



**Northeast Power Coordinating Council, Inc.
Compliance Monitoring and Enforcement Program**

Procedure for Compliance Guidance Statements

CP -08

Rev. 1

Owner

Assistant Vice President, Compliance Registration and Enforcement

Effective Date

June 13, 2018

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Review and Re-Approval Requirements

This document will be reviewed every two years from the effective date or as appropriate for possible revision. The existing or revised document will be re-approved by the Assistant Vice President, Compliance Registration and Enforcement.

1.0 Introduction and Purpose

- 1.1 NPCC may develop and issue Compliance Guidance Statements (CGS) in order to offer clarification to NPCC Registered Entities in a consistent and transparent manner on the compliance approach associated with any of the following:
 - 1.1.1 NERC Rules of Procedure (ROP) and associated Appendices
 - 1.1.2 NERC Reliability Standard
 - 1.1.3 NPCC Regional Reliability Standard
 - 1.1.4 NPCC Criteria Compliance and Enforcement Program (CCEP)
- 1.2 A CGS cannot provide an interpretation to a requirement of a NERC Reliability Standard or an NPCC Regional Reliability Standard. The development of an interpretation must follow the applicable NERC or Regional interpretation process.
- 1.3 The purpose of this procedure is to provide guidance on the steps to be followed for developing and issuing a CGS.

2.0 Responsibilities

- 2.1 The NPCC Assistant Vice President of Compliance Registration and Enforcement (AVP) and the responsible NPCC Manager are responsible for implementing this procedure.
- 2.2 The NPCC Compliance Attorney shall be consulted during the development process as necessary and, at minimum, prior to issuing the CGS.
- 2.3 The responsible NPCC Manager shall issue the CGS.

3.0 Overview

- 3.1 The AVP will oversee the development of a CGS.
- 3.2 The responsible NPCC Manager will develop the CGS with the AVP and Compliance Attorney as necessary.
- 3.3 The CGS will not change the intent of an approved NERC Reliability Standard, NPCC Regional Reliability Standard, or NPCC Directory.
- 3.4 Typically, NPCC will provide a draft CGS to the NPCC Compliance Committee (CC) for review and comment prior to issuing a CGS that is associated with NERC Reliability Standards, NPCC Regional Reliability Standards, or the NERC ROP and associated Appendices.

- 3.4.1 If deemed appropriate by the AVP, NPCC may also provide a draft CGS to any related NPCC committee, council, task force, or working group for general information or to solicit comments prior to finalizing the CGS.
- 3.4.2 However under special circumstances, NPCC may issue a CGS without review and comment from any NPCC committee, council, task force, or working group.
- 3.5 NPCC shall provide any CGS that is associated with the NPCC CCEP to the CC for Approval.
- 3.6 The AVP may share a proposed CGS related to a NERC Reliability Standard or NERC ROP for comment with the Compliance groups of the other NERC regions.
- 3.7 The responsible NPCC Manager shall take the following steps when issuing a CGS:
 - 3.7.1 Ensure that the proper effective date is included on the CGS.
 - 3.7.2 Post the CGS under “Compliance”, “Documents”, Compliance Guidance Statements” on the NPCC website.
 - 3.7.3 Send the CGS via email to all CDAA Primary and Alternate Compliance Contacts.
 - 3.7.4 Send the CGS via email to the CC email distribution list.
 - 3.7.5 Post an announcement on the NPCC homepage regarding the CGS.
 - 3.7.6 Archive the CGS on the Compliance network drive.
- 3.8 NPCC will retire CGS documents if warranted. In such cases, the CGS may remain posted for continued reference with a “Retired” watermark and the effective date of the retirement.

4.0 Glossary

- 4.1 Approval: Authorization provided to NPCC by the relevant committee, council, task force, or working group where 2/3 affirmative majority of the weighted sector votes must be obtained before NPCC can proceed with the voted upon activity.
- 4.2 Endorsement: An indication of support to NPCC by the relevant committee, council, task force, or working group where 2/3 affirmative majority of the weighted sector votes is a goal, but not a requirement to proceed with the voted upon activity.

5.0 References

- 5.1 Delegation Agreement between NERC and NPCC
- 5.2 NERC ROP and associated Appendices
- 5.3 NERC Standard Processes Manual

5.4 NPCC Regional Standards Process Manual

5.5 NPCC CCEP Process Document (CCEP-1)

6.0 Document Revision/Review History

Revision	Reason	Approved by	CC Approval Date
0	Original issue of CP-08	Assistant Vice President of Compliance Registration and Enforcement.	9/12/13
0	2 Year Review. No changes made.	Assistant Vice President of Compliance Registration and Enforcement.	9/22/15
1	Minor administrative changes	AVP, Compliance	6/13/18

Note: Rev 0 of CGS-08 was reviewed at the 9/22/15 CC meeting. There were no changes made to Rev 0.

There were again no changes made at the 6/13/18 CC meeting.