Northeast Power Coordinating Council, Inc.
Directory Development and Revision Manual
&
Process for the Review and Approval of Criteria, Guidelines, and Procedures
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II. EXECUTIVE SUMMARY

The Northeast Power Coordinating Council, Inc. (NPCC) is responsible for promoting and enhancing the reliability of the international, interconnected bulk power system in Northeastern North America. One of the ways NPCC carries out its mission is through the development of regionally specific criteria, and monitoring and enforcement of compliance with such criteria. NPCC Directories have been developed in order to provide a consistent and comprehensive set of reliability requirements for the Northeast, while consolidating related information for NPCC Criteria, Guidelines, Procedures as well as FERC and NERC approved Regional Standards into one document.

This document provides guidance to the NPCC Task Forces and NPCC Full Members when establishing a new or revised Directory, when retiring, or consolidating an existing Directory. This document also clarifies the roles and responsibilities of the NPCC Task Forces responsible for developing and maintaining Directory content.

The NPCC Regional Standards Committee (RSC), working with the lead Task Force for each Directory, has overall responsibility for managing the Directory project. Individual Directories are under the control of a lead NPCC Task Force which is responsible for coordinating review among all other Task Forces which have jurisdiction over either a portion of the criteria or one or more of the Appendices in the Directory.

NPCC also recognizes the industry concern surrounding the ongoing costs of maintaining the more stringent or more specific NPCC criteria contained within the NPCC Directories and the NPCC Board of Directors has expressed support for the appropriate balance between the incremental reliability benefit achieved by the criteria versus the cost to maintain or implement those criteria. Accordingly, an evaluation of the cost effectiveness of achieving the incremental reliability benefit has been incorporated into this Directory Development and Revision Manual and appears in Section VIII.

This document also contains the process for the review and approval of Criteria, Guideline, and Procedure documents that have not been incorporated into a Directory and remain as standalone documents outside of any Directory.

III. BACKGROUND

NPCC Reliability Directories have been developed consistent with the NPCC Bylaws which provide for the establishment of regionally specific reliability criteria, guidelines and procedures; within each Directory NPCC’s reliability criteria has been reviewed and translated to ensure that the criteria is not inconsistent with the ERO standards as required by the NERC Rules of Procedure.

Each Directory also contains former Guideline – Type “B” and Procedure – Type “C” documents which have been renamed as Appendices and are functionally relevant to the document’s Criteria. The Appendix supports the achievement of system performance related to the criteria and the consistent implementation, interpretation and monitoring of the criteria requirements.
Phase 1 of the Directory Project was initiated by the NPCC Reliability Coordinating Committee (RCC) in order to demonstrate consistency with NERC Standards and to effectively group documents together according to functional topics. During Phase 1 an initial translation of the existing criteria document was performed in addition to identifying and eliminating language within the criteria that duplicated existing NERC Reliability Standards.

Also during Phase 1, Functional Model language was introduced and the corresponding “B” Guidelines and “C” Procedures were incorporated into each Directory as Appendices. The resulting Directory created a single source reference for all entities while providing a method to demonstrate consistency with NERC Standards. All work from Phase 1 has been completed.

Phase 2 of the Directory Project was initiated in order to reformat the Criteria section of each document into specific and measurable NERC style requirements which will promote the NPCC Regional Criteria as more specific or more stringent within each Directory. Phase 2 will also facilitate the development of the NPCC Criteria Compliance Enforcement Program (CCEP) by providing the respective requirements of that program.

A mapping document has been provided on the Directory page of the NPCC Website and has been organized in a manner that provides guidance on where a Directory’s content originated (“A”- Criteria, “B”- Guideline, or “C”- Procedure). The mapping document provides tracking of specific content language from documents that were translated or replaced by Directories and their Appendices.

Most of NPCC’s “B” Guideline and “C” Procedure documents were transferred to Directories as Appendices in support of the relevant criteria. Those B and C documents that were not incorporated into a Directory remain as standalone documents.

Further work on the individual Directories will emphasize the importance of identifying the specific incremental reliability benefit provided by the criteria beyond the NERC Standards and if any cost effective alternatives exist or were considered. This additional work will be done during the normal course of development or review by the Task Force responsible for the Directory.

III. APPLICABILITY OF NPCC CRITERIA

The requirements of an NPCC Directory apply only to those facilities defined as NPCC bulk power system elements as identified through the performance based methodology of NPCC Document A-10, “Classification of Bulk Power System Elements,” the current list of which is maintained by the NPCC Task Force on System Studies and approved by the NPCC Reliability Coordinating Committee.

Requirements to abide by an NPCC Directory may also reside in NPCC Member tariff requirements, bilateral contracts and other agreements between facility owners and/or operators and their assigned Reliability Coordinator, Planning Coordinator, Transmission Operator, Balancing Authority and/or Transmission Owner as applicable.
and may be enforceable through those external tariff requirements, bilateral contracts and other agreements.

