

October 17, 2011

**NPCC composite responses to comments received on the
Directory Development and Revision Manual**

NPCC would like to thank those who provided comments on the draft Directory Development and Revision Manual which was posted to the Open Process from July 28, 2011 through September 12, 2011. The NPCC responses to individual comments are provided below.

NPCC Response to Comments Received in NPCC Open Process Posting of the Directory Development and Revision Manual.

Comments from Michael Falvo - IESO:

We appreciate the opportunity to comment on the draft NPCC Directory development and Revision Manual which was posted on July 28, 2011. We offer these comments:

1. Section III, 1. New Directory

We suggest providing a template or form for making a request to develop a directory, similar to an RSAR. This would ensure consistency in the information provided in support of the request.

We presume that some technical justification would have to be provided by the requestor in support of the request. There seems to be no provision to terminate the process if sufficient justification for development of a Directory cannot be provided. Does this need to be catered for and if so, who would make this decision (NPCC Staff, the RSC or the Lead Task Force) and on what basis?

NPCC Response:

Comment rejected. Based on the anticipated number of future requests to develop new Directories an email to the RSC should be sufficient. However, the language in the Manual was revised to reflect that such a request could be made via email and that it should contain the background and justification for the development of the new Directory.

2. Section III, 2c Revisions to NPCC Glossary of Terms

It is not clear whether all of the Directories in which a defined term subject to revision appears, will be posted for comment. Please clarify.

Where the only change to a Directory is the defined term itself, we do not see the benefit of posting the Directory for comment unless the intention is to highlight all occurrences of the term in the Directory. Please clarify. As an alternative approach, we suggest for consideration providing a comprehensive list of references to all occurrences of the defined term in the various NPCC documents.

NPCC Response:

Comment accepted. The language in the Manual will be revised to clarify how a posting of a new or revised defined term should be handled when the term appears in multiple Directories. In such cases, the posting notice for the Directory that is posted will also provide a comprehensive list of references to all occurrences of the defined term in other NPCC Directories.

3. Section IV, Directory Interpretation Process

This process does not indicate how NPCC Standards Staff will deal with Requests for Criteria Interpretation that turn out to be questions on how to comply with criteria. Will NPCC Standards Staff have the authority to screen Requests and re-direct them to NPCC Compliance Staff? Please clarify.

NPCC Response:

Comment rejected. A request for Criteria Interpretation that may also be a question on how to comply with the criteria can be handled in a similar manner as a Request for Criteria Interpretation. The response from the Task Force should be sufficiently precise to eliminate ambiguity. The language in the Manual was modified in order to provide further clarification on this point.

Comments from Mike Garton- Dominion:

Dominion provides the following comments on the NPCC Directory Development and Revision Manual:

1. Section III (Directory Development and Revision Procedure) – This section only involves the Regional Standards Committee (RSC) on a review of a request for a new Directory. Why is the RSC not involved with reviewing requests for revisions to a Directory or the NPCC Glossary of Terms?

NPCC Response:

Comment rejected. The section of the Manual that addresses the development of a new Directory and assigns the Regional Standards Committee (RSC) with the authority to develop a new Directory is consistent with the RSC's responsibility to manage the overall NPCC Directory project. Individual Task Forces are responsible for Directory content and language including the definition of terms and are better positioned to manage proposed revisions. The RSC manages and coordinates issues that impact the Directory project on a more comprehensive level.

2. Should the RSC be involved in reviewing the documents prior to open process posting?

NPCC Response:

Comment rejected. See the response to Comment #1.

3. Only a new Directory requires posting by the NPCC Standards staff. Please explain.

NPCC Response:

Comment accepted. The section on New Directories and Directory Revisions will be revised to specify that the NPCC Manager of Reliability Criteria will post the document.

4. Section IV (Directory Interpretation Process) – This section requires a request for interpretation to be submitted to “NPCC Standards staff.” Please provide clarification on how and to whom the request would be submitted.

