

CRIS Expiration Evaluation

Zach Smith, Manager, Capacity Market Design

ICAPWG/MIWG

December 6, 2022

Agenda

- **Background**
- **Proposed Project Timeline**
- **Market Design Concept for CRIS Transfers**
- **Incremental Tariff Revisions**
- **Next Steps**
- **Appendix**
 - MDC Proposals Summary

Background

Background

- **Objective:** develop modifications to further enhance CRIS expiration rules as well as the rules surrounding CRIS transfers
- **Stated Goal:** increase capacity deliverability headroom and potentially lower the cost of market entry to future facilities seeking to participate in the ICAP market.
- **2022 Project Deliverable:** Q3 Market Design Complete
- **Current Status:** NYISO began stakeholder discussions on tariff revisions to capture the market proposals developed as part of the CRIS expiration evaluation project

Previous Discussions

Date	Working Group	Discussion Points and Links to Materials
March 11, 2021	ICAPWG	Current rulesets related to CRIS retention, expiration and transfer: https://www.nyiso.com/documents/20142/19871290/CRIS%20Expiration_ICAPWG_03112021.pdf
April 29, 2021	ICAPWG	Initial thoughts on proposals: https://www.nyiso.com/documents/20142/21044421/CRIS%20Expiration%2004292021_v10.pdf
June 25, 2021	ICAPWG	Proposed rule changes: https://www.nyiso.com/documents/20142/22568342/CRIS%20Expiration%20for%20ICAPWG%2006252021_v5.pdf
July 27, 2021	ICAPWG	Revised proposals for discussion: https://www.nyiso.com/documents/20142/23319404/CRIS%20Expiration%20for%20ICAPWG%2007272021.pdf
March 03, 2022	ICAPWG	Kick-off MDC project, recap 2021 discussions, and introduce open items: https://www.nyiso.com/documents/20142/28897222/CRISExpirationEvaluation_ICAPWG_03032022.pdf

Previous Discussions

Date	Working Group	Discussion Points and Links to Materials
March 31, 2022	ICAPWG	Reorganize market proposals and start discussion on implementation details: https://www.nyiso.com/documents/20142/29607069/4%20CRISExpirationEvaluation_ICAPWG_03312022.pdf
April 28, 2022	ICAPWG	Discuss implementation details and remaining open items: https://www.nyiso.com/documents/20142/30276257/CRISExpirationEvaluation_ICAPWG_04282022.pdf
June 16, 2022	ICAPWG	Tariff revisions and open items for MDC: https://www.nyiso.com/documents/20142/31532822/3%20CRISExpirationEvaluation_ICAPWG_06162022.pdf
October 04, 2022	ICAPWG	Tariff revisions and MDC for CRIS Transfers: https://www.nyiso.com/documents/20142/33562316/CRISExpirationEvaluation_ICAPWG_10042022.pdf

Proposed Project Timeline

CRIS Expiration Evaluation – Proposed Timeline

No.	Proposal	December 2022	January 2022	Q1 2023	~End of Q1 2023	Q2 2023
(1)	CRIS modeling in deliverability studies	Finalize Tariff revisions	BIC and MC Approval	Board approval	File with FERC	<i>Proposed effective date of the tariff provisions: 60 days after filing with FERC</i>
(2)	CRIS retention/voluntary termination					
(3)	Partial CRIS expiration for internal facilities					
(4)	Partial CRIS expiration for UDRs/EDRs					
(5)	CRIS Transfers					

Market Design Concept for CRIS Transfers

Market Design Concept Proposal

- **Proposal**: The NYISO proposes modifying the existing rules to allow for same location CRIS transfers to have the same flexibility as different location CRIS transfers regarding deactivation requirements
- **Application**: Standalone facilities, multi-unit single technology resources, and CSRs
- Under the proposed change, facilities could transfer part or all of their CRIS to a facility located at the same electrical location while still in the process of shutting down (deactivate) or electing to remain active (ERIS-only or partial CRIS status)
 - Electrical location: Interconnected to the same transmission bus at the same KV level

