

Short-Term Reliability Process & Other Proposed Reliability Planning Process Tariff Language Changes

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November 13, 2019



Background

- **At the September 23, 2019 ESPWG/TPAS the NYISO discussed with stakeholders ‘concepts’ regarding a proposed, new Short-Term Reliability Process (STRP) including, among other topics:**
 - Improved management of workload for the NYISO and Transmission Owners
 - Opportunity to address Short-Term Reliability Process Needs beyond those that arise from generator deactivations
- **At the October 23, 2019 ESPWG/TPAS the NYISO presented to stakeholders proposed revisions to OATT Section 38 to implement the proposals for the STRP and other proposed changes to Attachment FF**
- **At the November 1, 2019 ESPWG/TPAS the NYISO presented proposed tariff language changes for the STRP to OATT Section 31 (Attachment Y), OATT Section 6 (Rate Schedules 10 and 14), and MST Section 15 (Rate Schedule 8)**
- **At the November 4, 2019 ESPWG/TPAS the NYISO presented proposed tariff language changes for the STRP to OATT Section 38 (Attachment FF) and Rate Schedule 16, and to MST Sections 5.12, 5.14, 5.18, 23.4.5, 23.6 and 30.4.**
- **The purpose of this presentation is to present and respond to stakeholder questions and comments regarding additional proposed tariff language changes for the STRP to OATT Sections 38 (Attachment FF), 1.18, 6.17, 31.11, and MST Section 15.2**

Changes to OATT Section 38.3

- 38.3.1.1, 38.3.2, 38.3.4, 38.3.5.1, and 38.3.5.4 updates are in response to stakeholder comments
- 38.3.1.1 – updated paragraph to clarify the start of the 365 day notice period
 - A Market Participant must provide the ISO with a minimum of 365 days prior notice (such period beginning after its Generator Deactivation Notice **has been** determined to be complete by the ISO, ~~on its Short-Term Assessment of Reliability Start Date~~ **as explained in Section 38.3.1.4 below**)
- 38.3.2 – updated paragraph to clarify that IIFO generators could be included in a STAR that is in progress, **if practicable**
- 38.3.4 – added a statement to reflect if the cost of returning a damaged step-up transformer and/or other system protection equipment is not expected to exceed \$100,000 then the Generator Owner shall promptly return the equipment without additional recompense (consistent with FERC-accepted language in Sections 38.16.1 and 38.16.1.2)

Changes to OATT Section 38.3 (cont.)

- **38.3.5.1 –**
 - clarified that as part of the STAR, the ISO and Responsible Transmission Owner will perform a Generator Deactivation Assessment “concerning each **the Initiating Generator(s) that have complete Generator Deactivation Notices**”
 - Added language to include that the BPTF portion of the STAR of “other changes to the availability of Resources or to the New York State Transmission System” is done “in accordance with ISO Procedures for the Reliability Planning Process.”
- **38.3.5.4 – clarified that for instances where a Short-Term Reliability Process Need could be resolved by two or more Initiating Generators that each seek to deactivate prior to the conclusion of the 365 day notice period that the NYISO would retain the necessary Generator(s) that completed their Generator Deactivation Notice **last****

Changes to OATT 38.10

■ 38.10.2.1.1

- Added a paragraph that allows interested parties to invoke the Dispute Resolution Procedure (ISO Services Tariff Section 11) when the ISO addresses a Short-Term Reliability Process Need (that isn't a Generator Deactivation Reliability Need or Near-Term Reliability Need) to resolve any disputes

■ 38.10.2.1.2

- When NYISO is selecting among proposed transmission solutions to address a Short-Term Reliability Process Need that is not a Generator Deactivation Reliability Need or a Near-Term Reliability Need, NYISO must present a draft Short-Term Reliability Process Report to stakeholders for review and comment, and consider stakeholder comments before it issues its final Short-Term Reliability Process Report selecting the solution(s)

Changes to OATT Section 38.26

- **OATT Section 38.26 is the “Form of Reliability Must Run Agreement”**
 - Updated to include new/revised definitions

Changes to OATT 1.18, 6.17, 31.11

- Changes include updates to defined terms to replace “Generator Deactivation Reliability Need” with “Short-Term Reliability Process Need” and to replace “Generator Deactivation Solution” with “Short-Term Reliability Process Solution” (and other, similar changes)

MST Section 15.2

- **MST Section 15.2: Rate Schedule 2 – Payments for Supplying Voltage Support Service**
 - Added clarifying language stating that only Interim Service Providers (ISPs) that are required to keep their generating units in-service are required to provide Voltage Support

MST 23.4.5.6

- **In response to Stakeholder questions, the NYISO has determined that there are no further changes needed to MST 23.4.5 as part of the Short-Term Reliability Process changes**
 - Audit and Review for Installed Capacity market Physical Withholding is conducted on a case-by-case basis
 - The ISO's physical withholding review will continue to 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
 - The impact of any resource's removal of capacity will be measured independent of other resources in the same STRP "grouping".

Tariff sections to capitalize “Reliability Planning Process”

Tariff Sections	Titles
MST	
5.11	Requirements Applicable to LSEs
OATT	
3.12	The Comprehensive Reliability Planning Process
6.1	Rate Mechanism for the Recovery of the Regulated Transmission Facilities Charge (“RTFC”)
6.16	Rate Mechanism for the Recovery of the Generator Deactivation Facilities Charge for a Regulated Transmission Solution in the Generator Deactivation Process (“GDFC”).
22	Attachment P – Transmission Interconnection Procedures
25.5	Cost Responsibility Rules for Both ERIS and CRIS
25.7	Cost Allocation Methodology for CRIS.
31.1	New York Comprehensive System Planning Process (“CSPP”)
31.2-31.2.7	Reliability Planning Process
31.3	Economic Planning Process
31.4	Public Policy Transmission Planning Process
31.5	Cost Allocation and Cost Recovery
31.6	Other Provisions
31.7	Appendices
31.11	Appendix H – Form of Operating Agreement
35.1	Coordination of Transmission Planning Studies
38.1-38.10	Definitions
38.11-38.21	Entry into RMR Agreements

In some instances the NYISO may need to add both ‘Reliability Planning Process’ and ‘Short-Term Reliability Process’

Next Steps

- Presentation of additional Tariff language at November 18 TPAS/ESPWG
- Please submit questions/comments to kburrell@nyiso.com by November 22nd

Questions?

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- Maintaining and enhancing regional reliability
- Operating open, fair and competitive wholesale electricity markets
- Planning the power system for the future
- Providing factual information to policymakers, stakeholders and investors in the power system

