, and indicate that transmission improvements can also eliminate the LOLE violations.

¹⁷ No local transmission load area limits are modeled for the resource adequacy assessment – deficiencies at this local level are identified in the transmission security assessments.



Figure 52: NYCA Free Flow Simulation Results

Study Year	RNA Base Case NYCA LOLE (days/year)	Free Flow Case NYCA LOLE (days/year)
2024	0.04	0.02
2025	0.08	0.03
2026	0.10	0.03
2027	0.12	0.03
2028	0.13	0.03
2029	0.17	0.04
2030	0.19	0.04

The NYISO performed additional topology limits variations to identify relieving which interfaces helps the most. This information provides additional insights to support solutions development:

- Increasing the transfer limits on the interface between Zones I and J only (I_to_J or Dunwoodie South interface): An increase of 450 MW resolved the needs in 2030. This value is larger than the identified Compensatory MW value of 350 MW because the I_to_J interface is not always fully available due to partial outage states.
- Modeling the I_to_J (Dunwoodie South) interface with no limit: The NYCA LOLE decreased to 0.05 days/year in 2030, which is close to the 0.04 days/year NYCA free flow result. This result confirms that Zone J is the critical area in the GE-MARS analysis RNA Base Case, and that any injection from any interface into Zone J would mitigate the resource adequacy zonal deficiency.

Additional free flow variations results are in Appendix D.

Beyond adding capacity or decreasing load in Zone J, increasing the interface limits into Zone J would mitigate or fully address the resource adequacy deficiency. However, solutions would also need to address the Zone J local¹⁸ transmission load area deficiencies identified in the transmission security evaluations.

Base Case Key Findings

 The dynamic stability Reliability Needs are observed for the entire Study Period. Following the initial phase of the Peaker Rule in 2023, instability of the grid may occur due to a lack of dynamic reactive power capability and inertia available to parts of the New York City grid. The criteria violations include transient voltage response violations, loss of generator synchronism,

¹⁸ No local transmission load area limits are modeled for the resource adequacy assessment – deficiencies at this local level are identified in the transmission security assessments.



and undamped voltage oscillations.

- With full implementation of the Peaker Rule in 2025, several 345 kV circuits in the Con Edison service territory would also be overloaded equating to a deficiency of 700 MW and increasing to at least 1,075 MW by 2030. The duration of the deficiency ranges from nine hours in 2025 (3,853 MWh) to 12 hours in 2030 (7,672 MWh).
- Similar transmission deficiencies would also occur within pockets of Con Edison's non-bulk system (138 kV), ranging in duration from 10 to 14 hours.
- The system exceeds the LOLE criterion of one day in 10 years, or 0.1 days per year, starting in 2027, and increasing through 2030. Therefore, the NYISO identifies resource adequacy Reliability Needs starting 2027.
- The deficiencies identified in this 2020 RNA are driven by the compound effect of the increasing load forecast (*i.e.*, +495 MW in 2030) and loss of generation in Zone J (*i.e.*, -1,372 MW in 2030).
- Potential solutions to address the 350 compensatory MW resource deficiency in Zone J by 2030 (100 MW in 2027) could include a combination of increased transfer capability into Zone J and/or resources located within Zone J, and/or demand-side solutions. However, solutions would also need to address the Zone J local¹⁹ transmission load area deficiencies identified in the transmission security evaluations.

7. Base Case Variation Scenarios

The NYISO, in conjunction with stakeholders and Market Participants, developed reliability scenarios pursuant to Section 31.2.2.5 of Attachment Y of the OATT. Scenarios are variations on the preliminary (1st pass) RNA Base Case to assess the impact of possible changes in key study assumptions which, if they occurred, could change the timing, location, or degree of violations of reliability criteria on the NYCA system during the Study Period, and are presented for information only. There were no changes between the preliminary RNA Base Case and the final Base Case. RNA scenarios are provided for information only, and do not lead to Reliability Needs identification or mitigation. The NYISO evaluated the following scenarios as part of this RNA, with an identification of the type of assessment performed:

¹⁹ No local transmission load area limits are modeled for the resource adequacy assessment – deficiencies at this local level are identified in the transmission security assessments.



- 1. High Load Forecast Scenario Resource Adequacy
 - The 2020 Gold Book High Load forecast were used for the resource adequacy analysis.
- 2. Zonal Resource Adequacy Margins (ZRAM) Resource Adequacy
 - Identification of the maximum level of zonal MW capacity that can be removed without either causing NYCA LOLE violations, or exceeding the zonal capacity.
- 3. "Status-quo" Scenario Transmission Security and Resource Adequacy
 - Removal of proposed major transmission and generation projects assumed in the RNA Base Case.

Additionally, the NYISO proposed to perform two exploratory scenarios, further detailed in **Appendix E**:

- 4. Further Simplified External Areas Model²⁰ Resource Adequacy
 - Starting with the simplified external model described in footnote 8 and also in the assumptions matrix in Appendix D, removing all load and generation from external areas along with removing interfaces between external areas, followed by inserting fixed amounts of capacity in each external area.
- 5. Different Load Shape Resource Adequacy
 - The RNA Base Cases use historical load shapes from 2002, 2006, and 2007 for resource adequacy analysis. The Climate Change Phase 1 study developed forward-looking hourly load shapes. Load shapes will continue to be discussed with the Load Forecast Task Force and other stakeholders.

The results of the scenarios 1-3 are summarized in the following sections; the exploratory scenarios 4 and 5 are in the **Appendix E**; the 70x30 scenarios are in **Section 8** below.

High Load Forecast Scenario

The RNA Base Case forecast includes impacts associated with projected energy reductions coming from statewide energy efficiency and behind-the-meter solar PV programs. The High Load Forecast scenario excludes these energy efficiency program impacts from the peak forecast, resulting in the higher

²⁰ During the 2020 RNA, the External Areas Model for the RNA Base Case was simplified to consolidate five PJM (mid-Atlantic) areas into a single area and eight ISO-NE areas into a single area.

forecast levels. The comparison of the High and Baseline forecasted loads is provided in the Figure 53 below. There is an increase of 2,388 MW in the peak load in 2030, as compared to the Base Case forecast. Given that the peak load in the High Load forecast is higher than in the Base Case, the probability of violating the LOLE criterion increases, and violations would occur starting in 2025. The NYCA LOLE results are in Figure 55.

Year	High Load	Baseline Load	Delta (High Load - Baseline Load)
2024	32,623	31,838	785
2025	32,641	31,711	930
2026	32,863	31,670	1,193
2027	33,163	31,673	1,490
2028	33,562	31,756	1,806
2029	33,976	31,865	2,111
2030	34,380	31,992	2,388

Figure 53: 2020 Gold Book NYCA High Load vs. Baseline Summer Peak Forecast

Figure 54: 2020 Gold Book Zone J High Load vs. Non-coincident Summer Peak Forecast

Year	High Load	Baseline Load	Delta (High Load - Baseline Load)
2024	11,751	11,557	194
2025	11,775	11,552	223
2026	11,884	11,609	275
2027	12,009	11,667	342
2028	12,158	11,747	411
2029	12,315	11,836	479
2030	12,467	11,924	543

Figure 55: 2020 RNA Resource Adequacy High Load Scenario NYCA LOLE Results

Study Year	2024	2025	2026	2027	2028	2029	2030
2020 RNA Base Case	0.04	0.08	0.10	0.12	0.14	0.17	0.19
High Load Scenario	0.07	0.15	0.19	0.26	0.35	0.49	0.63

This scenario indicates that if expected energy efficiency and peak load reduction programs do not materialize at expected levels, the criterion violations would be observed two years earlier, starting in 2025.



Zonal Resource Adequacy Margin (ZRAM)

The RNA Base Case results show that the LOLE is at the resource adequacy criterion in 2026 and exceeds 0.10 days/year starting in 2027.

Scenario analyses were performed to determine the amount of capacity in each zone that could be removed before the NYCA LOLE reaches 0.10 days/year, and offer another relative measure of how close the system is from violating reliability criteria. This simulation is applicable to any RNA Study Years that have LOLE levels that are below criterion, *i.e.*, from 2024 through 2026. The NYISO reduced capacity one zone at a time to determine when violations occur, in the same manner as the compensatory "perfect" MW are added to mitigate resource adequacy violations, but with the opposite impact. The zonal resource margin analysis is summarized in Figure 56.

Study Year	2024	2025	2026	2027	2028	2029	2030
LOLE	0.04	0.09	0.10*	0.12	0.14	0.17	0.19
Zone A	-850	-400	-50	-	-	-	-
Zone B	-850	-400	-50	-	-	-	-
Zone C	-1,500	-400	-50	-	-	-	-
Zone D	-1,500	-400	-50	-	-	-	-
Zone E	EZR	-400	-50	-	-	-	-
Zone F	-1,500	-400	-50	-	-	-	-
Zone G	-1,500	-400	-50	-	-	-	-
Zone H	EZR	EZR	-50	-	-	-	-
Zone I	EZR	EZR	-50	-	-	-	-
Zone J	-450	-50	0	-	-	-	-
Zone K	-1,400	-550	-150	-	-	-	-
Zones A-F	-1,500	-400	-50	-	-	-	-
Zones G-I	-1,500	-400	-50	-	-	-	-

Figure 56: Zonal Resource Adequacy Margin (MW)

Note: EZR - exceeds zonal resources (*i.e.*, all generation can be removed without causing a violation)

*LOLE for year 2026 is 0.097

The ZRAM assessment identifies a maximum level of capacity that can be removed from each zone without causing NYCA LOLE criterion violations. However, the impacts of removing capacity on the reliability of the transmission system and on transfer capability are highly location dependent. Thus, in reality, lower amounts of capacity removal are likely to result in reliability issues at specific transmission locations. The NYISO did not attempt to assess a comprehensive set of potential scenarios that might arise from specific unit retirements. Therefore, actual proposed capacity removal from any of these zones would need to be further studied in light of the specific capacity locations in the transmission network to



determine whether any additional violations of reliability criteria would result. Additional transmission security analysis, such as N-1-1 analysis, would need to be performed for any contemplated plant retirement in any zone.

Status-Quo Scenario

This scenario evaluates the reliability of the system under the assumption that no major transmission or generation projects come to fruition within the RNA Study Period. This includes the removal of all proposed transmission and generation projects that have met 2020 RNA Base Case inclusion rules and removal of generators that require modifications to comply with the DEC's Peaker Rule.

The results of this scenario are in the Figure 57:

Figure 57: 2020 RNA Resource Adequacy Status-quo Scenario NYCA LOLE Results

Study Year	2024	2025	2026	2027	2028	2029	2030
Base Case	0.04	0.08	0.10	0.12	0.14	0.17	0.19
Status-quo Scenario	0.07	0.13	0.14	0.17	0.19	0.23	0.25

From a resource adequacy perspective, this scenario indicates that if expected generation and transmission projects are not built, the criterion violation advances by two years to 2025.

