

On May 30, 2018 RCC approved the TFCP criteria for evaluating existing and alternative A-10 methodologies.

Among the guiding principles provided from TFCP to the CP-11 working group was Principle No. 3 – Simplicity.

The first criteria listed under Principle No. 3 is that the developed methodology is efficient in the use of engineering hours to perform. As a participant in the CP-11 working group the NYISO evaluated the proposed methodologies impact on New York buses BPS identification. The NYISO review showed that the amount of buses identified as BPS has decreased while the amount of engineering hours to complete the review significantly increased (the estimated increased time is greater than double the time previous for full Area-wide assessments). The increased amount of time required to perform the assessments is primarily due to the revisions to the proposed system conditions, including the requirement to stress each Area's major interfaces. Due to the significant increased amount of time needed to complete the evaluation (primarily due to required stressing of the major interfaces at or above the 98th percentile of flow) the proposed methodology does not meet Principle No. 3.

Furthermore, the inclusion of the required stressing criteria did not have any impact on New York BPS buses identified.

The NYISO recommends removing the requirement to set interface transfer levels at or above the 98th percentile of historical flow. Instead, the NYISO recommends that the requirement be revised to set the expected dispatch in the study models to the projected planned future system flows irrespective of historical conditions.

Additionally, the proposed revision now requires that the system conditions included in the A-10 assessment be presented to NPCC TFSS.

Although this is a new requirement, CP-11 did not provide justification in the technical rationale as to why the working group determined this requirement necessary to the successful completion of A-10 assessments.

Further, the proposed revision states that non-Area wide A-10 assessments (which would include interconnection assessments) may use the conditions previously approved by the TFSS. As the Area wide assessment is only required to be completed every five years, and non-Area wide A-10 assessments, including interconnection assessments occur more frequently, it seems that each Area would be obligated to present their system conditions each year to TFSS, with little benefit.

As such, the NYISO recommends removing the requirement for TFSS approval.