NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

September 23, 2014

VIA ELECTRONIC FILING

Kirsten Walli, Board Secretary
Ontario Energy Board
P.O Box 2319
2300 Yonge Street
Toronto, Ontario, Canada
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RE: *North American Electric Reliability Corporation*

Dear Ms. Walli:

The North American Electric Reliability Corporation ("NERC") hereby submits Notice of Filing of the North American Electric Reliability Corporation of Amendments to Regional Reliability Standards Development Procedure of the Northeast Power Coordinating Council, Inc. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ William H. Edwards

William H. Edwards
Counsel for the North American Electric Reliability Corporation

Enclosure

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ONTARIO ENERGY BOARD
OF THE PROVINCE OF ONTARIO

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION)
)

NOTICE OF FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION OF AMENDMENTS TO REGIONAL RELIABILITY STANDARDS DEVELOPMENT PROCEDURE OF THE NORTHEAST POWER COORDINATING COUNCIL, INC.

The North American Electric Reliability Corporation (NERC) hereby provides notice of the proposed Northeast Power Coordinating Council, Inc. (NPCC) Regional Standard Processes Manual (RSPM). The RSPM is contained in Exhibit C to the Amended and Restated Delegation Agreement between NERC and NPCC (NPCC Delegation Agreement). The proposed amendments to the NPCC Delegation Agreement consist of amendments to Exhibit C, the NPCC Regional Reliability Standards Development Procedure (RRSDP).Revisions to the RRSDP were executed by NPCC Staff and were posted for comment from May 21, 2013 until July 5, 2013. The comments received were reviewed by NPCC Staff and incorporated as necessary, and the document was posted for a second comment period between September 5, 2013 and October 20, 2013. After this second review of the comments received, the NPCC Regional Standards Committee ("RSC") approved the document to be posted for a pre-ballot review from November 12, 2013 until December 12, 2013. The ballot period for document approval was December 13, 2013 until January 27, 2014. The amended RRSDP, renamed to the RSPM, was approved by the NPCC Board of Directors ("BOD") at its March 11, 2014 meeting. The approved package was forwarded to NERC for approval, and it was approved by the NERC Board of Trustees on August 14, 2014.

As described in greater detail in Section III of this filing, the principal purposes of the amendments to the RRSDP are:

(1) to change the name of the RRSDP to the Northeast Power Coordinating Council, Inc. Regional Standard Processes Manual (RSPM),

(2) to provide organization and clarity to the RSPM by developing separate sections for:

(i) the withdrawal of a request for approval of a regional standard before it has been approved,

(ii) retirement of an approved NPCC regional standard,

(iii) requirements for approval of a process waiver, and

(iv) process for correcting errata;

(3) to incorporate NPCC's Cost Effectiveness Analysis Procedure (CEAP) into the RSPM;

(4) to further develop NPCC's clarification process for regional standards,

(5) to create new appendices for the newly revised RSPM, and

(6) to recognize the Reliability Standard Audit Worksheet (RSAW) as necessary to a regional standard developed by the NPCC Standard Drafting Team and the NPCC Compliance Staff. The proposed revisions also implement various updates, corrections, and typographical and format changes.

Attachment 1 to this filing is a "Clean" version of the RSPM incorporating the proposed amendments. Attachment 2 is a "Redline" version of the RSPM, marked to show the proposed amendments.

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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II. PROPOSED NPCC RSPM

The currently effective version of the NPCC Regional Reliability Standard Development Procedure ("NPCC RRSDP") is Version 0. The proposed amendments to the NPCC RRSDP include numerous improvements. As a preliminary matter, the title of the document has been changed from Northeast Power Coordinating Council, Inc. Regional Reliability Standards Development Procedure to the Northeast Power Coordinating Council, Inc. Regional Standards Processes Manual ("RSPM") to achieve consistency with the names of similar documents in the Delegation Agreements of other Regional Entities and NERC.

