

# Appendix 1C – Northeast Power Coordinating Council, Inc. (NPCC) 2014 CMEP Implementation Plan

This Appendix contains the CMEP Implementation Plan (IP) for NPCC as required by the NERC Rules of Procedure.

## 1. Compliance Monitoring and Enforcement

### 1.1 CMEP IP Highlights and Material Changes

NPCC will identify the reliability risk of each NPCC registered entity and assess and evaluate the registered entity’s internal controls as part of the audit and spot check processes as outlined below.

NPCC plans to implement a cyber-security outreach program beginning in 2014 with a goal toward providing recommendations for improvement.

**NPCC hired two new independent contract auditors in 2014 to complement the existing staff; one for CIP and one for O&P compliance.**

In lieu of conducting audits on a six-year audit cycle for registered entities solely registered as the PSE function, NPCC will conduct self-certifications for evaluating compliance assessments of PSEs.

### 1.2 Other Regional Key Initiatives & Activities

NPCC has initiated a Physical Security Outreach Program for NPCC registered entities. The program defines best practices and makes recommendations based on field visits for registered entities to improve their physical security.

NPCC is participating in:

- Internal Controls Pilot Program
- Audit Checklist Team
- Auditor Manual and Workbook Development Team
- Aggregation of Minimal Risk Issues Pilot

## 2. Reliability Standards Subject to Regional Monitoring

The table below contains NPCC Regional and NERC Reliability Standards that NPCC will monitor in addition to the Reliability Standards on the NERC AML. There is further guidance and schedules on the NPCC website.

Reliability Standards Subject to Regional Monitoring					
Standard Requirement &	Justification/Risk	Audit	Self-Cert.	Spot Check	Data Sub.
PRC-002-NPCC-01, R1	A successful implementation of the new NPCC Regional Standard for Disturbance Monitoring Equipment will allow for quicker and better system analysis and is expected to help with identifying additional standards to monitor in years to come. R1 is important because it identifies where Sequence of Event (SOE) recording equipment must be installed and the type of events that SOE equipment must capture.	X			

Reliability Standards Subject to Regional Monitoring					
Standard Requirement &	Justification/Risk	Audit	Self-Cert.	Spot Check	Data Sub.
PRC-002-NPCC-01, R2	R2 identifies the transmission elements that require Fault Recording (FR) capability from a TO perspective.	X			
PRC-002-NPCC-01, R3	R3 identifies the need to be able to capture the Current Zero Time through the elements identified in R2.	X			
PRC-002-NPCC-01, R4	R4 identifies the generating elements that require FR capability from a GO perspective.	X			
PRC-002-NPCC-01, R5	R5 identifies the types of electrical data to be captured by FR equipment.	X			
PRC-002-NPCC-01, R6	R6 identifies the recording duration, rate, and settings for FR equipment.	X			
PRC-002-NPCC-01, R7	R7 identifies the aspects that the RC must consider when establishing it's Dynamic Disturbance Recording (DDR) capability.	X			

### 3. Audit Scoping Process

NPCC performs an “Entity Risk Assessment and Impact Evaluation” prior to the preparation of the audit notification package. The result is an appropriately scoped audit that is commensurate with risk and impact to the reliability of the BPS. NPCC reviews information related to the entity’s registration, system size and geography, asset ownership, operational performance, and past compliance history. NPCC also works with the registered entity to gain an understanding of the entity's culture of compliance and internal controls before the audit engagement. During the audit, NPCC will review the entity’s control practices and culture of compliance further while offering suggestions for improvement. This scoping effort gives NPCC enough information to determine and justify the degree of any possible compliance monitoring adjustments (expansion or reduction of scope) and any adjustment of audit frequency in the future.

NPCC performs an “Entity Risk Assessment and Impact Evaluation” which considers in a consistent and in-depth fashion the criteria below:

1. Registered functions
2. System geography, population, and seasonal issues
3. Peak load and capacity
4. BPS Assets and related operating limitations
5. Interconnection points and critical paths
6. Special Protection Systems, UFLS, UVLS
7. SCADA and EMS systems
8. Situational Awareness and System Maintenance
9. System restoration and blackstart resources
10. System events and trends
11. Compliance history trends
12. Self-reports
13. Mitigation of previous violations
14. Internal Controls

## 4. Audit Schedule

The audit schedule is also located on NPCC's website: <https://www.npcc.org/Compliance/audit%20Schedule/>