Market Design Concept Proposal

- **Proposed rules would allow for an additional CRIS transfer option for active facilities/resources:**
 - Deactivated Facility/Resource
 - Different Location CRIS Transfer (“Option 1”)
 - Same Location CRIS Transfer (“Option 2”)
 - Active Facility/Resource
 - Different Location CRIS Transfer (“Option 3”)
 - Same Location CRIS Transfer (“Option 4”)
- **Incremental pieces of the design are noted in blue on the next slides**

CRIS Transfer – “Option 4”

- **A facility/resource requesting a same location CRIS transfer, that elects to remain active after the transfer, and the facility/resource receiving the transfer would be required to follow the process described below**
 - 1) Request a same location CRIS transfer using the “CRIS transfer request notification” form (**Transferor**)
 - The facility transferring the CRIS would be able to request a same location CRIS transfer at any point during the calendar year
 - The NYISO will provide public notice of CRIS transfer requests
 - 2) If applicable, obtain a BSM determination (**Transferee**)
 - If it is located in a MCZ and is not an “Excluded Facility” as defined by Section 23.2 of the Services Tariff, the facility/resource receiving the CRIS will be subject to a Buyer Side Mitigation Examination pursuant to Section 23.4.5.7
 - If a BSM Examination is required, the receiving facility must accept its BSM determination prior to August 1st of the year preceding the next capability year for the level of incremental CRIS requested
 - To obtain the BSM determination, the receiving facility would be required to participate in any of the EDS that follows the confirmation date of the initial CRIS transfer request notification, Step (1)
 - 3) Once Steps (1), and (2) are finalized confirm the same location CRIS transfer using the “CRIS transfer confirmation notification” form prior to August 1st of the year preceding the next capability year (**Transferor and Transferee**)
 - Transfer will become effective “effective date” at the later of the start of the next Capability Year or the synchronization date of the transferee facility
 - If the transferee facility does not reach Initial Synchronization before the end of the next Capability Year the transfer will not be effective, and the CRIS will remain with the transferor
 - Until the transfer is effective, the transferor maintains its CRIS and its ability to participate in capacity sales up to that level if meeting all applicable requirements to do so

Physical Withholding Considerations

- If the CRIS transferor is in a Mitigated Capacity Zone, it may be subject to an audit and review for physical withholding and potential penalties pursuant to MST 23.4.5.6.3.
 - MST 23.4.5.6.1 prescribes that:
 - Any proposal or decision by a Market Participant to retire or otherwise ***remove an Installed Capacity Supplier*** from a Mitigated Capacity Zone Unforced Capacity market ***maybe*** subject to audit and review by the ISO if the ISO determines that such action could reasonably be expected to affect Market-Clearing Prices in one or more ICAP Spot Market Auctions for a Mitigated Capacity Zone in which the Resource(s) that is the subject of the proposal or decision is located, ***subsequent to such action***.
- The NYISO has discretion in determining whether to complete a market power review.
 - If NYISO decides to complete a market power review, such “(...) review shall assess whether the proposal or decision has a legitimate economic justification or is based on an effort to withhold Installed Capacity physically in order to affect prices.”
 - If NYISO determines that the generator is physically withholding capacity, and that behavior would increase market clearing prices in a Mitigated Capacity Zone capacity market by five percent or more (and is at least \$0.50/kW-month), the NYISO will assess a penalty

Physical Withholding Considerations

- **In a 2018 FERC Order regarding the Generator Deactivation Process, the Commission found that there is a need for clarity and transparency surrounding final market power reviews and, given the lack of a deadline for NYISO to perform final market power reviews of deactivating generators, required NYISO to propose “a timeline for completing final market power reviews of deactivating generators, if needed, as part of its Generator Deactivation Process.”**
 - In response to that Order, the NYISO created a process to align Physical Withholding Determinations with the Generator Deactivation Process
- **Currently, a process with the same clarity and transparency does not exist for CRIS transfers where the transferor remains an active facility**