NPCC Response:

Comment accepted. See the response to Comment #3.

5. Revision requests for a Directory or the Glossary of Terms are not required to be submitted to the NPCC Standards staff. Please explain the difference in handling/processing.

NPCC Response:

Comment rejected. The Lead Task Force for each Directory is responsible for Directory content including the definition of terms and language revisions and are better positioned to manage proposed revisions.

6. Section IV (Directory Interpretation Process) – This section requires clarification with respect to processing an interpretation. Specifically, how does it get approved, does it go through open process review, is it attached to the Directory, etc.?

NPCC Response:

Comment rejected. The Interpretation is provided by the NPCC Lead Task Force for the Directory and which is comprised of subject matter experts who collectively are responsible for the content. The interpretation is not a revision to the document and therefore is not subject to an Open Process posting. Additionally, Section IV addresses archiving and potential revision protocol as a result of the interpretation.

7. The draft document should contain a revision history.

NPCC Response:

Comment accepted. A revision history will be added to the document.

Comments from Richard Burke – ISO-NE:

Comments:

1. Introduction - As discussed at the CCEP Working Group of the NPCC Compliance Committee the need for measures is not supported given the Levels of Non-Compliance addressing the failure to comply with specific criteria. Consider removing any mention of the development of measures as part of Phase II of this program.

NPCC Response:

Comment accepted. Criteria language reformatted as part of the Phase 2 development of the NPCC Directories will be concise enough to preclude the use of Measures within each Directory when evaluating levels of non compliance.

2. Directory Development and Revision Procedure - Given the many steps required to approve a new Directory or to revise an existing Directory, it is suggested that flow charts be appended to each specific section of this document to graphically depict the necessary steps and time frames. (See the NERC CMEP flow charts and/or the NPCC CCEP Process Document for examples of this graphical aid.)

NPCC Response:

Comment accepted. Flow Charts will be developed and inserted into the Manual.

Comments from John Seelke, P.E. - PSEG Services Corporation

PSEG's Comments re: July 27, 2011 draft NPCC Directory Development and Revision Manual

PSEG member companies of NPCC (PSEG Energy Resources & Trade LLC, PSEG Power Connecticut LLC, PSEG Power New York Inc) support the development of directories that will consolidate NPCC Criteria, Guidelines, Procedures and Regional Standards into individual topic-based documents. We have these comments:

1. The manual would benefit if the NPCC flowchart for directory approval and revisions was incorporated into the manual. See https://www.npcc.org/Standards/Directories/Directory_Flowchart.pdf.

NPCC Response:

Comment accepted. A link to the subject flowchart will be included in the Manual.

2. While the mapping document that maps current guidelines, criteria, and procedures is mentioned on page 3, it would be helpful if a link to that document was provided in manual. See https://www.npcc.org/Standards/Directories/Directory_Mapping.pdf.

NPCC Response:

Comment Accepted. A link to the mapping document will be included in the Manual.

3. In conjunction with comment #2 above, it would be helpful if the prior guidelines, criteria, and procedures that are incorporated into directories were kept in an archived section of the Website for user reference.

NPCC Response:

Comment rejected. Presently there is no plan to establish an archived section on the NPCC website as described. However, prior guidelines, criteria, procedures or

other retired documents can be obtained by sending an email request to the NPCC Manager of Reliability Criteria.

Comments from Christopher L. de Graffenried- Consolidated Edison Company of NY, Inc.

Con Edison's comments on the draft NPCC document "Directory Development and Revision Manual." Clearly, this Manual is needed to help keep the Directories up-to-date with the sometimes rapidly evolving NERC Reliability Standards which they reference.

1. P. 5 states: "This document is intended to provide guidance when establishing a new or revised Directory." I would add a section on the Retirement and Consolidation of Directories, where for example NERC's Reliability Standards grow to encompass the previously more stringent NPCC requirements or where two or more NERC Reliability Standards are collapsed into one, e.g., TPL-001-2.