The other proposed amendments revise the RRSDP to accomplish a number of objectives, including:

- developing separate sections within the RRSDP (hereafter referred to as "RSPM") for (i) "Withdrawal of a Regional Standard Pending Approval," (ii) "Retirement of an Approved NPCC Regional Standard," (iii) "Discontinuance of Regional Standard Development," (iv) "Approval of Process Waiver," and (v) "Process for Correcting Errata."
- integrating NPCC's CEAP into the RSPM,
- further developing NPCC's interpretation process for regional standards by moving to a clarification process instead of an interpretation process to ensure all statutory requirements are met while maintaining an expedited process to produce clarifications for stakeholders,
- revising Appendix A: Regional Standard Authorization Request (RSAR) Completion Guidelines and Form and developing three new appendices for the RSPM, including (i) Appendix B: Selection of Drafting Team Members and Nomination Form, (ii) Appendix C: Maintenance of Regional Standards and Process and (iii) Appendix D: NPCC Clarification Request;
- identifying the Reliability Standard Audit Worksheet (RSAW) as a companion document to a regional standard that is collaboratively developed by the NPCC Standard Drafting Team and the NPCC Compliance Staff; and,
- implementing other corrections, clarifications and typographical, formatting, and minor language changes.

The discussions in the following subsections describe the proposed amendments to the

RRSDP.

A. Table of Contents

The original Table of Contents is removed and replaced with a more expansive and inclusive Table of Contents to account for all of the additional requirements and information added to the RRSDP since the last filing. The revisions to the Table of Contents provide reference to each new section, including the various background information provided in the "Regional Standard Characteristics and Elements" section and the additional subsections added under the "Regional Standards Development Process" section. Further, the Table of Contents provides reference to the page numbers for each of the steps under Regional Standards Development Process as well as the Appendices A, B, C, and D.

B. Section I: Executive Summary

The Executive Summary is substantially revised to remove a majority of the background information about NPCC and to add revision history of the RSPM. Of particular importance is a section describing the close work of the NPCC Reliability Standards Staff in concert with the RSC to complete the revisions to the RSPM that are the subject matter of this filing. Several lines are inserted in this section which describe "Key changes" that were approved by the BOD including, among other changes, the incorporation of process improvements, provision of greater clarity, inclusion of the new CEAP, development of the RSAW, and the creation of three new appendices.

C. Section II: Introduction

New subsections for the Introduction section organize the subject matter further into "Purpose" and "Background" subsections.

The "Purpose" subsection describes the purpose and scope of regional standards and of the RSPM. The revisions to the subsection also list numerous guiding principles describing the development of standards as well as the proper procedure for regulatory approval following both industry and NPCC approval of proposed regional reliability standards.

The "Background" subsection describes the responsibilities of NPCC for "promoting and improving the reliability of the international, interconnected, Bulk Electric System in Northeastern North America." It also provides a description of NPCC's delegated authority to develop reliability standards, and it describes the legal and historical background for the creation of NPCC, the mission of NPCC, the statutory authority for the delegation of power to NPCC, the legal framework for the ERO and Regional Entity model, and the relationship of NPCC to NERC.

D. Section III: Regional Standard Characteristics and Elements

Under the "Characteristic Attributes" subsection, text is amended to describe the key characteristics of the regional standards development process, including: (i) fair due process, (ii) openness, (iii) inclusive, (iv) balanced, (v) transparent, and (vi) without undue delay. The subsection is also augmented to account for objectives of the regional standards development process, including: (i) No Adverse Impact on Reliability of the Interconnection, (ii) Justifiable Difference, (iii) Uniformity, and (iv) No Undue Adverse Impact on Commerce. Each of these characteristics and objectives include appropriate explanations of their purpose, scope, and application to the NPCC regional standards development process.

Under the "Elements of a Regional Standard" subsection, minor revisions were made to improve the text and style of language as well as to correct grammatical inconsistencies. Also, Table 1 and Table 2 were removed from this subsection. Table 1 and Table 2 were removed to

improve the readability of this section of the RSPM.

The "Types of Reliability Requirements" subsection is added to describe the variety of requirements that should be represented in the Drafting Team's portfolio of requirements to achieve an effective defense-in-depth strategy. The Types of Reliability Requirements are Performance-based, Risk-based, and Capability-based; for each of those types, a brief definition is added.

