



NORTHEAST POWER COORDINATING COUNCIL, INC.
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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
Contact information for person requesting the clarification:	
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Identify the Directory that contains the Criteria requiring clarification:	
Directory Number :	NPCC D8, October 22, 2010
Directory Title:	System Restoration
Identify specifically what portion of the Criteria needs clarification:	
Text of Requirement:	
<u>Request for interpretation:</u> 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?	

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: Directory 8 for Ontario Power Generation

The following clarification of the criteria in Directory#8 was developed by CO11 Restoration Working Group and approved by the TFCO.

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.