

August 13th, 2013

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

The RSC would like to thank those who provided comments on the proposed revisions to the Directory Development and Revision Manual posted from April 12, 2013 through May 27th, 2013. The RSC responses to individual comments are provided below.

Comments from Dominion:

NPCC Comment Form:

Currently a *Request for Criteria Interpretation* is developed and approved by the Task Force responsible for the Directory in which the criteria is contained and no further approvals are required.

The proposed revision to the Manual will require the Task Force which rendered the interpretation to submit the interpretation to the NPCC Reliability Coordinating Committee (RCC) for final review.

In this manner the RCC and its technical forum continues to provide oversight of the NPCC Criteria consistent with its scope.

Do you agree with this approach?

Yes

No

Dominion Comment#1:

The RCC should render final approval of the Interpretation consistent with Directory Revisions, Revisions to Appendices, and Revisions to the NPCC Glossary of Terms.

*Recommend changing “shall be presented to the NPCC Reliability Coordinating Committee (RCC) for final review...” to “shall be presented to the NPCC Reliability Coordinating Committee (RCC) for final **approval**...”*

RSC Response:

Comment accepted.

Section 5 Page 14 of the document will be revised to read:

‘...shall be presented to the RCC for final approval.’

NPCC Comment Form:

Please provide any other comments that you have on the *NPCC Directory Development and Revision Manual*.

Dominion Comment#2:

The Directory Development and Revision Manual should have a flow chart for the Interpretation process.

RSC Response:

Comment accepted.

A flow chart depicting the Interpretation (Clarification) process will be developed and inserted in the document.

Dominion Comment#3:

Section II (page 3) contains the following statement:

“Each Directory contains an Introduction, along with sections that identify NERC ERO Standards and NPCC Regional Standard Requirements that are associated with the Directory.” Dominion notes that the Directories do identify the NERC/Regional Reliability Standards; however, associated Requirements are not identified. Dominion believes identification of specific Requirements would be an improvement.

RSC Response:

Comment rejected.

The language as written in the current version of the Directory Manual does state that NERC ERO Standard and Regional Standard Requirements are contained within each Directory. That language will be revised to delete the term ‘Requirements’.

It is intended that each Directory should contain a general reference to the NERC ERO Standards and Regional Standards that are associated with that Directory; however to also list each requirement in the Directory would be an administrative burden.

Dominion Comment#4:

The Request for Interpretation is submitted to the NPCC Manager of Reliability Criteria; however, Directory Revisions, Revisions to Appendices, and Revisions to the NPCC Glossary of Terms are submitted directly to the Task Force. The manual fails to explain why Requests for Interpretation are treated differently.

RSC Response:

Comment accepted.

The existing version of the Directory Manual contains language that describes the responsibilities of the Manager of Reliability Criteria upon receiving a Request for Criteria Interpretation (Clarification). (Page 13 Section #5).

These responsibilities include a review of the Request in order to insure that it is not a compliance request nor does it expand the criteria.

This type of review is normally not applicable to a Directory Revision or a Request to develop a new Directory and therefore such a Request can proceed directly to the Task Force; however it is also anticipated that NPCC Staff (Manager of Reliability Criteria) will be closely engaged with a Task Force when considering a new or revised Directory

Finally, the language in Section #5 (page #13) of the existing version of the Directory Manual will be further clarified to better highlight the role of NPCC staff (Manager of Reliability Criteria) when considering an initial Request for Criteria Clarification.

Dominion Comment#5:

VII References, page 14; the link for item #3 does not work.

RSC Response:

Comment accepted.

Page 14 link for item#3 corrected.

Comments from IESO:

NPCC Comment Form:

Please provide any other comments that you have on the *NPCC Directory Development and Revision Manual*.

IESO Comment#1:

Section IV (1): The first 3 paragraphs describe the process that, upon receiving a request to develop a new Directory, the NPCC Manager of Reliability Criteria will forward the request to the Regional Standards Committee (RSC) for a review of the request and the assignment its development to the appropriate NPCC Task Force.

The lead Task Force will then develop a draft Directory which will be posted using the NPCC Open Process for a 45-day commenting period.

We fully support this process, but suggest that consideration be given to posting the initial request for comment by NPCC members for comment on/concurrence with the need to launch a Directory development project.

This posting will mirror the NERC's SAR posting process, which is a valuable tool for obtaining feedback and consensus from affected participants on the merit to proceed with developing the requested Directory. This can avoid unnecessary work and effort on drafting Directories which may in the end be found or assessed to be unnecessary or not contributing to NPCC's reliability objectives.

RSC Response:

Comment rejected.

Thank you for the comment.

As the NERC standards evolve the development of a new Directory will be an infrequent occurrence and as such the decision to move forward with a new Directory can be adequately vetted at the RSC as well as the NPCC Open Process review.

IESO Comment#2:

This suggested change also applies to Section IV (2) on revision to Directories.

RSC Response:

See above response.

Comments from National Grid:

NPCC Comment Form:

Currently a *Request for Criteria Interpretation* is developed and approved by the Task Force responsible for the Directory in which the criteria is contained and no further approvals are required.

The proposed revision to the Manual will require the Task Force which rendered the interpretation to submit the interpretation to the NPCC Reliability Coordinating Committee (RCC) for final review.

In this manner the RCC and its technical forum continues to provide oversight of the NPCC Criteria consistent with its scope.

Do you agree with this approach?

No

National Grid Comment#1:

National Grid recommends that the Directory Interpretation be presented to the Reliability Coordinating Council (RCC) for approval, not simply for final review.

RSC Response:

Comment accepted.

Section 5 Page 14 of the document will be revised to read:

‘...shall be presented to the RCC for final approval.’

NPCC Comment Form:

Please provide any other comments that you have on the *NPCC Directory Development and Revision Manual*.

National Grid Comment#2:

The words "as soon as practical" are vague. Is a time requirement necessary? If yes, then please define the time requirement.

RSC Response:

Comment accepted.

The language on page 14 will be revised from 'as soon as practical'.....to within 60 calendar days.

National Grid Comment#3:

For consistency to other sections of the manual, should the word "successive" be used instead of "subsequent" in reference to the 45 day posting period?

RSC Response:

Comment accepted.

Page #13 Section 5..... subsequent will be replaced by successive.

National Grid Comment#4:

Should a process be added regarding the rejection of an interpretation request?

RSC Response:

Comment accepted.

Thank you for the comment.

The Manual will be revised to consider circumstances when an Interpretation (Clarification) Request is rejected.

National Grid Comment#5:

Should an appeal process be referenced in the manual?

RSC Response:

Comment accepted.

The Manual will be revised to address the process to be followed when appealing a Task Force response to a Request for Criteria Interpretation (Clarification).

National Grid Comment#6:

Should a flow-chart figure be added to the manual for the Directory Interpretation Process?

RSC Response:

Comment accepted.

A flow chart depicting the Criteria Interpretation (Clarification) process will be developed and inserted in the document

Comments from Hydro One:

NPCC Comment Form:

Please provide any other comments that you have on the NPCC Directory Development and Revision Manual.

Hydro One Comment#1:

The Manual specifies that only NPCC Full Members are permitted to submit Criteria Interpretation Requests.

Consideration should be given for extending this right to non-Full Members as there may be additional requirements within tariffs, market rules or interconnection agreements that hold General Members or non-Members responsible for complying with the criteria within each Directory.

RSC Response:

RSC Response:

Comment accepted.

The Manual will be revised in multiple locations where reference is made to ‘NPCC Full Member’. Revision will state ‘Any NPCC Full or General Member or other non –Member subject to compliance with NPCC criteria’