Physical Withholding – Active Facility/Resource

- Consistent with the Generator Deactivation Process, the NYISO proposes to provide an opportunity for a MP that is transferring CRIS from a facility/resource that will remain active to **receive a physical withholding determination before the transfer of CRIS for same location CRIS transfers.**
 - The intention will be to provide clarity and transparency regarding the final market power reviews prior to the **CRIS Transfer Confirmation Date**

CRIS Transfer Confirmation Date

■ New Tariff Language

- “For purposes of Section 23.4.5.6 of this Attachment H, ‘**CRIS Transfer Confirmation Date**’ shall mean the date in which the transferor and transferee confirms the proposed CRIS transfer (e.g., through a CRIS transfer notification form submitted prior to August 1st for same location CRIS transfers for active facilities) and is considered by ISO, in consultation with the Market Monitoring Unit, to be a date which will become, essentially and practicably, an irreversible action for the transferor with respect to effectuating the CRIS transfer and for purposes with respect to the NYISO’s issuance of a final physical withholding determination to the transferor.”

Physical Withholding Considerations

- **If an MP request a physical withholding determination prior to the confirmed CRIS confirmation date, they may notify the NYISO, in writing at least 90 days prior to the confirmed CRIS Confirmation date, of a request that the ISO issue a final physical withholding determination to the Market Participant**
- **Provided that such request is supported by a submission showing the relevant information needed by the ISO to complete its review, the ISO shall issue its final determination, if needed, at least sixty days prior to the confirmed CRIS Confirmation date.**
 - The submission shall include (1) the rationale offered by the MP to support its proposal or decision, and (2) the relevant costs and projected revenues needed for the ISO to assess whether the MP's proposal or decision has legitimate economic justification.
 - If the ISO has not issued a notice to the MP that it has received all of the information it requires to perform its physical withholding review, then the ISO is not required to issue a final physical withholding determination to the MP prior to the CRIS transfer date.

Incremental Tariff Revisions

CRIS Tariff Revisions

- **As a part of the CRIS Expiration Evaluation project, the NYISO proposes tariff revisions in the OATT Attachment S**
 - Edits to Section 25.7 regarding rules on modeling CRIS in deliverability studies
 - Edits to Section 25.9 regarding rules on CRIS retention, voluntary CRIS termination, partial CRIS expiration, and CRIS transfers
- **The NYISO also proposes tariff revisions in the MST Attachment H**
 - Edits to Section 23.4.5.6 regarding mitigation rules for the CRIS transfer proposal

CRIS Tariff Revisions

- The NYISO received feedback from stakeholders on the tariff provisions presented at the October 4th ICAPWG meeting and included incremental edits to OATT Attachment S Section 25.9
 - The incremental edits have been highlighted in yellow in the “OATT 25.9” document included as part of today’s meeting materials
- The NYISO also included tariff revisions to MST Attachment H
 - New definition of CRIS Confirmation Date in MST 23.2
 - Tariff provisions regarding mitigation rules for the new CRIS transfer option are redlined in the “MST 23.4.5.6” document also included as part of today’s materials

Incremental Tariff Revisions – Summary

Document	Proposal	Section Updated	Update from the October 4 th set of revisions
OATT 25.9	CRIS Transfers	25.9.3.3.2	<ul style="list-style-type: none"> Minor edits (Clarification)
		25.9.4	<ul style="list-style-type: none"> Minor edits (Clarification) Added language referencing the PWD requirement as part of the same location CRIS transfer process
		25.9.5	<ul style="list-style-type: none"> Minor edits (Clarification) Added language referencing the PWD requirement as part of the different location CRIS transfer process
MST 23.4.5.6		23.4.5.6	<ul style="list-style-type: none"> Minor edits (Referencing the new process)
		23.4.5.6.1	<ul style="list-style-type: none"> Minor edits (Referencing the new process)
		New section 23.4.5.6.5	<ul style="list-style-type: none"> Added language aligning physical withholding audits and reviews with the transfer of deliverability rights process, and subsequent sections referring to 1) ISO notification, 2) Information requirements, 3) Further information requirements, and 4) Issuance of the physical withholding determination
MST 23.2		23.2.1	<ul style="list-style-type: none"> Added the definition for “CRIS Transfer Confirmation Date”

