



NORTHEAST POWER COORDINATING COUNCIL, INC.  
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June 25<sup>th</sup>, 2015

**Subject: Criteria Clarification NPCC Directory#8 System Restoration:**

NPCC Full Member Representatives and Alternates:

In accordance with the NPCC *Directory Development and Revision Manual* the CO-11 Restoration Working Group has considered a *Request for Criteria Clarification* and has provided the attached response.

The subject request which seeks an explanation of the criteria and its applicability within various sections of Directory #8 *System Restoration* was reviewed and clarified by CO-11 on June 17<sup>th</sup>, 2015.

Comments on the clarification will be received for forty five days through August 10<sup>th</sup>, 2015.

The NPCC Open Process Review can be accessed through the following link:

<https://www.npcc.org/Standards/SitePages/NonStandardsList.aspx>

In accordance with the Directory Manual the final Clarification will be presented to the Reliability Coordinating Committee (RCC) for approval.

Please contact me with any questions regarding Directory content or comment procedures.

Thank you.

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## NPCC Request for Criteria Clarification

**Note: a Clarification cannot be used to revise the Criteria within a Directory.**

Request for a Clarification of Criteria
Date submitted: 2015-March-23
Date revised version submitted: NPCC D8, October 22, 2010
<b>Contact information for person requesting the clarification:</b>
Name: Dave Kwan
Organization: Ontario Power Generation
Telephone: 416-592-6369
E-mail: david.kwan@opg.com
<b>Identify the Directory that contains the Criteria requiring clarification:</b>
Directory Number : NPCC D8, October 22, 2010
Directory Title: System Restoration
<b>Identify specifically what portion of the Criteria needs clarification:</b>
Text of Requirement:
<p><b><u>Request for interpretation:</u></b>            Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?</p>

Section 5.7 (excerpt) states:

*“Testing Requirements for Critical Components Associated with Key Facilities  
Each Transmission Owner and **Generator Owner** of a **key facility** shall:*

- *maintain a list of **critical components** associated with each **key facility**;*
- *perform the tests outlined in Table 1;”*

Table 1 identifies the standard tests required for associated critical components, including Tests ST-1 to ST-6; and CC-5.

However, in the sub-sections of 5.7 (e.g. 5.7.4 and 5.7.5.5, listed below), it appears that the Generator Owner is NOT listed; thus my interpretation is that 5.7.4 and 5.7.5.5 is not applicable to the Generator Owner.

Section 5.7.4 (excerpt) states:

*“Transmission Owners shall test the backup power supplies.....”*

Section 5.7.5.5 (excerpt) states:

*“Each Reliability Coordinator, Transmission Operator and Balancing Authority shall test its computer redundancy features every six (6) months to ensure computer systems continue to function adequately. (Reference: Table 1; Test CC-5)”*

### **Identify the material impact associated with the lack of clarity:**

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this Directory:

Clear interpretation is required to determine if the above mentioned sections and/or sub-sections are applicable to the Generator Owner. OPG owned generating sites require clarity to ensure their maintenance programs account for appropriate requirements.

Task Force Response to Request for Criteria Clarification:  
Criteria Clarification  
Directory 8 for OPG

The following clarification of the criteria in Directory#8 was developed by the Task Force (CO-11 Restoration Working Group) on June 17<sup>th</sup>, 2015.

**Question 1** Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?

**Response to Question 1**

Regarding Section 5.7.4, CO11 agrees that the requirement is applicable to the Generator Owner, in those circumstances where a Generator Owner is identified as owning a **key facility**.

Testing requirements apply to the **critical components** in all identified **key facilities**.

**Question 2** Although Section 5.7 indicates that the Generator Owner shall perform tests outlined in Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5) specifically applicable to the Generator Owner?

**Response to Question 2**

Regarding Section 5.7.5.5, CO11 agrees that the requirement is applicable to the Generator Owner, in those circumstances where a Generator Owner is identified as owning a **key facility**. (control center).

Testing requirements apply to the **critical components** (control center computer systems) in all identified **key facilities**.

CO11 will revise the applicability of Sections 5.7.4 and Sections 5.7.5.5 to incorporate Generator Owner during the current revision of Directory#8.