



NORTHEAST POWER COORDINATING COUNCIL, INC.  
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July 2, 2021

**Subject: TFCP Criteria Clarification --- A-10 Classification of Bulk Power System Elements**

In accordance with the NPCC *Directory Development and Revision Manual* the Task Force on Coordination of Planning (TFCP) has considered a *Request for Criteria Clarification* and has provided the attached response.

The TFCP clarification provides guidance relating to the requirement within document A-10 to present plans and schedules for achieving compliance with NPCC Directory #1 and Directory #4 within three months of an element being identified as a bulk power system element.

**Comment Period:**

Comments on this clarification will be received for forty- five days through August 16, 2021.

The NPCC Open Process can be accessed through the following link:

[NPCC Open Process](#)

After the TFCP consideration of comments, the final Clarification will be presented to the Reliability Coordinating Committee (RCC) for approval.

Please contact me with any questions regarding this Criteria Clarification.

Thank you.

A handwritten signature in black ink, appearing to read 'Edward Roedel', written in a cursive style.

Edward Roedel  
Principal Engineer – AVANGRID Transmission Planning  
Chair, TFCP



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## NPCC Request for Criteria Clarification

| Request for a Clarification of Criteria  |   |
|--|---|
| Date submitted: June 4, 2021   |   |
| <b>Contact information for person or organization requesting the clarification:</b>  |   |
| Name:  | Task Force on System Studies                        |
| Organization:  | N/A   |
| Telephone:   | N/A   |
| E-mail:  | N/A   |
| <b>Identify the Directory that contains the Criteria requiring clarification:</b>  |   |
| Criteria Identification:   | <b>A-10</b>   |
| Criteria Title:  | <b>Classification of Bulk Power System Elements</b> |
| <b>Identify specifically what portion of the Criteria needs clarification:</b>   |   |
| <p>At a recent Task Force on System Studies meeting, a Task Force member raised a question regarding language in Document A-10, Section 5.1.</p> <p>Specifically, this section discusses a requirement to present plans and schedules for achieving Directory 1 and Directory 4 compliance to TFCP, TFCO, and TFSP within three months of an element being identified as a bulk power system element.</p> <p>The question concerns the use of the word “identified:” at what point in time is an element considered “identified” as BPS?</p> |   |

## Task Force on Coordinating Planning Response to Request for Criteria Clarification:

### A-10 Classification of Bulk Power System Elements

The following clarification of the criteria in Document A-10 was developed by the Task Force on Coordination of Planning.

With consideration for the language used in the first paragraph of 5.1, TFCP takes the term “identify” to mean being added to the BPS list as approved by the RCC.

TFCP believes that each regional entity (RC, PC, BA, etc.) has their own processes in place to ensure that facilities in their area appropriately identified, designed, studied, and operated in accordance with their BPS status.

TFCP recommends the following revisions to document A-10 during its next review:

#### 5.1 Modifications to the Bulk Power System List

When, upon application of this methodology, an Area identifies a change to the bulk power system classification of a bus, the Area shall present documentation of the analysis supporting the change to the TFSS. Once the change in classification of the bus is recommended by the TFSS and approved by the RCC, the bus will be added to or removed from the NPCC Bulk Power System List with the appropriate comments and information.

If the application of the methodology identifies changes to elements excluded from Directory 1 applicability or changes to elements where only a portion of the element is classified as bulk power system for Directory 4 applicability, as per section 4.1, the Area shall present documentation of the analysis to the TFSS. Once the change in classification of the element is recommended by the TFSS and approved by the RCC, the element will be added to or removed from the NPCC Bulk Power System List with the appropriate comments and information.

All NPCC Task Forces and the Compliance Committee will be notified once the Bulk Power System List is updated.

**No later than** within three months of an element being **added to the BPS list and approved by the RCC identified** as a bulk power system element, a plan and schedule for achieving compliance with Directory 4 shall be provided to the Task Force on System Protection (TFSP) for review and acceptance. TFSP may require modifications to the proposed plan and schedule.

**No later than** within three months of an element being **added to the BPS list and approved by the RCC identified** as a bulk power system element to which Directory 1 applies, a plan for incorporating the element into Directory 1 analysis shall be provided to the NPCC Task Force on Coordination of Planning (TFCP) and to the NPCC Task Force on Coordination of Operation (TFCO) for review and acceptance. TFCP or TFCO may require modifications to the proposed

plan and schedule.