IV. TASK FORCE ROLES AND RESPONSIBILITIES

With the development of the Directories it has been recognized that in certain cases more than one Task Force is responsible for the content of a Directory and coordination between Task Forces is necessary. In general, revisions and clarifications to a Directory shall be coordinated by the Lead Task Force of the document. Revisions to a Directory can be initiated in a fully bi-directional manner; that is either by the Lead Task Force responsible for the document or by another Task Force who is responsible for some portion (criteria or appendices) of the document.

This process will allow each Directory to remain under the control of the respective Lead Task Force which has the necessary expertise to keep each document current and accurate while also providing a means to coordinate component review of those segments of the Directory that may be under the control of another Task Force.

The Lead Task Force can initiate a full review of the Directory in accordance with the NPCC Reliability Assessment Program (NRAP) date of approval or if a need to revise the criteria section of the document has been identified.

The Lead Task Force will also notify other Task Forces under whose jurisdiction either a portion of the criteria or Appendices exists in order to coordinate the total document review and revision. Similarly, a Task Force which is not the Lead Task Force of the Directory, but is responsible for some portion of the document, shall coordinate a necessary revision to their section of the document through the Lead Task Force of the Directory.

The Lead Task Force will also consider the cost effectiveness of the proposed criteria within the Directory during each periodic review of the document or for any proposed revisions to the criteria.

Cost Effectiveness Analysis (CEA) will be conducted as outlined in Section VIII and will utilize survey questions developed by the Task Force to accompany the open process comment period(s). These questions will be designed to solicit Member comment on whether the Criteria represents an incremental benefit to reliability and whether there are any cost effective alternatives to achieving a similar or greater level of reliability. As noted in Section VIII, the Lead Task Force may waive the cost effectiveness portion of the review or conduct it any time during the development process.

In all cases, the Lead Task Force will document its cost effectiveness decisions and activities. The Lead Task Force may choose to waive the cost effectiveness analysis portion of the development process if it is deemed to be of no added value (e.g. no change to established beneficial criteria or how to achieve the reliability objective). In this case, a letter from the Task Force Chair which indicates the desire of the Task Force to waive the CEA will be sent to the RCC and RSC to be stored with the developmental record and will be subject to RCC approval.
V. DIRECTORY DEVELOPMENT AND REVISION PROCEDURE

1. NEW DIRECTORY

Any NPCC Full Member may request the development of a new Directory. The request shall be made to the NPCC Manager of Reliability Criteria and shall contain the background and justification for the development of the new Directory including a cost effectiveness assessment if available.

The NPCC Manager of Reliability Criteria shall forward the request for the development of a new Directory, to the appropriate Task Force (TF) and copy the Regional Standards Committee (RSC) and the Reliability Coordinating Committee (RCC). The Lead Task Force responsible for developing the new Directory shall review the request and all information submitted, including any cost effectiveness documentation and determine if the development activity is warranted. If the TF accepts the request, it will notify the RCC of its intent to develop a new Directory and conduct a Cost Effectiveness Analysis (CEA) in accordance with Section VIII of the Directory Manual to accompany the initial posting of the draft Directory. If the Task Force rejects the request it will notify the Manager of Reliability Criteria of the reason for the rejection.

Upon development of the new draft Directory the Lead Task Force shall post it to the NPCC Open Process for a 45 day comment period. The initial posting will include the cost effectiveness survey questions as contained in Section VIII.

At the conclusion of the 45-day Open Process period, the Lead Task Force will consider comments received, develop responses to the comments and revise the Directory if necessary. The Lead Task Force shall also evaluate and document the results of the cost effectiveness survey questions.

The Lead Task Force will present the draft Directory along with the results of the cost effectiveness analysis to the RCC.

The RCC will review the TF recommendation and conclude whether the new Directory should move forward for Full Member consideration based on its incremental reliability benefit and cost effectiveness.

If the RCC concludes that the development of a new Directory is not cost effective, the RCC will notify the Manager of Reliability Criteria for notification to the RSC, the Lead Task Force and the NPCC Full Member that submitted the request to develop a new Directory. After consideration of cost effectiveness and reliability benefit if the RCC approves the draft Directory it is then submitted for final approval by the NPCC Full Member Representatives along with the RCC recommendation of approval.\(^1\)

The process for establishing a new Directory is represented below in Figure 1:

\(^1\) Approval of a new or revised Directory requires a 2/3\(^{rd}\) majority of Full Member voting representatives in accordance with the NPCC Bylaws.
Figure 1: New Directory

1. NPCC Full Member makes request to Manager of Reliability Criteria
2. Manager of Reliability Criteria assigns Lead TF to draft the New Directory
   - TF Accepts Request?
     - No: TF notifies Manager of Reliability Criteria of reason for not Accepting Request
     - Yes: Lead TF posts draft of the new Directory with Cost Effective Analysis survey questions.
       - Comments Received?
         - Yes: Lead TF Reviews Comments and Cost Effectiveness Analysis
         - No: Lead Task Force Presents Cost Effectiveness analysis and the New Directory to the RCC
           - RCC Approves Conducting a Full Member Ballot?
             - Yes: Manager of Reliability Criteria notifies Member who submitted request and the Lead TF and RSC
             - No: Manager of Reliability Criteria notifies the RCC and the RSC
2. DIRECTORY REVISIONS

a. REVISIONS TO THE CRITERIA SECTION OF A DIRECTORY

The Lead Task Force can initiate a full revision of the Directory in accordance with the NPCC Reliability Assessment Program (NRAP) date of approval or some need to revise the criteria section of the document as determined by a Full Member, the Lead Task Force itself or due to revision of a NERC Standard.

