

Short-Term Reliability Process Proposed

Revisions to Generator Registration

Requirements

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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 discuss proposed changes to the generator registration requirements**

Changes to OATT Section 38.2

- **For the purposes of ensuring the reliability of the system, the NYISO is proposing to expand the Generator deactivation rules to apply to non-Market Participants that possess ultimate authority to decide whether/when to deactivate a Generator**
 - If the Market Participant that administers a Generator's participation in the ISO Administered Markets is a different entity than the entity that possesses the ultimate decision-making authority concerning the deactivation, retirement and/or repair of a Generator, then (i) the entity with ultimate decision-making authority regarding the deactivation, retirement and/or repair of the Generator must agree, as part of the registration of the Generator with the ISO for participation in the ISO Administered Markets, that it will be subject to and comply with the requirements of this Attachment FF, and (ii) the entity with ultimate decision-making authority regarding the deactivation, retirement and/or repair of the Generator shall, along with the Market Participant, be subject to all of the requirements in this Attachment FF that apply to a Market Participant, a Market Party, a Generator Owner, or to a Generator

Changes to MST 5.18 (Generator Outage States)

- Added requirements similar to the proposed revisions in OATT 38.2 to expand the rules to include non-Market Participants that possess ultimate authority to decide whether/when to place a Generator in an outage, or to repair and return a Generator
- Generators will be exempt from the Outage State rules while they are participating in the ISO-Administered Markets as part of an Aggregation
 - Generators participating through an Aggregation will *not* be exempt from the Short-Term Reliability Process

Proposed Revision to Section BB Registration of a Generating Facility

- **For the Section BB Registration of a Generating Facility the following questions are added**
 - Is the Generator currently participating in NYISO's markets as part of an Aggregation (relevant to whether the Outage States rules apply)
 - Is the Market Participant the entity that decides whether to move a Generator to one of the outage states, or to repair a damaged Generator?
 - Is the Market Participant the entity that has the decision making authority concerning the deactivation and/or retirement of the Generator?

Responsible Generator Party Agreement

- A proposed, new Generator registration document that will assist NYISO's administration of IIFOs and Generator deactivations
- Signed by the Responsible Generator Party (RGP)
 - The RGP is the entity that is ultimately responsible for making determinations concerning one or more generating facilities seeking to participate or participating in the ISO Administered Markets
 - In the context of the Short-Term Reliability Process, the RGP is the entity that decides to deactivate (e.g. Mothball, Retire) a Generator.
 - The obligations of the RGP, related to the Short-Term Reliability Process, include compliance with MST Section 5.18 and OATT Section 38 for their Generators
 - "Generator" means each of the generating facilities for which the RGP has Outage and/or Deactivation Authority
- FERC might determine the Responsible Generator Party Agreement is a jurisdictional agreement and require a *pro forma* version to be included in Attachment FF

Next Steps

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

Questions?

Our mission, in collaboration with our stakeholders, is to serve the public interest and provide benefit to consumers by:

- 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