The steady state transmission security results show, as compared to the RNA base case, additional overloads are observed under N-1-1 conditions in the Orange and Rockland and the Con Edison service territories. No additional voltage issues were observed. The results of the steady state transmission security N-1-1 evaluation of the BPTF for this scenario are shown in Figure 58.



Figure 58: 2020 RNA Transmission Security Status-quo Scenario Results

Zone	Owner	Circuit	Observed in RNA Base Results
G	0&R	Chester-Shoemaker 138 kV (27)	
G	0&R	Chester-Sugarloaf 138 kV (28)	
G	0&R	Shoemaker-Shoemaker Tap (29)	
G	0&R	Middletown Tap/Shoemaker Tap 345/138 kV	
I/J	ConEd	Sprainbrook- W49th St 345 kV (51)	Х
I/J	ConEd	Sprainbrook- W49th St 345 kV (52)	Х
I/J	ConEd	Dunwoodie-Mott Haven 345 kV (71)	Х
I/J	ConEd	Dunwoodie-Mott Haven 345 kV (72)	Х
I/J	ConEd	Sprainbrook/Dunwoodie 345/138 kV (N7)	Х
I/J	ConEd	Sprainbrook/Dunwoodie 345/138 kV (S6)	Х
I/J	ConEd	Dunwoodie 345/138 kV (W73)	Х
J	ConEd	Mott Haven-Rainey West 345 kV (Q12)	Х
J	ConEd	Mott Haven-Rainey East 345 kV (Q11)	Х
J	ConEd	Goethals-Gowanus 345 kV (26)	Х
J	ConEd	Goethals-Gowanus 345kV (25)	Х
J	ConEd	Farragut 345/138 kV (TX8)	
J	ConEd	Farragut 345/138 kV (TX9)	



8. "70x30" Scenario

The Climate Leadership and Community Protection Act (CLCPA) mandates that New York consumers be served by 70% renewable energy by 2030 ("70x30"). The CLCPA includes specific technology based targets for distributed solar (6,000 MW by 2025), storage (3,000 MW by 2030), and offshore wind (9,000 MW by 2035), and ultimately establishes that the electric sector will be emissions free by 2040. Significant shifts are expected in both the demand and supply sides of the electric grid, and these changes will affect how the power system is currently planned and operated. To assist the evaluation of these impacts, the 2019 CARIS "70x30" scenario kicked-off the assessment using production cost simulation tools to provide a "first look." Focusing on the impact to energy flows, the NYISO modeled these policy targets for the year 2030 in order to examine potential system constraints, generator curtailments, and other operational limitations.

Subsequent studies, such as this 2020 RNA scenario, as well as the Climate Change Impact and Resilience Phase II Study, build upon the findings of the 2019 CARIS scenario, and provide further insight focusing on system reliability aspects such as transmission security and resource adequacy.

As policymakers advance the implementation plan of the CLCPA, the NYISO assessments are intended to complement their efforts, and are not intended to define the specific steps that must be taken to achieve the policy goals. Additional refinements in assumptions, models, and methods in the following years will be necessary as more information becomes available from policy implementation perspectives and simulation methods and models perspectives.

Scope

This 70x30 Scenario consists of a series of cases to study the potential reliability impact of several renewable energy mix and load levels assumptions. This study does not define the formula to calculate the percentage of renewable energy relative to end-use energy, (*i.e.*, how to account for 70% renewable energy for the "70 by 30" target). As policymakers advance on the implementation plan of CLCPA, this NYISO assessment is intended to complement their efforts, and is not intended to define the specific steps that must be taken to achieve the policy goals. Instead, the findings are intended to provide insight into the resource adequacy and transmission security reliability impacts of two load levels and their corresponding renewable resources mix evaluated in the 2019 CARIS Phase I study. The goal of the analysis is to augment the CARIS insights on congestion and curtailments with reliability perspectives.

A number of key modeling assumptions and approaches may have major impact on the results. To help readers understand the scope of this assessment, considerations that are outside of the scope of this



analysis are described below:

1. **Percentage of renewable energy relative to end-use energy:** This study does not define the formula to calculate the percentage of renewable energy relative to end-use energy, (*i.e.*, how to account for 70% renewable energy for the "70 by 30" or "70x30" target). Rather, two potential renewable build-out levels were defined and modeled in the 2019 CARIS study, (and used in this study), for corresponding load levels to approximate the potential future resource mix in 2030.

2. Renewable mix modeling

- I. Siting and sizing: New renewable generators are modeled as interconnecting to 115 kV or greater bus voltage levels, guided by the NYISO Interconnection Queue. There are many alternative possible interconnection points, but this assessment assumes a single approach for sizing and siting of renewable generation. Impacts of siting generators at lower voltage buses are outside the scope of this study. Nevertheless, the NYISO recognizes that constraints at the distribution level will affect the downstream constraints, which may change the energy flows at the higher voltage level.
- II. Operational constraints: Renewable resources are modeled as 8,760 hourly resource shapes for the resource adequacy MARS simulations. These generation profiles are synthetically generated resource shapes constructed using publicly available data and tools. This deterministic modeling approach will not capture the uncertainty involved with particular renewable resources.

Also, this analysis does not consider potential reliability impacts due to:

- Changes on the transmission system as a result of the resource additions or subtractions;
- Unit commitment, ramp rate constraints, and other production cost modeling techniques;
- Sub-hourly variation in renewable generation.
- 3. **Transmission system modeling:** These scenarios are not an interconnection level assessment of the renewable buildouts, and do not review detailed engineering requirements, capacity deliverability, or impact to the New York system reserve margin. Also, for the resource adequacy evaluations, the MARS topology was only slightly changed to restrict flows from Zone K to Zone J, due to DEC Peaker Rule related unit retirement assumptions. No other change was



implemented to reflect the impacts of any modification simulated in the scenarios, such as the addition of renewable resources, and the removal of fossil-fueled units.

- 4. **External area representation:** As the neighboring regions develop their own plans to achieve higher renewable generation penetration, those regions' demand, generation supply, and transmission system may change. At the time of this report, the plans for NYISO's neighboring regions are taking shape. The external area representation remains consistent with the RNA Base Case. An, exception is the HQ's model, where import from Hydro Quebec (HQ) to Zone D is modeled as a unit in MARS with hourly MW shape from the CARIS output into Zone D along with the addition of a 1,310 MW proxy tie from Hydro Quebec (HQ) to Zone J. If the neighboring areas increase their renewable generation, it is possible that the renewable curtailment amounts assumed in the New York system from this analysis are underestimated.
- 5. **COVID-19 impacts:** Due to the rapidly evolving nature of the pandemic, the impacts to the load forecast and other economic indicators are difficult to predict, and are not included in these scenarios.

Assumptions

The RNA 70x30 Scenario assumptions are based on the <u>2019 CARIS 70x30</u> renewable resource mix and associated load forecasts. The *2019 CARIS* assumptions were based on the *2019 Gold Book*, and used GE MAPS for production cost simulations, and its findings are intended to provide insight of the extent to which transmission constraints may prevent the delivery of renewable energy to New York consumers. The RNA 70x30 Scenarios is intended to supplement the 2019 CARIS 70x30 analysis of congestion and resource curtailment by providing insights on potential reliability impacts.

The 2019 CARIS 70x30 Scenario assessed two load levels labeled as 'Base Load' and 'Scenario Load' (described below). The production cost simulation utilized an hourly load profile for each of the load levels, and the simulation output provided an hourly dispatch profile for the two renewable resource mixes. The hourly dispatch profiles take into consideration transmission constraints that cause curtailments, as identified and described in the *2019 CARIS* report. That simulation output is utilized in this RNA scenario to the resource adequacy and transmission security models, as applicable.

The scenario cases also reflect removal of all of the peaker units, including those which subsequently provided compliance plans, affected by the DEC Peaker Rule in 2023 and 2025. For consistency with the 2019 CARIS 70x30 Scenario, the scenario cases includes removal of those peakers kept in service in the RNA Base. This includes removal of 1,232 MW of peaking generators from Zone K.



Load Assumptions

Two load models from the 2019 CARIS 70x30 Scenario are used for the RNA 70x30 Scenario:

- 'Base Load', representing a higher energy shape (153 TWh) and a higher peak forecast (31,303 MW); the 2002 load shape (8,760 hours) was scaled up to 2028 energy forecast from the 2019 Gold Book. The same load shape was used for all MARS load levels; and
- 'Scenario Load', representing lower energy shape (136 TWh) and a lower peak forecast (25,312 MW); the CARIS-developed load shape was scaled to match CARIS 70x30 'Scenario Load' energy and peak demand forecast. The same load shape was used for all MARS load levels.

Figure 59: Summer Energy and Peak Demand Forecast Zonal Distribution

70x30 Base Load	Α	В	С	D	E	F	G	н	I	J	K	NYCA
Net Load Energy (GWh)	14,590	9,695	15,394	5,337	7,095	11,312	9,544	2,807	5,881	51,749	19,608	153,012
Net Load Peak (MW)*	2,537	1,937	2,653	718	1,264	2,197	2,174	637	1,405	11,589	4,730	31,303
+ BtM-PV at Zonal Peak (MW)	368	60	556	13	518	584	246	35	35	352	102	2,757
Total Load Peak (MW)	2,905	1,997	3,209	731	1,782	2,781	2,420	672	1,440	11,941	4,832	34,060
70x30 Scenario Load	Α	В	С	D	E	F	G	Н	I	J	K	NYCA
Net Load Energy (GWh)	13,034	7,757	12,626	5,101	5,694	9,654	7,911	2,848	5,952	46,354	19,026	135,958
Summer Net Load Peak (MW)*	2,112	1,417	2,171	651	1,052	1,988	1,912	625	1,385	9,129	3,914	25,312
+ BtM-PV at Summer Zonal Peak (MW)	77	16	0	0	0	0	22	2	5	64	24	269
Total Summer Load Peak (MW)	2,189	1,433	2,171	651	1,052	1,988	1,934	627	1,390	9,193	3,938	25,581
Winter Net Load Peak (MW)*	2,234	1,310	2,264	740	1,246	1,934	1,607	636	1,065	7,344	3,841	23,779
+ BtM-PV at Winter Zonal Peak (MW)	0	0	0	0	0	0	0	0	0	0	0	0
Total Winter Load Peak (MW)	2,234	1,310	2,264	740	1,246	1,934	1,607	636	1,065	7,344	3,841	23,779

Note: *Non-coincident zonal peak

Because the 2019 CARIS assumptions are based on the 2019 Gold Book, Figure 60 is a comparison of the 2019 and 2020 Gold Book loads, for information.



