



June 3, 2022

Subject: Task Force on Coordination of Operation (TFCO) Response to a Request for NPCC Directory #5 Reserve Criteria Clarification.

In accordance with the NPCC *Directory Development and Revision Manual*, the Task Force on Coordination of Operation (TFCO) and its CO-1 Control Performance Working Group have considered a *Request for Criteria Clarification* on the reliability criteria within NPCC Directory #5 Reserve and have provided the attached response.

The TFCO response provides clarification on sustainability requirements upon the activation of reserves in conjunction with Requirement **R6**.

Subsequent to TFCO's consideration of any comments received, the final Clarification will be presented to the Reliability Coordinating Committee (RCC) for approval.

Comments on the clarification will be received for forty-five days through July 17, 2022.

The NPCC Open Process Review can be accessed through the following link:

[Regional Criteria Detail \(npcc.org\)](https://www.npcc.org/regional-criteria-detail)

Please contact me with any questions regarding Directory content or comment procedures.

Thank you.

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NPCC Request for Criteria Clarification

Note: A Clarification cannot be used to revise a Directory.

Request for a Clarification of Directory #5 Reliability Criteria
June 2, 2022
Contact information for person requesting the clarification:
Name: Katherine Zoellmer
Organization: NYISO
Telephone: 518-356-6046
E-mail: KZoellmer@nyiso.com
Identify the Directory that contains the Criteria requiring clarification:
Directory Number: Directory #5
Directory Title: Reserve
Identify specifically what portion of the Criteria needs clarification:
Sustainability of Operating Reserve
Text of Requirement:
<i>“R6. A Balancing Authority’s synchronized reserve, ten-minute reserve, and thirty-minute reserve, if activated, shall be sustainable for at least one hour from the time of activation.”</i>
The NYISO is seeking clarification on the sustainability requirements upon the activation of reserves. Specifically, the NYISO questions whether the requirement applies solely to the energy from the conversion of previously held reserves, or if the resource’s previous energy output plus any additional energy from the conversion of previously held reserves must be sustainable for one hour.



Identify the material impact associated with this clarification:

Identify the material impact to your organization or others caused by the lack of clarity within this Directory:

The NYISO is currently developing market rules for Hybrid Storage Resources, including participation in the ancillary services market.

The NYISO is looking to ensure it remains compliant with the NPCC reliability rule requirements and finds the requirements unclear regarding sustainability of reserves upon activation.

**Task Force on Coordination of Operation
Response to Request for Directory #5 Reliability Criteria Clarification**

The following clarification of Directory #5 Reserve was developed by the Task Force on Coordination of Operation (TFCO) and the CO-1 Control Performance Working Group.

Directory#5

Sustainability of **Operating Reserve**

*“R6. A Balancing Authority’s **synchronized reserve, ten-minute reserve, and thirty-minute reserve**, if activated, shall be sustainable for at least one hour from the time of activation.”*

Question 1

The NYISO is seeking clarification on the sustainability requirements upon the activation of reserves. Specifically, the NYISO questions whether the requirement applies solely to the energy from the conversion of previously held reserves, or if the resource’s previous energy output plus any additional energy from the conversion of previously held reserves must be sustainable for one hour.

Response to Question 1

D#5 R6 states, “A Balancing Authority’s **synchronized reserve, ten-minute reserve, and thirty- minute reserve**, if activated, shall be sustainable for at least one hour from the time of activation.” For this discussion, TFCO takes the word ‘sustainable’ to mean: “able to be maintained at a certain rate or level” as defined in the Oxford English Dictionary.

TFCO believes the R6 statement that **Reserves**, “shall be sustainable for at least one hour from the time of activation” applies to both the pre-existing energy schedule and the **Reserve** schedule at the time of activation. Once again, ‘sustainable’ means the *ability* to maintain the energy plus **Reserve** output for at least one hour from the time of activation.



Consistent with the NPCC definitions¹ of **Reserves**, the intent of scheduling and activating **Reserves** is to recover from contingencies, or to assist with energy support during other adverse system conditions. Allowing a resource to reduce its pre-existing energy schedule in order to sustain its **Reserve** activation runs counter to the intent of scheduling and activating that **Reserve** in the first place. Such behavior could jeopardize system reliability during times of contingency or other adverse system conditions.

The sustainability principle in R6 applies regardless of resource mix or type that the BA is procuring for **Reserves**. It is also important to note that there are a variety of ways that R6 could be met. Balancing Authority Areas may choose different approaches to meeting the sustainability requirement in R6, however must ultimately ensure that the sum total of the pre-existing energy schedule plus the reserve schedule of a resource must be sustainable for at least one hour from the time of activation.

¹ See NPCC Glossary of Terms: [npcc-glossary-20210810.pdf](https://www.npcc.org/wp-content/uploads/2021/08/npcc-glossary-20210810.pdf)