Next Steps

Next Steps

- **The NYISO is looking to obtain feedback on the attached language (MST Attachment H, Section 23.4.5.6 and OATT Attachment S Section 25.9) from stakeholders and will return to a working group meeting to continue discussion on tariff revisions**
 - Please send feedback to ntubbs@nyiso.com

Questions?

Appendix I – MDC Proposals Summary

Revisions to the Rules for CRIS Retention

Market Design Concept Proposal

- **Proposal:** The NYISO proposes modifying the existing rules to include an option and process for deactivated facilities with unexpired CRIS to voluntarily relinquish their CRIS
- **Application:** Deactivated Facility/ Resource*
- **Under the proposal, if the facility wishes to relinquish its CRIS, it can do so by notifying the NYISO at any point during the calendar year**
 - Deactivated facilities electing to relinquish their CRIS must notify the NYISO by submitting the corresponding standardized form
 - CRIS could only be relinquished in full (i.e., the facility may not elect to relinquish a portion of its CRIS)
 - NYISO will notify the facility its CRIS has expired upon receipt of the notification form and confirmation of the CRIS level and deactivation status of the facility
 - The effective date of the CRIS expiration would be the date the NYISO notifies the facility that its request has been confirmed and processed
 - After a confirmation notification has been sent to the facility, the NYISO will cease to model the corresponding CRIS in the applicable deliverability studies that commence after the effective date of the expiration of the CRIS
 - The NYISO will make the information about CRIS expiration publicly available on the Generator Status Update Report
- **Unless the facility relinquishes its CRIS under this new rule, the NYISO would continue to model the CRIS in the applicable deliverability studies unless the CRIS is scheduled to expire during the applicable deliverability study**

**A Facility/Resource that (a) is Retired or in a Mothball Outage or (b) is in an IIFO, and has been assessed in a STAR or a Generator Deactivation Assessment where the ISO, in coordination with the Responsible Transmission Owner(s), determined that a Generator Deactivation Reliability Need will not result from the Facility's deactivation*

Notification Form

- **For the purpose of notifying about the voluntary termination of CRIS, the NYISO will develop a standardized notification form known as the “CRIS Voluntary Termination Request”**
 - Proposed content of the notification form in Appendix II
- **The standardized form would be included as an attachment to the Transmission Expansion and Interconnection Manual**

OATT - Attachment S

- **The NYISO proposes incremental tariff revisions to OATT Attachment S, new Sections 25.9.3.2 and 25.9.3.2.1**
 - 25.9.3.2
 - Included language regarding the effective date of the voluntary CRIS termination
 - 25.9.3.2.1
 - Included language regarding deactivation status for the application of the voluntary CRIS termination option