Energy (GWh)	A	В	С	D	E	F	G	Н	I	J	K	NYCA
70x30 Base Load	14,590	9,695	15,394	5,337	7,095	11,312	9,544	2,807	5,881	51,749	19,608	153,012
2020 GB Y2030	13,931	9,461	15,371	5,925	7,176	11,293	8,713	2,994	5,566	49,450	19,894	149,774
Energy Delta (GWh)	Α	В	C	D	E	F	G	Н	I	J	K	NYCA
70x30 Base Load -	659	234	23	-588	-81	19	831	-187	315	2,299	-286	3,238
2020 GB Y2030												
Summer Non-Coincident	Α	В	С	D	E	F	G	н	1	J	ĸ	NYCA
Peak (MW)												Coincident Peak
70x30 Base Load	2,537	1,937	2,653	718	1,264	2,197	2,174	637	1,405	11,589	4,730	31,303
2020 GB Y2030	2,748	2,004	2,813	734	1,318	2,353	2,139	660	1,494	11,924	4,690	31,992
Summer Non-Coincident	Α	В	С	D	E	F	G	н	Т	J	K	NYCACoincident
Peak Delta (MW)												Peak
70x30 Base Load -	-211	-67	-160	-16	-54	-156	35	-23	-89	-335	40	-689
2020 GB Y2030												

Figure 60: Load and Energy Comparison between the 2019 and 2020 Gold Book Forecasts

Coincident peak demand is the projected zonal load during the date and hour of the NYCA system-wide peak. The NYCA coincident peak typically occurs in late afternoon during July or August. Non-coincident peak demand is the projected maximum load for each individual zone across a year or season.

Renewable Mix Assumptions

For the two load levels assessed in the 2019 CARIS 70x30 Scenario, the NYISO assumed a renewable resource mix distributed across the state by zone. This RNA 70x30 Scenario models the same zonal renewable resource distribution. The nameplate capacity of the renewable resource mix is provided in Figure 61 below.

70x30 'Base Load Case' (Nameplate MW) 70x30 'Scenario Load Case' (Nameplate MW) **BTM-PV** Zone/Type **OSW** LBW UPV Zone/Type **OSW** LBW UPV BTM-PV 2,286 4.432 995 1.640 3.162 995 А А --В 505 В 361 298 314 298 207 --С С 2,411 2,765 836 1,765 1,972 836 --D 1,762 -76 D 1,383 76 Е 2,000 1,747 901 Е 1,482 1,247 901 --F 3,592 1,131 F 2,563 1,131 -_ -G 2.032 961 G 961 1,450 Н _ -89 Н _ -89 --L -_ _ 130 T _ _ _ 130 J 4,320 950 J 4,320 950 1,778 Κ Κ _ 77 1,176 1,778 77 1,176 -Total 6,098 8,772 15,150 7,542 Total 6,098 6,477 10,832 7,542

Figure 61: Renewable Mix Assumptions for each Load Level

Additional modeling details, by type:

o Land-based wind (LBW): Hourly dispatch profiles (MWh shapes) are applied from CARIS

simulation output, including curtailments observed in the production simulation, for each of the two load shapes. CARIS used the 2009 National Renewable Energy Laboratory (NREL) hourly data as input.

- Off-shore wind (OSW): Hourly dispatch profiles (MWh shapes) are applied from CARIS simulation output, including curtailments observed in the production simulation, for each of the two load shapes. CARIS used the 2009 National Renewable Energy Laboratory (NREL) hourly data as input.
- Utility-scale PV (UPV): Hourly dispatch profiles (MWh shapes) are applied from CARIS simulation output, including curtailments observed in the production simulation, for each of the two load shapes. CARIS used the 2017 production data for existing plants and the 2006 NREL hourly data for new plants as input.
- Behind-the-Meter PV (BtM PV): Hourly dispatch profile (MWh shapes) are applied from CARIS simulation output, for each of the two load shapes. The CARIS behind-the-meter solar profiles are based on hourly shapes created using NREL's PV Watt tool.

Storage Assumptions

A four-hour battery storage is modeled in each NYISO zone, using the newly developed GE MARS Energy Limited Resource Type 4 (EL4) model.²¹ The scenario assumes the same zonal MW distribution modeled in the 2019 CARIS 70x30 scenario, as shown in the Figure 62 below. In these simulations, the EL4 units discharge their MW when the system is deficient, and recharge their energy when the system has an excess of capacity. Units are modeled with a maximum energy discharge per day of four times their maximum hourly discharge value. This paradigm allows the unit to discharge fully in four hours, or for longer if not at full discharge. Also, at this time, only 100% roundtrip efficiency can be modeled in MARS, which does not account for losses in charge/discharge cycle.

²¹ The MARS Energy Limited Resource type 4 (EL4) unit was introduced in the GE MARS version 3.29.1499 to better reflect battery behavior.



Figure 62: Storage Zonal MW Distribution

Zone	MW
А	150
В	90
С	120
D	180
E	120
F	240
G	100
Н	100
I	100
J	1,320
K	480
NYCA	3,000

External areas

PJM, Ontario and ISO-NE are modeled using same method as 2020 RNA Base Case.

Imports from Hydro Quebec (HQ) to Zone D are modeled as a generator in MARS with an hourly MW shape from the CARIS output. Consistent with the CARIS assumptions, the model for this 70x30 Scenario includes a generic HVDC tie from HQ directly to Zone J, capable of 1,310 MW. The generic HVDC tie is modeled as a generator in MARS with an hourly MW shape from the CARIS output.

Resource Adequacy Methodology and Results

GE's MARS program is used for resource adequacy analysis of the 70x30 Scenario. The GE MARS tool employs a sequential Monte Carlo simulation method, and calculates, on an area and system basis, standard reliability indices such as daily and hourly LOLE (days/year and hours/year). New MARS cases were developed based on the assumptions described above, and sensitivities were performed to better understand the impact of various factors. The three steps described above are detailed in the following pages.

Step 1: Renewable Mix on Two Load Levels

Model the 70x30 'Base Load' and 'Scenario Load' along with their corresponding renewable resources mix output and calculate NYCA LOLE.

These initial resource adequacy simulations did not identify a measurable LOLE in either the 'Base Load' or 'Scenario Load' 70x30 cases. This result occurs because large amounts of additional renewable generation were modeled to meet the 70% energy goal, while retaining in the models the existing fossil fuel generators; which in turn leads to an increase in the available generation. In addition, the transmission system model (MARS topology) was not revised to reflect the potential impacts of increasing the penetration of renewable resources.

Figure 63 and Figure 64 below show the resource mix for the two load levels with the renewables added and no fossil removal.

Figure 63: Resource Mix in the 70x30 'Base Load' Case before Capacity Removal



Figure 64: Resource Mix in the 70x30 'Scenario Load' Case before Capacity Removal



Step 2: Capacity Removal

Additional simulation were performed to gauge the sensitivity of the system to capacity removal. Two types of removals are simulated, with results in the figures below:

- A Zonal Resource Adequacy Margin (ZRAM) analysis: ZRAM analysis identifies the amounts of generic "perfect capacity" resources that can be removed from a zone while still meeting the LOLE criterion. "Perfect capacity" is capacity that is not derated (*e.g.*, due to ambient temperature or unit unavailability caused by factors such as equipment failures or lack of fuel), not subject to energy duration limitations, and not tested for transmission security or interface impacts. Actual resources would need to be larger in order to achieve the same impact as perfect-capacity resources.
- An age-based retirement analysis where fossil units are removed from the model, starting with the oldest, until the New York system is at LOLE criteria. This age-based approach is a simple analytical approach as a proxy to represent unit retirements that may occur as surplus resources increase. In reality many factors will affect specific generator status decisions.



Figure 65: ZRAM Results on the Initial 70x30 Cases

Cases	NYCA LOLE	ZONE A	ZONE B	ZONE C	ZONE D	ZONE E	ZONE F	ZONE G	ZONE H	ZONE I	ZONE J	ZONE K
Base Case	0.19	8	œ	œ	×	œ	œ	œ	8	80	350	×
70x30 Base Load Case	0.00	-2,400	EZR	-5,200	-1,750	EZR	-7,200	-5,400	EZR	EZR	-1,500	-1,250
70x30 Scenario Load Case	0.00	-3,550	EZR	-5,550	-1,750	EZR	EZR	EZR	EZR	EZR	-4,200	-1,400

Notes:

- Negative numbers indicate the amount of MW that can be removed from a zone (one zone at a time in this case) without causing a violation. For instance, NYCA LOLE reaches 0.1 days/year when 1,500 MW of "perfect capacity" is removed from Zone J in the 'Base Load' Case.
- EZR exceeds zonal resources: *i.e.*, all generation from the respective zone can be removed without causing a NYCA LOLE violation.
- The generation pockets in Zone J and Zone K are not modeled in detail in MARS, and the values identified here may be larger as a result.

The ZRAM analysis results show that many of the zones in the NYCA can have all internal resources removed without causing a violation of the LOLE criterion (*i.e.*, those labeled 'EZR'), a result pointing to the large renewable additions upstate.

Figure 66: Fossil Removal Based on 70x30 'Base Load' Scenario Cases

	Total [·]	Thermal Ca	pacity Left	(MW)	Cumulative Capacity Removed (MW)				
Cases	Zone J	Zone K	Other	Total	Zone J	Zone K	Other	Total	NYCA
(Age >=)			Zones				Zones		LOLE
Total	8,190	3,962	15,012	27,165	0	0	0	0	0.00
70	6,978	3,564	14,616	25,160	1,212	398	396	2,005	0.02
68	6,601	3,371	14,616	24,590	1,589	591	396	2,575	0.05
67*	6,386	3,360	14,616	24,364	1,804	602	396	2,801	0.11
67	6,236	3,360	14,616	24,214	1,954	602	396	2,951	0.15

Notes:

• Case 67: most, but not all units 67 and older were retired in this case.

• Case 67*: a special evaluation of Case 67 where the marginal unit was derated, instead of fully removed, to obtain an LOLE closer to 0.1 days/year.

The age-based analysis for the 'Base Load' scenario identifies that the removal of generators at least 67 years old would reduce the total capacity by 2,951 MW, which would exceed the LOLE criterion. An additional analysis was performed to bring the LOLE closer to the 0.1 days/year criterion by derating the capacity of the marginal unit (Case 67*), which identifies that the NYCA will exceed the LOLE criterion once 2,801 MW have been removed from the system, of which 1,804 MW is from Zone J. The age-based fossil removal method has the effect to primarily remove the units from Zones J and K, accelerating the rate of LOLE reaching its criterion violation. Because Zone J is driving the LOLE at criterion, and not upstate generation, additional fossil generation can be removed from the upstate zones without affecting the LOLE at criterion.



Figure 67, Figure 68 and Figure 69 below show the resources mix for NYCA, Zone J and Zone K respectively, with the renewables added and fossil removal up to the point of an LOLE criterion violation for 70x30 'Base Load' case. The fossil generation percentages are calculated based on the minimum of CRIS and DMNC, while solar and wind generation are based on nameplate rating.





