

NYISO Consumer Interest Liaison Weekly Summary

March 8 – March 12, 2021

Notices:

- The final version of the **Reliability Planning Process Manual (M-26) Attachment D** has been posted to the [Manuals, Technical Bulletins & Guides webpage](#) under **Manuals>Planning**. Attachment D of the Reliability Planning Process Manual contains the project status form, which has been updated to further clarify the information that Developers are required to provide to the NYISO.
- The NYISO has [posted](#) an announcement regarding updates to the securing of certain facilities starting with Round 5 of the **Spring 2021 Centralized TCC Auction and the April 2021 Balance-of-Period Auction**. This posting can be found on the NYISO website under **Markets > [Transmission Congestion Contracts](#) > Information and Announcements > 2021**.
- This is to inform you that a [Notice of Initial Decision Period to Class Year 2019 Long Island Additional SDU Study Project Developers](#) is posted on the NYISO website. The notice is posted on the NYISO website at the link below under the "Notices to Market Participants" subfolder. [Link to NYISO website](#)

Meeting Summaries:

Thursday, March 11, 2021

Operating Committee

Motion #1:

The Operating Committee (OC) hereby approves the NYISO Class Year 2019 Long Island Additional System Deliverability Upgrade Study and related Project Cost Allocations as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion #2a:

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The Operating Committee (OC) hereby approves the Q#849 Somerset Load Interconnection System Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion #2b:

The Operating Committee (OC) hereby approves the Q#850 Cayuga Load Interconnection System Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2c:

The Operating Committee (OC) hereby approves the Q#860 Rosalen Solar Energy Center Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2d:

The Operating Committee (OC) hereby approves the Q#883 Garnet Energy Center Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2e:

The Operating Committee (OC) hereby approves the Q#939 Far Rockaway Power Station Battery Energy Storage System Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2f:

The Operating Committee (OC) hereby approves the Q#957 Holtsville Energy Storage Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2g:

The Operating Committee (OC) hereby approves the Q#958 El Oceanside Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2h:

The Operating Committee (OC) hereby approves the Q#959 El Oceanside 2 Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2i:

The Operating Committee (OC) hereby approves the Q#965 Yaphank Energy Storage Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2j:

The Operating Committee (OC) hereby approves the Q#966 Suffolk County Storage Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2k:

The Operating Committee (OC) hereby approves the Q#974 KCE NY 19 Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2l:

The Operating Committee (OC) hereby approves the Q#987 NY Wind Holbrook 2 Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#2m:

The Operating Committee (OC) hereby approves the Q#995 Alabama Solar Park LLC Interconnection System Reliability Impact Study report as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Motion#3:

The Operating Committee (OC) hereby approves the Q#1093 Clean Path New York Interconnection System Impact Study scope as presented and discussed at the March 11, 2021 OC meeting.

The motion passed unanimously by show of hands

Thursday, March 11, 2021

Joint Installed Capacity/Market Issues/Price Responsive Load Working Group

CRIS Expiration Evaluation

Emily Conway of the NYISO presented the 2021 CRIS (Capacity Resource Interconnection Service) Expiration Evaluation project. The deliverable for this project is a Q3 Market Design Concept Proposed. The purpose of this project is to investigate opportunities to revise CRIS retention rules in cases where CRIS is not fully utilized (*e.g.*, Retired facilities and facilities no longer fully participating in the ICAP market). This project's stated goal is to consider rule changes that could increase capacity deliverability headroom and potentially lessen the need for deliverability upgrades. This may, as a result, lower the cost of market entry for future facilities.

Ms. Conway led a review of the current rules for retaining CRIS rights. Current rules allow a facility to retain its full CRIS for 3 years after retiring and also allow a facility to retain its full CRIS regardless of how much of that CRIS it is using. It is important to note that a CRIS-inactive unit is not necessarily modeled in the Class Year or Expedited Deliverability Study for 3 full years. Ms. Conway also highlighted the rules that deal with the transfer of CRIS.

The 2021 project description suggests changes that could be investigated with respect to the rule that currently permits units to retain and potentially transfer CRIS for 3 years ("3-year CRIS rule").

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Specifically, the 2021 project description focuses on the 3-year CRIS rule for retired units that did not fund deliverability upgrades. In this case, CRIS could expire immediately when a unit retires, hence transfer would not be permitted.

Currently, the NYISO is not proposing to change the fundamental rule set involving the 3-year CRIS rule for retired units. The current construct was designed to facilitate efficient retirements and repowering, and circumstances have not changed to warrant revision. Creating different classes of CRIS is contrary to the current design and would add significant complexity. Under the contemplated change, the retention of CRIS would need to be tracked differently depending on how it received CRIS to determine whether future transfer is possible. The NYISO could explore tariff language to clarify when the CRIS for retired units will not be modeled in a Class Year or Expedited Deliverability Study. The NYISO could also explore options that require a notice of transfer within a specified period of time following the date of retirement.

In addressing a partial CRIS expiration, Ms. Conway explained that the current rules require units to offer at least 0.1 MW into the ICAP market to be considered CRIS-active, thereby units could be taking up deliverability headroom with minimal participation in the capacity market. The NYISO has not observed a significant number of units that use only a minimal percentages of their CRIS, but could consider continuing to investigate options to modify the rules for units that are utilizing partial CRIS. The NYISO could consider limiting CRIS to a facility's ERIS (Energy Resource Interconnection Service) for both new and existing CRIS resources. Similarly, the NYISO could revise CRIS retention rules to allow for termination of CRIS in excess of ERIS.

