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Northeast Power Coordinating Council, Inc.

Regional Standard Processes Manual (RSPM)



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NPCC REGIONAL ~~RELIABILITY~~ STANDARDS PROCESS MANUAL

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I. EXECUTIVE SUMMARY

The NPCC Bylaws state "NPCC shall develop a Regional Reliability Standards Development Procedure that provides the design-basis approach to a consensus building process by which NPCC may develop Regional Reliability Standards and Regional Variances to be proposed to the ERO for adoption, under delegated authority by the FERC and the Canadian Provincial regulatory and/or governmental authorities."

The NPCC Regional Reliability Standards Development Procedure was originally adopted by the NPCC Board of Directors on September 19, 2007. Revision 1 of the manual was adopted by the NPCC Board of Directors on March 11, 2014.

The NPCC Regional Standard Process Manual conforms with NERC Rules of Procedure Section 300 Reliability Standards Development for Regional Reliability Standards

~~II.~~I. INTRODUCTION

PURPOSE

The NPCC Regional Standard Processes Manual conforms with the NERC Rules of Procedure Section 300 Reliability Standards Development for Regional Reliability Standards. This manual defines the characteristics of a Northeast Power Coordinating Council, Inc. (NPCC) regional Reliability Standard (hereinafter referred to as "regional standard") and establishes the process by which NPCC regional standards are developed, approved, revised, clarified, and retired. The NPCC regional standards process is a stakeholder process that is approved by the NPCC members to ensure a transparent standard development process that is "open, fair, and inclusive."

NPCC regional standards address the reliability of the international and interconnected Bulk Electric System (BES) in Northeast North America. NPCC regional standards shall enable or support one or more NERC/ERO reliability principles[1] and will, in all cases, not be inconsistent with or less stringent than any requirements of the North American Electric Reliability ~~Council~~Corporation/Electric Reliability Organization (NERC/ERO) continent-wide Reliability Standards.

The development of NPCC regional standards is performed according to the following principles using the process contained in this manual:

- Developed in a fair and open process that provides an opportunity for all interested parties to participate;
- Does not have an adverse impact on commerce that is not necessary for reliability;
- Provides a level of ~~Bulk Electric System~~BES reliability that is adequate to protect public health, safety, welfare, and national security and would not have a significant adverse impact on reliability; and
- Based on a justifiable difference between Regions or between sub-Regions within the Regional geographic area.

Following industry approval, NPCC regional standards process and NPCC regional standards require approval by the NPCC Board of Directors, NERC as the ~~Electric Reliability Organization~~ERO ~~(ERO)~~ and the applicable regulatory authorities in the United States (the Federal Energy Regulatory Commission) and Canada.

BACKGROUND

~~Northeast Power Coordinating Council, Inc. (~~NPCC~~)~~ is responsible for promoting and improving the reliability of the international, interconnected ~~Bulk Electric System~~BES in Northeastern North America. NPCC carries out its mission through (i) the development of regional standards and compliance assessment and enforcement of continent-wide and regional standards, coordination of system planning, design and operations, and assessment of reliability, (collectively, "Regional Entity activities"), and (ii) the establishment of regionally-specific criteria, and monitoring and enforcement of compliance with such criteria (collectively, "criteria services activities").

The Energy Policy Act (EPA) of 2005 (Section 1211) amended the Federal Power Act (FPA) by adding Section 215, Electric Reliability. Specifically regarding standards development and pursuant to~~with~~ Section 215(e)(4) of the FPA, NPCC as a Regional Entity with delegated authority from NERC may propose regional standards to NERC for eventual enforcement within the NPCC region.

[1] Reliability Principles are available on the NERC website as amended from time to time. https://www.nerc.com/pa/Stand/Resources/Documents/Reliability_Principles.pdf#search=reliability%20Principles

As a condition of NPCC membership, NPCC General and Full Members[2] agree to adhere to applicable NERC Reliability Standards. NERC Reliability Standards are comprised of both continent-wide and regional standards. The NPCC regional standards apply only to that part of the Eastern Interconnection within the NPCC geographical area.

~~III.~~II. REGIONAL STANDARD CHARACTERISTICS AND ELEMENTS

1. CHARACTERISTIC ATTRIBUTES

The NPCC regional standards development process has the following key characteristics:

- **Fair due process** — The NPCC regional standards development process provides for reasonable notice and opportunity for public comment. At a minimum, the procedure shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders. Upon approval by the NPCC Members, the NPCC Board of Directors then votes to approve submittal of the regional standard to NERC for ERO approval, followed by submission to the Federal Energy Regulatory Commission (FERC) and the applicable Canadian a~~A~~uthorities for their approvals.
- **Openness** — Participation in the NPCC regional standards development process is open to all persons and organizations that are directly and materially affected by the reliability of the NPCC's ~~Bulk Electric System~~BES. There is no undue financial burden to participation. Participation shall not be conditioned upon membership in the ERO, NPCC or any organization, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements.
- **Inclusive** — Any entity (person, organization, company, government agency, individual, etc.) with a direct and material interest in the reliability of NPCC's ~~Bulk Electric System~~BES has the right to participate by: (a) expressing an opinion and its basis; (b) having their position considered, and (c) having the right to appeal a response through an established appeal process.
- **Balanced** — The NPCC regional standards development process strives to have an appropriate balance of interest and shall not be dominated by any two interest categories and no single interest category shall be able to defeat a matter. Pursuant with the NPCC By- Laws there are seven (7) stakeholder voting sectors and the votes for each sector are weighted to achieve an appropriate balance.
- **Transparent** — All actions material to the development of NPCC regional standards are transparent and information regarding the progress of a standard's development action is made available to the public through postings on the NPCC website as well as through ~~E-~~email lists.
- **Without undue delay** — The NPCC regional standards development process shall be performed in a manner which is timely and responsive to new and changing priorities for the reliability of the NPCC BES.~~The NPCC regional standards development process shall be performed within a reasonable time.~~

[2] ~~As defined in the NPCC By-Laws~~

In order to receive the approval of the ERO, the NPCC regional standards development process must also achieve the following objectives:

- **No Adverse Impact on Reliability of the Interconnection** — An NPCC regional standard provides an Adequate Level of Reliability[4] as defined by NERC.
- **Justifiable Difference** — An NPCC regional standard addresses a justifiable difference within the NPCC geographical area that results from a physical difference[5] or operating difference in the Northeast's ~~Bulk Electric System~~BES. Although a justifiable difference allows for a unique regional standard, an NPCC regional standard shall be no less stringent and non-duplicative than a continent-wide standard covering the same reliability risks.
- **Uniformity** — To the extent possible, the NPCC regional standards provides uniformity with Reliability Standards across the interconnected ~~Bulk Electric System~~North American BES ~~of North America~~.
- **No Undue Adverse Impact on Commerce** — An NPCC regional standard will not cause any undue adverse impact on business activities that are not necessary for reliability of the power system in the Region and neighboring Interconnections. All regional standards shall be consistent with NERC's market principles[6].

2. Elements of a Regional Standard

To ensure uniformity of regional standards and avoid inconsistency with NERC continent-wide standards, an NPCC regional standard shall be consistent with the elements identified in this section of the procedure. These elements are intended to apply a systematic discipline in the development and revision of regional standards. The application of a systematic discipline is necessary for implementing regional standards that are measurable, enforceable, and consistent as well as results oriented[7], i.e.:

- Performance-based,
- Risk-based, and
- Capability-based.

Types of Reliability Requirements

Regional ~~reliability~~ standards should be viewed as a portfolio of requirements designed to achieve an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

a) **Performance-based** - defines a specific reliability objective or outcome that has a direct, observable effect on the reliability of the ~~Bulk Electric System~~BES, i.e. an effect that can be measured using power system data or trends.

[4] Adequate Level of Reliability is available on the NERC website as amended from time to time Remove the links and provide citation.

[5] The meaning of the phrase "physical difference" will be consistent with FERC's Order, issued September 22, 2004, Granting Request For Clarification regarding Docket No. PL04-5-000, Policy Statement on Matters Related to Bulk Power System Reliability.

[6] Market Principles are available on the NERC website as amended from time to time Link https://www.nerc.com/pa/Stand/Resources/Documents/Market_Principles.pdf#search=market%20principles

[7] For Results-based Standards see http://www.nerc.com/pa/Stand/Resources/Documents/ResultsBasedStandardGuidance.pdf

b) **Risk-based** - defines actions of registered entities that reduce a stated risk to the reliability of the ~~Bulk Electric System~~BES and can be measured by evaluating a result from the mandatory requirements.

c) ~~–~~**Capability-based** - defines registered entity capabilities needed to perform reliability functions and can be measured by demonstrating that the capability exists within the entity as required.

Each regional standard shall enable or support one or more of the reliability principles identified in the most recent set posted on the NERC website. Each regional standard shall also be consistent with all of the reliability principles. The intent of the set of NPCC regional standards is to deliver an Adequate Level of Reliability[8] as defined by NERC.

Recognizing that ~~Bulk Electric System~~BES reliability and electricity markets are inseparable and mutually interdependent, all regional standards shall be consistent with the most recent set of Market Principles[9] as posted on the NERC website. Consideration of the Market Principles is intended to ensure that regional standards are written such that they achieve their reliability objective without placing undue restrictions or causing adverse impacts on competitive electricity markets.

ELEMENTS OF A REGIONAL STANDARD

A regional standard includes several components designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the ~~Bulk Electric System~~BES. The components of an NPCC regional standard identified below are based on the current NERC standards development processes ~~NERC Standard Processes Manual (SPM) that was effective on March 1, 2019~~. Future revisions of the NERC standards development processes ~~SPM~~ will be used to provide guidance at the time of development of an NPCC regional standard if different from the elements listed below and not covered in this Manual.

The only mandatory and enforceable components of a regional standard are the: (1) Applicability, (2) Requirements, and (3) the Effective Dates. The additional components are included in the regional standard for informational purposes, to establish the relevant scope and technical paradigm, and to provide guidance to Registered Entities concerning how compliance will be assessed by the Compliance Enforcement Authority.

The components of a regional standard may include the following:

Title:	A brief, descriptive phrase identifying the topic of the regional standard.
Number:	A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the regional standards.
Purpose:	The reliability outcome achieved through compliance with the requirements of the regional standard.
Applicability:	Identifies which entities are assigned reliability requirements; i.e., the specific functional entities and facilities to which the regional standard applies.
Effective Dates:	Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

[8] ~~Adequate Level of Reliability is available on the NERC website as amended from time to time Link: https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Informational_Filing_Definition_Adequate_Level_Reliability_20130510.pdf~~

[9] ~~Market Principles are available on the NERC website as amended from time to time~~

Requirement: An explicit statement that identifies the functional entity responsible, the action or result that must be achieved, any conditions necessary to achiev~~cing~~ the result, and the reliability-related benefit of the outcome. Each requirement shall be a statement for which compliance is mandatory.

