

# **MMU Follow-up on Stakeholder Questions Raised during 2025-Q1 SOM Report Presentation**

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# 1) NYTO Obligations to Provide Info to NYISO and MMU

- 2025-Q1 SOM Report slides 6, 19, and 75 relate to NYTOs' obligations to provide info to the ISO after DARUs & SREs, leading a stakeholder to ask about NYTOs' obligations to provide info to the MMU.
- Day-Ahead Scheduling Manual §4.2.6 describes NYTOs' obligations:
  - *...When requesting [a DARU], TOs must give the NYISO the reliability reason for the request...*
  - *...Within 5 business days, [the TO] shall provide detailed written justification for the DARU...The NYISO will review all these requests to ensure that practices being followed are consistent with NYISO tariffs and NYS Reliability Rules.*
  - *...The TO's written justification must detail the system conditions that resulted in the need for the reliability commitment such that the NYISO can independently verify the request. The following system conditions should be identified when applicable: TO local area or regional load levels; thermal transmission facility or substation voltage constraint; whether the constraint represents a predicted pre-contingency or post-contingency violation; significant transmission or generating unit outages affecting such constraint; and special local reliability criteria...*

## NYTO Obligations to Provide Info to NYISO and MMU

- The 2025-Q1 SOM Report indicates the MMU was frequently unable to verify the need for DARU/SREs based on info available to NYISO.
- The MMU has sought additional information necessary to “verify” DARU and SRE commitments in New York City:
  - MST §30.6.1 gives the MMU broad access to info collected by NYISO in connection with its functions.
  - MST §30.6.2 allows the ISO to request specific categories of data from “Market Parties” (parties that bid, offer, buy, sell, or schedule) that is needed by the MMU to fulfill the objectives of MST §30.
  - 18 CFR §35.41(b) requires a “Seller” to provide accurate information and not omit material information in communications with the market monitor.
- In general, NYTOs are not “Market Parties” or “Sellers”
  - Therefore, the MMU has relied on information available to the NYISO related to the DARU and SRE commitments by NYTOs
  - NYISO has begun to receive more detailed information related to these commitments in recent months

## 2) Comms Failures Led to Manual Wind Curtailment

- 2025-Q1 SOM Report slides 6, 20, and 72 relate to the need for NYISO to curtail 28 GWh of wind generation with manual instructions in addition to 47 GWh of curtailment through the market dispatch
- Manual curtailment instructions were needed to secure transmission in the Southern Tier (south of the Finger Lakes) when local TO communications failed to relay dispatch instructions to four facilities.
  - All cases involved loss of dispatch signal from the TO to the facilities for reasons including rodent damage to cables, lack of memory, etc.
- The time to resolve the issue lasted from a few days to over a month.
- Economic and manual curtailments have been infrequent since the first quarter, so persistent communications issues (requiring significant manual curtailments) have not been observed through Q3.

### 3) Drivers of PJM Import Limits in January & February

- We were asked to clarify and distinguish between two issues that contributed to the PJM import limitations in Q1.
  - 1) 2025-Q1 SOM Report slides 5, 13, and 61-63 reported frequent import limit reductions on the PJAC interface from late-December to February 1<sup>st</sup> to secure the Watercure-to-Oakdale 345kV line (“31 line”) for loss of a large generation contingency.
    - ✓ The large generation contingency was the combination of Nine Mile 2 and Fitzpatrick units following the September 24, 2024 event when both units tripped in quick succession.
  - 2) At the March 2025 Operating Committee meeting, the NYISO indicated that recent manual wind curtailments were needed to secure the Hillside-Chemung line (“962 line”) for a stuck breaker contingency involving the Watercure-to-Oakdale 345kV line (“31 line”).
    - ✓ We also observed that this issue led to manual wind curtailments from February 8 to 18, 2025 to secure the 962 line.