Figure 68: Zone J Resource Mix in 70x30 'Base Load' Case at Criterion





Figure 70 shows a comparison between the total installed capacity and unforced capacity for 70x30 Base Load case when the system is close to LOLE criterion. To bring the model to criterion, approximately 2,800 MW of fossil generation were removed resulting in an installed capacity margin of 191.8%, equivalent to an unforced capacity margin of 114%. Out of 2,800 MW, approximately 1,800 MW were removed from Zone J, resulting in installed capacity margin of 92% in Zone J, equivalent to unforced capacity margin of 61%.



Figure 70: 70x30 'Base Load' Load and Capacity Totals, ICAP vs. UCAP

	70x30 'Base Load'	70x30 'Base Load'
	(ICAP)	(UCAP) ¹
NYCA Totals		
Load (net of BtM Solar)	31,303	31,303
Renewable Additions (offshore&land wind, utility solar)	30,020	7,861
Total capacity in the 70x30 model before age-based removal ²	62,837	38,322
Total thermal capacity in the 70x30 model before age-based removal	27,165	25,444
Total fossil units in the 70x30 model before age-based capacity removal	23,822	22,175
Total nuclear in the 70x30 model before age-based capacity removal	3,343	3,269
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	2,801	2,629
Total capacity ("model at criterion")	60,036	35,693
Capacity/ Load Ratio	191.8%	114.0%
NY_J Totals		
Load (net of BtM Solar)	11,589	11,589
Total capacity in 70x30 Case	12,510	8,761
Total fossil units in 70x30 model before age-based fossil removal	8,190	7,602
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	1,804	1,701
Total capacity ("model at criterion")	10,706	7,060
Capacity/Load Ratio	92.4%	60.9%
NY_K Totals	·`	
Load (net of BtM Solar)	4,730	4,730
Total capacity in 70x30 Case	5,782	4,400
Total fossil units in 70x30 model before fossil removal	3,962	3,745
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	602	579
Total capacity ("model at criterion")	5,180	3,821
Capacity/Load Ratio	109.5%	80.8%

Notes

1. UCAP calculation:

- For thermal units, MARS EFORd data is used.
- For renewables, UCAP is calculated based on the average output during peak hours.
- 2. Reflects additional peaker removal in Zone K.
- 3. Calculated based on 70x30 'Base Load' Case 67.*

Figure 71: Fossil Removal Based on 70x30 'Scenario Load'

	Total [•]	Thermal Ca	pacity Left	(MW)	Cumulative Capacity Removed (MW)				
Cases	Zone J	Zone K	Other	Total	Zone J	Zone K	Other	Total	NYCA
(Age >=)			Zones				Zones		LOLE
Total	8,190	3,962	15,012	27,165	0	0	0	0	0.00
50	4,354	1,541	11,228	17,124	3,836	2,421	3,784	10,041	0.03
40	4,354	1,393	10,247	15,995	3,836	2,569	4,765	11,170	0.07
39	4,354	1,349	10,197	15,901	3,836	2,613	4,815	11,264	0.09
38	3,563	1,325	9,935	14,824	4,627	2,637	5,077	12,341	0.11

The age-based analysis for the "Scenario Load" shows that the removal of generators at least 38 years old would cause NYCA to exceed the LOLE criterion. This equates to a removal of 12,341 MW from the system, with the zonal distribution shown in Figure 71. The age-based fossil removal method has the effect of primarily removing units from Zones J and K, accelerating the rate of reaching the LOLE criterion. Because mainly Zone K deficiencies are driving the LOLE at criterion in this scenario, additional fossil generation can be removed from the upstate zones without affecting the LOLE at criterion.

Figure 72, Figure 73 and Figure 74 below show the resource mix for NYCA, Zone J and Zone K respectively, with the renewables added and fossil removal until an LOLE violation results for 70x30 Scenario Load case. The fossil generation percentages are calculated based on minimum between CRIS and DMNC, while solar and wind generation are based on nameplate rating.



Figure 72: NYCA Resource Mix in 70x30 'Scenario Load' Case at Criterion

Figure 73: Zone J Resource Mix in 70x30 'Scenario Load' Case at Criterion



Figure 74: Zone K Resource Mix in 70x30 'Scenario Load' Case at Criterion



Figure 75 shows a comparison between the total installed capacity and unforced capacity for 70x30 Scenario Load case when the system is close to LOLE criterion violation. To bring the model to criterion,

approximately 12,350 MW of fossil generation were removed resulting in an installed capacity margin of 173.4%, equivalent to an unforced capacity margin of 103.7%. Out of 12,350 MW, approximately 4,600 MW and 2,650 MW were removed from Zone J and Zone K, respectively resulting in installed capacity margin of 97% in Zone J and 80% in Zone K.

Figure 75: 70x30 'Scenario Load' Load and Capacity Totals, ICAP vs UCAP

	70x30 'Scenario Load'	70x30 'Scenario Load'
	(ICAP)	(UCAP) ¹
NYCA Totals		
Load (net of BtM Solar)	25,312	25,312
Renewable Additions (offshore&land wind, utility solar)	23,407	6,082
Total capacity in the 70x30 model before age-based fossil removal ²	56,224	36,543
Total thermal capacity in the 70x30 model before age-based removal	27,165	25,444
Total fossil units in the 70x30 model before age-based capacity removal	23,822	22,174
Total nuclear in the 70x30 model before age-based capacity removal	3,343	3,269
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	12,341	10,295
Total capacity ("model at criterion")	43,883	26,246
Capacity/ Load Ratio	173.4%	103.7%
NY_J Totals		
Load (net of BtM Solar)	9,129	9,129
Total capacity in 70x30 Case	13,460	8,759
Total fossil units in 70x30 model before age-based fossil removal	8,190	7,602
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	4,627	4,152
Total capacity ("model at criterion")	8,833	4,607
Capacity/Load Ratio	96.8%	50.5%
NY_K Totals		
Load (net of BtM Solar)	3,914	3,914
Total capacity in 70x30 Case	5,782	4,391
Total fossil units in 70x30 model before fossil removal	3,962	3,745
Age-based fossils removed to get to 0.1 LOLE ("model at criterion") ³	2,637	2,502
Total capacity ("model at criterion")	3,145	1,889
Capacity/Load Ratio	80.3%	48.3%

Notes

1. UCAP calculation:

- For thermal units, MARS EFORd data is used.
- For renewables, UCAP is calculated based on the average output during peak hours.
- 2. Reflects additional peaker removal in Zone K.
- 3. Calculated based on 70x30 'Scenario Load' Case 38.

Sensitivity: Nuclear Generation Retirement

As a sensitivity analysis for this capacity removal step, the nuclear units are removed from the system, which equates to the removal of 3,343 MW summer capacity, all located upstate. In this analysis, first the nuclear generation is removed, followed by the fossil plants removal by age until the LOLE criterion is violated. This exercise identifies how much fossil MW can be removed before exceeding the criterion. It is important to note these nuclear units may continue in operation beyond 2030 and this sensitivity analysis should not be interpreted as forecasting any deactivation.

	Total ⁻	Thermal Ca	pacity Left	(MW)	Cumulative Capacity Removed (MW)				
Cases	Zone J	Zone K	Other	Total	Zone J	Zone K	Other	Total	NYCA
(Age >=)			Zones				Zones		LOLE
Total	8,190	3,962	11,669	23,822	0	0	**3,343	3,343	0.00
70	6,978	3,564	11,273	21,817	1,212	398	3,739	5,348	0.02
68	6,601	3,371	11,273	21,247	1,589	591	3,739	5,918	0.06
67*	6,386	3,360	11,273	21,021	1,804	602	3,739	6,144	0.11
67	6,236	3,360	11,273	20,871	1,954	602	3,739	6,294	0.17

Figure 76: Nuclear Retirement Sensitivity based on 70x30 "Base Load" Case

Notes:

• Case 67: most, but not all units 67 and older were retired in this case.

• Case 67*: a special evaluation of Case 67 where the marginal unit was derated instead of fully removed to obtain an LOLE closer to 0.1 days/year.

• **3,343: the amount of nuclear MW removed in the sensitivity.

Observations:

- The removal of the nuclear units did not significantly affect the LOLE results on the case before the age-based fossil removals, because the addition of upstate renewable resources outweigh the loss of nuclear capacity.
- The results previously identified in the age-based retirement analysis on the 'Base Load' case were effectively unchanged by the removal of the nuclear units. Specifically, the 3,343 MW of retirement of the upstate nuclear units does not significantly impact the NYCA LOLE results because the needs are driven by downstate capacity deficiencies. It is important to note that other benefits of existing generation, such as voltage and stability support, were not captured in this resource adequacy simulation.
- NYCA meets the LOLE criterion with 5,918 MW removed, of which 2,575 MW fossil (5,918 3,343 = 2,575).
- NYCA exceeds the LOLE criterion when 6,144 MW are removed (at 67*), of which 3,343 MW are nuclear units, and 2,801 MW are fossil-fueled units.



	Total ⁻	Thermal Ca	pacity Left	(MW)	Cumulative Capacity Removed (MW)				
Cases	Zone J	Zone K	Other	Total	Zone J	Zone K	Other	Total	NYCA
(Age >=)			Zones				Zones		LOLE
Total	8,190	3,962	11,669	23,822	0	0	**3,343	3,343	0.00
50	4,354	1,541	7,885	13,781	3,836	2,421	7,127	13,384	0.04
45	4,354	1,541	7,010	12,906	3,836	2,421	8,002	14,259	0.07
41	4,354	1,526	7,002	12,883	3,836	2,436	8,010	14,282	0.08
40	4,354	1,393	6,904	12,652	3,836	2,569	8,108	14,513	0.14

Figure 77: Nuclear Retirement Sensitivity based on 70x30 "Scenario Load" Case

Observations:

- NYCA meets the LOLE criterion in 2030 with 14,282 MW of existing generation removed.
 - 14,282 3,343 nuclear = 11,170 MW fossil removed with nuclear units out of service, versus 11,264 MW fossil removed when nuclear units are modeled in service.
- As a result of the removal of nuclear units, the removal of 14,513 MW of thermal generation would exceed the LOLE criterion. Of that amount, 11,170 MW is from fossil fuel generators.

Sensitivity: Energy Storage Resources

One of the New York's CLCPA goals is to add 3,000 MW of energy storage resources by 2030. In this sensitivity, the storage resources are distributed across the NY system, and the age-based removal is simulated on both the initial 70x30 analysis from Step 1, and on the nuclear retirement sensitivity. Four-hour duration storage resources are assumed, using the MARS EL4 model.

For each of the two load cases, with the model at the LOLE criterion, the NYISO added storage based on the zonal distribution utilized in the CARIS 70x30 Scenario, and recalculated the NYCA LOLE to determine impact on resource adequacy.

Figure 78 identifies the amount of fossil fuel generation that is removed from the system to exceed the LOLE criterion.