Compliance Elements: Elements to aid in the administration of compliance monitoring and enforcement responsibilities.

Measure: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement.

Violation Risk Factors and Violation Severity Levels: Violation risk factors (VRFs) and violation severity levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the violation of a requirement in an approved ~~Reliability Standard~~regional standard. Each requirement in each ~~Reliability Standard~~regional standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NPCC Standards & Criteria Staff and Compliance Staff, at the same time as the associated ~~Reliability Standard~~regional standard, but are not part of the ~~Reliability Standard~~regional standard. The Board of Directors is responsible for approving VRFs and VSLs.

- Violation Risk Factors
  VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.
- Violation Severity Levels
  VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.

Version History: The version history is provided for informational purposes and lists information regarding prior versions of the regional standard.

Variance: As applied to an NPCC regional standard is a Requirement (to be applied in the place of the NPCC region-wide Requirement) that is applicable to a specific geographic area or to a specific set of Registered Entities.

Compliance Enforcement Authority (CEA): The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated regional standard. The Compliance Enforcement Authority will be NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the ERO regional standards.

Reliability Standard Audit Worksheets (RSAWs)[~~10~~] Reliability Standard Audit Worksheets (RSAWs) are developed as companion documents to regional and continent-wide Reliability Standards to facilitate the CEA assessment of a registered entity's compliance with a standard. While RSAWs are not part of the regional standard, they are developed through collaboration of the drafting team and NPCC Compliance Staff.

~~[10] While RSAWs are not part of the regional standard, they are developed through collaboration of the drafting team and NPCC Compliance Staff.~~

~~IV.~~III. REGIONAL STANDARDS DEVELOPMENT PROCESS

1. ROLES IN THE NPCC REGIONAL STANDARD PROCESS

NOMINATION, REVISION, CLARIFICATION, OR RETIREMENT OF A STANDARD:

Any member of NPCC or group within the NPCC region shall be allowed to request that an NPCC regional standard be developed, modified, clarified, or retired. Additionally, any person (organization, company, government agency, individual, etc.) who is directly and materially affected by the reliability of the NPCC ~~Bulk Electric System~~BES shall be allowed to request that an NPCC regional standard be developed, modified, clarified, or retired. The following section identifies the process roles in the NPCC regional standards process. Refer to Step 2 STANDARD DEVELOPMENT PROCESS STEPS and FIGURE 1: FLOWCHART OF REGIONAL STANDARDS DEVELOPMENT PROCESS OVERVIEW for the regional standards development process steps and associated flowchart. Refer to Step 3 STANDARD CLARIFICATION PROCESS STEPS and FIGURE 2: FLOWCHART OF REGIONAL STANDARDS CLARIFICATION PROCESS OVERVIEW for the regional standards clarification process steps and associated flowchart.

PROCESS ROLES AND RESPONSIBILITIES

BOARD OF DIRECTORS

The NPCC Board of Directors (Board) shall consider for adoption regional standards, definitions, variances and clarifications and associated implementation plans that have been processed according to the processes identified in this manual.

DRAFTING TEAM

The drafting team (DT) should strive to achieve a portfolio of performance, risk, and capability-based mandatory reliability requirements that support an effective defense-in-depth strategy. The drafting team develops standards-related regional products as directed by the NPCC Regional Standards Committee (RSC) and within the scope of an approved Regional Standard Authorization Request (RSAR) or a Clarification Request (CR). The product that is developed is typically a new or revised regional standard, but could also be a definition, a reference document, a set of Violation Risk Factors, a set of Violation Severity levels, or the team could be appointed to assist an author in refining an ~~Regional Standard Authorization Request (~~RSAR~~)~~. The drafting team also works collaboratively with NPCC Compliance Staff to develop Reliability Standard Audit Worksheets (RSAWs) at the same time regional standards are developed. The drafting team shall remain in place until such time as the NERC Board of Trustees adopts the regional standard.

NPCC STANDARDS LEADERSHIP (DIRECTOR/MANAGER/DESIGNEE)~~MANAGER OF RELIABILITY STANDARDS~~

The NPCC ~~Manager of Reliability Standards~~Standards & Criteria Leadership (Director/Manager/Designee) has the overall responsibility for managing the NPCC regional standards processes in accordance with this manual. ~~As used herein, the NPCC Manager of Reliability Standards will be the NPCC Manager of Reliability Standards or his/her designee.~~

NPCC MEMBERS

NPCC members may participate in the comment and ballot periods associated with the development and industry approval of regional standards. The ballot body is comprised of all

entities or individuals that qualify for one of the stakeholder sectors within NPCC as stated in the most recently approved NPCC Bylaws. All General and Full Members of NPCC can participate in the balloting of regional standards. Any entity or person, including non-NPCC members, may submit comments during the open process comment periods for regional standards.

NON-NPCC MEMBERS

Any entity or person that is neither a General nor Full Member of NPCC is not eligible to participate in the ballot body voting on a regional standard. However, any entity or person, including non-NPCC members, may submit comments during the open process comment periods for standards. Subject Matter Experts (SMEs), regardless of NPCC membership status, are encouraged to participate in comment periods for regional standards.

NPCC STANDARDS & CRITERIA STAFF

The NPCC Standards & Criteria Staff is responsible for assisting the NPCC Standards & Criteria Leadership ~~Manager of Reliability Standards~~ and the RSC in administering the NPCC regional standards processes in accordance with this manual.

NPCC COMMITTEES, TASK FORCES AND WORKING GROUPS

The Committees, Task Forces and Working Groups within NPCC serve an active role in the regional standards process. Activities performed by these groups include, but are not limited to, the following:

- Identify the need for new or modified regional standards
- Initiate NPCC Standards actions by developing Regional Standard Authorization Requests ~~(RSARs)~~
- Develop comments (views and objections and suggestions) to standards actions
- Participate in NPCC regional standard~~Standard~~ drafting
- Dispensation of Clarification Requests ~~(CRs)~~
- Provide technical oversight in response to changing industry conditions and ERO Requirements
- Conduct Field Tests, as required

REGIONAL STANDARDS COMMITTEE

The NPCC Regional Standards Committee (RSC), a committee of the NPCC Board of Directors, is charged with oversight of all drafting team activities and managing the NPCC regional standards development process in accordance with this manual.

The RSC is responsible for maintenance of the Regional Standard Processes Manual ~~(RSPM)~~, including the endorsement of RSPM revisions for NPCC Board review and approval.

RELIABILITY COORDINATING COMMITTEE

The NPCC Reliability Coordinating Committee (RCC) supports the regional standards development process through ~~the assignment~~coordination with the RSC to identify ~~of~~ individuals from NPCC Task Forces to serve as technical resources for: (1) staffing drafting teams, and (2) performing a technical advisory role in the regional standards process through comments, recommendations and technical justifications.

COMPLIANCE COMMITTEE

The NPCC Compliance Committee (CC) supports the regional standards development process by providing stakeholder input regarding compliance monitoring, implementation, and enforceability

considerations associated with regional standards. The CC may identify compliance-related issues, lessons learned, and emerging risks that warrant consideration during the development, modification, or retirement of regional standards, and may provide comments and recommendations on proposed regional standards and implementation documents.

REQUESTER

Any individual representing an organization (entity, company, government agency, etc.) that is directly and materially affected by the reliability of the ~~Bulk Electric System~~BES within the NPCC

geographical area may request a regional standard be developed or an existing regional standard be modified, clarified, or deleted.

QUALITY REVIEW TEAM

The NPCC Standards & Criteria Staff shall coordinate a quality review of the "final draft" of the regional standard, implementation plan, VRFs and VSLs, and associated documents to assess whether the documents are within the scope of the associated RSAR, whether the regional standard is clear and enforceable as written and the VRFs and VSLs are developed according to NERC and FERC guidelines. The Quality Review Team may be comprised of legal and compliance representatives, a technical writer, and NPCC Standards & Criteria Staff.

2. STANDARD DEVELOPMENT PROCESS STEPS

STEP 2.1: REGIONAL STANDARDS AUTHORIZATION REQUEST TO DEVELOP, MODIFY OR RETIRE

A Regional Standard Authorization Request (see Appendix A)~~[1]~~ ~~(RSAR)~~ is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified regional standards or the benefit of retiring one or more approved regional standards.

An RSAR shall be used to seek approval and initiate the development, modification or retirement of an NPCC regional standard. An RSAR is not used to seek a ~~Clarification Request (~~CR~~)~~ of an NPCC regional standard. The initiation and handling of a CR is covered in Step 3 STANDARD CLARIFICATION PROCESS STEPS, of this manual.

Any individual representing an organization which is directly or materially impacted by the operation of the ~~Bulk Electric System~~BES within the geographical footprint of NPCC may request, via a submittal of an RSAR to the NPCC ~~Manager of Reliability Standards~~Standards & Criteria Leadership, the development, modification, or deletion of an NPCC regional standard. The individual completing the form is referred to herein as the Requester.

Time periods specified in this manual may be extended as deemed appropriate by NPCC Staff. When business days are specified, this provision could be used to take into account differing Canadian and US holiday schedules. When calendar days are specified, this provision could be used to take into account due dates that fall on a weekend.

STEP 2.1.A. REQUESTER ACTIONS

> *Note: The NPCC Manager of Reliability Standards will assist the Requester, as necessary, to ensure all required information is submitted on the RSAR.*

The Requester shall complete an RSAR form in accordance with the guidance provided in APPENDIX A: RSAR COMPLETION GUIDELINES.

The Requester shall submit the completed RSAR to the NPCC ~~Manager of Reliability Standards~~Standards & Criteria Leadership, via ~~npccstandard@npcc.org,~~ npcc.org/contact and select Standards, Criteria, and Other Documents for processing.

STEP 2.1.B. NPCC ~~MANAGER OF RELIABILITY STANDARDS~~STANDARDS & CRITERIA LEADERSHIP ACTIONS

~~The NPCC Manager of Reliability Standards shall review the submitted RSAR and verify that the submitted form has been adequately completed.~~ The NPCC ~~Reliability~~ Standards & Criteria Staff shall review each RSAR and work with the Requester~~submitter~~ to verify that all required information has been provided. All properly completed RSARs shall be submitted to the Regional Standards Committee ~~(RSC)~~ for action at the next regularly scheduled RSC meeting. If an action needs to be taken prior to the next scheduled RSC meeting, action can be solicited electronically

from the RSC members. ~~Within fifteen (15) calendar days[12] of receipt of the submitted RSAR, the NPCC Manager of Reliability Standards will electronically acknowledge~~

~~[11] The RSAR is located on the NPCC website under Standards – Regional Standards General~~

~~[12] Time periods specified in this manual may be extended as deemed appropriate by NPCC Staff. When business days are specified, this provision could be used to take into account differing Canadian and US holiday schedules. When calendar days are specified, this provision could be used to take into account due dates that fall on a weekend.~~

~~receipt of the RSAR. If, at that time, the NPCC Manager of Reliability Standards finds the RSAR to be deficient, the Requester will be contacted to determine how to proceed~~.

