

Dominion Comments

PROJECT TITLE: *NPCC Directory Development and Revision Manual*

COMMENTS:

1. Dominion does not support the revision, in multiple locations, to include “General Members and any other non-Member subject to compliance with the NPCC criteria” as this change is not consistent with The Amended and Restated Bylaws of NPCC. Specifically, membership is defined in Article IV of the Bylaws as either General Member or Full Member. The Bylaws do not recognize “non-Members.” The Bylaws specify that (Article IV, 4.2, (2)), “[f]ull Members are subject to compliance with regionally-specific more stringent reliability criteria for their generation and transmission facilities on which faults or disturbances can have a significant adverse impact outside of the local area and which are identified utilizing a reliability impact-based methodology.” Therefore, the regionally-specific more stringent reliability criteria **only** apply to the sub-set of Full Members that meet both criteria specified in the Bylaws Article IV, 4.2, (2). . The Bylaws further grant Full Members (Article IX, 9.1, (1), (e)) the right to vote to establish, modify or eliminate NPCC’s regionally-specific more stringent reliability criteria. The Bylaws do not place any regionally-specific more stringent reliability criteria compliance obligations on “General Members and any other non-Member subject to compliance with NPCC criteria.” Any third party obligations placed on General Members or non-Members to comply with NPCC’s regionally-specific more stringent reliability criteria are outside of NPCC’s authority and have no bearing on NPCC’s directory development or enforcement. Therefore, Dominion recommends that this Manual and all document related to regionally-specific more stringent reliability criteria be maintained consistent with the NPCC Bylaws.

RSC Response:

Agreed.....will remove ‘General Members and any other non –Member subject to compliance with NPCC Criteria’ in each location it was inserted into the Manual.....as agreed at the RSC meeting October 9 and 10 2013.

2. II. INTRODUCTION – the added language states, in essence, that Directory Appendices are not criteria and therefore not subject to the NERC Criteria Compliance Enforcement Program (CCEP). This language is not contained in the NPCC CCEP Process Document – CCEP-1 or reflected in recent CCEP certifications. For example, in the 2012 CCEP Compliance template for Directory #1, the Reporting entity certifies Full 100% Compliance as “[a]n annual Area Transmission Review Report, including all supporting documentation in accordance with Appendix B of NPCC Directory #1, was submitted to TFSS and the Planning Coordinator’s Area Transmission Review

meets the requirements of NPCC Directory #1.” Further, a Level 1 non-compliance states “[t]he Planning Coordinator’s Area Transmission Review was submitted, but was incomplete in meeting the requirements of NPCC Directory #1, Appendix B.” Therefore, Dominion suggests that the language regarding Directory Appendices be deleted or clarified.

NPCC response:

RSC Response:

Agreed.....will revise the language surrounding Directory Appendices to read as follows:

The appropriate Type ‘B’ Guideline and Type ‘C’ Procedure documents are also included within each Directory as Appendices.

Although the Appendices in ~~a each~~ Directory are functionally associated with the subject criteria in the document, they do not contain NPCC criteria and are included within the Directory. ~~Furthermore, Directory Appendices are utilized in order~~ to achieve ~~the~~ acceptable performance and consistent implementation of the criteria ~~and are not subject to the NPCC Criteria Compliance Enforcement Program (CCEP).~~

3. MAINTENANCE OF LINKS AND ERRATA – this section fails to identify errors as errata and suggests the concept of “minor Errata changes” in the first sentence. Additionally, there are no bounds placed on what constitutes Errata and Dominion is concerned that corrections could be made that change the scope or intent of the Directory. Therefore, Dominion recommends the following revision to the first sentence: “The maintenance of Links and the correction of errors found in a Directory or its Appendices shall be the responsibility of NPCC Standards staff. An error may be classified as Errata provided its correction does not change the scope or intent of the Directory and has no impact on the end user of the Directory.”

RSC Response:

Agreed.....will revise first sentence in Errata section to read:

“The maintenance of Links and the correction of errors found in a Directory or its Appendices shall be the responsibility of NPCC Standards staff. An error may be classified as Errata provided its correction does not change the scope or intent of the Directory and has no impact on the end user of the Directory” as agreed at RSC meeting October 9 and 10 2013.