A request to revise the criteria section of an NPCC Directory shall be submitted to the Lead Task Force responsible for the document. The Lead Task Force shall notify each affected NPCC Task Force which has jurisdiction over either a portion of the criteria or one or more of the appendices within the Directory that a request to revise the criteria in the document has been received.

The Lead Task Force shall review the request to revise the criteria and shall also consider conforming changes to appendices as a result of the criteria revision if necessary.

The Lead Task Force will also consider the cost effectiveness of the criteria within the Directory during each periodic review of the document or for any proposed revisions to the criteria.

The cost effectiveness of the criteria will consist of CEA survey questions developed by the Task Force and which are designed to solicit Member comment on the relative cost of different approaches to achieving the level of reliability provided by the criteria. Emphasis will be placed on identification of the incremental reliability benefit of the criteria beyond that which may be achieved by any associated NERC Standards.

These survey questions will accompany the Open Process 45 day posting of the Directory in order to promote transparency.

Section VIII provides guidance for the CEA and Open Process posting. If the Lead Task Force determines that there is no benefit to conducting the CEA activity then this decision shall be documented and notification provided to the RCC and RSC along with the reasons for the decision to waive this portion of the process.

The NPCC Manager of Reliability Criteria shall post the Directory containing the revised criteria to the NPCC Open Process review for 45 days, along with the survey questions developed to assess the cost effectiveness of the criteria. The survey responses will be documented and archived as part of the record of the Task Force review.

At the conclusion of the 45-day Open Process, the Lead Task Force will discuss the comments submitted and post responses to comments on the NPCC Open Process portal. If the responses to the comments received on the criteria revision result in substantive changes to the document, then the revised Directory criteria shall be reposted to the Open Process for an additional 45 day posting period.

Alternatively, if there are no substantive changes which would require additional postings, the Directory is presented to the Reliability Coordinating Committee (RCC) for approval along with any information regarding incremental reliability benefit and cost effectiveness.
If the RCC concludes that the proposed revision(s) to the criteria section of a Directory is (are) not cost effective, the RCC will notify the Manager of Reliability Criteria for notification to the RSC, the Lead Task Force and, if applicable, the NPCC Full Member that submitted the request to revise the Directory.

Upon RCC approval, the document is submitted for a ballot to the NPCC Full Member Representatives along with the RCC recommendation of approval.

Approval of the revised Directory criteria requires a 2/3rd majority of Full Member voting representatives in accordance with the NPCC Bylaws.

The process for revisions to the criteria in an existing Directory is represented below in Figure 2:
Figure 2: Revisions to Criteria

NPCC Full Member makes request to Lead Task Force to revise a Directory

Lead TF posts draft of the revised Directory with Cost Effective Analysis survey questions.

Comments Received? Yes

Lead TF Reviews Comments and Cost Effectiveness Analysis

Substantive Changes? Yes

Manager of Reliability Criteria notifies Member who submitted request and the Lead TF and RSC

No

Lead Task Force presents Cost Effectiveness Analysis and the revised Directory to the RCC

RCC Approves Conducting a Full Member Ballot? Yes

NPCC Full Member Ballot for Approval

No

No
b. REVISIONS TO THE APPENDIX SECTION OF A DIRECTORY

Any NPCC Full Member may request an Appendix within a Directory to be revised, added or retired. Revisions, additions or retirements of Appendices shall only require Task Force approval.

A request to revise, add or retire an Appendix of a NPCC Directory shall be submitted to the Task Force responsible for the Appendix. The Task Force responsible for the Appendix shall notify the Lead Task Force of the Directory that a request to revise, add or retire an appendix within the document has been received.

The Lead Task Force of the Directory shall be responsible for notifying all Task Forces which have jurisdiction over either the criteria or one or more of the other Appendices within the Directory that a request to revise, add or retire an appendix has been received. The Lead Task Force will also determine whether to waive or conduct cost effectiveness activities associated with the proposed revisions to the Appendix and notify the RCC and RSC of such determination.

After the Task Force responsible for the revised Appendix request reviews the subject Appendix, they will forward the Directory containing the draft revised Appendix to the Lead Task Force of the Directory. The Lead Task Force shall be responsible for posting the Directory (in its entirety) which contains the new, revised, or retired Appendix to the NPCC Open Process review for 45 days and will also conduct the cost effectiveness activities as described in Section VIII if necessary. The Lead Task Force will limit the comments solicited to only the subject Appendix.

