

Exhibit \_\_\_\_ (JPB-7)

Technical Bulletin 171

STATE OF NEW YORK  
DEPT. OF PUBLIC SERVICE  
DATE 3/21/09  
CASE NO. 06-T-0050  
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11/30/2007

**Subject: Monitoring Viability of Solutions to Meet Reliability Needs – NYISO Process**

This Technical Bulletin details the processes and methods the NYISO will employ to implement Solutions Monitoring as identified in the Comprehensive Reliability Planning Process (CRPP) Manual

**Details:****1. General**

The NYISO, as the responsible party for assessing the continued viability of solutions to meet the Reliability Needs in a timely manner, has established a comprehensive solution monitoring process. This Technical Bulletin augments the monitoring criteria in the CRPP Manual to include a more complete representative list of tracking metrics, to require solution updates on a quarterly basis, to modify the allowed grace period for overdue update responses from solution proposers, and to include independent status verifications on critical path activities by the NYISO through office and site visits.

In accordance with the provisions of Attachment Y and the CRPP Manual, the NYISO process also includes an independent analysis of project schedules submitted by the Transmission Owners in determination of the Benchmark trigger dates associated with their proposed regulated backstop solutions.

**2. Background**

Attachment Y of the NYISO OATT describes the Comprehensive Reliability Planning Process (CRPP) and establishes NYISO's responsibility for monitoring the progress of all solutions to assess their continued viability to meet the identified Reliability Needs on a timely basis. Sections 2.4 and 2.5 within the CRPP Manual contain the criteria that the NYISO has developed thus far in conjunction with the ESPWG, to assess the continued viability of market-based and regulated solutions, respectively.

The NYISO will utilize the monitoring criteria framework to assess the status of proposed solutions and to make a determination as to their continued viability. If the NYISO determines that a solution is no longer viable to meet the Reliability Needs on a timely basis, it will remove the solution from the list of accepted solutions and, if necessary, trigger the appropriate regulated backstop or gap solutions.

**3. Monitoring Criteria – CRPP Manual**

The Manual provides the framework for monitoring criteria which shall be incumbent upon proposers of solutions to periodically update. The monitoring criteria provided in the Manual provide the general categories of the information which the NYISO may require to assess continued viability. These criteria form the basis for a solution monitoring process which will be implemented by the NYISO to collect sufficient information necessary to continually assess the validity of solutions to meet the Reliability Needs. The Manual also states that the NYISO may request other information from solution proposers and Responsible TOs it deems necessary to adequately assess continued solution validity.

The monitoring criteria in the Manual includes a sampling of solution tracking metrics, suggests updates may be required once or twice a year depending upon whether the solution is market based, a regulated backstop or an alternative regulated solution, and indicates that solution proposers will be

The purpose of this "Technical Bulletin" is to facilitate participation in the NYISO by communicating various NYISO concepts, techniques, and processes to Market Participants before they can be formally documented in a NYISO manual. The information contained in this bulletin is subject to change as a result of a revision to the ISO Tariffs or a subsequent filed tariff with the FERC.

required to respond to NYISO's update requests with a reasonable period of time (not to exceed 60 days). The NYISO may reject a proposed solution for failure of the solution proposer to sufficiently respond to its update requests or if it determines that a solution is no longer viable to meet the Reliability Needs in a timely manner.

The Manual establishes a solution monitoring framework for determination of the timeliness for each market based solution. If the NYISO determines that, by the benchmark date of the regulated backstop solution, a market based solution is not likely to be available to meet an identified Reliability Need, the NYISO will trigger the backstop solution.

#### **4. Solution Monitoring – NYISO Process**

The NYISO has developed an expanded process to monitor solutions to assess their continued viability to meet the Reliability Needs on a timely basis. The NYISO process adopts the monitoring criteria and framework delineated within the CRPP Manual and provides more detailed procedures and methods to establish a comprehensive and credible monitoring program.

In order to effectively assess the progress of all TO projects and Market Based Solutions against the requirements of the current CRP, status updates will be required on a quarterly basis. Quarterly status updates will be required for each of the Transmission Owners' (TOs') updated plans that were included in the CRP base case, and that were identified in the RNA or CRP as affecting the identified reliability needs of the BPS (whether DSM, major transmission, or generation). Similarly, quarterly updates will be required for each Market Based Solution included in the CRP. Quarterly updates will also be required from Responsible TOs regarding Regulated Backstop Solutions that are triggered by the NYISO to begin the regulatory approval process, and from developers of Alternative Regulated Solutions, if and when they are selected by government agencies to meet a Reliability Need(s).

The solution proposers and Responsible TOs will be required to respond with status updates to the NYISO on or before the first day of each calendar quarter (first day of January, April, July, and October). Each quarterly update will be required to include the NYISO "Solution Performance Log" which delineates plans and progress against required tracking metrics. Quarterly updates must be submitted to the New York Independent System Operator 10 Krey Boulevard Rensselaer, New York 12144, to the attention of Clyde Custer, Manager of Resource Planning, or sent electronically to [ccuster@nyiso.com](mailto:ccuster@nyiso.com). Failure to fully respond to the NYISO within 14 days of a due date may lead to NYISO's rejection of the solution and the possible triggering of an appropriate Regulated Backstop or Gap solution.

The NYISO has established monitoring criteria (metrics) it will use to track progress on each solution and TO project to gauge their continued viability to meet the Reliability Needs on a timely basis. These metrics will be provided to solution proposers and Responsible TOs in a spreadsheet form titled "Solution Performance Log." Solutions providers and Responsible TOs will be required to update and submit the spreadsheet each quarter. The metrics will include site control, project schedule, status of major permits, easements, dcertifications, energy agreements, financing, and major equipment orders, contractual agreements for fuel supply and delivery, engineering labor, construction labor, and operating arrangements, and progress toward major milestones within engineering, construction, and commissioning activities.

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The NYISO may independently verify the progress and completion of critical path activities for each solution. The NYISO will provide reasonable advance notice of each office or field visit. The NYISO expects that each solution proposer and Responsible TO to fully cooperate with its employees or designated consultants during each visit.

To effectively gauge the timeliness of each market based solution, the NYISO will determine the Benchmark trigger date for the proposed regulated backstop solution allowing sufficient time for implementation by the respective Responsible TO. Responsible TOs will be required to quarterly submit updated plans, schedules, and milestones to sufficiently justify their proposed trigger date for each of their Regulated Backstop Solutions. The NYISO process will include its own independent analysis of the project schedules submitted by the Responsible TOs for each proposed Regulated Backstop Solution in its determination of the respective Benchmark trigger dates. The NYISO will utilize the respective Benchmark dates in its assessment of each market based solution for determination of continued validity and the need to trigger a Regulated Backstop solution.

The NYISO will endeavor to work with each solution proposer to avoid the removal from the solutions list, as outlined in the CRPP Manual. However, failure to cooperate fully with the NYISO's requests for information or to provide proof of sufficient project plans and progress to NYISO's satisfaction may result in the rejection of the solution from the CRP plan.

Section 2.8 of the Manual aligns with the NYISO's Code of Conduct, which is contained in Attachment F to the NYISO's OATT and identifies the confidentiality policies that apply to information provided as part of the CRPP.

**The NYISO tentatively anticipates that this Technical Bulletin will be rolled into the Comprehensive Reliability Planning Process Manual during its next available recertification period.**

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