NPCC Response:

Comment accepted. The language in the subject paragraph will be revised to include circumstances when a Directory is retired or incorporated.

2. P. 5 fix the minor typographical error where it states: "the related NPCC 'A' documents" and replace with the related NPCC [added space, corrected single quote] 'A' documents."

NPCC Response:

Comment accepted. Minor typographical error corrected.

3. P. 6, Phase 2 – Should NERC’s performance-based approach be specifically adopted in this manual?

NPCC Response:

Comment rejected. Directory content reformatted into NERC Style requirements are in general Risk Based and are consistent with the development of regionally specific criteria within NPCC.

4. P. 7, Posting – Should the Lead Task Force have an opportunity to offer a Webinar explaining the posting and responding to questions?

NPCC Response:

Comment rejected. A Task Force can elect to hold a Webinar at the discretion of the individual Committee if its Members feel it will be productive in explaining issues surrounding individual postings.

P. 8, under b. Revisions to the Appendix Section of a Directory it states: “Revisions pertaining to the Appendices shall only require RCC approval.” It is not clear why the process for modification of an Appendix would necessarily be different or any less rigorous than a change in the Directory language. For example, the Appendices to the UFLS Directory #12 contain the specific generator tripping frequency performance envelopes/criteria, and serve as a key part of the Directory’s requirements.

NPCC Response:

Comment rejected. The distinction between the approval for a change in the language of an Appendix, all of which have been developed from legacy B and C documents, and a change in the language of the (criteria section) of a Directory is consistent with NPCC document A1 Criteria for Review and Approval of Documents. Regarding Directory #12 the performance attributes are included in the criteria section of the document.

P. 9, NPCC Glossary of Terms – Once the NERC BES Definition is promulgated, NPCC will need something to differentiate its A-10 based facilities from BES facilities. This might require development of a new term. The term BPS is ambiguous as it is the same wording (and abbreviation) as is used in the wider “bulk power system” term defined by and used in FPA Section 215, 824(o).

NPCC Response:

Comment accepted. The various designations used to distinguish different elements of the power system can lead to confusion and ambiguity. NPCC will consider this issue in other forums in the future.

P. 9 – 10, It states: “Finally, and upon Full Member approval of the new or revised NPCC term the Glossary ...” Comment: We did not see a requirement for a 2/3rds ballot approval. What is the requirement? Is it a 50% simple majority or 2/3rds? Whatever it is, shouldn’t we say what the approval requirement is for this ballot?

NPCC Response:

Comment accepted. Full Member approval will be in accordance with the Voting Requirements as described in the NPCC Bylaws. The language in the Manual will be revised accordingly.

5. P. 18, The Request for Interpretation (RFI) appears to be modeled after the NERC RFI. Will or should NPCC also have CAN’s process to supplement RFI’s during the three-year update cycle on p. 17 (“This Directory will be updated at least once every three years ...”)?

NPCC Response:

Comment rejected. The Interpretation process was developed to provide guidance to NPCC Members and NPCC Staff when responding to such inquiries. The process is expected to be sufficient in order address these circumstances when they arise.

Comments from Michael Lombardi- NU

1. Change 'Requirement' to Criteria. The term 'Requirement' is commonly associated with NERC Standards and 'Criteria' is more commonly associated with NPCC Directories.

NPCC Response:

Comment rejected. The NPCC criteria will still be promoted within the document, although the criteria have been reformatted into NERC style requirements.

2. Is the Regional Standard referenced here the same as a Standard approved by NERC and FERC? If it is, it would be beneficial to indicate as such, otherwise more specified terminology would be beneficial.

NPCC Response:

Comment accepted. Manual language will be revised to clarify that the Regional Standards referenced have been approved by FERC and NERC..