~~Within ten (10) calendar days of the receipt of an adequately completed RSAR, the NPCC Manager of Reliability Standards shall forward the RSAR to the NPCC Regional Standards Committee (RSC) for its review and processing. Included in the transmittal of the RSAR to the RSC, the NPCC Manager of Reliability Standards shall include a statement indicating the applicability of the NPCC Cost Effectiveness Analysis Procedure (CEAP) for the proposed change.~~

STEP 2.1.C. NPCC REGIONAL STANDARDS COMMITTEE ~~(RSC)~~ ACTIONS

~~*Note: The RSC shall meet to review all pending RSARs. The frequency of this review process will depend on workload, but in no case shall a RSAR wait for RSC action more than 60 calendar days from the date of receipt by the RSC.*~~

When presented with an RSAR, the RSC shall determine if the RSAR is sufficiently complete to guide regional standard development and whether the RSAR is consistent with this manual. The RSC shall take one of the following actions:~~The RSC shall review the RSAR and take one of the following actions:~~

• Accept the RSAR.

• Remand the RSAR back to the requestor or to NPCC ~~Reliability~~ Standards & Criteria Staff for additional work.

• Reject the RSAR. The RSC may reject an RSAR for good cause. If the RSC rejects an RSAR, it shall provide a written explanation for rejection to the sponsor within ten days of the rejection decision.

• Delay action on the RSAR pending one of the following: (i) development of a technical justification for the proposed project; or (ii) consultation with another NPCC Committee/Task Forces to determine if there is another approach to addressing the issue raised in the RSAR.

Upon RSAR acceptance, NPCC ~~Reliability~~ Standards & Criteria staff shall post the RSAR on the NPCC website.

- ~~Remand the RSAR back to the NPCC Manager of Reliability Standards for additional work. In this case, the NPCC Manager of Reliability Standards shall work with the Requester to provide additional information or clarification for the RSAR as specified by the RSC.~~
- ~~Reject the RSAR. In this case, the RSC will provide its determination to the NPCC Manager of Reliability Standards, who will then provide a written explanation for rejection to the Requester within ten (10) calendar days of the rejection decision.~~

~~*Note: Before the RSC can accept an RSAR for a new or modified standard the applicable CEAP process steps shall be completed.*~~

- ~~Accept the RSAR.~~
  - ~~If a new or modified standard has been authorized, within ten (10) calendar days of the authorization the NPCC Manager of Reliability Standards shall: 1) post notification on the NPCC website of the intent to develop or modify a regional standard; 2) notify the ERO for processing in accordance with its process, as applicable; and 3) notify the Requester of the acceptance of the RSAR.~~

- ~~If the retirement of an existing regional standard has been authorized, within ten (10) calendar days of the authorization the NPCC Manager of Reliability Standards shall: 1) post notification on the NPCC website of the intent to retire an existing regional standard; 2) notify the ERO for processing in accordance with its process, as applicable; and 3) notify the Requester of the acceptance of the RSAR. The process to retire an existing regional standard is included in Step 6 RETIREMENT OF AN APPROVED NPCC REGIONAL STANDARD.~~

STEP 2.2: FORMATION OF DRAFTING TEAM FOR NEW OR MODIFIED STANDARD

~~An RSAR that has been accepted by the RSC shall, within ten (10) calendar days of the acceptance of the RSAR, be submitted by the NPCC Manager of Reliability Standards to the NPCC Reliability Coordinating Committee (RCC). The RCC shall, within sixty (60) calendar days, assign the development of the regional standard to an NPCC Task Force, and notify the NPCC Manager of Reliability Standards of its decision within ten (10) calendar days.~~

The RSC will coordinate with RCC leadership, as required, to identify relevant ~~Subject Matter Experts (~~SME~~s)~~ from the existing Task Forces, Committees, Working Groups, and NPCC Staff, for consideration as potential drafting team members. The RSC may use a public nomination process to populate the ~~Region Reliability Standard~~regional standard drafting team or may use another method that results in a team that collectively has the necessary technical expertise, diversity of views, and work process skills to accomplish the objective of the project on a timely basis.

~~After receipt of the notification of drafting team assignment, t~~The NPCC ~~Manager of Reliability Standards~~Standards & Criteria Leadership shall oversee solicitation and recommendation of a list of additional qualified [13] candidates over and above the appropriate NPCC Task Forces, Committees, Working Groups, and NPCC Staff~~Task Force members~~, for appointment to the drafting team. NPCC Standards & Criteria Leadership will present the list of ~~the qualified~~qualified candidates to the RSC for approval at the next scheduled meeting or via electronic approval. The RSC may accept the recommendations of the NPCC ~~Manager of Reliability Standards~~Standards & Criteria Leadership as presented or revise the recommendations as necessary.~~-~~
The NPCC S~~s~~taff shall provide one or more members (including ~~a~~ Ce~~C~~ompliance ~~s~~Staff) as needed to support the team with facilitation, project management, compliance, legal, regulatory and technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. In developing the ~~Regional Reliability Standard~~regional standard, the individuals provided by the NPCC S~~s~~taff serve as advisors to the drafting team and do not have voting rights but share accountability along with the drafting team members assigned by the RSC for timely delivery of a final draft ~~Regional Reliability Standard~~regional standard that meets the quality attributes identified in Section II~~3~~ of this manual. The drafting team members assigned by the RSC shall have final authority over the technical details of the ~~Regional Reliability Standard~~regional standard, while the NPCC L~~l~~egal ~~s~~Staff shall provide assistance to the drafting team in assuring that the final draft of the ~~Regional Reliability Standard~~regional standard meets the quality attributes identified in Section II~~3~~ of this manual.~~The Requester and an NPCC Compliance Staff person will be included on the drafting team. Within sixty (60) calendar days of the drafting team assignment notification from the RCC, the NPCC Manager of Reliability Standards shall submit the list of the entire drafting team membership to the RSC for acceptance. The RSC may accept the recommendations of the NPCC Manager of Reliability Standards as presented or revise the recommendations as necessary.~~

Upon acceptance of the drafting team slate, the RSC shall provide a target date on which the drafting team is expected to have ready a completed draft regional standard and associated supporting documentation available for consideration by the NPCC membership. Additionally, the NPCC Standards & Criteria Staff~~RSC~~ shall provide the drafting team with any preliminary development products including, but not limited to, a draft regional standard, comments, and related white papers.

The RSC may~~shall~~ designate one of its members to actively monitor and assist NPCC ~~s~~Staff in the oversight of drafting team milestones and deadlines, and extend or expedite milestones and deadlines, as appropriate, acting as a liaison between the drafting team and the RSC to help resolv~~e~~~~ing~~ any issues.

STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS

Step 2.3.a. Project Schedule

Prior to beginning work on the development of a new or revised regional standard and the associated supporting documentation, the drafting team should develop a work plan for completing the regional standard development work, including the establishment of milestones for completing critical elements of the work in sufficient detail to ensure that the drafting team will meet the target date established by the RSC, or the drafting team shall propose an alternative date. This work plan must be submitted to the RSC for its concurrence. ~~When a drafting team begins its work, it~~The drafting team shall ~~regularly (at least quarterly)~~ report progress ~~against that aforementioned work plan~~ to the ~~NPCC Manager of Reliability Standards for presentation to the~~ RSC at each scheduled meeting until completion of the regional standard development processes.~~.~~

Step 2.3.b. Draft Reliability Standard

The team shall develop a ~~Regional Reliability Standard~~regional standard that is within the scope of the associated RSAR that includes all required elements as described earlier in this manual, with a goal of meeting the criteria for governmental approval.

The drafting team may, at its discretion, develop one or more supporting technical documents to help explain or facilitate understanding of the draft ~~Regional Reliability Standard~~regional standard, implementation plan, VSL, or VRF. These supporting technical documents may include, among other things: (1) reference documents designed to provide the drafting team's technical rationale, analysis, or explanatory information to support the understanding of the draft ~~Regional Reliability Standard~~regional standard or related element; or (2) white papers designed to explain a technical position or concept underlying the draft ~~Regional Reliability Standard~~regional standard or related element. Such documents may be posted during an informal outreach or a comment period. ~~The drafting team shall create and manage its work structure (e.g., sub-teams) and meeting schedule (face-to-face as well as electronic meetings), as necessary, to meet the milestone dates and project deliverables outlined in the work plan.~~

~~The work products of the drafting team should consist of the following~~

- ~~A draft regional standard consistent with the RSAR on which it was based~~
- ~~An implementation plan, including the nature, extent and duration of field-testing, if any~~
- ~~Identification of any existing regional standard and NPCC criteria that will be deleted, in part or whole, or otherwise impacted by the implementation of the draft regional standard~~

Step 2.3.c. Implementation Plan

As a drafting team drafts its proposed revisions to a ~~Regional Reliability Standard~~regional standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated ~~Regional Reliability Standard~~regional standard(s) ~~or Standards~~. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the Requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated ~~Regional Reliability Standard~~regional standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the Requirements.
- The Functional Entities that will be required to comply with one or more Requirements in the proposed ~~Regional Reliability Standard~~regional standard.

A single implementation plan may be used for more than one ~~Regional Reliability Standard~~regional standard. The implementation plan is posted with the associated ~~Regional Reliability Standard or Standard~~regional standard(s) during the formal comment period and is balloted with the associated ~~Regional Reliability Standard~~regional standard.

Step 2.3.d. Violation Risk Factors and Violation Severity Levels

The drafting team shall work with NPCC staff in developing a set of VRFs and VSLs that meet the latest criteria established by NPCC and ~~A~~applicable ~~G~~governmental ~~A~~authorities. The drafting team shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. NPCC Staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the drafting team has finalized its ~~Regional Reliability Standard~~regional standard, implementation plan, and VRFs and VSLs, the team should seek stakeholder feedback on its preliminary draft documents.

[13] ~~Refer to Appendix B: Selection of Drafting Team Members~~

- ~~Technical reports, white papers and/or work papers that provide technical justification for the draft regional standard under consideration~~
- ~~Reliability Standard Audit Worksheet (RSAW) collaboratively developed by the drafting team and NPCC Compliance Staff~~

~~Any proposed changes to definitions in existing regional standards should be sent to the appropriate Task Force (TF) for consideration of the impact to the standard. If necessary, the TF can produce an RSAR.~~

Step 2.4: Informal Outreach

Drafting teams may use a variety of methods to collect informal stakeholder feedback on preliminary drafts of its documents, including the use of informal outreach, webinars, industry meetings, workshops, or other mechanisms. Information gathered from informal outreach shall be publicly posted. While drafting teams are not required to provide a written response to each individual comment received, drafting teams are encouraged, where possible, to post a summary response that identifies how it used comments submitted by stakeholders. Drafting teams are encouraged, where possible, to reach out directly to individual stakeholders in order to facilitate resolution of identified stakeholder concerns. The intent is to gather stakeholder feedback on a "working document" before the document reaches the point where it is considered the "final draft."

