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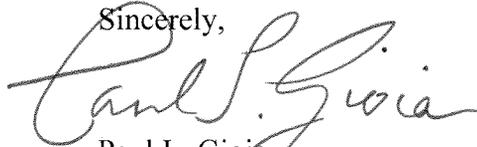
State Energy Plan Regulations Comments
c/o Dave Munro
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Re: NYSRC Comments on the 2013 State Energy Plan Draft Regulations

Dear Mr. Munro:

Enclosed please find comments on the 2013 State Energy Plan Draft Regulations, submitted on behalf of the New York State Reliability Council. Please acknowledge receipt of these comments.

Sincerely,



Paul L. Gioia
Counsel to the
New York State Reliability Council

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**COMMENTS ON THE 2013 STATE ENERGY PLAN DRAFT REGULATIONS
SUBMITTED ON BEHALF OF THE NEW YORK STATE RELIABILITY COUNCIL**

The New York State Reliability Council (NYSRC) was established at the same time as the New York Independent System Operator (NYISO) and the competitive wholesale electricity market in New York State. The primary objective in establishing the NYSRC was to ensure that the high level of electric system reliability maintained by the New York Power Pool would be continued in the newly established competitive electricity market. The NYSRC's primary role is to promulgate the reliability criteria and standards (Reliability Rules) necessary to address the special reliability requirements of the New York State bulk power system. The Reliability Rules promulgated by the NYSRC must be complied with by the NYISO in its operation of the State's bulk power system, and by the NYISO's market participants. The NYSRC monitors compliance with its Reliability Rules, and issues notices of non-compliance as required. The NYSRC also establishes the annual statewide Installed Capacity Requirement, which determines the amount of resources needed to maintain the reliability of the State's bulk power system.

In developing the State Energy Plan, the State Energy Board must consider how various policy options relate to and affect the important State objective of maintaining electric system reliability. The NYSRC is a valuable resource to the Board in evaluating the impact of proposed policies on electric system reliability and looks forward to working with the Board as might be requested. The NYSRC believes, therefore, that it would be appropriate for the SEP regulations to make some reference to the role of the NYSRC.

We suggest two places in the SEP regulations where references to the NYSRC would be appropriate.

1. Section 7841.1, Definitions, should include a reference to the NYSRC, as follows:
New York State Reliability Council, or NYSRC, means the entity responsible for the promulgation of criteria and standards for the reliable operation of the New York State bulk power system by the NYISO, and for the establishment of the annual statewide Installed Capacity Requirement.
2. Section 7857.1 Electric Plans, should be revised to include a reference to the NYSRC, as follows:
“Section 7857.1 General. This part sets forth the information filing requirements, as determined by the Board or by the Chair as authorized by the Board, applicable to major electricity suppliers and any other entity from which the Board deems appropriate to collect such information, including but not limited to the Bulk System Operator and the NYSRC.”

Respectfully Submitted,

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