2014 Audit Schedule			
NCR #	Registered Entity	CIP	O&P
NCR07076	AP (Curtis Palmer) LLC		X
NCR00538	Astoria Energy, LLC	X	
NCR07012	Astoria Generating Company L.P.		X
NCR07013	Bangor Hydro-Electric Company		X
NCR07015	Bear Swamp Power Company LLC		X
NCR07034	Bozrah Light and Power Company	X	X
NCR07022	Braintree Electric Light Department		X
NCR03035	Bridgeport Energy, LLC	X	
NCR10237	Brooklyn Navy Yard Cogeneration Partners, L.P.		X
NCR07023	Bucksport Energy LLC		X
NCR07024	Burlington Electric Department	X	
NCR07026	Capitol District Energy Center Cogeneration Associates		X
NCR07028	Central Hudson Gas & Electric Corporation		X
NCR07029	Central Maine Power Company	X	
NCR07031	Chicopee Municipal Lighting Plant	X	X
NCR07042	Cogen Technologies Linden Venture L.P.		X
NCR07043	Connecticut Jet Power LLC		X
NCR07045	Connecticut Resources Recovery Authority (CRRA)		X
NCR11088	Constellation Mystic Power, LLC		X
NCR10009	Covanta Niagara LP	X	X
NCR10010	Covanta Onondaga LP	X	X
NCR10011	Covanta SEMASS LLC	X	X
NCR07055	Cross Sound Cable Company, LLC.		X
NCR07056	Danvers Electric Division	X	X
NCR02922	Dartmouth Power Associates, LP	X	X
NCR07058	Devon Power LLC		X
NCR07017	Dighton Power LLC		X
NCR07060	Dominion Energy Brayton Point LLC		X
NCR07061	Dominion Energy Manchester Street, Inc.		X
NCR07065	Dominion Nuclear Connecticut, Inc.		X
NCR07068	Dunkirk Power LLC		X
NCR07071	Entergy Nuclear Fitzpatrick, LLC	X	
NCR00540	Essential Power Newington, LLC	X	
NCR04057	Exelon Generation Co., LLC (Power)		X
NCR10049	FirstLight Hydro Generating Company		X
NCR07086	Fitchburg Gas and Electric Light Company	X	X
NCR07103	Green Mountain Power Corporation	X	
NCR07035	Groton Utilities	X	X
NCR07106	Hingham Municipal Lighting Plant	X	
NCR07107	Hudson Light and Power Department	X	
NCR07110	Hydro-Québec Distribution	X	

2014 Audit Schedule			
NCR #	Registered Entity	CIP	O&P
NCR00124	Ipswich Municipal Light Department	X	
NCR07135	Mansfield Municipal Electric Department	X	
NCR00208	Marblehead Municipal Light Department	X	
NCR00333	Middleton Municipal Electric Department	X	
NCR07037	Mohegan Tribal Utility Authority	X	
NCR10050	Mt Tom Generating Co., LLC	X	
NCR07155	New Brunswick <b>Power Corporation</b>		X
NCR07159	New England Power Company	X	X
NCR07160	New York Independent System Operator		X
NCR07163	Niagara Mohawk Power Corporation	X	X
NCR00126	North Attleborough Electric Department	X	
NCR07038	Norwich Public Utilities	X	
NCR00415	Norwood Municipal Light Department	X	
NCR07180	NSTAR Electric Company	X	
NCR07184	Ontario IESO	X	X
NCR07187	Oswego Harbor Power LLC	X	
NCR07191	Peabody Municipal Light Plant	X	
NCR07201	PSEG Power Connecticut LLC	X	
NCR07202	PSEG Power New York LLC	X	
NCR07206	Reading Municipal Light Department	X	
NCR07214	Taunton Municipal Lighting Plant		X
NCR07041	Town of Wallingford Department of Utilities	X	
NCR07223	Unitil Energy Systems, Inc.	X	
NCR07224	Vermont Electric Cooperative	X	
NCR07227	Vermont Public Power Supply Authority	X	
NCR07228	Vermont Transco, LLC	X	
NCR07229	Verso Androscoggin LLC		X
NCR10239	Verso Bucksport LLC		X
NCR07230	Wellesley Municipal Light Plant	X	
NCR07233	Westfield Gas & Electric Light Department	X	
NCR02923	Wheelabrator Bridgeport, L.P.	X	
NCR10033	Wheelabrator Saugus J.V.	X	

## 5. Compliance Outreach

Compliance Outreach Activities	
Outreach Activity	Anticipated Date
Physical Security Outreach Program	Ongoing during the year

Compliance Outreach Activities	
Outreach Activity	Anticipated Date
<p>Cyber Security Outreach Program</p> <p><b>Key Activities:</b></p> <ul style="list-style-type: none"> <li>• Develop a cyber-security outreach program that will advise registered entities on the vulnerabilities, threats, and risks faced by electric industry.</li> <li>• Present at NPCC’s Spring 2014 Compliance and Standards Workshop to increase awareness of the program.</li> <li>• Evaluate the cyber security postures of NPCC registered entities (participation is completely voluntary) via onsite security assessments, and provide written recommendations for improving security after completion of security assessments.</li> <li>• Complete four assessments by December 31, 2014.</li> </ul>	Ongoing during the year
NPCC Compliance and Standards Workshop	Twice Yearly; May and November
Various Webinars for Compliance and Standards Development issues	As needed