3. To whom would this document provide guidance? i.e. a Task Force, a member, a Full Member etc.

NPCC Response:

Comment accepted. Manual language will be revised to provide additional clarity.

4. This wording indicates that the Directory either provides more stringent or more specific criteria, which is more vague than the previous statement (bolded above) indicating that the Criteria are more stringent and specific and consistent with NERC.

NPCC Response:

Comment accepted. Manual language will be revised to provide a more consistent reference.

5. This section may be better suited as a note to the Directory Phase 1 discussion.

NPCC Response:

Comment accepted.

6. Where is a NPCC Full Member Defined?

NPCC Response:

Thank you for the Comment. The definition of a NPCC Full Member can be found in the NPCC By-Laws.

<https://www.npcc.org/Library/Business%20Plan%20Bylaws/Approved%20Bylaws%20of%20NPCC%20Inc%207-24-07.pdf>

7. How shall the request be made, an email, a form, a letter? Is there a point of contact on the RSC this request should be made to? Where can a Full Member go to find out who is on the RSC to make the request?

NPCC Response:

Comment accepted. Manual language will be revised to provide additional clarity. The RSC roster is available in the NPCC Directory.

8. Is there a time line for this? What happens if they deny the request?

NPCC Response:

Comment rejected. The RSC review and assignment of a Task Force to review such a request would occur at its subsequent meeting following receipt of the request. The NPCC Manager of Reliability Criteria would notify the entity making the request if the RSC decides not to develop the new Directory.

9. Will there be template to aid in this?

NPCC Response:

Thank you for the Comment. A Directory 'template' is attached to this Manual.

10. How long does this process take?

NPCC Response:

Thank you for the Comment. This process can vary depending on the extent of the comments and the workload of the Task Force.

11. What constitutes "substantive"? Who makes this determination?

NPCC Response:

Thank you for the Comment. If the performance attributes of the criteria have changed as a result of revisions made in response to comments then those 'changes' would be considered substantive. Typically, such a change is evident and is made by the Task Force managing the revisions.

12. This section may be better served as a note to the previous statement.

NPCC Response:

Comment accepted. This section moved to a note of the previous statement.

13. How does a Directory get recommended for obsolescence? Is it because the contents are now covered by other Directories or Regional Standards or NERC Standards?

NPCC Response:

Thank you for the Comment. Yes. (In some cases a Regional Standard may replace an existing Directory, or Directory content may be moved to another Directory to promote efficiency, or as NERC Standards become more robust they could supplant a Directory). When a Directory is impacted by changes that render it obsolete, the Lead Task Force of the Directory will present its recommendation for modification or retirement to the RCC, which in turn approves a Full Member ballot.

14. When criteria are revised, how do the appendices get reviewed by the Task Forces responsible for them to make sure the Appendices are still applicable and/or need to be updated?

NPCC Response:

Comment accepted. Manual language will be revised to consider conforming changes to appendices as a result of the criteria revision.

15. How is the Lead Task Force Determined? Is this indicated by the 'prepared by xyz Task force' at the end of the Directory? Also, how is a revision request made {email, phone, etc} and how does a Full Member get contact information for the Lead Task Force?

NPCC Response:

Thank you for the Comment. The Lead Task Force is responsible for the criteria within the Directory and is typically comprised of general SME's experienced in that area from the region. The 'prepared by xyz Task Force' is a reflection of that Directory's Lead Task Force.

A request to revise the criteria can be made to the Chairperson of the Lead Task Force via email or through the Full Members representative on the respective Task Force.

The roster of all NPCC committees including Task Forces can be found in the NPCC Directory.

16. Is there a way to get a request to revise the Criteria and this to be denied?

NPCC Response:

Thank you for the Comment. The Lead Task Force will consider the request among its members and will arrive at a consensus on the merits of such a request. Should the TF agree with the request to revise the criteria the proposed revision will be posted to the open process. The entity making the request is entitled to present its request to the TF, however after vetting the request if the TF does not support the proposed revision the entity making the request will be notified of the TF decision and the background informing the decision.

