



## **Northeast Power Coordinating Council, Inc. Regional Standards Committee Work Plan for Calendar Years 2014-2015**

The following Regional Standards Committee (RSC) activities planned for 2014 -2015 will be consistent with the NPCC 2014 and 2015 Business Plans and Budgets, Organizational Goals, and also will continue to be supportive of the ongoing Cost Effective and Results Based Standards efforts. Also, the plan is responsive to the NERC Reliability Standards Development Process, containing expedited schedules with rapid and successive revision and ballot provisions.

### **Core Reliability Standards Committee Functions**

- Review, promote, and support the ERO Results Based Standards initiative and ongoing standards development work.
- Promulgate the Results Based Standards initiative throughout the Northeast.
- Implement the Cost Effective Analysis Process and apply to NPCC regional standards development. Continue to promote NERC's adoption of its Cost Effective Analysis Process which is based on the NPCC Cost Effective Analysis Procedure.
- Develop and/or utilize NERC tools to incorporate the "Results Based" types of requirements into the NPCC Regional Standards being considered for development.
- Review and participate in the Regional Standards development process, and develop NPCC Regional Reliability Standards on a schedule as directed by NERC and the reliability related needs of the Region.
- Coordinate NPCC Regional Standards development with the development of standards appearing in the NERC reliability standards development plan.
- Monitor and coordinate NERC's Reliability Issues Steering Committee (RISC) top reliability related issues and priorities.
- Coordinate the NPCC participation in the review and the revision of NERC Standards per Order 693 addressing Directives from the Commission and any Provincial Regulatory directives.
- File the Regional Standard Process Manual with the FERC to promote consistency and support the ERO One Enterprise model.
- Manage the development and revision of the Regional Reliability Directories including Criteria clarifications as necessary.
- Promote the NPCC Criteria as being more specific or more stringent. Coordinate efforts with the NPCC Compliance Committee to facilitate the development of the NPCC Criteria Compliance Enforcement Program (CCEP) via Phase 2 of the Directory project which was initiated to reformat the Criteria section of each Directory into measurable NERC style requirements.
- Coordinate and provide input to the development and prioritization of ERO reliability standards within the NERC reliability standards work plan.
- Conduct thorough reviews of all NERC standards being developed or revised and coordinate timely comments for Northeastern North America.
- Ensure the NERC standards have measurable "Results Based" requirements.
- Develop and submit Standard Authorization Requests (SAR) for revisions when necessary to improve a standard and address reliability related issues for approved or draft standards.
- Develop comments and ballot recommendations or "issues statements" for all NERC standards under development.
- Review and develop ballot recommendations for all NERC Formal Interpretations to standards.
- Review posted Reliability Standard Audit Worksheets (RSAWs) and incorporate comments from the NPCC CC and NPCC Members.
- Participate in NERC and NPCC Quality Reviews of standards on a schedule as determined by NERC, NPCC and government regulatory authorities.



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- Provide guidance for NPCC regional standard drafting teams in critical areas of Results Based Standards, Violation Severity Level, and Violation Risk Factor development as well as in ensuring quality.
- Review and monitor the NERC definition of Bulk Electric System with respect to existing standards and the impact on the northeast with assistance from the NPCC Task Forces to determine if any Regional Differences need to be initiated or revisions to Regional Standards.
- Review of North American Energy Standards Board (NAESB) postings and activities for potential conflicts with reliability related issues and objectives.
- Review FERC Orders and Provincial rulings pertaining to standards and standards development activities to ensure directives are addressed.
- Respond to FERC and Provincial filings on issues related to regional standards
- Participate in the regional standards development activities and processes in other regions within the Eastern Interconnection.
- Serve as a liaison for the Northeast to the Reliability Issues Steering Committee for all new and emerging reliability risks to the BES.
- Participate in the proceedings of various NERC groups to contribute to the continual improvement to NERC standards and processes. These groups include but are not limited to:
  - NERC Standards Committee
  - NERC Standards Committee Process Subcommittee
  - NERC Functional Model Working Group
  - NERC SAR and Standards Drafting Teams
  - NERC Reliability Issues Steering Committee

### **NPCC Standard and Directory Activities**

- Review the need for and develop the following regional standards and requirements utilizing the NPCC Regional Reliability Standards Development Procedure if directed by the ERO or as needed in response to the revision of the ERO standard(s):
  - Special Protection Systems Standard
  - Regional Reserve Sharing Groups Standard
- Develop any required responses to regulatory inquiry for NPCC Regional Disturbance Monitoring Standard and the Underfrequency Load Shedding Standard. Provide to the FERC and the applicable Provincial regulatory authorities for their information or approvals, as may be required, i.e. data requests, filings to address directives etc. and review the need to revise the standard in the context of the revised NERC BES Definition.
- Address any outstanding issues with the regulatory authorities in the U.S. and all applicable Provincial authorities for regional standards or NPCC Directories.
- Draft and review Regional Standards Authorization Requests (RSARs) upon acceptance by NPCC's Regional Standards Process Manager.
- Produce initial drafts of new or revised regional standards for Drafting Teams to start with.
- Develop proposed standards utilizing regional technical committees as assigned by the NPCC RCC.
- Work with the NPCC CC to develop the necessary compliance elements of the standards. For example, Violation Severity Levels (VSLs).
- Coordinate Directory criteria requirements with Regional Standards requirements to ensure no



