



## Clean November 9<sup>th</sup>, 2016

### **Northeast Power Coordinating Council, Inc. Regional Standards Committee Work Plan for Calendar Years 2017-2018**

The following Regional Standards Committee (RSC) Work Plan activities for the calendar years of 2017 -2018 will be consistent with the NPCC 2017 and 2018 Business Plans and Budgets, Organizational and Strategic Goals, both approved and in draft, and will also continue to be supportive of the ongoing cost effective enhanced periodic reviews and results based standard development activities. Also, the Work Plan is responsive to the NERC Reliability Standards Development Process and ERO strategic goals. In 2017-2018, expedited standards project schedules as a result of FERC Orders Directives and the NERC Board of Trustees goal of achieving a “steady-state” for reliability standards will be the focus of the RSC.

#### **NPCC Reliability Standards Committee Program Responsibilities (related to Standards)**

To carry out its standards related responsibilities defined in the NPCC RSC Scope of Work, the RSC will perform the following activities:

1. Monitor NERC’s Reliability Issues Steering Committee (RISC) risk profiles and other reliability related issues and priorities for potential incorporation into NERC standards, for removal from standards or for potential incorporation into guidelines or other non-standards solutions. Provide and coordinate NPCC’s input into those decisions.
2. Coordinate and provide input to the development and prioritization of ERO reliability standards within the NERC Reliability Standards Development Plan through active regional participation in the Enhanced Periodic Review Standing Committee.
3. Review and support the ERO results-based standards initiative and ongoing standards development work towards the ERO goal of a ‘steady-state’ of standard development which is defined to be a core set of results-based standards achieving an adequate level of reliability and subject to little change by providing ongoing input to the Enhanced Periodic Review Template used to determine the efficacy of standards. Promote the steady-state standards initiative throughout the Northeast.
4. Continue to provide input to the development of a model for consideration of costs in NERC’s Standards Development program. [Cost of Risk Reduction Analysis (CRRA) first draft and pilot.]
5. Oversee, and participate in the regional standards development process and base any development, revision or retirement of NPCC Regional Reliability Standards on the reliability related needs of the Region or continent-wide ERO standards such as:
  - a. Revision of NPCC PRC-006-NPCC-01 Underfrequency Load Shedding
  - b. Revision of NERC PRC-006-2 Underfrequency Load Shedding (Quebec Regional Variance)
6. Engage in the newly approved NERC Compliance Guidance Policy process. Support the inputs through the NPCC Compliance Committee by providing technical and policy related opinions as necessary.
7. Coordinate NPCC Regional Standards development activity with NERC Standards development activity to ensure resources are available for efficient and effective standards development and implementation.

