Procedure for Compliance Guidance Statements

CP -08

Rev. 1

Owner
Assistant Vice President, Compliance Registration and Enforcement

Effective Date
June 13, 2018
Table of Contents

1.0 INTRODUCTION AND PURPOSE .......................................................... 3
2.0 RESPONSIBILITIES ........................................................................... 3
3.0 OVERVIEW ......................................................................................... 3
4.0 GLOSSARY ......................................................................................... 4
5.0 REFERENCES ........................................................................................ 4
6.0 DOCUMENT REVISION HISTORY ...................................................... 5

Review and Re-Approval Requirements

This document will be reviewed every two years from the effective date or as appropriate for possible revision. The existing or revised document will be re-approved by the Assistant Vice President, Compliance Registration and Enforcement.
1.0 Introduction and Purpose

1.1 NPCC may develop and issue Compliance Guidance Statements (CGS) in order to offer clarification to NPCC Registered Entities in a consistent and transparent manner on the compliance approach associated with any of the following:

1.1.1 NERC Rules of Procedure (ROP) and associated Appendices
1.1.2 NERC Reliability Standard
1.1.3 NPCC Regional Reliability Standard
1.1.4 NPCC Criteria Compliance and Enforcement Program (CCEP)

1.2 A CGS cannot provide an interpretation to a requirement of a NERC Reliability Standard or an NPCC Regional Reliability Standard. The development of an interpretation must follow the applicable NERC or Regional interpretation process.

1.3 The purpose of this procedure is to provide guidance on the steps to be followed for developing and issuing a CGS.

2.0 Responsibilities

2.1 The NPCC Assistant Vice President of Compliance Registration and Enforcement (AVP) and the responsible NPCC Manager are responsible for implementing this procedure.

2.2 The NPCC Compliance Attorney shall be consulted during the development process as necessary and, at minimum, prior to issuing the CGS.

2.3 The responsible NPCC Manager shall issue the CGS.

3.0 Overview

3.1 The AVP will oversee the development of a CGS.

3.2 The responsible NPCC Manager will develop the CGS with the AVP and Compliance Attorney as necessary.

3.3 The CGS will not change the intent of an approved NERC Reliability Standard, NPCC Regional Reliability Standard, or NPCC Directory.

3.4 Typically, NPCC will provide a draft CGS to the NPCC Compliance Committee (CC) for review and comment prior to issuing a CGS that is associated with NERC Reliability Standards, NPCC Regional Reliability Standards, or the NERC ROP and associated Appendices.
3.4.1 If deemed appropriate by the AVP, NPCC may also provide a draft CGS to any related NPCC committee, council, task force, or working group for general information or to solicit comments prior to finalizing the CGS.

3.4.2 However under special circumstances, NPCC may issue a CGS without review and comment from any NPCC committee, council, task force, or working group.

3.5 NPCC shall provide any CGS that is associated with the NPCC CCEP to the CC for Approval.

3.6 The AVP may share a proposed CGS related to a NERC Reliability Standard or NERC ROP for comment with the Compliance groups of the other NERC regions.

3.7 The responsible NPCC Manager shall take the following steps when issuing a CGS:

3.7.1 Ensure that the proper effective date is included on the CGS.

3.7.2 Post the CGS under “Compliance”, “Documents”, Compliance Guidance Statements” on the NPCC website.

3.7.3 Send the CGS via email to all CDAA Primary and Alternate Compliance Contacts.

3.7.4 Send the CGS via email to the CC email distribution list.

3.7.5 Post an announcement on the NPCC homepage regarding the CGS.

3.7.6 Archive the CGS on the Compliance network drive.

3.8 NPCC will retire CGS documents if warranted. In such cases, the CGS may remain posted for continued reference with a “Retired” watermark and the effective date of the retirement.

4.0 Glossary

4.1 Approval: Authorization provided to NPCC by the relevant committee, council, task force, or working group where 2/3 affirmative majority of the weighted sector votes must be obtained before NPCC can proceed with the voted upon activity.

4.2 Endorsement: An indication of support to NPCC by the relevant committee, council, task force, or working group where 2/3 affirmative majority of the weighted sector votes is a goal, but not a requirement to proceed with the voted upon activity.

5.0 References

5.1 Delegation Agreement between NERC and NPCC

5.2 NERC ROP and associated Appendices

5.3 NERC Standard Processes Manual
5.4 NPCC Regional Standards Process Manual

5.5 NPCC CCEP Process Document (CCEP-1)

6.0 Document Revision/Review History

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<thead>
<tr>
<th>Revision</th>
<th>Reason</th>
<th>Approved by</th>
<th>CC Approval Date</th>
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<tr>
<td>0</td>
<td>Original issue of CP-08</td>
<td>Assistant Vice President of Compliance Registration and Enforcement.</td>
<td>9/12/13</td>
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<tr>
<td>0</td>
<td>2 Year Review. No changes made.</td>
<td>Assistant Vice President of Compliance Registration and Enforcement.</td>
<td>9/22/15</td>
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<td>1</td>
<td>Minor administrative changes</td>
<td>AVP, Compliance</td>
<td>6/13/18</td>
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Note: Rev 0 of CGS-08 was reviewed at the 9/22/15 CC meeting. There were no changes made to Rev 0. There were again no changes made at the 6/13/18 CC meeting.