Step 2.5: Conduct Quality Review

The NPCC ~~Reliability~~ Standards & Criteria Staff shall coordinate a quality review of the ~~Regional Reliability Standard~~regional standard, implementation plan, and VRFs and VSLs with NPCC Legal Staff and Compliance Staff to assess whether the documents are within the scope of the associated RSAR, whether the ~~Regional Reliability Standard~~regional standard is clear and enforceable as written, and whether the ~~Regional Reliability Standard~~regional standard meets the criteria specified in S~~s~~ection ~~3~~II of this manual and criteria for governmental approval of ~~Regional Reliability Standard~~regional standards. The drafting team shall consider the results of the quality review, decide upon appropriate changes, and recommend to the RSC whether the documents are ready for formal posting and balloting.

The drafting team shall submit the drafts of the regional standard and associated documents to obtain RSC concurrence to post documents for comment and ballot.

If the RSC finds that any of the documents do not meet the specified criteria, the RSC shall remand the documents to the drafting team for additional work.

If the ~~Regional Reliability Standard~~regional standard is outside the scope of the associated RSAR, the drafting team shall be directed to either revise the ~~Regional Reliability Standard~~regional standard so that it is within the approved scope, or submit a request to expand the scope of the approved RSAR. If the ~~Regional Reliability Standard~~regional standard is not clear and enforceable as written, or if the ~~Regional Reliability Standard~~regional standard does not meet the specified criteria, the ~~Regional Reliability Standard~~regional standard shall be returned to the drafting team by the RSC with specific identification of any Requirement that is deemed to be unclear or unenforceable as written.

~~NPCC Standards Staff can assist in the drafting of the regional standard including compliance measures, process and elements. The drafting of measures and compliance administration aspects of the standard will be coordinated with the NPCC Compliance Staff.~~

~~The drafting team shall submit the initial and subsequent interim drafts of the regional standard and associated documents to the NPCC Manager of Reliability Standards to obtain RSC concurrence to post documents for comment.~~

STEP 2.64: POSTING FOR FORMAL COMMENT PERIOD AND ~~RESOLUTION OF COMMENTS~~BALLOT

> ~~*Note: There are no limits to the number of public comment periods and ballots that can be conducted to result in a regional standard that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.*~~

~~STEP 2.4.A. COMMENT PERIOD~~

> ~~*Note: For Final Comment Period skip this step and proceed to* STEP 2.4.B. FINAL COMMENT PERIOD.~~

Proposed new or modified ~~Regional Reliability Standard~~regional standards require a formal comment period where the new or modified ~~Regional Reliability Standard~~regional standard, implementation plan and associated VRFs and VSLs or the proposal to retire a ~~Regional Reliability Standard~~regional standard, implementation plan, and associated VRFs and VSLs are posted.

The formal comment period shall be at least 45-days long. Formation of the ballot pool and Ballot of the ~~Regional Reliability Standard~~regional standard take place during this formal 45-day comment period. The intent of the formal comment period(s) is to solicit very specific feedback on the draft of the ~~Regional Reliability Standard~~regional standard, implementation plan and VRFs and VSLs.

Comments in written form may be submitted on a draft ~~Regional Reliability Standard~~regional standard by any interested stakeholder, including NPCC Staff, NERC Staff, FERC Staff and other interested governmental authorities. If stakeholders disagree with some aspect of the proposed set of products, comments provided should explain the reasons for such disagreement and, where possible, suggest specific language that would make the product acceptable to the stakeholder.

Step 2.7: Form Ballot Pool

The NPCC ~~Regional Reliability~~ Standards & Criteria Staff shall establish a ballot pool during the first 30 days of the 45-day formal comment period. The NPCC ~~Reliability~~ Standards & Criteria Staff shall post the proposed ~~Regional Reliability Standard~~regional standard, along with its implementation plan, VRFs and VSLs and shall send a notice to NPCC members to provide notice that there is a new or revised ~~Regional Reliability Standard~~regional standard proposed for approval and request members to join the ballot pool. All NPCC members are eligible to join each ballot pool to vote on a new or revised ~~Reliability Standard~~regional standard and its implementation plan and to participate in the non-binding poll of the associated VRFs and VSLs.

NPCC members may join or withdraw from the ballot pool until the ballot window opens. The NPCC Standards & Criteria Leadership or its designee may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any authorized deviation shall be documented and noted to the RSC.

Primary or alternate NPCC ~~m~~Member representatives can designate a written proxy at their discretion.

Step 2.8: Conduct Ballot

The NPCC ~~Reliability~~ Standards & Criteria Staff shall announce the opening of the ballot window. The ballot window shall take place during the last 10 days of the formal comment period. If the last day of the ballot window falls on a Saturday or Sunday, the period does not end until the next business day at 5:00 PM Eastern Prevailing Time.

The ballot poll shall be conducted electronically. The voting window shall be for a period of 10 days but shall be extended, if needed, until a quorum is achieved.

Step 2.9: Criteria for Ballot Pool Approval

Ballot pool approval of a ~~Regional Reliability Standard~~regional standard requires:

A quorum, which is established by at least 51% of the F~~f~~ull ~~m~~Members of NPCC that joined the ballot pool; and

A two-thirds majority of the weighted Segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative votes and negative votes with comments. This calculation of votes for the purpose consensus excludes (i) of determining abstentions, (ii) non-responses, and (iii) negative votes without comments.

The following process is used to determine if there are sufficient affirmative votes.

- For each Segment with ten or more voters, the following process shall be used: The number of affirmative votes cast shall be divided by the sum of affirmative and negative votes with comments cast to determine the fractional affirmative vote for that Segment. Abstentions, non-responses, and negative votes without comments shall not be counted for the purposes of determining the fractional affirmative vote for a Segment.
- For each Segment with less than ten voters, the vote weight of that Segment shall be proportionally reduced. Each voter within that Segment voting affirmative or negative with comments shall receive a weight of 10% of the Segment vote.
- The sum of the fractional affirmative votes from all Segments divided by the number of Segments voting~~23~~ shall be used to determine if a two-thirds majority has been achieved. (A Segment shall be considered as "voting" if any member of the Segment in the ballot pool casts either an affirmative vote or a negative vote with comments.)
- A ~~Reginoal Reliability Standard~~regional standard shall be approved if the sum of fractional affirmative votes from all Segments divided by the number of voting Segments is at least two thirds.

Step 2.10 Voting Positions

Each member of the ballot pool may **only** vote one of the following positions on the ballot:

- Affirmative;
- Affirmative, with comment;
- Negative with comments;
- Abstain.

Step 2.11: Consideration of Comments and Additional Ballots

A drafting team must respond in writing to every stakeholder written comment submitted in response to a ballot or concluding a ~~Regional Standards~~regional standards action. These responses may be provided in summary form, but all comments and objections must be responded to by the drafting team. All comments received and all responses shall be publicly posted.

The drafting team should consider, at a minimum, the nature of the changes from the previous draft, the comments received, the technical complexity of the subject matter, and the number of ~~Regional Reliability Standards~~regional standards affected and submit a request for a shorter or longer comment and ballot period to the RSC for approval. The comment period shall be no less than 10 calendar days and ballot period shall be no less than 5 calendar days.

If a stakeholder or balloter proposes a significant revision to a ~~Regional Reliability Standard~~regional standard during the formal comment period that will improve the quality, clarity, or enforceability of that ~~Regional Reliability Standard~~regional standard, then the drafting team may choose to make such revisions and post the revised ~~Regional Reliability Standard~~regional standard for another public comment period and ballot.

There are no limits to the number of public comment periods and ballots that can be conducted to result in a ~~Regional Reliability Standard~~regional standard that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval.

The RSC may, upon its own motion or upon the recommendation of NPCC Staff or the drafting team, conclude this process for a particular ~~Regional Reliability Standards~~regional standards action if it determines that the drafting team cannot develop a ~~Regional Reliability Standard~~regional standard that is within the scope of the associated RSAR, is sufficiently clear to be enforceable, and is capable of achieving the requisite weighted Segment approval percentage. In such cases, the RSC may end all further work on the proposed regional standard. The RSC may also refer the RSAR to a NPCC technical committee/Task Forces or to the original RSAR submitter to determine if an alternative approach may achieve the desired reliability outcome.

Step 2.12: Final Ballot Results

The NPCC ~~Reliability~~ Standards & Criteria Staff shall post the final outcome of the ballot process.

If the ~~Regional Reliability Standard~~regional standard is rejected, the RSC may decide whether to end all further work on the proposed regional standard, refer the RSAR to a NPCC technical committee/Task Forces or to the original RSAR submitter to determine if an alternative approach may achieve the desired reliability outcome, or continue holding ballots to attempt to reach consensus on the proposed regional standard.

~~As authorized by the RSC, the NPCC Manager of Reliability Standards shall post the draft of the regional standard on the NPCC website, along with a draft implementation plan and available supporting documents, for a forty-five (45) calendar day comment period. The NPCC Manager of Reliability Standards shall also notify NERC to process the draft document in accordance with NERC's regional standards review procedure, as applicable.~~

~~Following the conclusion of the NPCC comment period, the NPCC Manager of Reliability Standards will assemble the comments on the draft regional standard and associated documents and provide all comments to the drafting team for consideration.~~

~~Within thirty (30) calendar days of the conclusion of the comment period the drafting team shall convene and consider changes to the draft Standard, the implementation plan and/or supporting technical documents based upon comments received. All submitted comments shall be addressed, and each commenter shall be advised of the disposition, with reasons, of their comments. The NPCC Manager of Reliability Standards shall publicly post all of the drafting team's responses to stakeholder comments on the NPCC website.~~

~~Based on the comments received, the drafting team may elect to:~~

- ~~Return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS to revise the draft regional standard, the implementation plan and/or supporting technical documents.~~
- ~~Recommend that the RSC authorize Field Testing of the draft regional standard. Upon completion of the Field Test, return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD~~

AND ASSOCIATED DOCUMENTS to revise the draft regional standard based on insights learned during the Field Test.

- Obtain RSC concurrence to post documents for Final Comment Period and request that the RSC initiate the second phase (CEA) of the CEAP process

STEP 2.4.B. FINAL COMMENT PERIOD

The NPCC Standards Staff shall coordinate a Quality Review of "final draft" of the regional standard, implementation plan, VRFs and VSLs, and associated documents to assess whether the documents are within the scope of the associated RSAR, whether the regional standard is clear and enforceable as written and the VRFs and VSLs are developed according to NERC and FERC guidelines. Upon Completion of the Quality Review, including resolution of comments, the drafting team shall submit the regional standard to the NPCC Manager of Reliability Standards to obtain RSC concurrence to post these documents for comment.