At the conclusion of the 45-day Open Process, the Lead Task Force will forward the comments submitted on the Appendix to the Task Force responsible for the new, revised, or retired Appendix. If the responses to the comments received on the new, revised, or retired Appendix result in substantive changes to the Appendix, then the Directory containing the new, revised, or retired Appendix shall be reposted to the Open Process for a successive 45-day review period by the Lead Task Force of the entire Directory. Alternatively, if there are no substantive changes which would require additional postings, the new, revised or retired Appendix shall be voted on by the Task Force responsible for the Appendix.

The lead Task Force for the Directory containing the new, revised or retired Appendix shall distribute the Directory containing the revised or retired Appendix to the RCC for informational purposes.

The process for revisions to the Appendices within an existing Directory is represented below in Figure 3:
Figure 3: Revisions to Appendices

1. Responsible Task Force receives Request to change existing Appendices within Directory

2. Responsible Task Force notifies Lead TF of revision request

3. Responsible Task Force drafts revision to existing Appendix

4. Lead TF posts draft of the revised Appendix with Cost Effective Analysis survey questions.

5. Comments Received?
   - Yes
     - Lead TF Reviews Comments and Cost Effectiveness analysis
     - Substantive Changes?
       - Yes
         - Responsible Task Force approves Cost Effectiveness analysis and revised Appendix and Lead Task Force presents revision to the RCC for information
       - No
         - Lead Task Force of Directory notifies other TFs having jurisdiction of revision request

   - No
     - Responsible Task Force approves Cost Effectiveness analysis and revised Appendix and Lead Task Force presents revision to the RCC for information
The NPCC Glossary of Terms contains the definitions of all terms found within the NPCC Directories, Criteria, Guidelines, and Procedures. The Glossary of Terms is intended to be a repository of all NPCC defined terms and contains the Full Member approved definition of that term as developed by the Task Force responsible for the Directory in which the term resides.

The Glossary is organized into two sections, one containing all defined terms within the Directories (including Appendices) which support the NPCC Criteria and another section for definitions found within remaining B and C documents.

The process of establishing or revising a NPCC defined term shall be considered a revision to the Directory in which the term resides in order to capture the context of its use within the document. Accordingly, the entire Glossary is not subject to the Open Process for a revision to an individual definition.

The development and review of a new definition or a revision to an existing NPCC specific definition contained within the Glossary will be coordinated by the Lead Task Force for the Directory in which the defined term resides.

Any NPCC Full Member may request that a Glossary term be revised or added to the NPCC Glossary of Terms by forwarding a request to the Lead Task Force for the Directory in which the defined term to be revised resides or will reside. When the subject term resides in multiple Directories, the requestor shall forward the request to each of the Task Forces for the Directories in which the defined term resides and the individual Task Forces shall coordinate their review of the request, by assigning one of the Task Forces as the Lead Task Force for the review.

In general, it is not anticipated that the development of a new or revised term in the Glossary will result in significant cost implications. However, the Lead Task Force may utilize the cost effectiveness analysis as described in Section VIII to identify cost impact and reliability benefit of the proposed or revised Glossary term.

The RCC will review the results of the cost effectiveness analysis conducted for the proposed or revised Glossary term with the Lead Task Force and the NPCC Manager of Reliability Criteria prior to the Task Force proceeding with the process of establishing a new or revised Glossary term.

In accordance with Section VIII, if the RCC concludes that the development of a new or revised Glossary term is not cost effective, the RCC will forward the determination to the Manager of Reliability Criteria for notification to the Lead Task Force and NPCC Full Member.

After the Lead Task Force, in which the defined term resides, has completed its review, they will post the subject Directory containing the new or revised term to the NPCC Open Process for 45 days. When the new or revised term appears in multiple Directories, the designated Lead Task Force for the review shall include in the posting notice a comprehensive list of references to all occurrences of the defined term in other NPCC Directories, including each Directory in which the term resides.
At the conclusion of the 45-day Open Process, if responses to comments received on the new or revised term result in further substantive change to the term, then the Directory containing the new or revised term shall be reposted to the Open Process for a successive 45 day posting period by the Lead Task Force for the subject Directory. Alternatively, if no substantive changes to the term are developed which would require an additional posting, then the Directory containing the new or revised term will be presented to the Reliability Coordinating Committee (RCC) by the Lead Task Force for approval.

Upon RCC approval, the Directory containing the new or revised term will be balloted by the Full Members. Upon Full Member approval of the new or revised term the Glossary will be updated by the Lead Task Force of the document in which the term resides.

The process for revisions to the Glossary of Terms is represented below in Figure 4:
Figure 4: Revisions to the NPCC Glossary of Terms

Task Force receives request to add or revise a term within the Glossary of Terms

Term in Multiple Directories?

