NPCC Compliance Webinar - Question and Answer Document

Conducted June 25, 2014

The Effect of the Revised BES Definition within NPCC

Questions that were received via the online chat feature or email were reviewed and consolidated. The questions have been divided into two categories, Compliance Related and BESnet Process Related.

Version 1.3 of the NERC BES Frequently Asked Questions (referred to as “NERC BES FAQ” in this document) was posted July 1, 2014 and offers additional guidance.


Compliance Related Questions

1. **What are the NERC Standard compliance implications associated with a transformer that receives an approved exclusion (E1 or E3) that is attached to a BPS A10 bus?**
   
   There are no NERC Standard compliance obligations associated with the excluded transformer. However, the BES bus section must still remain compliant with NERC Standards. For example, the entity’s PRC-005 maintenance program must still consider the degree that there are aspects of the protection scheme that are shared between the BES bus section and the excluded transformer. Section 10.1 of the NERC BES FAQ addresses this issue.

2. **If transformers that are connected to an A10 BPS bus qualify for an E1 or E3 exclusion, is it expected that NPCC will initiate an Exception Request inclusion?**
   
   If an element that is connected to an A10 BPS bus qualifies for an exclusion, a Self Determined Notification (SDN) should be submitted by the owner into the BESnet application. The potential exists for NPCC, after consultation with the other Scope of Responsibility entities (RC, BA, TOP, TP, or PA) whose purview the element falls under, to submit to an Exception Request for Inclusion.

3. **What are the NPCC Criteria obligations for NPCC Full Members for elements connected to a BPS bus that qualify for a BES Exclusion?**
   
   BES Exclusions associated with NERC Standards are not transferable to NPCC Criteria. The Full Member must continue to meet its Criteria obligations as described in the Amended and Restated Bylaws of NPCC on the elements determined by NPCC A10 methodology.

4. **Are all newly identified TOs required to register as TPs? Are all newly identified TOs required to register as TPs if the RC/BA is already registered as a TP and performing TP functions?**
   
   There must be a TP assigned for each newly identified BES element. The NYISO and ISONE are both currently TPs. The degree to which NYISO and ISONE wish to provide TP services for the TOs newly identified BES elements must be coordinated between the TO and the respective ISO.
In the absence of an agreement between the TO and the respective ISO, NPCC will register the TO as a TP as necessary.

5. **Will NPCC fulfill their commitment to modify PRC-002-NPCC-01 to account for the new BES definition?**
   If Project 2007-11 PRC-002-2 ultimately fails to gain industry approval, NPCC staff and the Regional Standard Drafting Team will lead the development of a revision to PRC-002-NPCC-01 and associated new Implementation Plan for newly identified elements based on the new NERC BES definition.

6. **As a result of a BES Inclusion, an entity determines that it must register for the first time. When (or how) will it be added to the CDAA portal?**
   The new entity must first be registered before it is added to the CMEP Data Administration Application (CDAA). Once the registration paperwork is finalized with NERC, NPCC will contact the entity compliance contact to establish a CDAA account for compliance submittals. Please contact Duong Le at dle@npcc.org for further information on new entity registration. The registration instructions and forms are located at: https://www.npcc.org/Compliance/Compliance%20Registration1/Forms/Public%20List.aspx

7. **It was stated during the webinar that a new generating unit must be fully compliant when initially connected to the grid. How will a new generating unit be able to document all required testing before full commissioning is completed?**
   A new generating unit must be registered as a GO/GOP before synchronizing for the first time to the grid for commissioning or testing. The GO/GOP is obligated to comply with all GO/GOP standards at the time of initial synchronization and during commissioning. However, NPCC recognizes that historical testing documentation will not immediately exist when the commissioning phase begins. See Section 7.3 of the NERC BES FAQ.

8. **If BESnet entries are beginning on July 1, when is NPCC expecting to start adjusting registration data?**
   In parallel with making its BESnet differential submissions that require registration changes, it is the responsibility of the entity to contact NPCC registration. Before any registration adjustments are made, NPCC will review the BESnet entries to ensure that the revised BES definition has been applied properly. NPCC will perform periodic data reviews of the BESnet entries to identify potential registration changes. An example would be a snapshot comparison of entities making inclusion entries vs. the actual TOs or GOs that are already registered within NPCC. Please contact Duong Le at dle@npcc.org for further information on new entity registration.

**BESnet Process Related Questions**

9. **If an asset is considered part of the BES before and after the application of the new definition, do we need to enter anything into BESnet? It appears that all that needs to be done in this situation is to establish the entity administrators and users.**
   In the situation described, there is no information that needs to be entered into the BESnet application other than to establish the BESnet administrators and users.
10. How does the BESnet capture the difference between pre-July 2014 elements subject to compliance and Elements captured by applying the revised BES when our NPCC BPS list is not an element based list, it is instead a bus or station based list?
   The difference is captured by the proper entry of Self Determined Notifications (SDN) by the user into the BESnet application. The entity’s pre-July 2014 element list is comprised of the A10 BPS bus list, elements connected to the A10 BPS bus, and generation captured by CGS-002. After applying the revised BES definition in good faith and comparing to the entity pre-July 2014 element list, the user enters the resulting SDNs into the BESnet application which results in the proper differential.

11. Do NPCC dispersed power generators need to report individual wind turbines into BESnet?
    Section 2.5 of the NERC BES FAQ addresses this issue.

12. Can you explain when it becomes necessary to input an NPCC wind farm into BESnet?
    Sections 2.5 and 2.6 of the NERC BES FAQ address this issue.

13. Will existing A10 information be populated into BESnet and associated with the entity?
    Neither NPCC nor the entity will populate the BESnet application with the associated entity A10 information.

14. Are the PRC-006-NPCC-1 UFLS elements BES elements? If so, do they need to be entered into BESnet?
    The revised BES definition does not specifically address UFLS equipment. There is nothing to enter into the BESnet application related to UFLS.

15. For a new generating site that gets registered with NERC as a GO after 7/1/14, is it automatically "in" the BESNet or does it get added in by the owner?
    After the entity’s registration application has been approved and the entity has been notified by NPCC that it has been added to the NERC registry, the newly registered GO must enter the generating site data into the BESnet application.

16. In Canada, who is responsible for administering the Exception Request to Include or Exclude?
    The BESnet application is specific to U.S. Entities. There are specific provincial BES processes (inclusions, exclusions, and exception requests) being developed in New Brunswick, Nova Scotia, Ontario, and Quebec. Please contact Scott Nied at snied@npcc.org for information on the provincial contacts.