			Fossil MW Removed to Reach LOI Criterion Violation		
			Nuclear In-Service	3,343 MW Nuclear Out-Of-Service	
	Base Load' case	Without ESRs	2,801	2,801	
		With 3000 MW ESRs	3,062	3,037	
	Scenario Load'	Without ESRs	12,341	11,170	
	scenario case	With 3000 MW ESRs	13,133	11,550	

Figure 78: Storage Sensitivity Fossil MW Removed by Age to Exceed LOLE

Note: the values in this table should not be used to approximate the Effective Load Carrying Capability (ELCC) of storage resources because the analysis was not conditioned to perform this type of analysis.

On the 'Base Load' cases, the benefit of the energy storage resources is limited to around 250 MW (*i.e.*, with additional storage, and with or without the existing nuclear units, around 260 MW of additional fossil can be removed to reach NYCA LOLE violation). These effects occur mainly because of the location of the capacity shortfalls (in Zones J and K), due to the storage resource allocation (1,320 MW in Zone J and 480 MW in Zone K), and due to the duration of the events, with many longer than four hours.

For the Scenario Load cases, the energy storage resources have additional benefits. Specifically, with existing nuclear units in-service, and the additional storage resources in service, approximately 800 MW of additional fossil can be removed to reach LOLE violation. With existing nuclear units out of service, and the additional storage resources in service, approximately 380 MW of additional fossil can be removed to reach LOLE violation. Units out of service and the additional fossil can be removed to reach LOLE violation.

An additional simulation was performed to gauge the impact of using an eight-hour EL4 model on the 'Base Load' scenario. When comparing with the four-hour model, a lot more (*e.g.* approximately 1,450 MW for this specific simulation) fossil generation is removed until the LOE criterion is exceeded. Results are shown in the Figure 79 below.

To better quantify the locational benefit of energy storage resources, a simulation was performed on the Base Load case that evaluated only modeling the Zone J resources. The results are consistent with those in Figure 78, indicating that for the modeled system energy storage resources are most effective in Zone J. This result is driven largely by the location of unit retirements in this scenario.

		Fossil MW Remov Criterion Violat serv	ed to Reach LOLE ion (Nuclear in- ice)
		4-hour ESR	8-hour ESR
'Base Load' case	Without ESRs	2,801	2,801
	With 3000 MW ESRs	3,062	4,516

Figure 79: 4-Hour vs. 8-Hour Energy Storage Sensitivity

Sensitivity: Resolve Local Transmission Constraints

The production cost analysis performed in CARIS showed that renewable resources were curtailed due to local transmission bottlenecks. As part of the resource adequacy analysis, the NYISO modeled the output renewable shapes, including the CARIS-simulated curtailments, in the initial analysis. This sensitivity analyzes the impact of modeling the input renewables shapes with no curtailment reflected.

The use of non-curtailed renewables does not significantly affect the resource adequacy results. This output demonstrates that alleviating the local constraints that caused the curtailments, while beneficial from an annual energy production perspective as shown in CARIS, does not offset the need for dispatchable generation to meet reliability requirements at peak load.

Transmission Security Methodology and Results

The purpose of this assessment is to identify reliability risks focusing on the steady-state thermal loading on the BPTF for N-1 and N-1-1 conditions. The transmission security assessment for 70x30 models six different output levels of intermittent renewable resources and load levels. The basis for the load and renewable resource mix is the 70x30 Base Load case. Figure 80 shows the load level for each case along with the assumption for land-based wind, off-shore wind, and solar. For the solar dispatch, both the behind-the-meter and in front of the meter solar are dispatched to the same percentage. Dispatchable resources are needed to fill the gaps created when intermittent renewable resources are not producing sufficient power to serve load. The amount of dispatchable resources included in the transmission security base case is approximately 24,700 MW (after age-based removals and peaker removals).



Coco #	Case Load (Net Load including BtM solar	Land-Based Wind	Off-Shore Wind	Solar
Case #	reductions, MW)	(% of Pmax)	(% of Pmax)	(% of Pmax)
1	Day Peak Load (30,000)	10	20	45
2	Evening Peak Load (31,100)	0	0	0
3	Light Load (12,500 MW)	15	45	0
4	Light Load (12,500 MW)	0	0	0
5	Shoulder Load (21,500 MW)	0	0	40
6	Shoulder Load (21,500 MW)	15	45	40

Figure 80: 70x30 Scenario Transmission Security Case Assumptions ('Base Load' Case)

The age-based fossil removals for the Base Load resource adequacy scenario, with no energy storage resources (ESR), are also modeled in this assessment, including the removal of units that were in service prior to January 1, 1963. This removal amounts to a total of 2,586 MW summer capability. The 2,586 MW removal is utilized in the transmission security analysis, as it is the last point of generation removal prior to observing resource adequacy LOLE violations.

The pairings of similar load levels (*e.g.*, Cases 1 & 2, Cases 3 & 4, and Cases 5 & 6) with different levels of renewable resource penetration shows that a balance in load and generation is achievable (*i.e.*, the case was able to match load plus losses with the available generation under N-0). While transmission security analysis for this assessment does not consider an 8,760-hour type of load and generation variety, the six cases considered cover, within reasonable bounds, load levels that can be seen for many hours. For all cases (except Case 2), the renewable generation mix shown in Figure 80 was selected based on observations from the CARIS 70x30 'Base Load' results for similar load levels. Case 2 reflects the potential for an evening peak load assuming no MW output from the wind and solar resources. The evening peak load reflects approximately 93% of the peak load observed during the day peak with no output from the behind-the-meter solar. For this assessment, after peaker generation removals and age-based removals, both 10-minute and 30-minute operating reserve levels were maintained by utilizing the remaining synchronous generation.

Case 1 and Case 2 result in N-1 thermal loading criteria violations. These violations are observed on the Rainey 345/138 kV (8W) (both Case 1 and Case 2) and the Rainey 345/138 kV (8E) (Case 1 only) transformers. These violations are primarily driven by local load pocket deficiencies created by the age-based generation removals. No N-1 thermal loading criteria violations are observed in Cases 3, 4, 5, or 6.

Case 1 and Case 2 have N-1-1 thermal loading criteria violations. These violations are summarized in Figure 81. In addition to the transmission security issues observed in the RNA Base Case, overloads are



observed in the O&R and PSEG-LI service territories.

The thermal loading issues indicate transmission constraints that may occur with high renewable output, as well under peak load conditions without these resources. To secure the transmission system, additional dispatchable resources would be needed. To maintain system transmission security, approximately 750 MW of dispatchable resources would be needed in addition to the 24,700 MW of dispatchable resources remaining in the model *(i.e.* after age-based removals and peakers). This assessment did not consider the potential duration of the deficiencies or the sudden loss of all off-shore wind. Rather, contingency events for renewable resources only considered loss of resources due to electrical faults. For all cases, the NYISO locational reserves requirements were achieved by utilizing dispatchable generation.



Zone	Owner	Circuit	Observed in RNA Base Results	Case 1	Case 2
G	O&R	Shoemaker-Shoemaker Tap (29)		х	х
G	O&R	Middletown Tap/Shoemaker Tap 345/138 kV		х	х
J	ConEd	Sprainbrook-W49th St 345 kV (51)	х	х	х
J	ConEd	Sprainbrook-W49th St 345 kV (52)	х	х	х
J	ConEd	Dunwoodie-Mott Haven 345 kV (71)	х	х	х
J	ConEd	Dunwoodie-Mott Haven 345 kV (72)	х	х	х
J	ConEd	Mott Haven-Rainey West 345 kV (Q12)	х	х	х
J	ConEd	Mott Haven-Rainey East 345 kV (Q11)	х	х	Х
J	ConEd	Goethals-Gowanus 345 kV (26)	х		Х
J	ConEd	Goethals-Gowanus 345kV (25)	х		Х
J	ConEd	Sprainbrook/Dunwoodie 345/138 kV (N7)	х	х	х
J	ConEd	Sprainbrook/Dunwoodie 345/138 kV (S6)	х	х	Х
J	ConEd	Rainey West - Farragut East 345 kV (61)		х	х
J	ConEd	Rainey 345/138 kV (8W)		х	х
J	ConEd	Rainey 345/138 kV (8E)		х	
K	LIPA	Dunwoodie - Shore Rd 345 kV (Y50)			Х
K	LIPA	Kings - Pilgrim 138 kV (880)			Х
K	LIPA	Kings - West Bus 138 kV			х
K	LIPA	Elwood 2 - Greenlawn 138kV (138-673)			х
K	LIPA	Valley Stream 2 - East Garden City 2 138 kV			Х
K	LIPA	Syosset - Greenlawn 138 kV (138-676)			х
K	LIPA	Syosset - Oakwood 138 kV (138-675)			х
K	LIPA	Northport 3 - Pilgrim 138 kV (138-679)			Х
K	LIPA	Northport 1 - Pilgrim 138 kV (138-677)			х
K	LIPA	Elwood 1 - Northport 2 138 kV (138-681)			х

Figure 81: N-1-1 Thermal Load Criteria Violations

Key Findings of the "70x30" Scenario

As policymakers advance an implementation plan for the CLCPA, this assessment is intended to complement their efforts and provide information about possible challenges. The "70x30" RNA scenario builds on the 2019 CARIS 70x30 scenario to model state-mandated policy goals, and supplements the 2019 CARIS Key Findings.

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- 1. **Adding renewables:** The NYCA system represented in cases with the renewable resource mix added is reliable with a significant surplus of resources when not taking into consideration potential retirements.
- 2. Surplus generation: Depending on load, approximately 10% (70x30 Base Load) 45% (70x30 Scenario Load) of fossil plants could be removed before exceeding LOLE criterion. The age-based approach to remove fossil plants results in concentrating the removal in zones that had the least amount of generation surplus. The total fossil removal also depends on other factors such as unit unavailability, maintenance and location.
- 3. **Nuclear sensitivity:** Retirement of nuclear plants would result in less surplus capacity and therefore more conventional generation (currently fossil-fueled) would need to be retained in order to maintain a reliable system.
- 4. **Energy storage resources:** Energy storage resources may provide a benefit to the system from a reliability standpoint by assisting in meeting peak load (subject to limitations identified in this report), thus allowing for additional fossil units to be retired. Resources with a duration longer than four hours would provide additional benefit to the system.
- 5. **Curtailments due to local constraints**: Alleviating the local transmission constraints that cause renewable curtailments, while beneficial from an annual energy production perspective as shown in CARIS, would not significantly offset the need for conventional generation to meet system demands reliably.
- 6. **Dispatchable generation**: Even with a high output from intermittent renewable resources, there is still a need for significant amounts of dispatchable generation to meet reliability requirements at various times throughout the year, including peak load. Dispatchable resources would be needed to fill the gaps created when intermittent renewable resources are not producing energy. Even with a large amount of installed capacity of renewable resources, there would still be a need for significant dispatchable generation to meet reliability requirements at various times throughout the year, including peak load. To maintain system transmission security, approximately 750 MW of dispatchable resources would be needed in addition to the 24,700 MW of dispatchable resources remaining in the model *(i.e.* after age-based removals and peakers).
- 7. **Additional Resource Adequacy Considerations**: The resource adequacy simulations did not consider potential reliability impacts due to:



- Intra-zonal constraints on the transmission system;
- Changes on the transmission system as a result of the resource additions or subtractions; and
- Unit commitment, ramp rate constraints, and other production cost modeling techniques.
- 8. **Transmission security thermal considerations:** Thermal loading issues are observed in the peak load case with a high penetration of land-based wind, off-shore wind, and solar, as well as in a peak case without these resources. Dispatchable resources beyond those identified in resource adequacy would be needed in the downstate area to address thermal reliability criteria violations.

