



NORTHEAST POWER COORDINATING COUNCIL, INC.
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782

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The Task Force on Coordination of Planning (TFCP) Response to Comments Received in the NPCC Open Process Posting of A-01 *Criteria for Review and Approval of Documents*.

The TFCP would like to thank those who provided comments on the recent posting of the A-01 document from June 28th, 2016 through August 12th, 2016.

The Task Force responses to individual comments are provided below.

Comment#1:

Comments (Multiple) from Dominion Resources Services:

Dominion Resources Services, Inc. presents the following comments on proposed changes to NPCC document A-01 *Criteria for Review and Approval of Documents* for consideration.

1. In the Introduction paragraph, as well as throughout the document, references are made to (Document C-0) Listing of NPCC Documents by Type. This C-0 document has been retired (Discontinued November 2013), this reference needs to be updated/removed throughout the document, including as a reference.

Task Force response:

Thank you for your comment.

Comment accepted.

Document C-0 has been discontinued and references to this document will be removed in the A-01 document.

2. Page 6: The review frequency of this document says 4 years, but the last review appears to have been in 2005. A process should be put in place to ensure that the review frequency is adhered to.

Task Force response:

Thank you for your comment.

Comment accepted.

Although document review often competes with other reliability issues on Task Force agendas the TFCP agrees that a timely review schedule should be adhered to.

NPCC will tabulate the next review date for each NPCC document (Directories and remaining A- Criteria, B-Guidelines and C-Procedure documents).

The tabulation will be available on the NPCC Home Page under *Document Status*.

Task Force response:

Thank you for your comment.

Comment accepted.

The acronym CMAS formerly identified the NPCC Compliance Monitoring and Assessment Subcommittee (CMAS).

This reference will be updated to NPCC Compliance Committee (CC).

3. Page 8: Beginning in the fifth paragraph, the term ‘lead TF’ is used but is not defined. It should be defined in the first instance of the use of lead Task Force on page 3 in the Review and Approval section. In addition, the term lead Task Force should be used throughout the document in place of ‘Lead Task Force’ which is used intermittently throughout the document.

TFCP Response to Comments on A-01 *Criteria for Review and Approval of Documents*.

Task Force response:

Thank you for your comment.

Comment accepted.

The references to ‘Lead Task Force’ and/or ‘lead TF’ will be replaced throughout the document with ‘lead Task Force’.

Comment#2:

Comments from the IESO:

The IESO appreciates the opportunity to provide comment on the subject posting. However, it is unclear to us as to what specific comments on the document being posted are being requested since:

- a. It is not a revision to the existing A-01 document;
- b. There is no specific mention of solicitation of comment on the existing process presented in the current A-01 document; and
- c. There is no indication of what the TFCP plans to do with the comments – whether or not to assess the need to revise the A-01 document or to consider public comments in its planned revision of the A-01 document.

Since the A-01 document and the due processes presented therein have been in place for some time, and the announcement mail is not specific on what comments are being solicited, we are unable to offer anything specific other than requesting NPCC to provide a bit more clarity and specificity in future announcements of similar nature.

Task Force response:

Thank you for your comment.

Comment accepted.

The comment letter that accompanied this posting contained the following:

“In accordance with the NPCC Reliability Assessment Program (NRAP) the Task Force on Coordination of Planning (TFCP) is soliciting comments on the A-01.

Additionally, since NPCC has established a separate Directory Development and Revision Manual which governs the approval and commenting protocols on NPCC Directories the TFCP is limiting comments to the processes contained in the A-01 document and not those associated with NPCC Directories.”

However, TFCP agrees that additional language in the posting letter explaining that the TFCP was not initially proposing any revisions to the document but merely soliciting comments would have improved clarity.

Subsequent postings of this document will contain proposed revisions.

Comment#3:

Comments from the NPCC Task Force on Coordination of Operation (TFCO):

NPCC Task Force on Coordination of Operation would like to provide the following comments in regards to the A-01 Criteria for Review and Approval of Documents.

The members of the Task Force believe that the process for the review and approval of the Type “C” documents (Procedures), should be expanded/modified.

The suggested revision to the NPCC document A-01 will allow for flexibility and option for the responsible lead Task Force to determine if the changes/modifications to an applicable document or preparation of a new Type “C” document would require or necessitate the subject document to go through the prescribed NPCC Open Process or distributed to other Task Forces’ for review and comments.

TFCP Response to Comments on A-01 *Criteria for Review and Approval of Documents.*

For example – for those Type “C” documents for which TFCO is the lead Task Force, TFCO assigns the review to an applicable CO Working Group, whose membership, as mandated by their individual Term of Reference Document, is composed of representatives of the five NPCC member Areas (five NPCC Reliability Coordinators). These reviewers are also the sole users and beneficiaries of the subject “C” Procedure document(s) (specifically C-01 – “NPCC Emergency Preparedness Communications Procedures” and C-15 – “Procedures for Geomagnetic Disturbances Which Affect Electric Power Systems”) and the only NPCC members potentially impacted by any changes to the subject document.

TFCO believes that the current automatic and rigid requirements of the current extended process, which includes distribution and attention of other TFs, as well as, built in delay of the 45-day Open Process Comment Period, provides no added value to the membership, but rather postpones implementation of new or revision to existing procedures that have been identified by the applicable group as beneficial to the reliable operation of the Bulk Power System.

TFCO suggests the following edits to the current language of the procedure (Appendix A of the document and the associated flow chart would need to be modified accordingly):

Please see marked version of A-01:

<https://www.npcc.org/Standards/SitePages/Comments.aspx?DevDocumentId=135&CommentPeriodId=233>

Task Force response:

Thank you for your comment.

The TFCP acknowledges that the existing A-01 criteria requirement to post proposed revisions to a NPCC ‘C’ Procedure document for 45 days can in some cases have an undesirable impact on the implementation of the revised procedures.

The TFCP has proposed modifying the A-01 criteria to provide the lead Task Force with an expedited posting option to address implementation issues as identified by the lead Task Force.

The lead Task Force may invoke an expedited posting period of no less than 30 days for a “C” document if necessary to address implementation issues as identified by the lead Task Force.