No

Lead Task Force drafts new or revised term

Lead TF posts draft of the revised Directory with the new / revised term with Cost Effective Analysis survey questions

Comments Received?

Yes

Lead Task Force presents Cost Effectiveness Analysis and Directory with the new / revised term to RCC for approval

No

Task Forces coordinate their review of the request and draft new or revised term

Designated TF posts drafts of the revised Directories with the new / revised term with Cost Effective Analysis survey questions

Comments Received?

Yes

Designated Task Force presents Cost Effectiveness Analysis and Directories with the new / revised term to RCC for approval

No

Full Member ballot for approval
d. **Withdrawal of Revision Requests**

Any NPCC Full Member which has initiated a request to develop a new Directory, revise an existing Directory or revise an NPCC Glossary Term may withdraw the request at any time prior to Full Member approval of the revised Directory or NPCC Glossary Term by notifying the NPCC Manager of Reliability Criteria. The NPCC Manager of Reliability Criteria will then notify the Lead Task Force, RSC and RCC.

3. **Directory Retirement**

Upon identification of the need to retire an existing Directory, the Lead Task Force responsible for the Directory shall notify the NPCC Manager of Reliability Criteria of its proposal to retire a Directory.

The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the Bulk Power System. The NPCC Manager of Reliability Criteria shall post the proposal, along with supporting documentation to the NPCC Open Process for 45 days.

At the conclusion of the 45-day Open Process, the Lead Task Force will review the comments submitted and post responses on the NPCC Open Process portal. The NPCC Manager of Reliability Criteria shall present the proposal to retire the Directory to the Reliability Coordinating Committee (RCC) for approval.

Upon RCC approval the proposal to retire the Directory will be submitted for a ballot to the NPCC Full Member Representatives along with the RCC recommendation to retire the document.

4. **Maintenance of Links and Errata**

The maintenance of Links and the correction of errors found in a Directory or its Appendices shall be the responsibility of NPCC Standards staff. An error may be classified as Errata provided its correction does not change the scope or intent of the Directory and has no impact on the end user of the Directory.

Errata and Link revisions are updated as needed and require only the Lead Task Force approval prior to publishing and notifications to the applicable regulatory jurisdictions if required.

NPCC staff will also maintain a record of the change on the Directory Revision History page within the document.
VI. DIRECTORY CLARIFICATION PROCESS

a. REQUEST FOR CRITERIA CLARIFICATION

Any NPCC Full Member may request a clarification of the criteria within a Directory. The NPCC Full Member seeking the clarification shall submit a Request for Criteria Clarification form 2 to the NPCC Manager of Reliability Criteria explaining the clarification required and the specific circumstances surrounding the request. The NPCC Manager of Reliability Criteria shall review the request and work with the originator to make certain that the request is clearly written, seeks clarity regarding the intent or purpose of the criteria and is not a question on a compliance aspect of the criteria.

The Manager of Reliability Criteria will forward an approved Request for Criteria Clarification to the NPCC Task Force designated as the Lead Task Force for the subject Directory. The Lead Task Force shall notify each NPCC Task Force which has jurisdiction over either another portion of the criteria and/or one or more of the appendices within the subject Directory, that a Request for Criteria Clarification has been received. The Lead Task Force shall also forward the request to the affected Task Force.

The Lead Task Force for the Directory or the Task Force having jurisdiction shall review the request among its Members and provide a response to the NPCC Manager of Reliability Criteria within 60 calendar days. The Manager of Reliability Criteria shall post the Request for Criteria Clarification, along with the responses provided by the Lead Task Force to the NPCC Open Process for 45 days.

The Lead Task Force will consider all comments received on the posted clarification and if necessary revise the clarification based on these comments. If the Lead Task Force revises the clarification substantively on the basis of comments received the clarification shall be reposted to the NPCC Open Process for a successive 45 day posting period.

The Manager of Reliability Criteria will coordinate a response to all commenters on behalf of the Lead Task Force. The Lead Task Force response to a Directory clarification request shall provide the requested explanation without expanding on the criteria and should be sufficiently concise to eliminate any ambiguity.

The NPCC Manager of Reliability Criteria shall review the clarification provided by the Lead Task Force or the Task Force having jurisdiction to ensure that it is clear and provides the requested explanation without expanding on the criteria.

2 The Request for Clarification Form is included in Appendix B of this document.
The Lead Task Force response to a *Request for Criteria Clarification* shall be presented to the NPCC Reliability Coordinating Committee (RCC) for final approval prior to posting the clarification to the NPCC website.

The detailed results of the *Request for Criteria Clarification* shall be retained by the Lead Task Force and the NPCC Standards Staff along with a recommendation on whether the language within the document should be revised in order to provide additional clarity.

The process for a Criteria Clarification Request is represented below in Figure 5:
NPCC Manager of Reliability Criteria receives a Request for Criteria Clarification

NPCC Manager of Reliability Criteria reviews the request and forwards to the Lead Task Force of the applicable Directory.