Revisions to the Rules for Modeling CRIS in Deliverability Studies

Market Design Concept Proposal

- **Proposal:** The NYISO proposes modifying the existing rules to require facilities to inform the NYISO, prior to the start of a Class Year or EDS, whether the facility intends to transfer its CRIS rights prior to the scheduled completion of the applicable study
- **Application:** Facilities for which their CRIS will expire prior to the schedule competition of the applicable deliverability study
- **The proposal formalizes the existing rule that removes CRIS from the applicable deliverability study base case if such CRIS will expire prior to the scheduled completion of the applicable deliverability study**
 - If the CRIS of a facility would expire prior to the scheduled completion of the applicable deliverability study, the facility, prior to the start of the applicable study, must notify the NYISO and submit documentation regarding a potential or proposed CRIS transfer
 - Facilities must notify the NYISO by submitting the corresponding standardized form
 - The notification for CRIS transfer could be for either full or part of the existing CRIS rights
 - Upon receipt of the notification form and confirmation of information, the NYISO will notify the facility, confirming that it will continue to model the corresponding CRIS rights on the applicable deliverability studies
 - Proposed CRIS transfers will be processed in accordance with applicable rules for same location or different location CRIS transfers (e.g., different location transfers must be evaluated in a Class Year Study)
 - Failure to submit documentation regarding a potential or proposed CRIS transfer will result in the CRIS of the deactivated facility ceasing to be modeled in the applicable deliverability studies if its CRIS will expire prior to its scheduled completion
- **Note: Current tariff rules for when the CRIS expires, or for when a transfer becomes effective will remain the same**

Notification Form

- **For the purpose of notifying prior to the Start Date of the applicable deliverability study, the NYISO will develop a standardized notification form known as the “CRIS Transfer Request Notification ”**
 - Proposed content of the notification form in Appendix II
- **Any facility, including the ones for which their CRIS will not expire within the window, would be able to use this form to request either a same location or a different location CRIS transfer**
- **The standardized form would be included as an attachment to the Transmission Expansion and Interconnection Manual**

OATT - Attachment S

- **The NYISO proposes tariff revisions to OATT Attachment S, Sections 25.7.8.2.1.3 and 25.7.8.2.2.3**
 - 25.7.8.2.1.3
 - Revisions regarding removing CRIS from the CY deliverability study base case if such CRIS will expire no later than 12 months (i.e., 365 Calendar Days) after the CY Start Date, except where the facility has provided notice of a CRIS transfer anticipated to be finalized no later than 12 months (i.e., 365 Calendar Days) of the Class Year Start Date
 - 25.7.8.2.2.3
 - Revisions regarding removing CRIS from the CY deliverability study base case if such CRIS will expire no later than four months (i.e., 120 Calendar Days) after the Expedited Deliverability Study Start Date, except where the facility has provided notice of a CRIS transfer anticipated to be finalized no later than four months (i.e., 120 Calendar Days) of the Expedited Deliverability Study Start Date

Rules for Partial CRIS Expiration for Internal Facilities

Market Design Concept Proposal

- **Proposal:** The NYISO proposes modifying the existing rules to include a condition to expire partial CRIS rights based upon utilization criteria
- **Application:** all internal generators
- **Proposal would expire a portion of a facility's CRIS if its CRIS utilization ratio (i.e., ratio of the monthly CRIS utilization to its total applicable seasonal CRIS value) falls at or below 0.9 for every month for three consecutive years, measured on a forward rolling basis**
 - If a unit falls at or below the threshold, the unit's CRIS will be reduced to the MW level of its existing CRIS values multiplied by the sum of (1) the maximum utilization ratio for any month within the prior three-year period and (2) 0.05, rounded to the nearest tenth of a MW
 - The 0.9 threshold is established in an effort to remain consistent with trends of historic degradation levels
 - A 0.05 value gives units flexibility for recoverable losses and maintenance repairs
 - Note: CRIS utilization is the MW sum for a given month of the Installed Capacity Equivalent of UCAP: (1) offered into ISO capacity auctions; (2) certified through a Bilateral Transaction(s); and (3) exported to an External Control Area
- **The NYISO will make the information about partial CRIS expirations publicly available on the Generator Status Update Report**
 - After notification of partial CRIS expiration, the expired CRIS will cease to be modeled in deliverability studies
- **For purposes of calculating CRIS utilization, any months during which a facility is in a Mothball Outage or ICAP Ineligible Forced Outage are excluded and not considered as part of the three-year period for determining CRIS utilization.**

