

CRIS Expiration Rules

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Agenda

- Background
- Proposed changes to CRIS expiration rules
- Next Steps

Background



Background

- Potential changes to CRIS expiration rules were identified as part of the CY Redesign project
- NYISO has decided that CRIS expiration rules would be discussed separately from the CY Redesign

Purpose of Today's Discussion

- Continue discussions on the NYISO's proposal for more stringent CRIS expiration rules

Background (cont.)

- Under current tariff provisions, a facility becomes CRIS-inactive on the last day of the month during which:
 - (i) it ceases to offer capacity into ISO capacity auctions, or
 - (ii) it ceases to be registered as a Capacity Resource for a Load Serving Entity through a bilateral transaction(s) or self-supply arrangement

Background (cont.)

- A facility's CRIS expires if the facility is CRIS-inactive for 3 years
- Currently, the 3 year CRIS expiration "clock" does not commence until facility enters the ICAP market
 - As a result, a facility with CRIS can go in-service and maintain its CRIS without its "3-year clock" starting until it enters the ICAP market and thereafter ceases to participate
 - In addition, a facility with CRIS can go in-service and participate as a load modifier and maintain CRIS indefinitely (i.e., 3-year clock never starts if the facility remains a load modifier)

Proposed changes to CRIS Expiration Rules

Proposed Changes

- **Propose three distinct changes to CRIS expiration rules:**
 - Start of the CRIS “clock” expiration would be when the facility begins operation
 - Load modifiers not participating in the ICAP Market would be CRIS-inactive
 - A resource exporting capacity would not be CRIS-inactive (even if it has not sold capacity in New York)

CRIS Expiration Rules Overview

■ Overview of this proposal

- Do not allow existing facilities to retain CRIS if they do not enter the NYISO ICAP market for 3 years
- Prevent retention of CRIS that is not being used
- Modify expiration rule to maintain CRIS being used for exports

■ Benefits of this proposal

- Improves transparency of CRIS “clock”
- Increases deliverability “headroom” retained by facilities not using CRIS or that have not yet entered the ICAP market

Commencement of “3-year CRIS clock”

- **Propose to apply the 3-year CRIS inactivity clock when the unit begins operation**
 - Once a facility begins operation, if it is CRIS-inactive for 3 years, its CRIS will terminate
 - All resources with CRIS will be obligated to inform the NYISO when they begin operation (most resources already have this obligation)
 - Rule would be effective for resources that begin operation after FERC acceptance of revision

CRIS for Resources Acting as Load Modifiers

- **Propose to treat as CRIS-inactive resources that have not offered capacity into ISO capacity auctions or been registered as a Capacity Resource for a Load Serving Entity through a bilateral transaction**
 - Treat load modifiers as CRIS-inactive for purposes of CRIS expiration
 - Rule would be effective on a future effective date (2-3 years after FERC acceptance to allow transition for resources currently acting as load modifiers)
 - Would allow resources wishing to maintain their CRIS opportunity to enter the market

CRIS for Resources Exporting their ICAP

- **Propose to allow a resource to maintain its CRIS even if it exports its capability for 3 years**
 - Exporting capability would not be deemed CRIS-inactive
 - Prevents the expiration of CRIS for an exporting unit, which then may be unable to participate in our neighbor's markets
 - Rule would be effective for resources exporting after FERC acceptance of revision

Changes For Future Consideration

- The following changes have been identified previously as part of the CY Redesign but are not being proposed at this time:
 - Terminate portion of CRIS for facilities that do not use their full CRIS for certain period of time
 - Terminate CRIS in excess of ERIS
 - CRIS-inactivity for single units within multi-unit PTIDs

Next Steps

Next Steps

- Return to a future ICAPWG to continue discussions on CRIS expiration rules
- Review proposed tariff revisions corresponding to proposal

Feedback/Questions?

Email additional feedback to: scarkner@nyiso.com and
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