The "Elements of a Regional Standard" subsection is added to describe the necessary components of a reliability standard. As is developed further in that subsection, the standard should, at a minimum, include: (1) Applicability, (2) Requirements, and (3) the Effective Dates. Additional components are included for informational purposes, but they are not mandatory and enforceable. A description of each of the possible elements for a reliability standard is added to this subsection to provide additional information for the development of regional standards. A description of "Compliance Elements," or "elements to aid in the administration of compliance monitoring and enforcement responsibilities" is also added to provide explanations for various compliance elements, including (i) Measure, (ii) Violation Risk Factors and Violation Severity Levels, (iii) Version History, (iv) Variance, (v) Compliance Enforcement Authority (CEA), and (vi) Reliability Standard Audit Worksheets (RSAWs). A description of "Informational Elements: Elements to aid in the implementation of the regional standard" is also added to provide explanations for various informational elements, including (i) Application Guidelines and (ii) Procedures. The information in the "Terms and Functions" subsection is relocated to Section IV. Regional Standards Development Process.

E. Section IV: Regional Standards Development Process

The Regional Standards Development Process section is added to encompass the entire

process for the development of a regional standard. Within this section, subsections are added to provide clarity to the process, including the addition of subsections for (i) Roles in the NPCC Regional Standards Process, (ii) Standard Development Process Steps, (iii) Standard Clarification Process Steps, (iv) Discontinuance Of Regional Standard Development, (v) Withdrawal of a Regional Standard Pending Approval, (vi) Retirement Of An Approved NPCC Regional Standard, (vii) Approval Of Process Waiver, (viii) Process For Correcting Errata, and (ix) Appeals (process broken down into two levels).

"Roles in the NPCC Regional Standards Process" is a subsection added to provide rules for Nomination, Revision, Interpretation, or Retirement of a Standard and to provide information on Process Roles and Responsibilities for various NPCC regional standard development participants. Full descriptions of each of the Process Roles and Responsibilities are added to this subsection, including descriptions for: Board of Directors, Drafting Team, Manager of Reliability Standards, NPCC Members, Non-NPCC Members, NPCC Standards Staff, NPCC Committees, Task Forces and Working Groups, Regional Standards Committee (RSC), Reliability Coordinating Committee (RCC), Requester, and Quality Review Team.

"Standard Development Process Steps" is a subsection added to provide individual process steps for the development of a regional standard. Step 2.1 is created to describe a Regional Standard Authorization Request (RSAR), the first step in the development, modification or retirement of a standard. Steps 2.1.A, 2.1.B, and 2.1.C are created to describe different actions to be taken by Requesters, NPCC Manager of Reliability Standards, and the RSC for submission of the RSAR. Step 2.2 is added for the purpose of describing the timeline and process for responding to the RSAR, and also the creation of a Drafting Team for a new or revised standard. Step 2.3 is added to describe the actual development process of the standard

and associated documents, including all of the work product expected from the Drafting Team. Steps 2.4.A and 2.4.B are created to provide information for posting for comment and the resolution of those comments during a final comment period, respectively. Step 2.5 "Posting for Ballot Period in the Open Process" is created to describe the posting, quorum, and voting requirements. Steps 2.5.A, 2.5.B, 2.5.B.1, and 2.5.B.2 are added to provide situational responses based on the number of votes received. Step 2.6 is added to direct the BOD to either approve, approve with the stipulation that non-substantive comments be incorporated, or remand a standard presented to them upon the affirmative vote of the NPCC Members, and Step 2.7 provides direction for submission of the new or revised standard to NERC for filing with FERC. Finally, Step 2.8 is created to provide the process for the implementation of a regional standard upon recognition and approval of the standard by the Applicable Governmental Authority.

"Standard Clarification Process Steps" is a subsection that is added to provide individual process steps for requests for standard clarifications. Step 3.1 is added to allow any Member of NPCC or group within the NPCC region to submit a Clarification Request (CR). As this Step explains, a valid CR 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. Step 3.1 also provides that a request may alternatively seek a Request for Interpretation and explains that an interpretation will be initiated under the NERC process for developing an interpretation. Step 3.2, Review and Validation of Clarification Request (CR) is added so that the NPCC Manager of Reliability Standards may determine the validity of a CR. Step 3.3 is added to explain the Regional Standards Committee (RSC) Actions and its role in accepting or rejecting the CR jointly with the NPCC Manager of Reliability Standards. Step 3.4, Formation of a Drafting Team for the Response to CR, and Step 3.5 are

created to provide guidance on the process for developing a response to the CR. Step 3.6 is added to explain the procedure for posting the CR for a comment period and resolution of said comments. Step 3.7 is added to explain the actions to be taken by the RSC upon receipt of the CR from the NPCC Manager of Reliability Standards. Finally, Step 3.8 is added to direct the BOD to take an action on the CR once it has been endorsed by the RSC.