As authorized by the RSC, the NPCC Standards Staff shall post the "final draft" of the regional standard on the NPCC website, along with the implementation plan, supporting documents and the Cost Effectiveness Analysis (CEA) survey[14] for a forty-five (45) calendar day comment period. NPCC Standards Staff shall also notify NERC to process the proposed final document in accordance with NERC's regional standards review procedure, as applicable.

Following the conclusion of the NPCC comment period, the NPCC Manager of Reliability Standards will assemble the comments on the posted regional standard and associated documents and provide all comments to the drafting team for consideration.

In addition, the RSC, pursuant with the requirements of the Cost Effectiveness Analysis Procedure (CEAP), will use the responses to the posted CEA survey to develop a recommendation based on the cost effectiveness of the proposed regional standard.

The NPCC Task Forces (TFs) or Working Groups (WGs) may develop recommendations for submittal to the RSC. Following the RSC deliberations to determine a course of action, the RSC will communicate to the drafting team to:

- Return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS to revise the Standard to address the results of the CEAP
- Accept the Standard "as is" to move forward through the remainder of the process
- Hold the Standard in abeyance until such time as additional guidance can be provided regarding whether or how to continue
- Decide not to pursue the development of certain requirements or the entire Standard due to cost effectiveness considerations

Upon Completion of the final comment period the drafting team shall submit the proposed regional standard, along with any supporting materials, consideration of comments and field test results, to the NPCC Manager of Reliability Standards to obtain RSC concurrence to post the regional standard for ballot and concurrently provide an information copy to the RCC.

[14] In accordance to the Cost Effectiveness Analysis Procedure (CEAP) the Cost Effectiveness Analysis (CEA) survey may be assigned directly to NPCC Task Forces (TFs) or Working Groups (WGs) in addition to the posting process.

The NPCC Manager of Reliability Standards shall also publicly post all of the drafting team's responses to stakeholder comments on the NPCC website.

STEP 2.5: POSTING FOR BALLOT PERIOD IN THE OPEN PROCESS

As authorized by the RSC, the NPCC Manager of Reliability Standards shall post the proposed regional standard on the NPCC website, along with supporting documentation [15] (e.g., implementation plan, consideration of comments, technical reports, white papers and any field test results), for a thirty (30) day pre-ballot review period and a subsequent ten (10) day ballot period. The ten (10) day ballot period will commence immediately following the pre-ballot review period. In the event that a quorum exists for purposes of an electronic vote but the ballot purpose has not been resolved, NPCC may continue to solicit additional responses in order to resolve the matter by electronic voting. In the event that quorum has not been achieved for purposes of an electronic vote, NPCC may continue to solicit electronic ballots, including abstentions, to obtain quorum and resolve the matter.

At the time the regional standard is posted for ballot, the NPCC Manager of Reliability Standards shall also notify NERC to process the proposed regional standard in accordance with NERC's regional standards review procedure, as applicable.

During the ballot period, the NPCC Members of the ballot body can cast their vote as follows:

- Affirmative, with or without comments
- Negative with comments
- Abstain

In accordance with the NPCC Bylaws, a quorum and receipt of a two thirds (2/3) affirmative majority of the weighted sector votes is required for a ballot to pass.

The NPCC Manager of Reliability Standards shall post the final outcome of the ballot process on the NPCC website.

STEP 2.5.A. BALLOT DOES NOT RECEIVE 2/3 AFFIRMATIVE VOTE

If a ballot fails to achieve the 2/3 majority vote the NPCC Manager of Reliability Standards may:

- Direct the drafting team to respond to ballot comments and return to STEP 2.5: POSTING FOR BALLOT PERIOD IN THE OPEN PROCESS to re-ballot the regional standard. The consideration of comments from prior ballot will be included with the re-posting.
- Return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS to revise the regional standard to address the comments received.
- Pursue the discontinuance of the regional standard development by soliciting the Requester to withdraw the RSAR or by soliciting the RSC to reject the RSAR pursuant with STEP 2.1.C. NPCC REGIONAL STANDARDS COMMITTEE (RSC) ACTIONS. The NPCC Manager of

[15] The ballot posting is for the regional standard, definition, variance or clarification. Supporting documentation is included for information only and is not balloted.

~~Reliability Standards, in the event of a discontinuance of the development of a regional standard, shall post a notice of the discontinuance and will post and archive all comments submitted during the process for future consideration, if required. The NPCC Manager of Reliability Standards will also notify NERC to process the proposed regional standard in accordance with NERC's regional standards review procedure, as applicable.~~

~~STEP 2.5.B. BALLOT RECEIVES ≥ TWO-THIRDS (2/3) AFFIRMATIVE VOTE~~

~~A ballot that achieved two-thirds or greater affirmative vote has successfully passed. However, negative votes with comments should still be reconciled. If there is at least one negative vote with comments proceed to STEP 2.5.B.1 APPROVED BALLOT WITH "NEGATIVE VOTE WITH COMMENT". If there was not any negative vote with comments proceed to STEP 2.5.B.2 APPROVED BALLOT WITHOUT "NEGATIVE VOTE WITH COMMENT".~~

~~STEP 2.5.B.1 APPROVED BALLOT WITH "NEGATIVE VOTE WITH COMMENT"~~

~~Following the conclusion of the NPCC ballot period, the NPCC Manager of Reliability Standards will assemble the comments on the posted regional standard and provide all comments to the drafting team for consideration. The drafting team shall review all negative votes with comments and elect to:~~

- ~~Recommend to the RSC to accept the regional standard "as is" and seek RSC endorsement to move forward through the remainder of the process. Upon receiving RSC endorsement to proceed, the regional standard and associated documents, approved by the NPCC ballot body, shall be forwarded by the Assistant Vice President Standards to the NPCC Board of Directors for final Regional approval. If comments that were received during balloting should be considered in future revisions to the regional standard then the NPCC Manager of Reliability Standards should log comments in an issues database.~~
- ~~Return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS to revise the regional standard to address the comments received.~~
- ~~Respond to ballot comments and recommend to the RSC endorse the return to STEP 2.5: POSTING FOR BALLOT PERIOD IN THE OPEN PROCESS to re-ballot the regional standard. The NPCC Manager of Reliability Standards should include the consideration of comments from the prior ballot with the re-posting.~~

~~STEP 2.5.B.2 APPROVED BALLOT WITHOUT "NEGATIVE VOTE WITH COMMENT"~~

~~Regional standard and associated documents, approved by the NPCC ballot body, shall be forwarded by the Assistant Vice President Standards to the NPCC Board of Directors for final Regional approval.~~

STEP 2.13~~6~~: NPCC BOARD OF DIRECTORS APPROVAL

Following approval by the NPCC Members, regional standards require review and approval by the NPCC Board of Directors. The NPCC Board of Directors may take the following actions:

- Approve the regional standard as presented.
- Approve the regional standard with comments to incorporate non-substantive revisions. [The NPCC Board of Directors may not make substantive revisions to the regional standard.]
- Remand the regional standard back to the RSC and the drafting team to address their concerns. The RSC / drafting team can address the BOD comments and re-submit for BOD

approval or return to STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS to revise the regional standard to address the comments received.

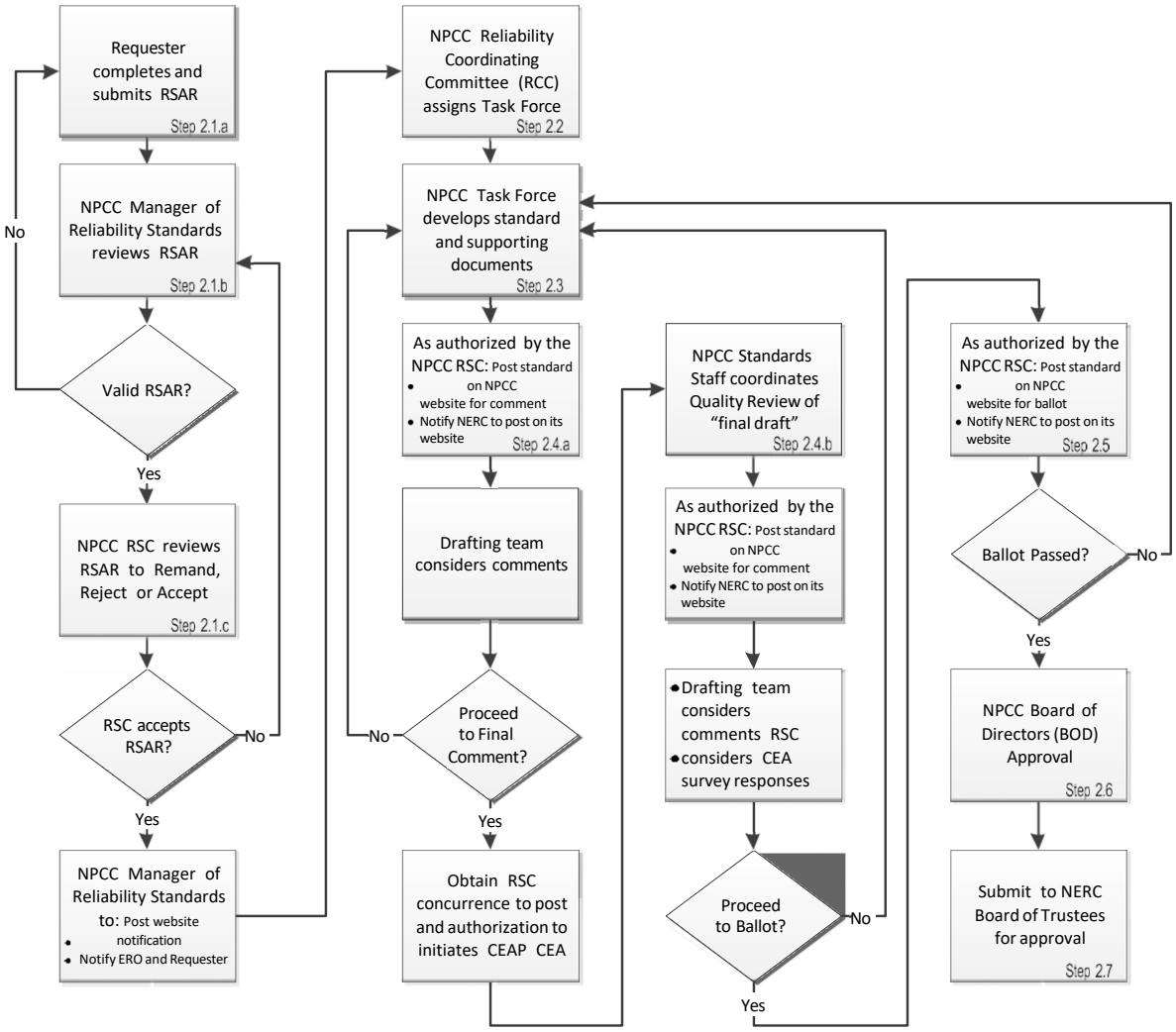
STEP 2.~~7~~14: NERC BOARD OF TRUSTEES SUBMITTAL

Upon approval by the NPCC Board of Directors, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall submit the regional standard to NERC, as the ~~Electric Reliability Organization~~ERO, for approval and subsequent filing with FERC and the applicable Canadian Provincial regulatory and/or governmental authorities for adoption.