The Lead Task Force for the Directory or the Task Force having jurisdiction shall provide a response to the Request for Criteria Clarification to the Manager of Reliability Criteria.

The Manager of Reliability Criteria shall post the Request for Criteria Clarification along with the response of the Lead Task Force to the NPCC Open Process for 45 days.

The Lead Task Force shall consider all comments received on the posted Clarification and if necessary revise the Clarification based on comments received.

If the Lead Task Force revises the Clarification substantively on the basis of comments received the Clarification shall be reposted to the NPCC Open Process.

The Manager of Reliability Criteria shall coordinate a response to all Commenters on behalf of the Lead Task Force.

The Lead Task Force response to a Request for Criteria Clarification shall be presented to the NPCC Reliability Coordinating Committee (RCC) for final approval prior to posting the Clarification on the NPCC website.
b. **Appeals**

Any NPCC Full Member that has submitted a *Request for Clarification* may appeal the rendered Task Force response.

The appellant shall submit a written complaint to the NPCC Manager of Reliability Criteria describing the substantive or procedural action or inaction associated with the Clarification Request process.

The appellant shall also describe in the complaint the actual or potential adverse impact to the appellant.

Assisted by any necessary NPCC Standards Staff and Lead Task Force resources, the NPCC Manager of Reliability Criteria shall prepare a written response addressed to the appellant as soon as practical, but not more than forty-five (45) calendar days after receipt of the complaint.

VII. **Directory Format and Version Control**

Each Directory will be formatted in accordance with the Directory Template in Appendix A of this document.

The Task Force Revision Review Record on the cover page of each Directory shall contain the date of the most recent version of the Directory as approved by the Full Members of NPCC.

The Revision History record on page 2 of each Directory shall contain a record of all revisions to the document, including maintenance of errata and links.

VIII. **NPCC Procedure for Cost Effectiveness Analysis (CEA) of New and Revised Criteria in Directories**

1. Upon receipt of a request to review or revise the criteria in an existing Directory, by a NPCC Full Member, or a request to develop a new Directory, the Task Force having jurisdiction (Lead Task Force) will determine if the activity warrants conducting a cost effectiveness analysis.

2. The Lead Task Force will document these activities as part of the record of development and notify the RCC and RSC if a waiver of the CEA will be exercised. The RCC may accept the Lead Task Force determination not to proceed with a CEA or request that a CEA be completed.

3. If the Task Force later determines that conducting a cost effectiveness analysis is warranted at any time during the development process of the new or revised Directory, the Task Force will notify the NPCC Manager of Reliability Criteria.

4. NPCC will coordinate the necessary cost effectiveness analysis as directed by the Task Force. These activities will focus on identification of the incremental reliability benefit of the Criteria and the cost effectiveness associated with that benefit. The Lead
Task Force shall use the subject matter expertise of its Members as well as other TFs, as may be applicable, along with the Open Process 45 day posting(s) for comment to gather this information (See below for sample questions).

- Does the proposed Criteria provide an increased level of reliability? If not, why not (probabilistic data, such as the information taken from the Reliability Issues Steering Committee report(s) regarding probable occurrence of a risk may be used to help make a determination)

- Is there a more cost effective solution to achieving the same or greater level of reliability if a different approach is taken? If so what is that solution? What are its costs relative to the original Criteria and associated processes?

- How long would it take your organization to implement full compliance to the Criteria as written? What would affect the implementation (i.e. outage scheduling, availability of materials, human resources, etc.)?

5. The Task Force shall use the information obtained, to make a determination if the revised or new Criteria is of sufficient reliability benefit to pursue further development activities by NPCC or if other cost effective approaches to achieve the reliability objective of the Criteria should be pursued. (E.g. development of a whitepaper, guideline document, etc.)

IX. PROCESS FOR REVIEW AND APPROVAL OF CRITERIA, GUIDELINES, AND PROCEDURES

Introduction

The Process for Review and Approval of Criteria, Guidelines, and Procedures was formerly outlined in NPCC Document A-01 Criteria for Review and Approval of Documents. The Directory Project has consolidated most NPCC Criteria-Type “A” documents, Guideline-Type “B” documents, and Procedure-Type “C” documents into the Directories.

This section is intended to outline the review and approval procedures, (the NPCC Open Process), to be followed for all remaining NPCC Criteria-Type “A” documents, Guideline-Type “B” documents, and Procedure-Type “C” documents.
Document, Criteria - Type "A"

General Description

Type "A" documents, with approval by the NPCC Full Member Representatives; describe the minimum criteria for Member Systems of NPCC functioning as part of the coordinated interconnected network.