17. Again, what constitutes substantive and who makes the determination as to what is or is not substantive?

NPCC Response:

Thank you for the Comment. Please see the response to Question #11.

18. This may be better served as a note.

NPCC Response:

Comment accepted. Subject language moved to a footnote.

19. How are requests to make an Appendix obsolete handled?

NPCC Response:

Comment accepted. Manual language will be revised to include circumstances when an Appendix is retired. In general the process of retiring an Appendix will follow the process of revising an existing appendix.

20. Who does this request go to, and by what method of communication? How does the Full Member find the appropriate contact information to make request?

NPCC Response:

Comment accepted. A request to revise an appendix shall be submitted to the Task Force responsible for the Appendix. In cases where the TF responsible for the Appendix is not the Lead TF for the Directory, the TF responsible for the Appendix will be noted on the Appendix. All NPCC Directories and the appendices within will be reviewed to insure that the TF responsible for the appendices is apparent.

An email to the chairperson of the TF responsible for the appendix.

The roster of all NPCC committees including Task Forces can be found in the NPCC Directory.

21. Why is only RCC's approval needed?

NPCC Response:

Thank you for the Comment. The Appendices within NPCC Directories are all former B Procedure or C Guideline documents. The requirement for RCC approval of B and C documents (as opposed to a Full Member approval ballot) is described in NPCC document A1 Criteria for Review and Approval of Documents.

22. Will the whole Directory be posted or will only the Appendix be posted? If the whole Directory is posted comments may be made in regards to Directory rather than just the revised the Appendix.

NPCC Response:

Comment accepted. Manual language will be revised to limit comments received in the open process to only the subject appendix and not the entire Directory.

23. Is there a separate process for requesting an interpretation of a definition?

NPCC Response:

Thank you for the Comment. No. A request for an interpretation of a Glossary Definition is the same as the Directory Interpretation Process.

24. Due to the NPCC Glossary of Terms relying on the NERC Glossary for some definitions, will the NPCC Glossary contain a link and/or reference to the NERC Glossary?

NPCC Response:

Comment accepted. The NPCC Glossary will have extensive references to the NERC Glossary.

25. This is a little confusing because the discussion above indicates that B & C documents were incorporated into Directories as Appendices.

NPCC Response:

Comment accepted. Not all B and C documents have been incorporated into Directories. However, the Manual language will be revised to provide more clarity.

26. What happens when the Term resides in more than one Directory/Appendix where there is more than one Task Force responsible?

NPCC Response:

Comment accepted. The Task Forces will coordinate the review of the term among all the Lead Task Forces of Directories in which the term resides, by assigning a Lead Task Force to coordinate the review. The Manual language will be revised to provide more clarity.

27. If the term resides in more than one Directory does that mean more than one Directory revision is going to occur? If so, how is a Lead, Lead Task force etc. appointed to coordinate the contextual review of a Term change in multiple Directories?

NPCC Response:

Thank you for the Comment. When the term resides in more than one Directory, the Task Forces will coordinate the review of the NPCC defined term by assigning a Lead Task Force to coordinate the review among the TF's. Each TF individually will examine the context of the term within the Directory it has jurisdiction over. The TF designated to coordinate the review of the term shall include in the posting notice a comprehensive list of references to all occurrences of the defined term in other NPCC Directories, including each Directory in which the term resides.

28. Similar comment as above regarding how to make a request.

NPCC Response:

Thank you for the Comment. See response to Question #20.

29. Should the entire Directory be posted for review for a revision and/or addition of an NPCC Glossary Term even though the Directory does not materially change? It may be more efficient and effective to post the Term for review with background on impacted NPCC documents, once the review completed then have take comments on the revision/addition itself.

NPCC Response:

Comment rejected. NPCC will post the entire Directory in order to provide the context in which the term or proposed revision resides.

