Memorandum To: NPCC Registered Entities

From: Sal Buffamante, Assistant Vice President of Compliance Audits and Investigations, NPCC

Subject: NPCC Compliance Guidance Statement – NPCC-CGS-003

Date: February 28, 2012

NPCC, as the Regional Entity responsible for implementing the Compliance Monitoring and Enforcement Program (CMEP), is issuing this “Compliance Guidance Statement (CGS).” The NPCC Compliance Guidance Statements clarify reliability compliance issues such as; reporting requirements, entity registration questions, and clarifying other regional compliance matters, that have been brought to the NPCC Compliance Staff by registered entities. CGS documents will be periodically released to all the NPCC Registered Entities and posted on the NPCC Compliance website. (https://www.npcc.org/Compliance/Compliance%20Guidance%20Statements/Forms/Public%20List.aspx)

The attached Compliance Guidance Statement states NPCC’s additional guidance to all the entities in the NPCC footprint for actions required by NERC Reliability Standards MOD-010, and MOD-012.

NERC Reliability Standards MOD-010-0, R2 and MOD-012-0, R2 state that the Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners shall provide steady-state modeling and dynamics system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standards MOD-011-0_R1 and MOD-013-1_R1.

In the Compliance Guidance Statement (NPCC-CGS-003), NPCC describes the actions that each applicable entity performs to comply with certification or periodic data submittal requirements for MOD-010-0 R2 and MOD-012-0 R2 where entities are required to provide the requested information to the respective parties as stated above.

We appreciate your cooperation with this request and please do not hesitate to contact an NPCC Compliance Audit Staff member if you have any questions.
Compliance Guidance Statement on Providing Steady-State and Dynamics Data for Transmission System Modeling and Simulation

The purpose of this Compliance Guidance Statement (CGS) is to provide guidance to applicable registered entities for actions required by NERC Reliability Standards MOD-010, MOD-011, MOD-012, and MOD-013. By direction of this CGS, applicable entities are to adhere to NPCC Procedure C-29 by submitting the requested information to their Reliability Coordinator(s) or Balancing Authority(s) to develop the analyses for submittal to appropriate NPCC Working Groups SS-37 (Base Case Development) and SS-38 (Inter-Area Dynamic Analysis). Entities should not provide such information directly to NPCC as stated in the aforementioned NERC MOD Reliability Standards.

Discussion:
Consistent data requirements, reporting procedures, and system models must be established for use in the analysis of the reliability of the Interconnected Transmission Systems. Proprietary/confidential models are not acceptable and do not meet the intent of these requirements.

NERC Reliability Standards state that Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners shall provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling (MOD-010, Requirement R1) and dynamics system modeling (MOD-012, Requirement R1) and simulation data requirements and reporting procedures.

NERC Reliability Standards MOD-010, R2 and MOD-012, R2 state that the Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners shall provide steady-state modeling and dynamics system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standards MOD-011-0_R1 and MOD-013-1_R1. NERC standards MOD-010 and MOD-012 are FERC approved, while MOD-011 and MOD-013 are “fill-in-the-blank” standards. “Fill-in-the-blank” standards provide broad direction to the Regional Reliability Organization to develop the specifics of the standard through a regional stakeholder process. Hence the reason for this Compliance Guidance Statement.

NPCC document C-29, Procedure for System Modeling: Data Requirements and Facility Ratings, was originally issued 5/21/01 and was last revised in March 2007. This document was developed by the NPCC SS-37 Working Group (Base Case Development) for the Task Force on System Studies (TFSS) and predates the NERC standards. One of the purposes of C-29 is to ensure the complete, accurate and timely capture of data that is needed for system analyses to ensure the adequacy and security of the interconnected transmission systems, to meet projected customer demands, and to determine the need for system enhancements or reinforcements. System analyses include steady-state, transient, and dynamic simulations of the electrical networks. Data requirements for such simulations include information on system components, system configuration, customer demands, and electric power transactions. A
comprehensive list of the detailed requirements, schedule and responsibilities related to system modeling and facilities ratings are provided in the NPCC C-29 document.

NPCC C-29 describes Base Case Development requirements, Roles and Responsibilities of Working Groups and Task Forces, Data Requirements of GOs, TOs, LSEs, PSEs, development of a library of base case models, and provides a Table of Tasks, Responsibilities and Schedule to achieve compliance with NPCC C-29 and to meet the needs of NERC MMWG (Multiregional Modeling Working Group). Adherence to NPCC C-29 by the applicable entities meets the data submittal requirements of the NERC standards MOD-010 and MOD-012. Propriety and Confidential models do not meet the requirements of the NERC MMWG.

By direction of this CGS, applicable entities are to continue adherence to NPCC C-29 by submitting the requested information to their Reliability Coordinator(s) or Balancing Authority(s) who will develop the analyses for submittal to appropriate NPCC Working Groups SS-37 (Base Case Development) and SS-38 (Inter-Area Dynamic Analysis). Entities should not provide such information directly to NPCC as stated in the aforementioned NERC MOD Reliability Standards.