"Discontinuance of Regional Standard Development" is a subsection added to define the term "discontinuance" as used in the RSPM, and refers to the termination of the standard development process after RSAR approval but prior to posting for industry ballot.

"Withdrawal of a Regional Standard Pending Approval" is a subsection added to define the term "withdrawal" as used in the RSPM. This process allows the requester to revoke a request for approval of a regional standard, variance, clarification, or definition that has already "been approved by the NPCC Board of Directors and has not been filed with Applicable Governmental Authorities or has been filed but not yet approved by Applicable Governmental Authorities".

"Figure 5" of the RSPM, the "Flowchart Regional Standards Development Procedure (Open Process)," is removed from the RRSDP because its content is included in Figure 1 Flowchart of Regional Standards Development Process Overview.

"Retirement of an Approved NPCC Regional Standard" is a subsection added to define the term "retirement" as used in the RSPM, and to explain the discontinuance of a regional standard, variance, clarification, or definition that has been approved by the Applicable Governmental Authority.

"Approval of Process Waiver" is a subsection added to give NPCC the authority to develop a new or modified regional standard, implementation plan, variance, clarification, or

definition when extenuating circumstances arise. As is explained in that subsection, the RSC may override the requirements for standard development in the RSPM if good cause exists, limited to extenuating circumstances. That subsection also allows any individual to submit a waiver request to the RSC, and it requires certain notice to be provided before the waiver request may be considered.

"Process for Correcting Errata" is a subsection added to give the RSC the ability to make minor errata changes after final ballot approval by the NPCC ballot body. More detailed directions for submitting these errata changes are also added to this subsection.

The "Appeals" section is edited to account for non-substantive grammatical errors, updated terms, style, and improved text, and it is not amended substantively from the original RRSDP.

F. Appendix A: RSAR Completion Guidelines

Appendix A: RSAR Completion Guidelines is added to provide guidance that results in a streamlined, efficient process for submitting an RSAR to the NPCC Manager of Reliability Standards. Also included in this Appendix is a revised version of the RSAR with some minor stylistic changes and limited typographical and grammatical revisions. Substantively, the RSAR is updated to reflect the requirements for RSARs in the RSPM, including revisions to the following fields in the RSAR, which are edited to become a "Required Field" for purposes of submission to NPCC: (i) information for the standard and of the RSAR requester, (ii) detailed description of the "Purpose" of the proposed standard, (iii) the technical justification for "Industry Need," (iv) a "Brief Description" of the proposed standard, (v) identification of "Reliability Functions," (vi) a "Detailed Description" of the standard, (vii) "Related Standards," and (viii) "Related SARs or RSARs."

G. Appendix B: Selection of Drafting Team Members

Appendix B: Selection of Drafting Team Members is added to explain the process by which Drafting Team Members are selected. Precise criteria for each member and for the selection process are added to this Appendix. Also included in this Appendix is the newly created Nomination Form for NPCC [Name of Drafting Team] Drafting Team, used to allow parties to nominate candidates to the Drafting Teams.

H. Appendix C: Maintenance of Regional Standards and Process

Appendix C: Maintenance of Regional Standards and Process is added to provide for periodic review and revision to NPCC regional standards and to the RSPM so that those documents remain current and viable. To provide clarity, Appendix C is further separated into two subsections: Maintenance of Regional Standards and Maintenance of Regional Standards Process. These two subsections provide a timeline for review of these documents and the requirements for the review process.

I. Appendix D: NPCC Clarification Request

Appendix D: NPCC Clarification Request is added to provide a standard form for submitting a clarification request.

Respectfully submitted,

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Counsel for the North American Electric Reliability Corporation

Date: September 23, 2014

Attachment 1 (Clean)

NPCC, Inc.

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Northeast Power Coordinating Council, Inc.