Example of Partial CRIS Expiration – Internal generators

■ For Example:

- A 200 CRIS MW unit with a max CRIS utilization of 180 MW for every month for three consecutive years
- Using 0.9 as the specified threshold:
 - CRIS Utilization Ratio: $\frac{180}{200} \leq 0.9$ (for every month)
- Because the unit falls at or below the threshold level (every month) a portion of it's CRIS would be expired
 - New CRIS value: $(0.9 \times 200 \text{ MW}) + (0.05 \times 200 \text{ MW}) = 190 \text{ MW}$
 - In this example, 10 MW would be expired

OATT - Attachment S

- **The NYISO proposes to add a new Section 25.9.3.3 and corresponding subsections describing the rules regarding Partial CRIS Termination**

Rules for Partial CRIS Expiration for UDRs and EDRs

Market Design Concept Proposal

- **Proposal:** The NYISO proposes to expire partial CRIS rights for facilities limited from utilizing their full CRIS due to physical limitations in neighboring control area systems
- **Application:** UDRs and EDRs
- **If the UDR or EDR does not demonstrate, consistent with ISO Procedures, that it is capable of delivering the MW of Energy to the NYCA interface equivalent to its MW of CRIS, its CRIS MW will be reduced to the maximum monthly amount of MW of Energy demonstrated during the three-year period starting from the date of its initial synchronization**
 - Once the NYISO confirms a facility is subject to the application of the partial CRIS expiration rule, it will notify the facility about the partial expiration of its CRIS and confirm the facility's new MW level of CRIS
 - The NYISO will make the information about partial CRIS expirations publicly available on the Generator Status Update Report
 - Applicable ISO Procedures are detailed in Section 4.9.3.2 of the ICAP Manual
- **If the UDR or EDR demonstrates, consistent with ISO Procedures, that it is capable of delivering MW of Energy to the NYCA interface equivalent to its MW of CRIS, before the three-year expiration clock, the NYISO will confirm that the facility is fully deliverable at its existing CRIS level, and no partial expiration rule will be applied**

OATT - Attachment S

- The NYISO proposes to add a new Section 25.9.3.3.2 describing the rules regarding Partial CRIS Termination for UDRs/EDRs

Appendix II – Notification Forms

CRIS Transfer Request Notification

- **The form would require, for example:**

1. Submitting Entity's Information
2. Receiving Entity's Information
3. Type of transfer
 - Partial transfer of deliverability rights/Full transfer of deliverability rights
 - Proposed Same Location CRIS transfer/Potential Same Location CRIS transfer/Proposed Different Location CRIS transfer
4. Identity of Generator(s)
5. Acknowledgments
6. Signed Certification

CRIS Transfer Confirmation Notification

- **The form would require, for example:**
 1. Submitting Entity's Information
 2. Receiving Entity's Information
 3. Type of transfer
 - Partial transfer of deliverability rights/Full transfer of deliverability rights
 - Proposed Same Location CRIS transfer/Proposed Different Location CRIS transfer
 4. Identity of Generator(s)
 5. Acknowledgments
 6. Signed Certification

CRIS Voluntary Termination Request

- **The form would require, for example:**

1. Submitting Entity's Information

- Submitting entity's interest in and relationship with Generator(s)
- Contact information

2. Identity of Generator(s)

3. Acknowledgments

- The submitting entity will be required to acknowledge:
 - The request is binding, meaning the submitting entity cannot rescind this notice once submitted.
 - The request, if granted, will result in the full expiration of the facility's CRIS.
 - Upon acceptance of the voluntary termination request, the CRIS expiration and its effective date will be made public

4. Signed Certification

- The requestor will be required to attest to the accuracy of the information and to certify that the signatory is authorized to bind the submitting entity

Our Mission & Vision



Mission

Ensure power system reliability and competitive markets for New York in a clean energy future



Vision

Working together with stakeholders to build the cleanest, most reliable electric system in the nation