Review and Approval

Type "A" documents are prepared and revised by the designated lead Task Force on a periodicity to be determined by the lead Task Force or initiated at the request of a Full Member. Drafts are distributed to other Task Forces for review, comments and/or concurrence. The document is also posted on the NPCC Open Process webpage for review for a period of 45 days, allowing industry comment. Notification is also given to neighboring Regions whose reliability might be impacted by NPCC’s Criteria. Their review of the proposed Criteria will be encouraged and comments will be considered for inclusion. The lead Task Force will discuss the comments submitted and post the responses to those comments on the NPCC Open Process webpage. If no substantive changes are required, which would require additional posting(s), the draft Type "A" document is presented by the lead Task Force to the Reliability Coordinating Committee (RCC) for its approval.

In its review, the RCC will determine if the proposed or revised Criteria are neither inconsistent with nor less stringent than NERC industry-wide reliability standards and are not intended to result in any undue competitive advantage or disadvantage to any party or parties. The NPCC recognizes that Member systems or local conditions may require criteria which are more stringent than those defined by NPCC Criteria.

Should the RCC determine that the document cannot be approved, the RCC will return the document to the lead Task Force.

Following the RCC’s approval, the document is submitted to the NPCC Full Member Representatives for ballot, with a recommendation for its adoption. Approval of NPCC Criteria requires a 2/3rd affirmative majority of the weighted sector votes.

For modified Type “A” documents, once approval has been obtained from the Member Representatives, the document is officially adopted with an effective date or implementation plan, as noted on the document itself with the following statement:

“Adopted by the Members of the Northeast Power Coordinating Council Inc., on (mm, dd, yyyy) based on recommendation by the Reliability Coordinating Committee, in accordance with Section VIII of the NPCC Inc. Bylaws dated January 1, 2012 as amended to date.”
The approved and adopted Type “A” document will then be posted, along with necessary additional documentation, if needed, such as an implementation plan or schedule for achieving full compliance with the requirements outlined in the document. This will be posted on the NPCC web site and distributed to the membership via a documented and maintained distribution list.

Members may request the lead Task Force, at any time, to review and revise the Criteria, or portions thereof, and have the right to enter into the NPCC “Appeals and Dispute Resolution Process” for non-compliance issues.

Retiring a Type “A” document requires following the same steps as the revision process.

The process for revisions to the criteria in an existing Type "A" document is represented below in Figure 6:
Figure 6: Revisions to Document, Criteria - Type "A"

Document review initiated in accordance with the frequency stipulated by the lead Task Force or initiated by Member request.

Lead Task Force drafts revision to existing Criteria Type "A" Document.

Criteria Type "A" Document distributed to other Tasks Forces by the Lead Task Force.

Comments Received?

Yes  Lead Task Force Reviews Comments  Substantive Changes?

Yes

Post draft document and provide notification of its availability on the Web for a 45-day review.

Comments Received?

Yes  Lead Task Force Reviews Posted Comments  Substantive Changes?

Yes

No

No

No

Yes  Responsible Task Force presents revision to the RCC for approval.

RCC Approval?

Yes  Submitted to the Full Members for ballot with the recommendation to approve.

Full Member Approval? 2/3 Majority

Yes

No

Yes

No

Document is officially adopted and posted and notifications are made to the NPCC Membership.
Documents: Guideline - Type "B" and Procedure-Type “C”

General Description

Type "B" documents are guideline documents.

Type "C" documents are procedures which provide for consistent implementation, interpretation and monitoring of conformance with the general criteria, guides and reporting requirements.

Review and Approval

Any NPCC Full Member may request a Guideline-Type “B” or a Procedure-Type “C” document be revised or retired. Revisions or retirements of Guideline-Type “B” or Procedure-Type “C” documents shall only require Task Force approval.

A request to revise or retire a Guideline-Type “B” or a Procedure-Type “C” document shall be submitted to the Task Force responsible for the document.

The Task Force shall be responsible for posting the revised or retired document to the NPCC Open Process review for 45 days.

The revised B or C document (or the proposal to retire a B or C document) shall be posted to the NPCC Open Process for a 45-day posting.

At the conclusion of the Open Process, the Task Force responsible for the B or C document shall consider all comments received and incorporate comments as appropriate. If the comments received on the revised or retired document result in substantive changes to the document, then the document shall be reposted to the Open Process for a successive 45-day review period by the Task Force responsible for the document. Alternatively, if there are no substantive changes which would require additional postings, the revised or retired document shall be voted on by the Task Force responsible for the document.

The Task Force responsible for the document shall distribute the document to the Reliability Coordinating committee for informational purposes.

The process for revisions to an existing Type "B" and “C” document is represented below in Figure 7:
Figure 7: Revisions to Guideline - Type "B" and Procedure-Type “C” Documents

Responsible Task Force receives request to revise existing Type "B" or Type “C” document

Responsible Task Force drafts revision to existing Type "B" or Type “C” document

Post draft document and provide notification of its availability on the Web for a 45-day review

Comments Received?

Yes

Lead Task Force Reviews Comments

Substantive Changes?