STEP 2.15~~8~~: IMPLEMENTATION OF AN NPCC REGIONAL STANDARD

Following the approval of an NPCC regional standard by FERC and the applicable Canadian Provincial regulatory and/or governmental authorities, all applicable Registered Entities in the NPCC geographic area are required to comply with the regional standard as of its enforcement date.

FIGURE 1: FLOWCHART OF REGIONAL STANDARDS DEVELOPMENT PROCESS OVERVIEW



3. STANDARD CLARIFICATION PROCESS STEPS

This section applies to NPCC regional standards that have been approved by FERC or Canadian Provincial regulatory and/or governmental authorities[16] and are currently enforceable or have a future enforcement date. A Celarification Rrequest is not permitted for regional standards under development. For regional standards under development, an explanation of a requirement or its meaning can be sought during a comment period. Refer to Step 2, STANDARD DEVELOPMENT PROCESS STEPS of this manual for details on the comment process for a standard under development.

STEP 3.1: REGIONAL STANDARDS CLARIFICATION REQUEST (CR)

Any member of NPCC or group within the NPCC region shall be allowed to submit a Clarification Request (CR) for an NPCC regional standard.

Additionally, any person (organization, company, government agency, individual, etc.) who is directly and materially affected by the reliability of the NPCC Bulk Electric SystemBES shall be allowed to submit a Clarification Request (CR) for an NPCC regional standard.

> *Note: A valid Clarification Request is one that seeks additional clarity about one or more requirements in an approved regional standard, but does not request approval as to how to comply with any requirements of the standard.*

The Requester should submit a Clarification Request (see Appendix C)[17] (CR) for an NPCC regional standard directly to the NPCC Manager of Reliability Standards & Criteria Leadership, via npcc.org/contact and select Standards, Criteria, and other npccstandards@npcc.org, fordocuments for processing. Alternatively, the Requester can submit a Request for Interpretation (RFI) of an NPCC regional standard under the NERC process for developing an interpretation[18] to the NERC Reliability Reliability Standards Staff explaining the clarification required, the specific circumstances surrounding the request, and the impact of not having the clarification provided. A copy of the completed RFI form should also be sent to the NPCC Manager of Reliability Standards & Criteria Leadership.

NERC Reliability Reliability Standards Staff will refer the RFI to NPCC and delegate its resolution to NPCC. NPCC will process the NERC delegation pursuant with the NPCC Clarification Request (CR) process described herein.

STEP 3.2: REVIEW AND VALIDATION OF CLARIFICATION REQUEST (CR)

Upon receipt of a Clarification Request (CR) for an NPCC regional standard, the NPCC Manager of Reliability Standards & Criteria Leadership shall review the CR to determine whether:

- It meets the requirements for a valid Clarification Request
- A compliance process or approach could be used in lieu of a clarification

The NPCC Manager of Reliability Standards & Criteria Leadership will utilize, as necessary, the NPCC Standards & Criteria Staff, NPCC Compliance and Legal Staffs when determining the validity of the CR. Based on this review, the NPCC Manager of Reliability Standards & Criteria Leadership will recommend to the RSC whether to accept or reject the CR. The recommendation to the RSC should be made within thirty (30) calendar days of the receipt of the CR.

[16] Approval is granted by FERC and the Canadian Provincial regulatory and/or governmental authorities, as applicable.

[17] The NPCC Clarification Request form is included as Appendix D

[18] The *Request for Interpretation* form is posted under Resource Documents on the NERC Standards webpage.

The following examples identify situations that may warrant a recommendation from the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership to reject the CR:

- Requests approval of a particular compliance approach
- Identifies a gap or perceived weakness in the approved regional standard (Requester should be redirected to initiate an RSAR rather than a CR)
- Where an issue can be addressed by an active (regional or continent-wide) standard drafting team
- Where an issue can be better addressed by a compliance process or approach
- Where it requests clarification of any element of a regional standard other than a requirement
- Where a question has already been addressed in the record
- Where the clarification identifies an issue and proposes the development of a new or modified regional or continent-wide standard (such issues should be addressed via submission of an RSAR or a SAR)
- Where a clarification seeks to expand the scope of a regional standard
- Where the requirement of the regional standard is clear

STEP 3.3: NPCC REGIONAL STANDARDS COMMITTEE ~~(RSC)~~ ACTIONS

The RSC shall review the CR along with the recommendation from the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership and take one of the following actions:

- Reject the CR. In this case, the RSC will provide its determination to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, who will then provide a written explanation for rejection to the CR to the entity requesting the clarification within ten (10) calendar days of the decision to reject.
- Accept the CR. In this case, the RSC will provide its determination to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, who will then: 1) post notification on the NPCC website of the intent to develop a clarification; 2) notify the NPCC ~~Reliability Coordinating Committee (~~RCC~~)~~ of the need to assign the resolution of the CR to one or more Task Forces (if more than one Task Force is assigned, one of them shall be assigned the lead role); and 3) notify the Requester of the acceptance of the CR. The notifications shall be made within ten (10) calendar days of the acceptance of the CR.

STEP 3.4: FORMATION OF DRAFTING TEAM FOR RESPONSE TO CLARIFICATION REQUEST

A CR that has been accepted by the RSC shall be assigned by the RCC to the responsible NPCC Task Force to make up the clarification drafting team (CDT) and develop the CR response.

STEP 3.5: DEVELOPMENT OF RESPONSE TO CR

> *Note: A valid clarification response provides additional clarity about one or more requirements, but does not expand on any requirement and does not explain how to comply with any requirement.*

Within sixty (60) calendar days from the receipt of being assigned to respond to a CR, the CDT shall submit a proposed clarification response to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership. Upon receipt of the proposed clarification response from the CDT, the NPCC ~~Manager of~~

~~Reliability~~ Standards & Criteria Leadership shall present the response to the RSC to obtain concurrence to post the proposed response for comment.

Along with the proposed clarification response, the drafting team shall also develop and submit a set of questions to be included in the comment form, for approval by the RSC.

If the RSC concurrence is not received, the clarification drafting team will continue to refine the clarification response.

Note: There are no limits to the number of public comment periods that can be conducted to result in a clear and concise clarification of a regional standard requirement.

STEP 3.6: POSTING CLARIFICATION REQUEST FOR COMMENT PERIOD AND RESOLUTION OF COMMENTS

As authorized by the RSC, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall post the proposed clarification response on the NPCC website for a forty-five (45) calendar day comment period.

Following the conclusion of the NPCC comment period, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership will assemble the comments on the proposed clarification response and provide all comments to the clarification drafting team for consideration.

Within thirty (30) calendar days of the conclusion of the comment ~~period~~period, the clarification drafting team shall convene and consider changes to the proposed clarification response based upon comments received. All submitted comments shall be addressed, which may be in the form of a summary response addressing each of the issues raised in comments received. The NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall publicly post all of the clarification drafting team's responses to stakeholder comments on the NPCC website.

Based on the comments received, the clarification drafting team may elect to:

- Return to STEP 3.5: DEVELOPMENT OF RESPONSE TO Clarification Request to revise the proposed clarification response.
- Accept the proposed clarification response "as is" to move forward through the remainder of the process.

Upon acceptance of the proposed clarification response "as is," the drafting team shall submit the proposed clarification response to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership to obtain RSC endorsement to the submitted CR response.

STEP 3.7: REGIONAL STANDARDS COMMITTEE APPROVAL OF CLARIFICATION REQUEST

Upon receipt of the CR response from the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, the RSC shall elect to:

- Endorse the proposed clarification response and direct the NPCC ~~Assistant Vice President~~ Standards & Criteria Leadership to forward the CR to the NPCC Board of Directors for final Regional approval; or
- Direct the drafting team to return to STEP 3.5: DEVELOPMENT OF RESPONSE TO Clarification Request to revise the proposed clarification response

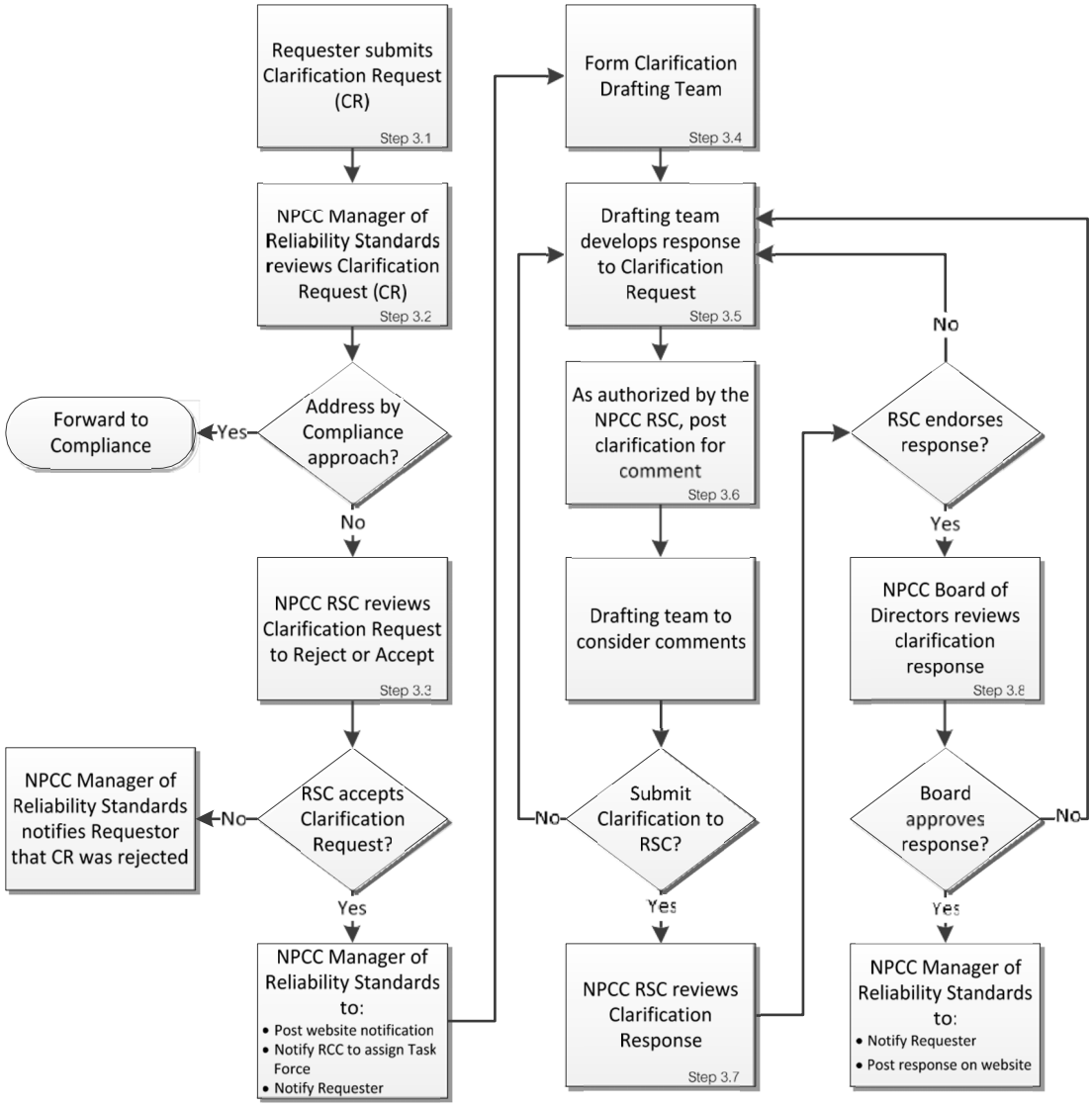
STEP 3.8: NPCC BOARD OF DIRECTORS APPROVAL OF CLARIFICATION REQUEST

Following endorsement by the RSC, clarification responses require review and approval by the NPCC Board of Directors. The NPCC Board of Directors may take the following actions:

