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

The RSC would like to thank those who provided comments on the proposed revisions to the NPCC Directory Development and Revision Manual which was posted from January 4, 2019 to February 18, 2019. The RSC responses to individual comments are provided below.

Comments from New Brunswick Power:

After a review of the proposed changes to the NPCC Directory Development and Revision Manual (“the Directory Manual”) NBP has the following comments/recommendations.

Note that the comments extend beyond the Cost Effectiveness Analysis (CEA) process revisions.

Comment 1:

Suggest Modifying Directory/Criteria balloting process.

Consider modifying language in the Directory Manual such that the RCC does not approve Directories/Criteria in advance of balloting, but rather the RCC simply recommends that Directory/Criteria go to ballot.

With the present practice of the RCC approving a Directory prior to balloting, NPCC Members are losing an important opportunity to have the Directory vetted through the balloting process. Negative voting on a Directory should not be perceived as opposing the RCC initial approval, but rather seen as an opportunity to improve the Directory.

Rather than RCC approval prior to ballot, suggest that the RCC recommend for ballot based on stability in the development/revision phase (commenting/modifications not resulting in additional material changes) as well as meeting the intended reliability objective.

While this comment is not directly related to the CEA revisions being proposed, it should see a more rigorous review of Directories including CEA reviews during the development process.

RSC Response:

Comment not accepted.

Thank you for the comment.

The RSC contends that prior approval of the criteria at the RCC does not preclude a Member from casting a negative vote when the criteria is presented to the Full Member Committee for ballot.

Comment 2:

Suggest adding guidance to tailor criteria based on CEA results.

Aspects of a proposed Directory may not be equally cost effective across the region or across all BPS facilities. Instead of simply seeking a “one size fits all” solution which may result in unnecessary added expense or abandoning a proposed Directory’s reliability benefit, consider providing guidance on the CEA review to allow further refinement.

Suggested change in the text of VIII (5) below:

5. The Task Force shall use the information obtained, to make a determination if the revised or new Criteria is of sufficient reliability benefit to pursue further development activities by NPCC. If the benefit is prevalent to particular local areas, specific configurations or situations, consider tailoring the criteria applicability accordingly. Otherwise other cost effective approaches to achieve the reliability objective of the Criteria should be pursued. (E.g. development of a whitepaper, guideline document, etc.)

RSC Response:

Comment not accepted.

The NPCC By-Laws require a Full Member to abide by the NPCC criteria. The By Laws do not provide a local exclusion for compliance with the criteria.

Comment 3:

Suggest requiring approval when waiving CEA.

In looking at page 9 and 21: Suggest adding the text highlighted below to ensure that waiving the CEA process is approved.

1) Section VIII provides guidance for the CEA and Open Process posting. If the Lead Task Force determines that there is no benefit to conducting the CEA activity then this decision shall be documented and notification provided to the RCC and RSC along with the reasons for the decision to waive this portion of the process. The RCC may accept the Lead Task Force determination not to proceed with a CEA or request that a CEA be completed.

2) The Lead Task Force will document these activities as part of the record of development and notify the RCC and RSC of intent to conduct cost effectiveness analysis or exercise a waiver. The waiver will be subject to RCC approval.

RSC Response:

Comment accepted.

The Directory Manual cost effective review process will be revised to include a provision that provides for RCC approval of the Task Force determination not to proceed with a Cost Effective Analysis (CEA). (Page 22)

Comment 4:

Clarify Functional Entity Applicability

The applicability section of each Directory identifies those Functional Entities that are assigned reliability requirements. The Functional Entities appear to be based on the NERC functional model. While the NERC functional model has clear processes to identify and inform on applicability of NERC standards, there does not appear to be any process that aligns NPCC voluntary membership with the Functional Entities listed in the Directories.

A recommendation is to utilize the NPCC Full Member Sector Membership as the basis for determining Functional Entity.

Suggest including the wording in section III as follows:

III. APPLICABILITY OF NPCC CRITERIA

The requirements of an NPCC Directory apply only to those Full Member facilities defined as NPCC bulk power system elements as identified through the performance based methodology of NPCC Document A-10, "Classification of Bulk Power System Elements," the current list of which is maintained by the NPCC Task Force on System Studies and approved by the NPCC Reliability Coordinating Committee. For entities that may qualify for multiple Full Memberships, Full Membership sector representation will be the basis for determining Functional Entity applicability as listed in the Directory.

RSC Response:

Comment not accepted.

In accordance with the NPCC By Laws, Members are eligible to vote in one of the seven (7) stakeholder voting sectors.

Members are assigned to voting sectors consistent with the Members business or other activities within NPCC and multiple memberships of separate business functions of an entity are permitted.

However, the By Laws require that a Full Member comply with the criteria, applicable to critical facilities as determined by the A-10 procedure.

Comment 5:

Comment on Generator Applicability

The Directories and the Directory manual identify generator applicability as only those BPS elements identified by the A-10 methodology. However, there may be a belief that generator applicability is based on an MVA threshold.

RSC Response:

Thank you for the comment.

Generator applicability to the NPCC criteria is in accordance with the provisions of the A-10 methodology and is not based on an MVA threshold.

Comments from the New York State Reliability Council, LLC:

Comment 1:

Agree with changes.