NPCC Request for Criteria Clarification

Note: a Clarification cannot be used to revise the Criteria within a Directory.

Request for a Clarification of Criteria

Date submitted: 2015-March-23

Contact information for person requesting the clarification:

Name: Dave Kwan
Organization: Ontario Power Generation
Telephone: 416-592-6369
E-mail: david.kwan@opg.com

Identify the Directory that contains the Criteria requiring clarification:

Directory Number: NPCC D8, October 22, 2010
Directory Title: System Restoration

Identify specifically what portion of the Criteria needs clarification:

Text of Requirement:

Request for interpretation:
Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?
Section 5.7 (excerpt) states:
“Testing Requirements for Critical Components Associated with Key Facilities
Each Transmission Owner and Generator Owner of a key facility shall:
• maintain a list of critical components associated with each key facility;
• perform the tests outlined in Table 1;”

Table 1 identifies the standard tests required for associated critical components, including Tests ST-1 to ST-6; and CC-5.

However, in the sub-sections of 5.7 (e.g. 5.7.4 and 5.7.5.5, listed below), it appears that the Generator Owner is NOT listed; thus my interpretation is that 5.7.4 and 5.7.5.5 is not applicable to the Generator Owner.

Section 5.7.4 (excerpt) states:
“Transmission Owners shall test the backup power supplies.....”

Section 5.7.5.5 (excerpt) states:
“Each Reliability Coordinator, Transmission Operator and Balancing Authority shall test its computer redundancy features every six (6) months to ensure computer systems continue to function adequately. (Reference: Table 1; Test CC-5)”

**Identify the material impact associated with the lack of clarity:**

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this Directory:

Clear interpretation is required to determine if the above mentioned sections and/or sub-sections are applicable to the Generator Owner. OPG owned generating sites require clarity to ensure their maintenance programs account for appropriate requirements.
The following clarification of the criteria in Directory #8 was developed by CO11 Restoration Working Group and approved by the TFCO.

<table>
<thead>
<tr>
<th>Question 1</th>
<th>Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?</th>
</tr>
</thead>
</table>
| Response to Question 1 | Regarding Section 5.7.4, CO11 agrees that the requirement is applicable to the Generator Owner in those circumstances where a Generator Owner is identified as owning a **key facility**.  
Testing requirements apply to the **critical components** in all identified **key facilities**. |

<table>
<thead>
<tr>
<th>Question 2</th>
<th>Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?</th>
</tr>
</thead>
</table>
| Response to Question 2 | Regarding Section 5.7.5.5, CO11 agrees that the requirement is applicable to the Generator Owner in those circumstances where a Generator Owner is identified as owning a **key facility**. (control center).  
Testing requirements apply to the **critical components** (control center computer systems) in all identified **key facilities**.  
CO11 will revise the applicability of Sections 5.7.4 and Sections 5.7.5.5 to incorporate Generator Owner during the current revision of Directory #8. |