NPCC Compliance Committee Process for Submitting Implementation Guidance to NERC

1. Overview

1.1. The NPCC Compliance Committee (“CC”) is a Regional Entity Stakeholder Committee and is a pre-qualified organization that may vet and submit to NERC examples proposed for Implementation Guidance in accordance with the NERC Compliance Guidance Policy.

1.2. Implementation Guidance is defined in the NERC Compliance Guidance Policy.

1.3. The CC process to develop and vet examples proposed for Implementation Guidance is described in this document.

1.4. A flowchart providing an overview of the CC process to develop and vet examples proposed for Implementation Guidance is provided in this document.

2. Submitting Draft Implementation Guidance to the CC

2.1. Any NPCC Registered Entity or other NPCC committee, working group, task force, NPCC Staff, or subcommittee may request that the CC vet an example proposed for Implementation Guidance.

2.2. To request the CC vet an example proposed for Implementation Guidance, the registered entity, NPCC committee, working group, task force, NPCC Staff, or subcommittee shall develop and submit Draft Implementation Guidance to the Chair and Vice-Chair of the CC.

2.3. Once the Draft Implementation Guidance is submitted, the Chair or the Vice-Chair of the CC shall provide the Draft Implementation Guidance to the Reliability Standards Committee (RSC) and CC email distribution lists for comment.

2.4. The Chair of the CC shall include the Draft Implementation Guidance as an agenda item during the next CC meeting.

3. Vetting of Implementation Guidance

3.1. All CC Members, RSC Members, and NPCC staff shall have 30 days to provide written comments on the Draft Implementation Guidance. Written comments shall be provided to the CC, the RSC, and the registered entity that submitted the Draft Implementation Guidance via email.

3.2. If there are no written comments during the 30 days or the written comments are supportive and do not include any substantive recommended changes, the CC shall vote on the Draft Implementation Guidance. The vote should normally occur during the next CC meeting.

3.3. If there are written comments opposing or recommending substantive changes to the Draft Implementation Guidance, the registered entity, NPCC committee, working group, task force, NPCC Staff, or subcommittee submitting the Draft Implementation Guidance should respond to such comments via email to the CC within 30 days.
3.4. After the time has passed for the submitter to respond to the written comments opposing or recommending substantive changes to the Draft Implementation Guidance, the CC may vote on the Draft Implementation Guidance. The CC may also form a subcommittee to evaluate and report to the CC on the Draft Implementation Guidance.

3.5. If any CC Member company, RSC Member, or NPCC remains opposed to the Draft Implementation Guidance after it has been approved by the CC, such opposition may be documented and provided to the ERO by the party opposed.

3.6. Upon approval by the CC, the Chair of the CC or his designee shall submit the NERC Compliance Guidance Policy Implementation Guidance Submittal Form, the CC approved Implementation Guidance, and any documented opposition to the CC approved Implementation Guidance via email to ComplianceGuidance@nerc.net.
NPCC Compliance Committee Process for Submitting Implementation Guidance to NERC Flowchart Overview

Registered Entity, NPCC Committee, Working Group, Task Force, or Subcommittee Develops draft Implementation Guidance

- Draft Implementation Guidance

- Request to CC to Vet Draft Implementation Guidance

- CC Chair or Vice Chair provides Draft Implementation Guidance to CC and RSC

- 30 Days to respond to written comments

- Written Opposition or Changes Recommended?
  - Yes
    - CC Votes on Draft Implementation Guidance
    - Chair of CC submits Implementation Guidance into NERC Process
  - No
    - Option for CC to Vote on Draft Implementation Guidance

- Option for CC to Subcommittee to Examine Draft Implementation Guidance

- 30 Day Written Comment Period for CC, RSC, NPCC Staff

- Provide Comments and/or Recommended Changes to Submitter
4. References
   4.1.1. NERC Compliance Guidance Policy, November 5, 2015
   4.1.2. NERC Compliance Guidance Policy Implementation Guidance Submittal Form.