

NYS Utility Intervention Unit Comments on 2022 Market Project Candidates

2. **CRIS tracking:** section 2.3 refers to “increased market efficiency;” small thing, but it seems to me more accurately described as “increased *administrative* efficiency.”
9. **Adjustment of energy offer/bid floor:** overarching question for context - is this something that the ISO has observed or is this a potential outcome with no actual instances? If it has occurred, how frequently and what were the specific conditions under which it took place?
10. **Advancing NYISO transparency:** understanding that this question may have to be referred back to DC energy (but NYISO’s opinion is appreciated), it is not clear to me how the data requested in 10.2.1 is not contained by inference in the answers to 10.2.2 and 10.2.3 and can't also be derived from the information in the FERC form 715. Additionally, it’s not clear what frequency the data is sought: daily, monthly, hourly. While I agree the data would be good to have, and I would appreciate having the data for purposes of analysis, whether the information is needed to satisfy the transparency goals of Order 704 as referenced in the justification is unclear to me.
11. **Capacity demand curve adjustments:** Is there a problem or is NYISO just investigating whether it can draw a better curve? How is efficacy defined for the purpose of this assessment? What criteria would be used to measure the extent to which any choice a curve shape more properly provides reserve adequacy, grid reliability and price formation. It is important that clear criteria be established prior to any assessment to determine if an alternative shape is demonstrably superior to the status quo and under what conditions.
12. **Constraint specific transmission shortage pricing:** In section 12.1 it reads, “transmission demand curve prices will increase proportionally with the severity of transmission overloads.” I would argue that transmission demand curve prices shouldn't scale this way, as the opportunity cost of transmission should increase dramatically as one moves towards more extreme scarcity. Is “proportionally” better read as a placeholder for “a function of ...”?
13. **Coordination of interconnection and transmission expansion:** It is unclear what the project justification is. Section 13.3 references benefits described in the objectives section 13.2, but this section includes no discussion of benefits. From the problem / opportunity section, it appears that, at a minimum the benefits are associated with the alignment of the base case inclusion rules across all the various planning and study types. Ideally, perhaps, NYISO seeks a comprehensive study methodology that includes one overarching transmission planning process to address what are now studied through multiple parts of the tariff, i.e., attachments P, S, X, Z, etc. Please clarify NYISO’s intent.
16. **Dynamic reserves:** The problem / opportunity section 16.1 describes the ISO’s inability to reflect changes to the largest contingency during real time operations, limiting its ability to dynamically reflect changes the reserve requirement. However, the project justification section doesn't refer to determining the requirement, but rather refers to the benefits of more dynamically scheduling resources provide the reserves to meet the requirement. It's an efficient procurement-based justification. There seems to be a disconnect in this project description between the problem statement (static requirements) and the justification (flexible procurement). Please clarify.

20. **Enhanced BSM Forecast assumptions:** Why is this project not part of the comprehensive mitigation reform scope?

24. **Improving capacity accreditation:** Is the important difference between this project and project 1, that this is a comprehensive investigation into the way all resources are measured and project 1 is limited to carrying out the requirements of the tariff, as currently written? Please consider any efficiencies in combining these project scopes, as possible.

30. **More granular operating reserves:** This item is linked to item 16. Refer to my notes on that project description.

35. **Transmission Security in the ICAP market:** Would this project be instead of project 27? Seems to me that the assessment should be coordinated with the demand curve shape review (project 11). Undoubtedly, how the demand curves are defined would have to be revised to accept an explicit treatment of security constraints in the market formulation.