



NORTHEAST POWER COORDINATING COUNCIL, INC.
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NPCC Request for Criteria Clarification

Request for a Clarification of Criteria	
Date submitted: June 4, 2021	
Contact information for person or organization requesting the clarification:	
Name:	Task Force on System Studies
Organization:	N/A
Telephone:	N/A
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Identify the Directory that contains the Criteria requiring clarification:	
Criteria Identification:	A-10
Criteria Title:	Classification of Bulk Power System Elements
Identify specifically what portion of the Criteria needs clarification:	
<p>At a recent Task Force on System Studies meeting, a Task Force member raised a question regarding language in Document A-10, Section 5.1.</p> <p>Specifically, this section discusses a requirement to present plans and schedules for achieving Directory 1 and Directory 4 compliance to TFCP, TFCO, and TFSP within three months of an element being identified as a bulk power system element.</p> <p>The question concerns the use of the word “identified:” at what point in time is an element considered “identified” as BPS?</p>	

Task Force on Coordinating Planning Response to Request for Criteria Clarification:

A-10 Classification of Bulk Power System Elements

The following clarification of the criteria in Document A-10 was developed by the Task Force on Coordination of Planning.

With consideration for the language used in the first paragraph of 5.1, TFCP takes the term “identify” to mean being added to the BPS list as approved by the RCC.

TFCP believes that each regional entity (RC, PC, BA, etc.) has their own processes in place to ensure that facilities in their area appropriately identified, designed, studied, and operated in accordance with their BPS status.

TFCP recommends the following revisions to document A-10 during its next review:

5.1 Modifications to the Bulk Power System List

When, upon application of this methodology, an **Area** identifies a change to the **bulk power system** classification of a *bus*, the **Area** shall present documentation of the analysis supporting the change to the TFSS. Once the change in classification of the *bus* is recommended by the TFSS ~~and approved by the RCC~~, the *bus* will be added to or removed from the NPCC **Bulk Power System** List with the appropriate comments and information and forwarded to the RCC for approval.

If the application of the methodology identifies changes to **elements** excluded from Directory 1 applicability or changes to **elements** where only a portion of the **element** is classified as **bulk power system** for Directory 4 applicability, as per section **Error! Reference source not found.**, the **Area** shall present documentation of the analysis to the TFSS. Once the change in classification of the **element** is recommended by the TFSS ~~and approved by the RCC~~, the **element** will be added to or removed from the NPCC **Bulk Power System** List with the appropriate comments and information and forwarded to the RCC for approval.

All NPCC Task Forces and the Compliance Committee will be notified once the **Bulk Power System** List is updated.

No later than~~Within~~ three months after of an **element** has been being added to the BPS list and the list has been approved by the RCC identified as a bulk power system element, a plan and schedule for achieving compliance with Directory 4 shall be provided to the Task Force on System Protection (TFSP) for review and acceptance. TFSP may require modifications to the proposed plan and schedule.

No later than ~~Within~~ three months after of an **element** has beenbeing added to the BPS list and the list has been approved by the RCC identified as a bulk power system element to which Directory 1 applies, a plan for incorporating the **element** into Directory 1 analysis shall be provided to the

NPCC Task Force on Coordination of Planning (TFCP) and to the NPCC Task Force on Coordination of Operation (TFCO) for review and acceptance. TFCP or TFCO may require modifications to the proposed plan and schedule.