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August 18, 2021

**The Task Force on Coordination of Planning (TFCP) Response to Comments Received in the Open Process posting of TFCP Criteria Clarification --- A-10 Classification of Bulk Power System Elements.**

The TFCP would like to thank those who provided comments during the Open Process posting of the draft TFCP criteria clarification which was posted from July 1, 2021, to August 16, 2021.

TFCP responses to individual comments are provided below.

**TFSP Comment**

On behalf of the Task Force on System Protection (TFSP), we have reviewed the A-10 clarification and submit the following comments:

We support the clarification.

Additionally, we feel the wording "no later than," is redundant to "within three months" and not entirely necessary.

Recommend to remove "no later than" from the revisions.

**TFCP Response:**

**Comment accepted:** TFCP accepts TFSP's comment that "no later than" is redundant to "within three months" and chose to remove "within" as the redundant term and keep "no later than" as a stronger language.

## IESO Comment

The IESO suggests the following edit may more clearly indicate that the clock starts for A10 conformance at the point of the RCC approval and may be simpler to interpret.

TFCP proposed language: "No later than within three months of an element being added to the BPS list and approved by the RCC as a bulk power system element, ..."

IESO Suggestion: "No later than three months after an element being approved by the RCC as a bulk power system element, ..."

### **TFCP Response:**

**Comment accepted:** TFCP agrees with the IESO's comment that the clock for A10 conformance starts at the point of the RCC approval. TFCP also noted that the review and approval of a BPS element goes through a technical review and approval process that ultimately ends with the RCC approval of a revised BPS list. TFCP recommends further clarifying language added and unnecessary language removed as shown below for Section 5.1 of Document A-10.

#### **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 ~~and forwarded to the RCC for approval.~~ ¶

¶  
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 ~~and forwarded to the RCC for approval.~~ ¶

¶  
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 ~~after of~~ an element ~~has been being~~ added to the BPS list and ~~the list has been~~ 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 ~~after of~~ an element ~~has been being~~ added to the BPS list and ~~the list has been~~ 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 ¶