8. Coordinate NPCC participation in the review and the revision of NERC Standards and addressing reliability directives from FERC's Orders and any Provincial regulatory directives through the Enhanced Periodic Review process. Specifically, and of the highest importance:
  - a. Reliability Standards activity resulting from FERC Order 860 Geomagnetic Disturbances (GMD)
  - b. Single Points of Failure
  - c. Modifications to CIP Standards
  - d. Cyber Security Supply Chain Management
  - e. Establish and Communicate System Operating Limits
  - f. and any other similar activity which may evolve during the course of the year.
9. Address emerging issues FERC has identified with the NPCC Regional Standard Processes to promote consistency and support of the ERO One Enterprise model.
10. Conduct thorough reviews of all NERC Standards being developed or revised and coordinate timely comments within the NPCC Region based on reliability needs, results based requirements, Paragraph 81, FERC directives and Enhanced Periodic Reviews.
11. Develop and submit Standard Authorization Requests (SARs) for revisions when necessary to improve a Standard and address reliability related issues for approved or draft Standards utilizing input from the NPCC Regional Feedback Mechanism to improve the quality and efficacy of standards.
12. Develop ballot recommendations or "issues statements" for all NERC Standards under development.
13. Review and develop ballot recommendations for all NERC formal interpretations to Standards.
14. Identify candidates for NERC Standards Drafting Team members from the NPCC region to ensure regional representation during the development of the respective Standards.
15. Provide guidance to NPCC regional Standard Drafting Teams in critical areas of results-based Standards, Violation Severity Levels, and Violation Risk Factor development as well as ensuring quality.
16. Respond to FERC and Provincial filings and interrogatories on issues related to regional Standards.
17. Serve as a liaison for the Northeast Region to the NERC Reliability Issues Steering Committee for all new and emerging reliability risks to the BES.
18. Participate in the proceedings of various NERC groups to contribute to the continual improvement of NERC Standards and processes. These groups include but are not limited to:
  - a. NERC Standards Committee (SC)
  - b. NERC Standards Committee Process Subcommittee (SCPS)
  - c. NERC Project Management Oversight Subcommittee (PMOS)
  - d. NERC Functional Model Advisory Group (FMAG)
  - e. NERC SAR and Standards Drafting Teams (SDTs)
  - f. NERC Reliability Issues Steering Committee (RISC)
19. Manage the development and revision of the regional reliability Directories including criteria clarifications as necessary and review all criteria to ensure consistency with NERC or regional Reliability Standards.
20. Promote the NPCC criteria as augmenting and providing specificity to NERC standards requirements or addressing issues not covered in existing NERC standards. Coordinate efforts with the NPCC Compliance Committee to facilitate further 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.
21. Develop proposed standards and standard clarifications utilizing regional technical committees as assigned by the NPCC Reliability Coordinating Committee, RSC or as identified through the NPCC Regional Feedback Mechanism.
22. Work with the NPCC CC to develop the necessary compliance elements of the regional Standards, for example, Violation Severity Levels (VSLs).
23. Implement the NPCC Cost Effective Analysis Procedure and apply it to Directories being revised or developed, and promote and participate in the NERC Cost of Risk Reduction Analysis (CRRRA) application to the ERO draft continent-wide Standards.
24. Review NERC SARs, Standards, and interpretations, and provide comments as well as participate in NERC stakeholder processes.
25. Ensure that the appropriate NPCC Task Forces review NERC Standards-related issuances, and provide input to support development of a NPCC consensus opinion.
26. Solicit technically qualified candidates from NPCC stakeholder companies to participate on each of the

- NERC Standard Drafting Teams and additional members to the regional drafting teams. Ensure sufficient regional representation exists on the drafting teams.
27. Educate and notify NPCC Region stakeholders and regulators about issues related to Standards development.
  28. Participate in two scheduled NPCC Compliance and Standards Workshops
  29. Participate in the revision and redrafting of the NERC Rules and Procedures and other documents related to standards development such as, but not limited to:
    - a. The NERC Functional Model Working Group (FMWG)
    - b. The NERC Regional Standards Group (RSG)
    - c. The NERC Standards Committee (SC)
    - d. The NERC Standards Committee Process Subcommittee (SCPS)
  30. Coordinate implementation of the NERC Standards development processes and NPCC regional Standard processes and recommend revisions as necessary.

### **NPCC Reliability Standards Committee Program Responsibilities (related to Directory Criteria)**

1. Coordinate Directory Development activities with the regulatory authorities in the U.S. and applicable Provincial authorities.
2. Identify the need for new or modified NPCC Directories and the Criteria, Guidelines and Procedures within pursuant to Section 313 of the NERC ROP responsibilities
3. Oversee the development or modification of Directories in accordance with the NPCC Directory Development and Revision Manual
4. Coordinate Directory criteria requirements with regional and NERC Standards requirements to ensure no inconsistencies exist and identify potential areas for improvements.
5. Develop filing for the Directories for the New York State Public Service Commission to fulfill obligations for the “Carve-out” outlined in Order 672 for mandatory adherence to more stringent regional criteria for New York State.
6. Develop filings of Directories as required with the Provincial authorities as per the various Memorandums of Understanding.
7. Communications
  - a. Announce development activities pertaining to the NPCC Reliability Directories and NPCC guidance documents which will enable users, owners and operators of the Bulk Power System in the Region to be aware of and apply the NPCC regionally-specific criteria.
  - b. Identify future regional Standard development or retirement opportunities by developing a set of regional reliability Directories incorporating the ERO Reliability Standards, regional Standards and regionally-specific more stringent criteria.

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The activities listed in this work plan are based on the current planned execution of the NERC Reliability Standards Development Plan (RSDP), proposed strategic direction of the NPCC BOD and NERC BOT as well as additional Directives from the FERC Orders. Changes to these programs, the NERC RSDP, the NERC Rules of Procedure, or the NPCC Standards or Directory processes may necessitate changes to listed activities, including revised scheduling of the activities, removal of certain activities, and/or the addition of activities. If significant changes occur during the course of the year, the RSC Work Plan will be revised in advance of the NPCC Board of Director’s annual review and will be forwarded to the NPCC Board of Directors for approval.