



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

August 29, 2018

The Regional Standards Committee (RSC) Response to Comments Received in the Open Process Posting of the NPCC *Directory Development and Revision Manual*.

The RSC would like to thank those who provided comments on the proposed revisions to the Directory Manual posted from April 25, 2018 through June 9, 2018.

RSC responses to individual comments are provided below.

Comments from the IESO:

The IESO respectfully submits the following comments on the subject draft document for consideration by the lead task force responsible for drafting this document.

IESO Comment #1:

Cost Benefit Analysis (CBA) for New Directory:

The IESO supports an initial CBA for proposals to develop new Directories. However, Section V.1. is silent on the situation where the CBA results should indicate that it is not cost beneficial to develop the proposed directory. We suggest to add a few words to address this possibility, along with an additional flow path in Figure 1.

RSC Response:

Comment accepted.

Section V of the Manual revised to consider the possibility that the Cost Benefit Analysis (CBA) section of the NPCC Cost Effectiveness Analysis Procedure (CEAP) determines that a new Directory is cost effective.

The corresponding figure (Figure #1) has also been revised.

IESO Comment #2:

Cost Benefit Analysis (CBA) for Revised Directory:

The above comments also apply to proposals for revising existing Directories in the event that the NPCC Manager of Reliability Criteria requests the RSC to perform an initial analysis of the cost benefit of the proposed Directory revision.

In addition, we suggest the process for NPCC Manager of Reliability Criteria requesting the RSC to perform an initial analysis of the cost benefit of the proposed Directory revision be reflected in the flow chart (Figure 2).

RSC response:

Comment accepted.

Section V of the Manual revised to consider the possibility that the Cost Benefit Analysis (CBA) section of the NPCC Cost Effectiveness Analysis Procedure (CEAP) determines that a revision to an existing Directory is not cost effective.

The corresponding figure (Figure #2) has also been revised.

IESO Comment #3:

Proposal to Add an Appendix Section:

Section V 2b presents the process for revising or retiring an existing Appendix Section. There is no discussion on the process to add a new Appendix Section in those cases where the NPCC Manager of Reliability Criteria requests the RSC to perform an initial analysis of the cost benefit of the proposed Directory revision.

We propose this Section and the process diagram in Figure 3 be expanded to also present the process for adding a new Appendix Section.

RSC response:

Comment accepted.

Section V 2b of the Manual revised to consider the circumstances surrounding a request for a new Appendix.

However, an Appendix is a supporting document that supports the achievement of system performance related to the criteria and the addition of an Appendix should not result in significant cost implications.

Therefore, this Section does not contain a requirement to consider a Cost Benefit Analysis.

IESO Comment #4:

Revision to the NPCC Glossary of Terms:

The comments on CBA in (2) above also applies to this Section (V. 2c) for cases where the NPCC Manager of Reliability Criteria requests the RSC to perform an initial analysis of the cost benefit of the proposed or revised Glossary term.

RSC response:

Comment accepted.

Section V 2c of the Manual revised to consider the possibility that the Cost Benefit Analysis (CBA) section of the NPCC Cost Effectiveness Analysis Procedure (CEAP) determines that the development of a new or revised Glossary term is not cost effective.

The corresponding figure (Figure #4) has also been revised.

Comments from Consolidated Edison

Con Ed Comment #1:

On the bottom of page 22 in the combined "Clean/Redline" version of the document, in the B & C guideline section reads: "The process for revisions to the criteria in an existing Type "A" document is represented below in Figure 7" but should describe B & C documents instead.

RSC response:

Comment accepted.