- Approve the clarification response as presented
- Approve the clarification response with comments to incorporate non-substantive revisions. [The NPCC Board of Directors may not make substantive revisions to the clarification response.]
- Remand the clarification response back to the RSC and the drafting team to address their concerns

Upon receipt of Board approval, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall notify the Requestor and post the approved clarification on the NPCC website.

FIGURE 2: FLOWCHART OF ~~REGIONAL STANDARDS CLARIFICATION PROCESS OVERVIEW~~



4. DISCONTINUANCE OF REGIONAL STANDARD DEVELOPMENT

~~**The term "discontinuance" as used herein refers to terminating the standard development process after RSAR approval but prior to posting a regional standard for industry ballot. From time to time the need or rationale for a regional standard may change thereby necessitating the curtailment**~~

~~of the regional standard development. Upon notification or determination that a regional standard under development should be considered for discontinuance due to a perceived change in the need for the standard, the NPCC Manager of Reliability Standards will submit the recommendation for discontinuance to the RSC for approval.~~

5. WITHDRAWAL OF A REGIONAL STANDARD PENDING APPROVAL

The term "withdrawal" as used herein, refers to the revocation of a request for approval of a regional standard, variance, clarification or definition that has been approved by the NPCC Board of Directors and has not been filed with ~~Applicable~~ applicable ~~Governmental~~ governmental ~~Authorities~~ authorities or has been filed but not yet approved by ~~Applicable~~ applicable ~~Governmental~~ governmental ~~Authorities~~authorities. The RSC may withdraw a regional standard, variance, clarification or definition for good cause subject to approval by the NPCC Board of Directors. Upon approval by the NPCC Board of Directors, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership will notify NERC Staff to petition the a~~A~~pplicable g~~G~~overnmental a~~A~~uthorities, as necessary, to allow for withdrawal in the case that the regional standard has been filed.

6. RETIREMENT OF AN APPROVED NPCC REGIONAL STANDARD

The term "retirement" refers to the discontinuation of a regional standard in whole, certain requirements within a regional standard, a variance, clarification or definition that: 1) has been approved by a~~A~~pplicable g~~G~~overnmental a~~A~~uthorities and 2) is not being superseded by or merged into a new or revised regional standard, clarification or definition.

Upon identification of a need for retirement, an RSAR containing the proposal of the retirement will be handled in accordance with the STEP 2.1: REGIONAL STANDARDS AUTHORIZATION REQUEST TO DEVELOP, MODIFY OR RETIRE. The proposal shall include the rationale for the retirement and a statement regarding the impact of retirement on the reliability of the ~~Bulk Electric System~~BES. Upon approval by the NPCC Members and the NPCC Board of Directors, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall submit the request for retirement to NERC, as the ~~Electric Reliability Organization~~ERO, for approval and to subsequently petition the Applicable Governmental Authorities to allow for retirement.

7. APPROVAL OF PROCESS WAIVER

While it is NPCC's intent to adhere to this manual under normal circumstances, NPCC may need to develop a new or modified regional standard, implementation plan, variance, clarification or definition under extenuating circumstances. Extenuating circumstances may include, but not be limited to, specific time constraint imposed by a regulatory body and urgent reliability issue that requires expedited handling outside of the normal regional ~~Reliability Standards~~standards process.

The RSC, by two-thirds (2/3) majority vote, may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- Where necessary to meet regulatory deadlines
- Where necessary to address an urgent reliability issue identified by regulatory and/or governmental authorities, including response to national emergency declared by the United States or Canadian government that involves the reliability of the ~~Bulk Electric System~~BES or cyber-attack on the ~~Bulk Electric System~~BES
- Where necessary to meet deadlines imposed by the NPCC Board of Directors

- Where the RSC determines that a revision to a proposed regional standard, implementation plan, variance, clarification or definition has already been vetted by the industry through the regional standards development process or is so insubstantial that developing the revision through the processes contained in this manual will add significant time delay without any corresponding benefit.

In no circumstances shall this provision be used to modify the requirements for achieving quorum or the voting requirements for approval of a regional standard.

A waiver request may be submitted to the RSC by any entity or individual, including NPCC committees or subgroups and NPCC Standards & Criteria Staff. Prior to consideration of any waiver request, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership must provide notification to stakeholders at least five
(5) business days prior to RSC consideration and action. Posting the waiver request on the NPCC website satisfies the notification provision.

Action on the waiver request will be included in the minutes of the RSC. Following the approval of the RSC to waive any provision of the regional ~~Reliability Standard~~standards process, the ~~Assistant Vice President~~NPCC Standards & Criteria Leadership shall report the exercise of this waiver provision to the NPCC Board of Directors prior to adoption of the related ~~Reliability Standard~~regional standard, clarification, definition or variance. Actions taken pursuant to an approved waiver request will be posted on the NPCC Standards webpage.

8. Process For Correcting Errata

From time to time, an error (including but not limited to printing or writing, such as misspellings, omissions, and other typographical errors) may be discovered in a regional ~~reliability~~ standard after it has received final ballot approval by the NPCC ballot body. Such errors may be corrected by the RSC without re-balloting if the RSC approves the correction, and the correction does not change the scope or intent of the regional ~~reliability~~ standard, and the correction has no material impact on the end users of the regional ~~reliability~~ standard.~~.~~

If the regional ~~reliability~~ standard containing errata is pending approval by the NPCC Board of Directors, then the corrected regional ~~reliability~~ standard shall be presented to the NPCC Board for approval in lieu of the regional ~~reliability~~ standard approved by the NPCC ballot body.

If a regional ~~reliability~~ standard containing errata had received prior approval by the NPCC Board of Directors, t he n the corrected regional ~~re lia b i lit y~~ standard s ho w i ng t h e c or r e c t e d er r a t a shall be presented to the NPCC RSC for approval. Upon approval by the RSC, the corrected regional ~~reliability~~ standard will be filed for approval by NERC.

The NPCC Board of Directors has resolved to concurrently approve any errata approved by the RSC associated with a regional ~~reliability~~ standard that has received prior approval by the NPCC Board of Directors.

9. Appeals

Persons who have directly and materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction related to the approval, revision, reaffirmation, or withdrawal of a regional standard (appellant) shall have the right to appeal. This appeals process applies only to the regional standards process as defined in this manual.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made within thirty (30) calendar days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. In all cases, the request for appeal must be

made prior to the next step in the process.

The final decisions of any appeal shall be documented in writing and made public.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants:

LEVEL 1 APPEAL

Level 1 is the required first step in the appeals process. The appellant submits a complaint in writing to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership that describes the substantive or procedural action or inaction associated with a ~~Reliability Standard~~regional standard or the regional standards process. The appellant describes in the complaint the actual or potential adverse impact to the appellant. Assisted by any necessary NPCC Standards & Criteria Staff and Committee resources, the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall prepare a written response addressed to the appellant as soon as practical, but not more than forty- five (45) calendar days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response will be made a part of the public record associated with the regional standard and posted with the regional standard.

LEVEL 2 APPEAL

If after the Level 1 Appeal the appellant remains unsatisfied with the resolution, as indicated by the appellant in writing to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, the NPCC Board of Directors shall appoint a ~~five member~~five-member panel to serve as a Level 2 Appeals Panel.

In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall post the complaint and other relevant materials and provide at least a thirty (30) calendar day notice of the meeting of the Level 2 Appeals Panel.

In addition to the appellant, any person that is directly and materially affected by the substantive or procedural action or inaction referenced in the complaint shall be heard by the panel. The panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The panel may in its decision find for the appellant and remand the issue to the RSC with a statement of the issues and facts in regard to which unfair and/or inequitable action was taken, or which fair and/or equitable action was not taken. The panel may find for or against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections. The panel may not, however, revise, approve, disapprove, or adopt a ~~Reliability Standard~~regional standard. The actions of the Level 2 Appeals Panel shall be publicly posted.

In addition to the foregoing, a procedural objection that has not been resolved may be submitted to the NPCC Board of Directors for consideration at the time the Board decides whether to adopt a particular ~~Reliability Standard~~regional standard. The objection must be in writing, signed by an officer of the objecting entity, and contain a concise statement of the relief requested and a clear demonstration of the facts that justify that relief. The objection must be filed no later than thirty (30) calendar days after the announcement of the vote on the regional standard in question.

APPENDIX A: REGIONAL STANDARD AUTHORIZATION REQUEST COMPLETION GUIDELINES

The Requester shall complete a~~n~~ Regional Standard Authorization Request (RSAR) form in accordance with the guidance provided below.

The RSAR, at a minimum, shall contain information in the required fields in order to be qualified for consideration. The NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership will assist the Requester to ensure all required information is submitted on the RSAR.

Information in a Regional Standard Authorization Request ~~(RSAR)~~

The tables below identify information to be submitted in a Regional Standard Authorization Request to the NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, at ~~npccstandard@npcc.org~~ npcc.org/contact and select Standards, Criteria, and other Documents. The NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership shall be responsible for implementing and maintaining this form as needed to support the information requirements of the regional standards process.