Yes

No

Responsible Task Force approves revised Type "B" or Type “C” document and Responsible Task Force presents revision to the RCC for information

No
X. REVIEW AND APPROVAL OF THE NPCC DIRECTORY DEVELOPMENT AND
REVISION MANUAL & PROCESS FOR THE REVIEW AND APPROVAL OF CRITERIA,
GUIDELINES, AND PROCEDURES

The NPCC Directory Development and Revision Manual & Process for the Review and Approval of Criteria, Guidelines, and Procedures will be reviewed at least once every five (5) years or more frequently if required.

A notification of a pending RSC review and re-approval of the Manual shall be posted on the NPCC website. All revisions to this Manual shall be posted to the NPCC Open Process Review for 45 days.

The Regional Standards Committee (RSC) shall respond to all comments received and shall have final approval over the revised document.
APPENDIX A - DIRECTORY FORMAT TEMPLATE

NPCC
Regional Reliability Reference Directory # XX

Task Force XXXXX Revision Review Record:

XX/XX, 20XX

Adopted by the Members of the Northeast Power Coordinating Council, Inc. June 26th, 2009 based on recommendation by the Reliability Coordinating Committee, in accordance with Section VIII of the NPCC Amended and Restated Bylaws dated July 24, 2007 as amended to date.
<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Action</th>
<th>Change Tracking (New, Errata or Revisions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Effective Date</td>
<td>New</td>
<td></td>
</tr>
</tbody>
</table>
Format for NPCC Directories (Phase 2)

Effective Dates (Denotes date of adoption by the Membership)

Revision History (Depicts revision history and tracks key changes)

Table of Content (Self-explanatory)

A. Introduction

Title: Self-explanatory

Directory #: Self-explanatory

Objective: State the reliability objective that this Directory intended to meet (i.e., achieving specific performance target/outcome, mitigating particular risks, establishing the minimum capability level, etc.)

Effective Date: Identify which parts of the Directory become effective on which dates.

Background: Provide information related to this creation or revision of this Directory, e.g., which “A”, “B” or “C” documents are mapped into this Directory; the general basis of the Directory, etc.

Applicability: Identify the entities that are assigned reliability requirements and/or which facilities need to conform to the stipulated criteria.

B. NERC ERO Reliability Standard Requirements

A list of the NERC standards associated with this Directory.

C. NPCC Regional Reliability Standard Requirements

A list of NPCC Regional Standards associated with this Directory.

D. NPCC Full Member, More Stringent Requirements, Criteria and Measures

Requirements

List the requirements and criteria that the applicable entities or facilities must comply with.
E. Compliance

Compliance with the requirements set forth in this Directory will be in accordance with the NPCC Criteria Compliance and Enforcement Program (CCEP).

Measures and corresponding Levels of Non-Compliance for these requirements are contained within the compliance template associated with this Directory.

Prepared by: Task Force XX (Lead Task Force for the Directory)

Review and Approval: Revision to any portion of this Directory will in accordance with the NPCC Directory Development and Revision Manual and will be posted by the Lead Task Force in the NPCC Open Process for a 45-day review and comment period. Upon satisfactorily addressing all of the comments in this forum, the Directory will be sent to the RCC for its approval.

Upon approval of the RCC, this Directory will be sent to the Full Member Representatives for their final approval if sections pertaining to the Requirements and Criteria portion have been revised. All voting and approvals will be conducted according to the most current "NPCC Bylaws" in effect at the time the ballots are cast.

Revisions pertaining to the Appendices or any other portion of the document such as links, glossary terms, etc., only RCC Members will need to conduct the final approval ballot of the document.

This Directory will be updated at least once every three years and as often as necessary to keep it current and consistent with NERC, Regional Reliability Standards and other NPCC documents.
NPCC Request for Criteria Clarification

Note: An Interpretation cannot be used to revise a Directory.

<table>
<thead>
<tr>
<th>Request for Criteria Clarification of a Directory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date clarification request submitted:</td>
</tr>
<tr>
<td>Date clarification response provided:</td>
</tr>
</tbody>
</table>

**Contact information for person requesting the clarification:**

<table>
<thead>
<tr>
<th>Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organization:</td>
</tr>
<tr>
<td>Telephone:</td>
</tr>
<tr>
<td>E-mail:</td>
</tr>
</tbody>
</table>

**Identify the Directory that needs clarification:**

| Directory Number: |
| Directory Title: |

**Identify specifically what portion of the Criteria needs clarification:**

| Text of Requirement: |

**Identify the material impact associated with this clarification:**

| Identify the material impact to your organization or others caused by the lack of clarity within this Directory: |
Submit completed Request for Criteria Clarification forms to the NPCC Manager of Reliability Criteria.

<table>
<thead>
<tr>
<th>Clarification: Response to Request for Clarification of Directory XX for the XXXX Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The following clarification of Directory was developed by the Task Force on XXXXX</td>
</tr>
<tr>
<td><strong>Directory Number and Text of Requirement</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Question 1</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Response to Question 1</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Question 2</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Response to Question 2</strong></td>
</tr>
</tbody>
</table>