The NYISO will continue to monitor and track system changes. Subsequent studies, such as the Comprehensive Reliability Plan, the Climate Change Impact and Resilience Study, and future economic and public policy planning studies will build upon the findings of this 70x30 Scenario. To inform policymakers, investors and other stakeholders as implementation unfolds, these forward-looking studies will provide further assessment of the CLCPA.



9. Reliability Compliance Obligations and Activities

The Reliability Needs Assessment is not the only NYISO work product or activity related to reliability planning. The purpose of this section is to discuss the NERC Planning Coordinator and Transmission Planner obligations fulfilled by the NYISO as well as the other NPCC and NYSRC planning compliance obligations. The NYISO has various compliance obligations under NERC, NPCC, and the NYSRC. The periodicity of these requirements varies amongst the standards and requirements. While achieving compliance with all NERC, NPCC, and NYSRC obligations is critical to ensuring the continued reliability of the transmission system, this section primarily discusses in some detail the planning compliance requirements that closely align with this Reliability Needs Assessment. The full details of the compliance obligations are found within the reliability standards and requirements themselves. Publically available results for the compliance activities listed below are found on the NYISO website under Planning – Reliability Compliance²².

The purpose of the NERC Reliability Standards is to "define the reliability requirements for planning and operating the North American bulk power system and are developed using a results-based approach that focuses on performance, risk management, and entity capabilities." The objective of NPCC Directory #1 and the NYSRC Reliability Rules and Compliance Manual are to provide a "design-based approach" to design and operate the bulk power system to a level of reliability that will not result in the loss or unintentional separation of a major portion of the system from any of the planning and operations contingencies with the intent of avoiding instability, voltage collapse and widespread cascading outages. Figure 82 shows the various NERC Standards with requirements applicable to the NYISO as a NERC registered Planning Coordinator and/or Transmission Planner. The NPCC planning compliance obligations are primarily located in NPCC Regional Reliability Reference Directory #1 Design and Operation of the Bulk Power System. The NYSRC planning compliance obligations are located in the Reliability Rules and Compliance Manual.

Fundamental to any reliability study is the accuracy modeling data provided by the entities responsible for providing the data. The data requirements for the development of the steady state, dynamics, and short circuit models is provided in the NYISO Reliability Analysis Data Manual (RAD Manual).²³ This data primarily comes from compliance with NERC MOD standards. Much of this data is collected through the annual database update process outlined in the RAD Manual and the annual FERC Form 715 filing to which the transmitting utilities certify, to the best of their knowledge, the accuracy of the

²² https://www.nyiso.com/planning-reliability-compliance

²³ https://www.nviso.com/documents/20142/2924447/rel-anl-data-mnl.pdf

data. Additional compliance obligations provide for the accuracy of the modeling data through comparison to actual system events (*e.g.*, MOD-026, MOD-026, and MOD-033).

Following the completion of the annual database update, these databases are used for study work such as the Reliability Planning Process, and for many other compliance obligations such as those listed in Figure 82. Planning studies similar to the Reliability Planning Process include the NPCC/NYSRC Area Transmission Reviews (ATRs) and the NERC TPL-001 assessments.

Standard Name	Title	Purpose
FAC-002	Facility Interconnection Studies	To study the impact of interconnecting new or materially modified Facilities to the Bulk Electric System.
FAC-010	System Operating Limits Methodology for the Planning Horizon	To ensure that System Operating Limits (SOLs) used in the reliable planning of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.
FAC-013	Assessment of Transfer Capability for the Near-Term Transmission Planning Horizon	To ensure that Planning Coordinators have a methodology for, and perform an annual assessment to identify potential future Transmission System weaknesses and limiting Facilities that could impact the Bulk Electric System's (BES) ability to reliably transfer energy in the Near-Term Transmission Planning Horizon.
FAC-014	Establish and Communicate System Operating Limits	To ensure that System Operating Limits (SOLs) used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.
IRO-017	Outage Coordination	To ensure that outages are properly coordinated in the Operations Planning time horizon and Near-Term Transmission Planning Horizon.
MOD-020	Providing Interruptible Demands and Direct Control Load Management Data to System Operators and Reliability Coordinators	To ensure that assessments and validation of past events and databases can be performed, reporting of actual demand data is needed. Forecast demand data is needed to perform future system assessments to identify the need for system reinforcement for continued reliability. In addition to assist a proper real-time operating, load information related to controllable Demand-Side Management programs is needed.
MOD-026	Verification of Models and Data for Generator Excitation Control System or Plant Volt/VAR Control Functions	To verify that the generator excitation control system or plant volt/var control function model (including the power system stabilizer model and the impedance compensator model) and the model parameters used in dynamic simulations accurately represent the generator excitation control system or plant volt/var control function behavior when assessing Bulk Electric System (BES) reliability.
MOD-027	Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Control Functions	To verify that the turbine/governor and load control or active power/frequency control model and the model parameters, used in dynamic simulations that assess Bulk Electric System (BES) reliability, accurately represent generator unit real power response to system frequency variations.

Figure 82	· List of NED(Standarde	for Planning	Coordinatore	and Tra	anemieelon	Diannare
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Standard	Title	Purpose
Name		
MOD-031	Demand and Energy Data	To provide authority for applicable entities to collect Data, energy and related data to support reliability studies and assessments to enumerate the responsibilities and obligations of requestors and respondents of that data.
MOD-032	Data for Power System Modeling and Analysis	To establish consistent modeling data requirements and reporting procedures for development of planning horizon cases necessary to support analysis of the reliability of the interconnected transmission system.
MOD-033	Steady State and Dynamic System Model Validation	To establish consistent validation requirements to facilitate the collection of accurate data and building of planning models to analyze the reliability of the interconnected transmission system.
PRC-002	Disturbance Monitoring and Reporting Requirements	To have adequate data available to facilitate analysis of Bulk Electric System (BES) Disturbances
PRC-006	Automatic Underfrequency Load Shedding	To establish design and documentation requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures.
PRC-006- NPCC	Automatic Underfrequency Load Shedding	The NPCC Automatic Underfrequency Load Shedding (UFLS) regional Reliability Standard establishes more stringent and specific NPCC UFLS program requirements than the NERC continent-wide PRC-006 standard. The program is designed such that declining frequency is arrested and recovered in accordance with established NPCC performance requirements stipulated in this document.
PRC-010	Undervoltage Load Shedding	To establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs (UVLS Programs).
PRC-023	Transmission Relay Loadability	Protective relay settings shall not limit transmission loadability; not interfere with system operators' ability to take remedial action to protect system reliability and; be set to reliably detect all fault conditions and protect the electrical network from these faults.
PRC-026	Relay Performance During Stable Power Swings	To ensure that load-responsible protective relays are expected to not trip in response to stable power swings during non-Fault conditions.
TPL-001	Transmission System Planning Performance Requirements	Establish Transmission system planning performance requirements within the planning horizon to develop a Bulk Electric System (BES) that will operate reliably over a broad spectrum of System conditions and following a wide range of probable Contingencies.
TPL-007	Transmission System Planned Performance for Geomagnetic Disturbance Events	Establish requirements for Transmission system planned performance during geomagnetic disturbance (GMD) events.

NPCC/NYSRC Area Transmission Reviews

The NPCC/NYSRC Area Transmission Reviews (ATRs) are performed on an annual basis to demonstrate that conformance with the performance criteria specified in NPCC Directory #1 and the NYSRC Reliability Rules. The ATR is prepared in accordance with NPCC and NYSRC procedures that require the assessment to be performed annually, with a Comprehensive Area Transmission Review performed at least every five years. Either an Interim or an Intermediate review can be conducted between Comprehensive reviews, as appropriate. In an Interim review, the planning coordinator summarizes the changes in planned facilities and forecasted system conditions since the last Comprehensive review and assesses the impact of those changes. No new analysis are required for an Interim review. An Intermediate review covers all the elements of a Comprehensive review, but the analysis may be limited to addressing only significant issues, considering the extent of the system changes. In the ATRs, the NYISO assesses the BPTF for a period four to six years in the future (the NYISO evaluates year five of the Study Period). The most recent NYISO Comprehensive ATR (2015) was completed in June 2016.²⁴ The most recent annual ATR (2019)²⁵ evaluated study year 2024 and found that the planned system through year 2024 conforms to the reliability criteria described in the NYSRC Reliability Rules and NPCC Directory #1. The 2020 ATR, currently underway, is a Comprehensive review, to be completed mid-2021. Seven assessments are required as part of each ATR.

The first assessment evaluates the steady state and dynamics transmission security. For instances where the transmission security assessments results indicate that the planned system does not meet the specified criteria, a corrective action plan is incorporated to achieve conformance. As part of the ATRs, and also for compliance with NERC FAC-013, thermal, voltage, and stability transfer limits are performed to identify the limiting constraints for power transfers. The most resent ATR found no steady state or dynamics transmission security criteria violations.

For the second assessment, steady state and dynamics analysis are conducted to evaluate the performance of the system for low probability extreme contingencies. The purpose of the extreme contingency analysis is to examine the post contingency steady state conditions, as well as stability, overload, cascading outages, and voltage collapse, to obtain an indication of system robustness and to determine the extent of any potential widespread system disturbance. In instances where the extreme contingency assessment concludes there are serious consequences, the NYISO evaluates implementing a change to design or operating practices to address the issues.

The extreme contingency analysis included in the most recent ATR concludes that the system remained stable during most events and showed no thermal overloads over short-term emergency (STE) ratings or significant voltage violations on the BPTF. For the events that did show voltage, thermal, or dynamics issues, these events were local in nature (loss of local load or reduction of location generation)

²⁴ https://www.nyiso.com/planning-reliability-compliance

²⁵ https://www.nyiso.com/documents/20142/1397660/2019-NYISO-Interim-ATR-Final.pdf



and did not result in a widespread system disturbance.

The third assessment evaluates extreme system conditions that have a low probability of occurrence such as high peak load conditions (*e.g.*, 90th percentile load) resulting from extreme weather or the loss of fuel supply from a given resource (*e.g.*, loss of all gas units under winter peak load). The extreme system conditions evaluate various design criteria contingencies to evaluate the post contingency steady state conditions, as well as stability, overload, cascading outages and voltage collapse. The evaluation of extreme contingencies indicate system robustness and determine the extent of any potential widespread system disturbance. In instances where the extreme contingency assessment concludes that there are serious consequences, the NYISO evaluates implementing a change to design or operating practices to address the issues. For the extreme system conditions evaluated in the most recent ATR, the assessment found no steady state or dynamics transmission security criteria violations.