The NYISO is supportive of modifying the rules for same-location CRIS transfers. Potential modifications could allow more flexibility as more public policy resources come on to the system. Concerning the question of Property Rights, FERC has declined to hold that interconnection rights are property rights. The 2015 Outage States FERC Order found that even if the contractual rights rose to the level of a property rights, that the proposed tariff changes were not an unconstitutional "taking". FERC found that parties that have signed NYISO's pro forma interconnection agreement have agreed to accept the terms and conditions of service established by the NYISO tariffs as they change over time; thus there can be no "taking" of interconnection service under those agreements when tariffs change.

The NYISO is seeking stakeholder feedback on this discussion and will return to a future working group meeting to continue the discussion. To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/19871290/CRIS%20Expiration_ICAPWG_03112021.pdf/d86f481-4985-7ca5-7377-1b6010817762

Grid Services from Renewable Generators Study

Amanda Myott of the NYISO presented the kickoff discussion for the Grid Services from Renewable Generators project. The Grid Services from Renewable Generators project has several key objectives:

- *Describe the relevant Reliability Rules that the NYISO must comply with, per NERC, NPCC, and NYSRC mandates, and how current market rules support those requirements*
- *Describe the nature of grid services and how they are procured and/or provided in New York*
- *Discuss the capability of renewable generators to provide various grid services, subject to technological capabilities and Reliability Rules*
- *Discuss potential market design and/or product revisions that would improve reliable grid operations and possibly enable participation by renewable generators*

Ms. Myott reviewed the current grid services that are required and the testing that suppliers must pass to become qualified to provide these services. These required services include Operating Reserves,

Regulation, Black Start and Voltage Support Service. The study may also investigate the ability of renewable generators to provide additional services beyond those procured by the NYISO today. In May 2021, the NYISO will return to a working group to discuss the initial study draft and seek stakeholder feedback. A consumer impact analysis will be provided in June 2021 prior to the production of a final report.

To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/19871290/Grid%20Services%20from%20Renewable%20Generators_ICAPWG_MIWG_March%2011%202021_FINAL_CD.pdf/60a6a045-60bf-5b2e-2b19-0007ab790e01

Hybrid Storage Aggregation Resource (HSR) Model: Project Kick-Off

Christina Duong of the NYISO kicked off the 2021 Hybrid Aggregation Model project. The deliverable for this project is a Q4 Market Design Complete.

Ms. Duong explained that the NYISO recently proposed market rules to allow an Energy Storage Resource (ESR) and a Wind or Solar Generator to be co-located at a single point of interconnection and share a common injection limit. These rules were introduced in the Co-located Storage Resource (CSR) market participation model and are currently pending review at the Federal Energy Regulatory Commission. However, those rules will not permit these resources to share the same point identifier (PTID). Instead, each resource type must be separately metered, bid, and scheduled.

Ms. Duong led a review of the current participation models, identified above, as well as the DER participation model, and explained the limitations of those models. This project will explore various resource types, including but not limited to fossil fuel generation.

The Hybrid Storage Aggregation Resource (HSR) Participation Model project is distinct from the DER and ESR Integration initiatives, but it will build on work completed as part of those initiatives. This project is a continuation of the 2020 Hybrid Storage model effort and will develop market rules that allow at least one ESR and other Generator(s) to be co-located behind the same point of interconnection, share a single PTID, and act as a single market resource. Ms. Duong noted that it is reasonable to expect that the design could be multifaceted, where some elements of the design are advanced faster than others.

This project will explore different aspects related to participation of hybrid resources, such as:

- *Participation in NYISO's Energy market*
- *Provision of Ancillary Services, including Operating Reserves, Regulation, and voltage support*
- *Participation in NYISO's Installed Capacity market*
- *Settlement process*
- *Modeling for interconnection, planning and operations*
- *Metering requirements*

Following this introduction meeting, the NYISO intends to work with stakeholders through Q2 and Q3 2021 to develop a Market Design Concept for a Q4 vote at the BIC. To see the complete presentation, please go to:

https://www.nyiso.com/documents/20142/19871290/20210311_Hybrid_Aggregation_Model_Kick-Off.pdf/384d8491-85a3-bb40-8100-66c3bee27947

FERC Filings **March 12, 2021**

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Joint NYISO-New York Power Authority Section 205 submittal of an executed Transmission Project Interconnection Agreement (SA 2603) among the NYISO, NYPA and NextEra Energy Transmission New York

March 12, 2021

Joint NYISO-Central Hudson Section 205 submittal of an executed Transmission Project Interconnection Agreement (SA 2605) among the NYISO, Central Hudson, and New York Transco

March 10, 2021

NYISO answer to a protest filed by the New York State Department of State Utility Intervention Unit (“UIU”) regarding the NYISO’s 2/2/21 Reserve Enhancements Filing

March 9, 2021

NYISO compliance filing to set early effective date for DER real-time telemetry provisions to accommodate implementation of CSR

March 8, 2021

NYISO filing of an answer in response to the protest filed by the U.S. Energy Storage Association (ESA), American Clean Power Association (ACPA), Alliance for Clean Energy – New York (ACE-NY), and New York Battery and Energy Storage Technology Consortium (NY-BEST) on 2/19/21, in response to the NYISO’s tariff revisions to Implement Co-located Storage Resources (CSR)

FERC Orders

March 8, 2021

FERC letter order accepting NYISO's proposed clarification to Tailored Availability Metric tariff provisions

Filings and Orders:

http://www.nyiso.com/public/markets_operations/documents/tariffviewer/index.jsp