



NORTHEAST POWER COORDINATING COUNCIL, INC.
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November 9th, 2015

The Task Force on Coordination of Operation (TFCO) Response to Comments Received in the NPCC Open Process Posting of a Criteria Clarification for Directory #8 System Restoration.

TFCO would like to thank those who provided comments on the Response to a Request for Criteria Clarification posted from June 25th, 2015 to August 10th, 2015.

Responses to individual comments are provided below.

Comment from – United Illuminating Company:

June 26, 2015

OPG is requesting clarification if the testing described in Section 5.7 and Table 1 of Directory 8 applies to Generator Owners. Specifically tests Table 1, are sub-sections 5.7.4 (ST-1 to ST-6) through to 5.7.5.5 (CC-5). CO-11 proposes a response that these tests are applicable to the Generator Owner and proposes to revise the Directory. I disagree.

It is NOT the intent of Directory 8 to capture Generator Owners in the ST and CC tests. Generator Owners may have facilities identified as key facilities. The Generator Owner is required to identify the critical components associated with the key facilities. But the only testing requirement of a critical component required by Directory 8 of the Generator Owner is test BS-1.

Directory 8 is clearly written from the perspective of establishing requirements on the Transmission Owner, Transmission Operator and Reliability Coordinator. The Generator Owner is identified solely because the Black Start test requires the Generator Owner's participation. The Substation Tests were created and phrased specifically to EXCLUDE Generators Owners.

Section 5.7.4 contains numerous references to the Transmission Owner specification and requirements, and never mentions the Generator Owner.

It is difficult to believe that when this Directory was drafted NPCC truncated the list of applicable entities as a drafting error. Section 5.7.2.1 clearly states the Generator Owner will perform a black start test. Yet in 5.7.4 the Directory only lists the Transmission Owner as required to perform a battery test. The sub-requirements of 5.7.4 only refer to the Transmission Owner. Another indicator is the Directory breaks out battery testing at substations and control centers and never lists the Generator.

Table 1 for test ST-1 sets the criteria of threshold to the Transmission Owner/Operator battery standards. Once again, NPCC is not including the Generator Owner.

Measure M8 requires ‘each asset owner to self-certify ...testing of critical components in accordance with ... 5.7’. The Measure itself requires the Generator Owner to refer to the entire section 5.7 to determine what is in scope for required testing. This is another indication that the subsections of 5.7 were meant to narrow the scope of applicability to specific entity types.

For these reasons tests ST-1 to St-6 and CC-1 to CC-5 do not apply to the Generator Owner.

TFCO Response:

Comment not accepted.

Thank you for the comment.

TFCO recognizes that the introduction of the NERC Functional Model has introduced some ambiguity regarding the applicability of the testing requirements to the responsible entity.

However, TFCO believes that if a facility is identified as a **Key Facility** by the Reliability Coordinator in order to establish the **Basic Minimum Power System** (BMPS), regardless of which Functional Entity owns that facility, then the testing requirements within Directory#8 shall apply to that facility.

TFCO is currently performing an extensive review of Directory#8 in order to remove the perceived ambiguities that are currently contained in the document.