30. May Errata and Link change recommendations be made by Members?

NPCC Response:

Comment rejected. NPCC Members may bring the suggested errata and link change recommendations to the attention of members of the NPCC Standards Staff, however it is the responsibility of the NPCC Standards Staff to maintain links and errata changes.

31. Which NPCC Staff?

NPCC Response:

Thank you for the Comment. See response to Question #30. Manual will be revised to provide clarity.

32. It may be beneficial to define “Full Member” and “Member” in the Glossary of Terms.

NPCC Response:

Comment rejected. The definition of Full and General Member can be found in the NPCC Bylaws.

33. How does a Member find contact information for the staff?

NPCC Response:

Thank you for the Comment. The roster of all NPCC Staff can be found in the NPCC Directory.

34. Is there a more specific guideline?

NPCC Response:

Thank you for the Comment. Depending on the number of agenda items, such a request is addressed by the Task Force at its next quarterly meeting.

35. A suggested approach would be to make the Interpretation an Addendum to the affected Directory to keep the related material together and allow the Interpretation to be retired if addressed in future Directory revisions.

NPCC Response:

Comment rejected. The results of the interpretation will be available from the Task Force or NPCC Standards staff.

36. A better place for this discussion may be with the discussion of Full Members regarding initiating revisions, requests for new Directories...Interpretations etc. above.

NPCC Response:

Comment accepted. This section relocated within the topic.

37. Will there be a link to this document?

NPCC Response:

Comment accepted. A link to the document will be provided.

38. This same information is provided in Section 2.b: Revisions to an Appendix.

NPCC Response:

Comment accepted. These paragraphs deleted.

39. NU recommends including a Revision number along with the date of revision.

NPCC Response:

Thank you for the Comment. The Revision history record on page 2 of each Directory contains the Revision number and date of each revision.

40. It may be beneficial to term this as “More Stringent Criteria” or instead label this section as “NPCC Full Member Criteria”

NPCC Response:

Thank you for the Comment. A revised Directory template which reflects the format developed for Phase 2 of the Directory project will be utilized in the Manual. This section of the document will be identified as: NPCC Full Member, More Stringent Requirements and Criteria.

41. Would it be simpler to reference solely the NPCC Glossary so only one Document with Definitions needs to be updated as opposed to having an Appendix A in each Directory?

NPCC Response:

Comment accepted. A revised Directory template which reflects the format developed for Phase 2 of the Directory project will be utilized in the Manual. NPCC and NERC defined terms will reside in the NPCC Glossary instead of an Appendix within the individual Directories.

42. The user of the Directory may be better served by showing or mapping of Directory Content to the ERO standard and requirement, which the Directory fulfills.

NPCC Response:

Thank you for the comment. A document which maps NERC requirements to individual NPCC documents is available and NPCC will consider making a link to this document available.

43. This is inconsistent with what is in the Table of Contents.

NPCC Response:

Comment accepted. Revised Directory template does not contain highlighted inconsistency.

44. In Section II Paragraph 2, there is a claim that the Directory Criteria are more specific, and more stringent, which is inconsistent with the or statement here.

NPCC Response:

Comment accepted. Revised manual language in Section II Paragraph 2 to clarify that criteria is either more stringent or more specific.

45. Which Compliance Committee? NPCC?

NPCC Response:

Comment accepted. Revised Directory template does not contain highlighted inconsistency.

46. Is this the Lead to be considered the Lead Task Force that owns the Directory?

NPCC Response:

Comment accepted. Revised Directory template will clarify the Lead Task Force responsible for the Directory.

47. Should there be a reference to the NPCC Directory Development and Revision Manual?

NPCC Response:

Comment accepted. A reference to the Directory Development and Revision Manual will be added.

48. It would be helpful if this form provided some directions as to where this may be submitted, such as a Task Force email.