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- inconsistencies exist and identify potential areas for improvement.
- Develop filing for the Directories for the New York State Public Service Commission to fulfill obligations for the “Carve-out” outlined in Order 672 of mandatory adherence to more stringent regional criteria for New York State.
  - Develop filings of Directories as required with the Provincial regulators per the various Memorandums of Understanding.
  - Implement technical aspects related to the implementation of the Energy Policy Act of 2005, focusing on Standards/Criteria Development, and related FERC and ERO requirements.
  - Implement the NPCC CEAP and apply to regional standards being developed, and follow the CEAP application to the ERO draft continent wide standards.
  - Review the Standards Authorization Requests, Standards, and Interpretations and provide comments as well as participate in the NERC process.
  - Ensure that the appropriate NPCC Task Forces review NERC issuances, and provide input to support a consensus opinion.
  - Solicit technically qualified candidates from Northeastern North America to participate on each of the NERC drafting teams and additional members to the regional drafting teams and ensure sufficient regional representation exists on the drafting teams.
  - Review FERC rulings and communicate the rulings to the NPCC members and coordinate the response to issues for the Members.
  - Participate in ballots for ERO standards and provide recommended comments and ballot positions to the NPCC Members of the NERC Registered Ballot Body.
  - Review and develop comments on the FERC Notice of Proposed Rulemaking (NOPR) for any and all standards-related issues as appropriate and directed by the NPCC Board of Directors and/or the NPCC President and CEO.
  - Educate and notify stakeholders and regulators about issues related to standards development.
  - Provide a forum for NPCC review of proposed and posted documents from the NERC Critical Infrastructure Protection Committee (CIPC) and NPCC Task Force on Infrastructure Security and Technology (TFIST), and other NPCC Task Forces and Working Groups.
  - Achieve NPCC reliability goals and objectives by initiating and efficiently completing standards development activities.
  - Leverage internet and web based tool functionality to ensure interregional consistency, uniformity, and quality of regional reliability standards.
  - Establish long-term strategy for standards improvement and initiate implementation.
  - Ensure the topics addressed by the reliability standards parallel changing industry needs.
  - Business Practices Interface
    - Coordinate the review of standards with NPCC members of the North American Energy Standards Board, details above.
    - Identify potential market issues for Regional Standards through NPCC Reliability Coordinating Committee (RCC) reviews.
  - Process Improvement
    - Identify efficiencies for a coordinated NERC standards development process and NPCC regional standard processes manual and recommend revisions as applicable.
    - Participate in the revision and redrafting of the NERC rules and procedures related to standards development such as, but not limited to:
      - The NERC Functional Model Working Group
      - The NERC Regional Standards Group
      - The NERC Standards Committee
      - The NERC Standards Committee Process Subcommittee



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- Establish goals/targets for NERC and NPCC standards procedure improvement.
- Incorporate the “results based” standards attribute into the NPCC standards development process
- Streamline and improve the regional standards process and continue to enhance program tools.
- Communications
  - Automate the notifications process to assure awareness of dates and proceedings of all standard development activities.
  - Strengthen the relationship with the industry’s technical committees to ensure adequate input to standards development.
  - Sponsor NPCC Workshops and participate in NERC/ERO workshops to promote awareness and educate the industry of standards-related activities.
  - Promote the reliability objectives of the NERC standards as appropriate to the NPCC members of the NERC Registered Ballot Body.
  - Educate and inform industry stakeholders through web based tools such as “Webinars” and participation in NERC Reliability Standards Workshops, as necessary.
  - Update and inform governmental regulators and/or authorities on the standards development work plan and processes through individual project discussions and annual meetings/conferences.
  - Develop standards program communications that support NERC’s overall communications platform.
  - Develop and maintain NPCC Reliability Directories that will enable users, owners and operators of the international Bulk Power System in the Region the ability to apply reliability requirements in NERC and NPCC as well as the more stringent NPCC regionally-specific criteria.
  - Identify future regional standard opportunities by developing a set of Regional Reliability Directories incorporating the ERO Reliability Standards, Regional Standards and regionally-specific more stringent Criteria.
  - Accomplish all directives of ERO and governmental and/or regulatory authorities with regard to regional standards development and procedures.
  - Adhere to and surpass the ERO work plan milestones, when practical, as they pertain to targets for the regional standards.

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### **RSC 2014-2015 Deliverables**

- Solicit and develop comments to all posted NERC reliability standards related postings, highlighting issues detrimental to the reliability of the Northeast
- Coordinate and oversee the review of the NPCC regional and NERC standards for potential revision based on the revised BES Definition (i.e. Disturbance Monitoring)
- Develop ballot recommendations and/or issues notifications for all posted NERC standards ballots
- File with the FERC the NPCC Regional Standard Processes Manual which gains efficiencies and increases effectiveness, and incorporates cost effectiveness and results based attributes for standards into the process.
- Develop an efficient Interpretation and Clarification Procedure for NPCC Standards
- Promote the adoption and implementation of the NERC Cost Effective Analysis Process CEAP. Participate in two NPCC Standards and Compliance Workshops.
- Participate in the presentations of two NERC Standards Workshops if requested by NERC.



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- Develop feedback mechanism to improve standards through Event Analysis and Compliance findings.