Regional Standard Authorization Request Form

Title of Proposed Standard:	***[Required Field]***
Request Date:	***[Required Field]***

RSAR Requester Information

Name:	***[Required Field]***	**RSAR Type (Check box for one of these selections.)**	
Company:	***[Required Field]***	☐	New Standard
Telephone:	***[Required Field]***	☐	Revision to Existing Standard
Fax:		☐	Withdrawal of Existing Standard
Email:	***[Required Field]***	☐	Urgent Action

Purpose: (Describe the purpose of the proposed standard – what the standard will achieve in support of reliability.) ***[Required Field]***
Industry Need: (Provide a detailed statement justifying the need for the proposed standard, along with a technical justification and any supporting documentation.) ***[Required Field -- must include technical justification (relevant studies, documentation, etc.) for a new standard or revision to an existing standard.]***

Brief Description: (Describe the proposed standard in sufficient detail to clearly define the scope in a manner that can be easily understood by others.)

[Required Field]

Reliability Functions *[Required Field]*

The Standard will Apply to the Following Functions (Check all applicable boxes.)		
☐	Reliability Coordinator	The entity that is the highest level of authority who is responsible for the reliable operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision.
☐	Balancing Authority	The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.
☐	~~Interchange Authority~~	~~Authorizes valid and balanced Interchange Schedules.~~
☐	Planning Coordinator	The responsible entity that coordinates and integrates transmission facility and service plans, resource plans, and protection systems.
☐	Transmission Service Provider	The entity that administers the transmission tariff and provides Transmission Service to Transmission Customers under applicable transmission service agreements.
☐	Transmission Owner	The entity that owns and maintains transmission facilities.
☐	Transmission Operator	The entity responsible for the reliability of its "local" transmission system, and that operates or directs the operations of the transmission facilities.
☐	Transmission Planner	The entity that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the Planning Authority Area.
☐	Resource Planner	The entity that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a Planning Authority Area.
☐	Generator Operator	The entity that operates generating unit(s) and performs the functions of supplying energy and Interconnected Operations Services.
☐	Generator Owner	Entity that owns and maintains generating units.

☐	~~Purchasing-Selling Entity~~	~~The entity that purchases or sells, and takes title to, energy, capacity, and Interconnected Operations Services. Purchasing-Selling Entities may be affiliated or unaffiliated merchants and may or may not own generating facilities.~~
☐	Distribution Provider	Provides and operates the "wires" between the transmission system and the customer.
☐	Load-Serving Entity	Secures energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.

Reliability and Market Interface Principles

Applicable Reliability Principles *(Check all boxes that apply.)*	
☐	1. Interconnected Bulk Electric System shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
☐	2. The frequency and voltage of interconnected Bulk Electric System shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
☐	3. Information necessary for the planning and operation of interconnected Bulk Electric System shall be made available to those entities responsible for planning and operating the systems reliably.
☐	4. Plans for emergency operation and system restoration of interconnected Bulk Electric System shall be developed, coordinated, maintained, and implemented.
☐	5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected Bulk Electric System.
☐	6. Personnel responsible for planning and operating interconnected Bulk Electric System shall be trained, qualified, and have the responsibility and authority to implement actions.
☐	7. The security of the interconnected Bulk Electric System shall be assessed, monitored, and maintained on a wide-area basis.
Does the proposed Standard comply with all of the following Market Interface Principles? *(Select 'yes' or 'no' from the drop-down box.)*	
Recognizing that reliability is a Common Attribute of a robust North American economy:	
1. A reliability standard shall not give any market participant an unfair competitive advantage. Yes	
2. A reliability standard shall neither mandate nor prohibit any specific market structure. Yes	
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes	

4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes

Detailed Description: (Provide enough detail so that an independent entity familiar with the industry could draft a standard based on this description.) ***[Required Field – Provide: 1) Necessary information to assist the drafting team (which is to include relevant study results and documentation), to the extent feasible, to allow them to draft the standard, 2) Any existing known cross references to NPCC or NERC documents and 3) Technical background for the RSAR to properly address the need for the standard.]***

Related Standards *[Required Field, to extent known]*

Standard No.	Explanation

Related SARs or RSARs *[Required Field, to extent known]*

SAR ID	Explanation

APPENDIX B: SELECTION OF DRAFTING TEAM MEMBERS

A regional standard drafting team shall be comprised of Subject Matter Experts (SMEs) from NPCC Task Forces and Working Groups ~~as determined by the RCC~~, and from industry. The guidelines provided herein primarily address overall team requirements and more specifically those of a SME.

Formal membership on a drafting team should be reserved only for those individuals who intend to work consistently, diligently, and professionally on what is required to be done for a regional standard. Drafting team members are expected to contribute meaningfully to the ongoing development of the regional standard.

Drafting t~~T~~eam members must be:

- Committed to participating in scheduled drafting team meetings, teleconferences, as well as industry outreach (e.g., workshops and webinars)
- Willing to lead teams / sub-teams, as necessary
- Open to consider the comments of others and provide constructive feedback

Subject Matter Experts should possess the necessary expertise and knowledge regarding the topic of the regional standard. The SMEs should represent a cross section of the registered entities applicable to the regional standard under development as well as geographical areas within the NPCC footprint.

Industry stakeholders may nominate themselves for consideration by the NPCC Regional Standards Committee (RSC) for the specific drafting team vacancies by completing the following drafting team Self Nomination form and submitting it to NPCC ~~Manager of Reliability~~ Standards & Criteria Leadership, at ~~npccstandard@npcc.org~~ npcc.org/contact and select Standards, Criteria, and other Documents.

Nomination Form for NPCC [Name of drafting team] Drafting Team

Please return this form as soon as possible. If you have any questions, please contact the NPCC Standards & Criteria Staff at ~~npccstandard~~standards@npcc.org.

By submitting the following information you are indicating your willingness and agreement to actively participate in the drafting team meetings if appointed to the drafting team ~~(RSC)~~. This means that if you are appointed to the drafting team~~DT~~ you are expected to attend all (or at least the vast majority) of the face-to-face ~~DT~~drafting team meetings as well as participate in all the drafting team~~DT~~ meetings held via conference calls. Failure to do so shall result in your removal from the ~~DT~~drafting team.

Name:	
Organization:	
Address:	
Telephone:	

E-mail:	

Please briefly describe your experience and qualifications to serve on the requested drafting team.

If you are currently a member of any NERC or Regional drafting teams, please list each team here.

☐ Not currently on any active SAR or standard drafting team.

☐ Currently a member of the following SAR or standard drafting team(s):

If you previously worked on any drafting team please identify the team(s).

☐ No prior NERC or Regional SAR or standard drafting team experience.

☐ Prior experience on the following team(s):

Select each Industry Segment that you represent:

☐	1 — Transmission Owners
☐	2 — RTOs, ISOs
☐	3 — Load-serving Entities
☐	4 — Transmission-dependent Utilities
☐	5 — Electric Generators
☐	6 — Electricity Brokers, Aggregators, and Marketers
☐	7 — Large Electricity End Users
☐	8 — Small Electricity End Users
☐	9 — Federal, State, and Provincial Regulatory or other Government Entities
☐	10 — Regional Reliability Organizations and Regional Entities
☐	NA – Not Applicable

Select each Function[19] in which you have current or prior expertise:

☐ Balancing Authority	☐ Transmission Operator
☐ Compliance Enforcement Authority	☐ Transmission Owner
☐ Distribution Provider	☐ Transmission Planner
☐ Generator Operator	☐ Transmission Service Provider
☐ Generator Owner	☐ Purchasing-selling Entity
☐ Interchange Authority	☐ Reliability Coordinator
☐ Load-serving Entity	☐ Reliability Assurer
☐ Market Operator	☐ Resource Planner
☐ Planning Coordinator	

[19] These functions are defined in the NERC Functional Model, which is downloadable from the NERC website.

Provide the names and contact information for two references who could attest to your technical qualifications and your ability to work well in a group.			
Name:		Telephone:	
Organization:		E-mail:	
Name:		Telephone:	
Organization:		E-mail:	

APPENDIX C: MAINTENANCE OF REGIONAL STANDARDS AND PROCESS

NPCC regional standards and the Regional Standard Processes Manual are living documents that will be updated periodically to remain current and viable (e.g., respond to changing conditions, as well as to incorporate lessons learned and process improvements).

MAINTENANCE OF REGIONAL STANDARDS

NPCC regional standards will be posted for open process review by the RSC for possible revision at least once every tenfive (105) years[20] after the first regulatory approval and follow the same process as in the case of a new regional standard. More frequent reviews of NPCC regional standards may be required to promptly evaluate new or revised NERC reliability standards to ensure NPCC regional standards remain consistent and more stringent than continent-wide reliability standards.

If no changes are warranted, the Regional Standards Committee (RSC) shall recommend to the NPCC Board that the regional standard be reaffirmed. If the review indicates a need to revise or retire a regional standard, a Regional Standard Authorization Request shall be prepared by the RSC and submitted in accordance with the NPCC regional standards process. The existing, approved regional standard subject to revision will remain in effect until such time as the revised version has received FERC or applicable Provincial regulatory and / or Ggovernmental Aauthorities approvals, as appropriate, at which time it will be retired in accordance with any applicable implementation plan associated with the newly approved regional standard.

MAINTENANCE OF THE REGIONAL STANDARDS PROCESS

This NPCC Regional Standards Process will be reviewed for possible revision at least once every tenfive (105) years, or more frequently if needed, and subject to the same procedure as applies to the development of a rRegional sStandard. All such revisions shall be subject to approval by the NPCC Board of Directors, NERC Board of Trustees, FERC, and may be subject to approval, if required, by aApplicable Ggovernmental Aauthorities in Canada.

APPENDIX C: MAINTENANCE OF REGIONAL STANDARDS AND PROCESS

~~[20] More frequent reviews of NPCC regional standards may be required to promptly evaluate new or revised NERC reliability standards to ensure NPCC regional standards remain consistent and more stringent than continent wide reliability standards.~~

APPENDIX D: NPCC CLARIFICATION REQUEST



NORTHEAST POWER COORDINATING COUNCIL, INC.
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782

Note: A valid ~~c~~Clarification ~~r~~Request is one that requests additional clarity about one or more requirements in approved NPCC regional standards, but does not request approval as to how to comply with one or more requirements.

When completed, email this form to:
npccstandard@npcc.org
For questions about this form or for assistance in completing the form, call Guy Zito at 212-840-1070.

Request for a~~n~~ Clarification of a Regional Standard	
Date submitted:	
Contact information for person requesting the clarification:	
Name:	
Organization:	
Telephone:	E-mail:
Identify the standard that needs clarification:	
Standard Number (include version number, e.g. PRC-006-NPCC-1):	
Standard Title:	
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement:	
Identify the nature of clarification that is requested: (Check as many as applicable)	
☐ Clarify the required performance ☐ Clarify the conditions under which the performance is required ☐ Clarify which functional entity is responsible for performing an action in a requirement Clarify the reliability outcome the requirement is intended to produce Please explain the clarification needed:	
Identify the material impact associated with this clarification:	

Identify the material impact to your organization or others, if known, caused by the lack of clarity or an incorrect clarification of this standard.