The fourth assessment evaluates the breaker fault duty at BPTF buses. The most recent ATR found no over-dutied breakers on BPTF buses.

The fifth assessment evaluates other requirements specific to the NYSRC Reliability Rules including an evaluation of the impacts of planned system expansion or configuration facilities on the NYCA System Restoration Plan and Local Area Operation Rules for New York City Operations, loss of gas supply – New York City, and loss of gas supply – Long Island.

The sixth assessment is a review of Special Protection Systems (SPSs). This review evaluates the designed operation and possible consequences of failure to operate or mis-operation of the SPS within the NYCA.

The seventh assessment is a review of requested exclusions to the NPCC Directory #1 criteria.

NERC Planning Assessments (TPL-001)

The NERC TPL-001 assessment (Planning Assessment) is performed annually. The purpose of the Planning Assessment is to demonstrate conformance with the applicable NERC transmission system planning performance requirements for the NYCA Bulk Electric System (BES). The Planning Assessment is a coordinated study between the NYISO and New York Transmission Owners.

The required system conditions to evaluate for this assessment include planned system representations over a 10-year study period for a variety of system conditions. Figure 83 provides a description of the steady state, dynamics, and short circuit cases required to be evaluated in the Planning Assessment.


Case Description	Steady State	Dynamics	Short Circuit
System Peak Load (Year 1 or 2)	х		
System Peak Load (Year 5)	х	х	x
System Peak Load (Year 10)	х	x ¹	
System Off-Peak Load (One of the 5 years)	Х	x	
System Peak Load (Year 1 or 2) Sensitivity	х		
System Peak Load (Year 5) Sensitivity	х	x	
System Off-Peak Load (One of the 5 years) Sensitivity	x	х	

Figure 83: Description of NERC TPL-001 Planning Assessment Study Cases

Notes:

 Only required to be assessed to address the impact of proposed material generation additions or changes in that timeframe.

The steady state and dynamics transmission security analyses evaluate the New York State BES to meet the applicable criteria. As part of this assessment, the unavailability of major transmission equipment with a lead time of more than a year is also assessed. The fault duty at BES buses are evaluated in the short-circuit representation. When the steady state, dynamics, or short circuit analysis indicates an inability of the system to meet the performance requirements in the standard, a corrective action plan is developed addressing how the performance requirements will be met. Corrective action plans are reviewed in subsequent Planning Assessments for continued validity and implementation status.

For each steady state and dynamics case, the Planning Assessment evaluates the system response to extreme contingencies. Similar to the ATR, when the Planning Assessment extreme contingency analysis concludes there is cascading caused by an extreme contingency, the NYISO evaluates possible actions designed to reduce the likelihood or mitigate the consequences and adverse impacts.

The most recent NERC Planning Assessment for compliance with TPL-001 was completed in June 2020. As this study contains Critical Energy Infrastructure Information (CEII), it is not posted on the NYISO website. Generally, the results of this study are consistent with the ATR studies. Given that the study scope of this assessment is different from the ATR is different (because the ATR evaluates the BPTF while the TPL evaluates the BES), criteria violations were observed. The corrective action plans for criteria violations are generally addressed in the affected Transmission Owner's LTP and/or the proposed transmission facilities listed in Section 7 of the Load and Capacity Data Report.

Resource Adequacy Compliance Efforts

NPCC's <u>Directory 1</u> defines a compliance obligation for the NYISO, as Resource Planner and Planning Coordinator, to perform a resource adequacy study evaluating a five-year planning horizon. The NYISO delivers a report every year under this study process to verify the system against the one-day-in-ten-years loss of load expectation (LOLE) criterion, usually based on the latest available RNA/CRP results and assumptions. The New York Area Review of Resource Adequacy completed reports are available at: https://www.nyiso.com/planning-reliability-compliance.

NYSRC <u>Reliability Rules</u> have recently added a requirement²⁶ that the NYISO deliver a Long Term Resource Adequacy Assessment report every RNA year, and an annual update in the non-RNA years. The NYISO will first implement this requirement after finalizing the 2020 RNA.

The NYISO is also actively involved in other activities such as the NERC's annual Long Term Reliability Assessment (LTRA), along with its biennial Probabilistic Assessment (ProbA), performed by NERC with the input from all the NERC Regions and Areas, as well as NPCC's Long Range Adequacy Overview (LROA).

²⁶ NYSRC Reliability Rule A.3, R.3.



10. New York Grid Assessments and Initiatives

Clean energy policies are reshaping the grid in unprecedented ways. New York's electric industry is transforming from a grid that is powered by traditional synchronous, controllable generation to more nonemitting, weather-dependent intermittent resources and distributed generation. The increase in the intermittent and distributed generation, along with the related penetration of inverter-based technology, creates new challenges. The wholesale markets in New York are continuing to evolve to provide the price and investment signals necessary to reflect system needs and to incent resources capable of resolving those needs.

The NYISO is forecasting higher growth in energy usage, which can be attributed in part to the increasing impact of electric vehicle usage and other electrification (*i.e.*, conversion of home heating, cooking, water heating, and other end-uses from fossil-fuel based systems to electric systems) especially in the later years of the planning horizon. Significant load-reducing impacts are expected to occur due to energy efficiency initiatives and the growth of distributed behind-the-meter energy resources, such as solar PV. The relative behind-the-meter solar impact on peak declines over time as the summer peak is expected to shift slightly further into the evening.

The NYISO has initiated a number of assessments of the impacts of various policies, including:

- 2019 Congestion Assessment and Resource Integration Study ("<u>CARIS</u>"), Phase I The NYISO's congestion assessment under the Economic Planning Process. The recent study contains a 70x30 scenario; one of the key findings is that renewable generation pockets are likely to develop throughout the state as the existing transmission grid would be overwhelmed by the significant renewable capacity additions. The results support the conclusion that additional transmission expansion, at both bulk and local levels, will be necessary to efficiently deliver renewable energy to New York consumers.
- *Climate Change Study <u>Phase I</u>: Long Term Load Impacts* This study was performed by the NYISO in collaboration with Itron. The core finding is that temperatures are rising across New York and will have a significant impact on electric grid demand.
- *Climate Change Study Phase II: Reliability and Resiliency* The NYISO retained the Analysis Group (AG) to develop/analyze resource mixes to serve load under the CLCPA 2040 state goals and then analyze various climate change-related scenarios that could impact the electric system. One reasoned approach to gain an understanding of the challenges that may be faced was to develop book-end type resource mixes where one of the key variables is increasing the

major interface capability versus the status quo. Using these bookend resource mixes, analysis can be performed and conclusions developed that can then be interpolated for mixes between the bookends. As the major interface capability is increased, the levels of land-based wind and upstate solar resources that can be incorporated into the system will increase. This increase in the capability of the transmission system from upstate to downstate will allow the output from significant increases in those renewable resources located upstate to serve load downstate. The Analysis Group also analyzed scenarios to determine the reliability impacts of heat waves, cold spells, droughts, and severe storms. One of the conclusions of the AG work is the need for significant amounts of a dispatchable emission-free resource in the downstate area. A key driving factor in terms of the amount of generation resource buildout needed is the CLCPA 2040 forecast from the Climate Change Phase 1 study. This load forecast shows a significantly higher winter peaking load level when compared to the summer peak, and therefore the resource mix needed to meet the winter peak demand.

- *Climate Change Study Phase III: Markets* to be initiated in 2021
- <u>Reliability and Market Considerations For A Grid In Transition</u>: The NYISO initiated a white paper followed by assessments focusing on potential market enhancements. The NYISO supports reliability through three complementary markets: energy, ancillary services, and capacity. Each market addresses distinct reliability needs through competitive market pricing that benefits New York consumers while reducing costs. Together, energy, ancillary services, and capacity market revenues provide economic signals for new investment, retirement decisions, and participation by demand response providers. The *Grid in Transition* looked into how the wholesale markets in New York can continue to provide the pricing and investment signals necessary to reflect system needs and to incent resources capable of resolving those needs.

In addition to these NYISO initiatives, the State of New York is engaging in its own analysis of the future needs of the electric transmission system. The Accelerated Renewable Energy Growth and Community Benefit Act (the "Act")²⁷ enacted in 2020 calls for the New York State Department of Public Service ("DPS") to "undertake a comprehensive study for the purpose of identifying distribution upgrades, local transmission upgrades, and bulk transmission investments that are necessary or appropriate to facilitate the timely achievement of the CLCPA targets."²⁸ The Act states that the DPS will conduct that

²⁷ L. 2020, ch. 58, Part JJJ, § 7(5).

²⁸ Id., § 7(2).

study in consultation with the New York State Energy Research and Development Authority ("NYSERDA"), the Power Authority of the State of New York ("NYPA"), the Long Island Power Authority ("LIPA"), the New York Independent System Operator, Inc. ("NYISO"), and the utilities.²⁹ The NYISO is providing technical support and input for the study.

A Grid In Transition: Reliability Gap Analysis

As part of the *Grid In Transition* white paper, the NYISO conducted a reliability gap analysis to identify ways in which the transition towards intermittent resources could lead to operational circumstances that may violate system reliability requirements. The analysis included potential areas that the NYISO must be prepared to address in order to continue to meet mandatory reliability standards, such as:

- Maintaining ability to balance load and generation: Balancing high levels of intermittent generation with system demand that may be difficult to forecast in real-time operations.
- Maintaining 10-minute operating reserves: High levels of intermittent resources may result in challenges to maintaining sufficient 10-minute operating reserves and disturbance-control performance requirements.
- Maintaining total 30-minute operating reserves: High levels of intermittent resources may lead to challenges in meeting operating reserve requirements in response to longer-term variations in generation levels from intermittent generation.
- Maintaining ability to meet daily energy requirements: Reliance on high levels of intermittent resources and limited energy storage resources may present challenges to meeting control-performance requirements and daily energy requirements in real-time operations.
- Maintaining reliable transmission operations: It may become difficult to forecast system and locational demand requirements in real time when operating under high levels of intermittent generation.
- Maintaining black start capability: The NYISO may be challenged to effectively restore the system within expected timeframes following a blackout given a system with high levels of intermittent generation.
- **Maintaining voltage support capability:** The NYISO may be challenged to meet voltage performance requirements with high levels of intermittent generation.
- **Maintaining frequency response capability:** The NYISO may be challenged to meet frequency performance requirements for a power system with high levels of intermittent generation.
- **Maintaining resource adequacy:** The NYISO may be challenged to maintain acceptable levels of resource adequacy.

²⁹ ld.



 Maintaining the ability to manage supply resource outage schedules: The NYISO may be challenged to manage supply resource maintenance outage scheduling.