NPCC Response:

Comment accepted. Additional information providing direction on where to send the request will be added to the form.

49. It would be beneficial to have fields available for capturing Dates for when the response to request for interpretation was provided back to entity requesting the interpretation, along with date of providing interpretation to the rest of the NPCC body.

NPCC Response:

Comment accepted. The form will be revised to provide a field indicating the date on which the entity was provided with a response.

Comments from Ted Dahill - National Grid

1. I am assuming final version will include page number references

NPCC Response:

Comment accepted. Page number references will be provided in the document.

2. Are we implying that NPCC will always seek to develop reliability requirements that are more stringent than NERC's? Would expect as ERO Standards are revised/developed then NPCC Directories will be eliminated – PRC-006-NPCC and Directory 12 as example.

NPCC Response:

Comment accepted. NPCC will continue to promote regionally more stringent or specific on BPS A-10 elements.

3. I suggest deleting the reference to 'Regional Standards to avoid confusion with Regional Reliability Standards, such as PRC-006-NPCC-1. The term 'Regional Standards' is generally used as a reference to the ERO process where need a 'regional standard' to satisfy the 'ERO approved continent-wide requirements'.

NPCC Response:

Comment rejected. The reference to Regional Standards is appropriate since in some circumstances a Directory could remain in force with a Regional Standard.

4. Suggest using 'requirements' instead of 'criteria' as a means of that the NPCC 'requirements' exceed the associated ERO standard requirements.

NPCC Response:

Comment rejected. The NPCC criteria will still be promoted within the document, although the criteria have been reformatted into NERC style requirements.

5. Want to emphasis that any entity operating within the NPCC region has access to these documents.

NPCC Response:

Comment accepted. Manual language will be revised to provide a broader reference.

6. I thought it was the RSC's responsibility to coordinate all reliability activities. Is this true? If so, need to ensure RSC is involved to control annual work plan activities.

NPCC Response:

Comment accepted. Manual language will be revised to clarify the RSC role.

7. Is this what we really want? I thought the RSC was responsible for coordinating all NERC related reliability standards and NPCC Directory related activities to ensure consistency. The RSC has the ability to coordinate the activities of all NPCC Task Forces to reach a common goal. I would be concerned that Task Forces working on their own might cause development/revision problems? I think all development/revision of Directories should go through the RSC for consistency purposes and to monitor the projected work load of the Task Forces.

NPCC Response:

Comment rejected. RSC is responsible for the overall Directory project and closely monitors the status of individual directories including revisions. However, the individual Task Forces comprised of NPCC subject matter experts are better positioned to initiate revisions to critical criteria wording.

8. Suggest using the word 'a'.

NPCC Response:

Comment accepted. Manual language will be revised.

9. Again, recommend coordinating through the RSC.

NPCC Response:

Comment rejected. See response to Question #7.

10. Question, would only the revised Appendix be submitted to the RCC or would the total directory be submitted such that the total document has a revised approval date while the Directory's 'change history' identifies why the revision was developed.

NPCC Response:

Comment accepted. The entire Directory would be submitted to the RCC. However, unlike a revision to the criteria section of a Directory, the revision to an Appendix would not require Full Member approval. Additionally, for any revision the Revision History and the Task Force Review Record will be updated.

11. Suggest moving this paragraph up to link it to the opening paragraph.

NPCC Response:

Comment accepted.

12. Again, I suggest having the RSC be the contact and lead for any changes. IF it is the RSC, then will need to modify references to Lead Task Force below.

NPCC Response:

Comment rejected. See response to Question #7.

13. Is this still a valid statement? Thought were using 'Criteria Compliance and Enforcement Program (CCEP)'. See NPCC documents CCEP-1 and CCEP-2.

NPCC Response:

Comment rejected. The NPCC Reliability Assessment Program (NRAP) is NPCC's comprehensive reliability program.

Directory (criteria) reviews and their milestones are part of the NRAP.