Below are the questions and corresponding answers associated with the webinar that was held on Tuesday, July 9, 2013.

1. On July 10, 2013, Slide 20 was modified to show the correct enforcement dates. See Question 4 and Answer 4 for background. This necessitated Revision 1 of the presentation.
2. On July 11, 2013, Slide 8 was modified for further clarity. See Question 2 and Answer 2 for background. This necessitated Revision 2 of the presentation.

Revision 2 of the presentation is posted in the “Latest News” section on the NPCC homepage. In the future, it will always be available and memorialized on the NPCC website at: “Compliance”, then “Documents”, then “Compliance Webinars”.

**Question 1**
Related to Slide 8: Although my connection status to an A10 bus is not relevant, aren’t there initial qualifications that a Generator Owner (GO) must first meet other than strictly following the MVA qualifications listed in R1 for SOE?

**Answer 1**
Yes, the GOs generating unit must first meet the criteria of NPCC Compliance Guidance Statement 002 (CGS-002) “Generator Materiality”. This document is the means for bringing GOs that own material generating units onto the NPCC Registry. Only the generating units of the GO that meet CGS-002 criteria are held to NERC Standards and NPCC Regional Standards.


If the generating unit has been deemed material and it’s owner registered as a GO, then the MVA qualifications of R1 would be applied to determine if SOE would have to be installed/acquired.

**Question 2**
Related to Slide 8: Please clarify #2 associated with FR for GO. Does the GO have to install/provide FR at a generating facility connected through a GSU to a BES Element or to an A10 bus?

**Answer 2**
One of the intended messages of Slide 8 was that the “Bulk Electric System Elements” described in R4 are the “A10 busses and all of the circuits that connect to the A10 busses”. In the spirit of trying to be brief on Slide 8, the slide used the term “A10 bus” only in #2. Also, the words “generating facility” should not have been used in the FR portion of Slide 8. This is because the term “Generating Plant” as used in R4 is defined in the NPCC Glossary of Terms.

In the FR portion of Slide 8, the slide has been revised to replace the words “generating facility” with “Generating Plant” and “A10 bus” has been replaced with “A10 bus or a circuit that connects to an A10 bus”.

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As a result, NPCC’s intended message in the FR portion of Slide 8 is:

- If you are a GO that has a Generating Plant equal/greater than 200MVA AND is connected through a GSU to an A10 bus, then you have to install FR.
- If you are a GO that has a Generating Plant equal/greater than 200 MVA AND is connected through a GSU to a circuit that is connected to an A10 bus, then you have to install FR.
- If you are a GO that has a Generating Plant equal/greater than 200MVA, but is not directly connected through a GSU to an A10 bus or to a circuit that connects to an A10 bus, then you don’t have to install FR.
- If you are a GO that has a Generating Plant that is below 200MVA, then you don’t have to install FR regardless of whether you are connected to an A10 bus/circuit or not.

**Question 3**

Related to Slide 12: If a GO has a generating facility with no existing capability (SOE, FR) registered under one NCR number with multiple units, is that generating facility allowed the full 4 year DME Implementation Plan to become 100% compliant or are there other requirements?

**Answer 3**

This needs to be broken into separate answers for SOE and FR to consider the situations where the 4 years for Single Facility NCRs would be allowed. See Question 2 and Answer 2 for further background.

- **For SOE:** Review Slide 10 which is R1.1 in bulleted fashion. It is allowable for the NCR to place generating facilities in any instance (#1 through #7) that best suits the needs of the NCR for becoming SOE compliant. If #5 applies because the NCR has eight 50 MVA units, that would result in eight total facilities. If #7 is also applicable to that same group of eight units, the NCR could instead place them into #7 as a “single facility”. It is up to the NCR to evaluate the qualifications in R1.1 (as shown on Slide 10) and apply them to its generating units and/or Generating Plants in order to determine its facility SOE obligations. If it results in one facility in total, the NCR can take the full 4 years for SOE implementation.

- **For FR:** As per R4 and Slide 8, the NCR only has to install FR at a Generating Plant (NPCC Glossary of Terms) that is over 200 MVA AND that is connected through a GSU to an A10 bus or circuit connected to an A10 bus. If the NCR has only one total instance of meeting both criteria, that Generating Plant qualifies as a single facility and can take the 4 years for FR.

**Question 4**

Related to Slide 20: Is the enforcement date that is shown, January 1, 2017, for R8 through R23 of PRC-006-NPCC-01 correct?

**Answer 4**

No, the enforcement date shown on Slide 20 for R8 through R23 is not correct. The effective date of the FERC Order was April 29, 2013. Therefore, the “first calendar quarter after 2 years” coincides to an enforcement date of July 1, 2015 for R8 through R23.

Slide 20 has been corrected to show the correct date in the revised presentations that have been posted.
**Question 5**
When does NPCC expect the RSAWs for the DME and UFLS Regional Standards to be available?

**Answer 5**
For Regional Standards, NERC does not participate or get involved in the RSAW development process. At this point in time, NPCC is focusing on the development of the DME RSAW as that is the relevant enforcement date that is approaching. A working group within the NPCC Compliance Committee has been formed to assist NPCC Staff in the development of the DME RSAW which is expected to be complete by the October 20, 2013 date. The RSAW for UFLS will be developed, in similar fashion with NPCC Compliance Committee assistance, as the UFLS enforcement date of July 1, 2015 nears.

**Question 6**
R4 of PRC-002-NPCC-01 has a provision that allows the TO to provide FR on behalf of the GO. If it was technically possible, can the same provision be applied to SOE in R1? That is, can the TO take responsibility for installing/acquiring the SOE capability that R1 assigns to the GO?

**Answer 6**
In general, the answer is no. The written words in R1 state that the SOE must be installed at the generating units or Generating Plants. R1 does not allow the same leeway that R4 allows. Unique situations would be reviewed in greater detail by NPCC in order to make a case by case determination as the need arises.