These concepts will continued to be explored in the *2021-2030 Comprehensive Reliability Plan* and numerous other reliability studies in the near future. None of the identified potential reliability gaps relative to intermittent resources represent near-term concerns. However, the challenge for the NYISO is to design and implement a portfolio of market products, reliability planning, and operational enhancements that facilitate achievement of clean energy policies while maintaining system reliability through the competitive wholesale electricity markets. There may also be a need for review of established reliability criteria to address reliability gaps that may arise due to the changing system operating characteristics as New York transitions to a zero emission resource mix.



11. Observations and Recommendations

This 2020 Reliability Needs Assessment (RNA) assesses the resource adequacy and transmission security of the New York Control Area (NYCA) Bulk Power Transmission Facilities (BPTF) from study year³⁰ 4 (*i.e.*, 2024) through year 10 (*i.e.*, 2030), which constitutes the Study Period of this RNA.

This 2020 Reliability Needs Assessment finds that there are Reliability Needs on the Bulk Power Transmission Facilities during the Study Period due to both resource adequacy and transmission security reliability criteria violations. The deficiencies identified are mainly due to the compound effect of load forecast increases and the assumed loss of generation in Zone J (New York City), affected by the Department of Environmental Conservation's (DEC's) Peaker Rule.

In 2020, the New York State Department of Environmental Conservation adopted a regulation to limit nitrogen oxides (NOx) emissions from simple-cycle combustion turbines ("Peaking Units") (referred to as the "Peaker Rule"). The Peaker Rule required all impacted plant owners to file compliance plans by March 2, 2020. NYISO considered the affected Generators' compliance plans in the development of the 2020 Reliability Needs Assessment Base Case.

From the resource adequacy perspective, the Loss of Load Expectation (LOLE) is at or above New York State Reliability Council's (NYSRC's) and Northeast Power Coordinating Council's (NPCC's) criterion of one day in 10 years, or 0.1 days per year, starting in year 6 (2026) of the RNA Study Period, and increasing through year 10 (2030). Therefore, the NYISO identifies resource adequacy Reliability Needs starting in 2027, with the year 2026 being at the resource adequacy criterion with an LOLE of 0.10 days/year.

The transmission security Reliability Needs include both thermal loading criteria violations on the BPTF as well as dynamic stability criteria violations. For thermal loading, several 345 kV circuits in the Con Edison service territory are overloaded under N-1-1 conditions beginning in year 2025 and increasing through 2030. Additionally, the Con Edison 345 kV system has violations of an NYSRC local reliability rule to design and operate 345 kV transmission system for the occurrence of a second contingency (N-1-1-0). The 345 kV circuit overloads under N-1-1-0 conditions in Zone J begin in 2025 (with a deficiency of 700 MW) and increasing through 2030 (with a deficiency of 1,075 MW). The duration of the deficiency ranges from 9 hours in 2025 (3,853 MWh) to 12 hours in 2030 (7,672 MWh).

³⁰ In 2019 the NYISO proposed to stakeholders creating a Short-Term Reliability Process ("STRP") to evaluate and address reliability impacts resulting from both Generator deactivations and other drivers of Reliability Needs that are identified in a quarterly Short-Term Assessment of Reliability study. The NYISO made a tariff filing at FERC to create the STRP in February 2020, requesting a May 1, 2020 effective date. The FERC accepted the NYISO filing on April 30, 2020, and the first quarterly STAR commenced on July 15, 2020. The 2020 RNA also incorporates the effects of these tariff changes by assessing Reliability Needs in years 4-10 of the Study Period, while the STRP assesses five years from its start date, with a focus on addressing needs in years 1-3 of the Study Period.

The dynamic stability criteria Reliability Needs are observed for the entire Study Period. The criteria violations include violations of transient voltage response, loss of generator synchronism, and undamped voltage oscillations. The transient voltage response violations arise on transmission facilities owned by Con Edison in its Transmission District but extending into areas adjacent to their service territory. The loss of generator synchronism is observed in generators within or near the Astoria and Greenwood load pockets and is primarily driven by the transient voltage response violations in the local area.

In addition, the 2020 Reliability Need Assessment analyzes risks to the BPTF under certain scenarios to inform NYISO stakeholders when developing projects, as well as informing policy makers when formulating state policy.

The results of the 2020 Reliability Need Assessment scenarios indicate that a higher load level, or proposed projects assumed in service in the Reliability Need Assessment Base Case not materializing, or additional removal of capacity, could cause additional Reliability Needs, or Reliability Needs that occur earlier.

In addition to the above-referenced scenarios, the NYISO also discusses the reliability risks associated with the cumulative impact of environmental laws and regulations, which may affect the flexibility in plant operation and may make fossil-fueled plants energy-limited resources.

A number of recent state policies and initiatives, along with various Department of Environmental Conservation rulemakings are underway that have the potential to significantly change the resource mix in the New York Control Area. These include the Climate Leadership and Community Protection Act (CLCPA), the Accelerate Renewable Energy Growth and Community Benefit Act, the Clean Energy Standard, the Offshore Wind Master Plan, the Large-Scale Renewable Program, the Zero Emission Credits Program for the James A. FitzPatrick, R.E Ginna and Nine Mile Point nuclear power plants, and the implementation of the DEC Peaker Rule. The NYISO will continue to monitor these and other developments to determine whether changing system resources and conditions could impact the reliability of the Bulk Power Transmission Facilities.

As part of its ongoing Reliability Planning Process, the NYISO monitors and tracks the progress of market-based projects and regulated backstop solutions, together with other resource additions and retirements, consistent with its obligation to protect confidential information under its Code of Conduct. Among other things, the NYISO closely follows: 1. units interconnecting through the NYISO's interconnection processes; 2. the development and installation of local transmission facilities; 3. additions, mothballs or retirements of generators; 4. the status of mothballed/retired facilities; 5. the continued implementation of New York State energy efficiency programs, solar PV installations, new wind facilities,



new storage facilities, and other additions due to the Clean Energy Standard and the CLCPA; 6. participation in the NYISO demand response programs; and 7. the implementation of the DEC Peaker Rule and other new and proposed environmental regulations that affect the existing generation fleet.



12. Next Steps

This 2020 Reliability Needs Assessment finds that there are Reliability Needs on the Bulk Power Transmission Facilities during the Study Period (i.e., 2024-2030) due to both resource adequacy and transmission security Reliability Criteria violations. All Reliability Needs occur within Con Edison's transmission district in New York City (Zone J). Therefore, Con Edison is the Responsible Transmission Owner, as defined by the NYISO OATT. The following are the next steps to be taken in the Reliability Planning Process.

RNA Base Case Update: Following NYISO Board approval, additional steps are taken to further minimize unnecessary solicitations. The process allows the NYISO to update the RNA Base Case by considering status changes of proposed projects such as Local Transmission Owner Plans (LTPs), proposed generation and transmission, and load forecast or demand response. As part of this step, the NYISO would consider only those updates that may reduce or eliminate the Reliability Needs and that met the inclusion rules. This would include any updates to the peak load forecast based on the NYISO's current understanding of residual impacts from COVID-19.

Solution Solicitation and Initial Review: If any Reliability Needs remain after these Base Case updates, the NYISO will solicit market-based solutions, regulated backstop solutions, and alternative regulated solutions to address the remaining Reliability Needs. The interested and qualified Developers and Other Developers, as well as the Responsible Transmission Owner(s) can submit solutions within 60 calendar days from the solicitation. The Responsible Transmission Owner(s) must submit regulated backstop solution(s) to address the Reliability Needs identified in their service territory, which can be generation, transmission, demand side or combinations. Any Transmission Owner or Other Developer can submit an alternative regulated solution and any Developer can submit a market-based solution. The NYISO will review the solutions for completeness.

Viability and Sufficiency Assessments: The NYISO will evaluate whether each proposed solution is viable and is sufficient to satisfy the identified Reliability Need by the need date. The proposed solutions may include multiple components and resource types. When evaluating proposed solutions to Reliability Needs from any Developer, all resource types – generation, transmission, demand response, or a combination of these resource types – will be considered on a comparable basis as potential solutions to the Reliability Needs identified. All solutions will be evaluated in the same general timeframe.

Establishment of Trigger Date of Proposed Regulated Solutions: Upon receipt of all proposed regulated solutions pursuant to OATT Section 31.2.5.1, the NYISO will notify all Developers if any Developer has proposed a lead time for the implementation of its regulated solution that could result in a

Trigger Date for the regulated solution within 36 months of the date of the ISO's presentation of the Viability and Sufficiency Assessment to the ESPWG. The NYISO will independently analyze the lead time proposed by each Developer for the implementation of its regulated solution. The NYISO will use the Developer's estimate and the NYISO's analysis to establish the NYISO Trigger Date for each regulated solution. The NYISO will also establish benchmark lead times for proposed market-based solutions.

Viability and Sufficiency Report: The NYISO will present its Viability and Sufficiency Assessment to stakeholders, interested parties, and the NYDPS for comment and will indicate at that time whether any of the proposed regulated solutions found to be viable and sufficient will have a Trigger Date within 36 months of the date of the NYISO's presentation of the Viability and Sufficiency Assessment to the ESPWG.

Evaluation and Selection of Proposed Regulated Transmission Solutions: If the NYISO determines that the Trigger Date of any Developer's proposed regulated solution that was found to be viable and sufficient will occur within 36 months of the date of the NYISO's presentation of the Viability and Sufficiency Assessment to the ESPWG, the NYISO will request that all Developers of regulated transmission solutions that the NYISO determined were viable and sufficient submit to the NYISO their project information, as applicable, for: (i) a proposed regulated backstop transmission solution, or (ii) a proposed alternative regulated transmission solution.

The Comprehensive Reliability Plan documents the NYISO's findings regarding the viability and sufficiency of solutions, the trigger dates of regulated solutions, and any recommendations that implementation of regulated solutions is necessary to maintain system reliability. The draft CRP will reflect any input from the NYDPS. If the CRP cannot be completed in the two-year planning cycle, the NYISO will notify stakeholders and provide an estimated completion date and an explanation of the reasons the additional time is required. The NYISO will include in the draft CRP the list of Developers that qualify and will identify the proposed solutions that it has determined are viable and sufficient to satisfy the identified Reliability Need(s) by the need date. The NYISO will identify in the CRP the regulated backstop solution that the NYISO has determined will meet the Reliability Need by the need date and the Responsible Transmission Owner. If the NYISO determines at the time of the issuance of the CRP that sufficient market-based solutions will not be available in time to meet a Reliability Need, and finds that it is necessary to take action to ensure reliability, it will state in the CRP that the development of regulated solutions (regulated backstop or alternative regulated solution) is necessary.

Short-Term Reliability Process: Additionally, the needs identified in the Short Term Reliability Process in year 1 through year 3 will be addressed in the applicable quarterly Short Term Assessment of Reliability (STAR), while the needs identified in years 4 and 5 will only be addressed using the Short-Term



Reliability Process if the identified Reliability Need cannot timely be addressed through the Reliability Planning Process.