Regional Standard Processes Manual (RSPM)

Adopted by FERC: XXXX XX, 20XX

Approved by NERC Board of Trustees: August 14, 2014

Approved by NPCC Board of Directors: March 11, 2014

Revision History

Version	NPCC Board of Directors Approval	NERC Board of Trustees Approval	FERC Approval
0	9/19/07	10/23/07	3/21/08
1	3/11/14	8/14/14	xx/xx/xx

NPCC REGIONAL RELIABILITY STANDARDS PROCESS MANUAL

TABLE OF CONTENTS

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. The NPCC Reliability Standards Staff in concert with the NPCC Regional Standards Committee (RSC) has completed a revision to the NPCC Regional Reliability Standards Process Manual to incorporate process improvements, provide greater clarity and reflect the new NPCC Cost Effectiveness Analysis Procedure (CEAP).

Key changes addressed in this revision include:

- Replacing interpretation with clarification and expanding the Clarification Section narrative into process steps and including an associated flowchart
- Creating separate sections for: 1) Withdrawal of a Regional Standard Pending Approval; 2) Retirement of an Approved NPCC Regional Standard; and 3) Approval of Process Waiver; 4) Process for Correcting Errata
- Recognizing the new NPCC Cost Effectiveness Analysis Procedure (CEAP)
- Identifying the Reliability Standard Audit Worksheet (RSAW) as a companion document to a regional standard that needs to be collaboratively developed by the drafting team and NPCC Compliance Staff
- Creating three new appendices: 1) Appendix A: Regional Standard Authorization Request (RSAR) Completion Guidelines and Form; 2) Appendix B: Selection of drafting team Members and Nomination Form; and 3) Appendix C: Maintenance of Regional Standards and Process

In addressing areas for improvement in the NPCC Regional Reliability Standards Development Procedure, recent improvements made to the NERC Standards Process Manual (e.g., Standards Process Input Group (SPIG) recommendations) as well as the manuals of other Regional Entities were benchmarked to identify best practices for inclusion in this manual.

The process improvements and clarity captured in this revision to the NPCC Regional Reliability Standards Development Procedure, will result in a more timely and efficient manner to address the development of regional standards to ensure the reliability of the Bulk Electric System within the NPCC geographical area.

II. INTRODUCTION

PURPOSE

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 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/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 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) and the applicable regulatory authorities in the United States (FERC) and Canada.

BACKGROUND

Northeast Power Coordinating Council, Inc. (NPCC) is responsible for promoting and improving the reliability of the international, interconnected Bulk Electric System 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 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

As a condition of NPCC membership, NPCC General and Full Members[2] agree to adhere to 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. 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 FERC and Canadian Authorities 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. 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 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[3] 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-mail lists.
- **Without undue delay** — The NPCC regional standards development process shall be performed within a reasonable time.

In as much as NPCC is one of six Regional Entities within the Eastern Interconnection of North America, there will be no presumption of validity by the ERO for any NPCC regional standard.

[2] As defined in the NPCC By-Laws – available on the NPCC website
[3] NPCC By-Laws are available on the NPCC website

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** — A NPCC regional standard provides an Adequate Level of Reliability[4] as defined by NERC.
- **Justifiable Difference** — A 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. Although a justifiable difference allows for a unique regional standard, a NPCC regional standard shall be no less stringent than a continent-wide standard.
- **Uniformity** — To the extent possible, the NPCC regional standards provides uniformity with Reliability Standards across the interconnected Bulk Electric System of North America.
- **No Undue Adverse Impact on Commerce** — A NPCC regional standard will not cause any undue adverse impact on business activities that are not necessary for reliability of the Region and its interconnected Regions. 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, a 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 achieving 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, i.e. an effect that can be measured using power system data or trends.

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[4] Adequate Level of Reliability is available on the NERC website as amended from time to time

[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

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

b) **Risk-based** - defines actions of entities that reduce a stated risk to the reliability of the Bulk Electric System and can be measured by evaluating a particular product or outcome resulting from the required actions.

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

Each regional standard shall enable or support one or more of the reliability principles[8] as 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[9] as defined by NERC.

Recognizing that Bulk Electric System reliability and electricity markets are inseparable and mutually interdependent, all regional standards shall be consistent with the most recent set of Market Principles[10] 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. The components of a NPCC regional standard identified below are based on the NERC Standard Processes Manual (SPM) that was approved by the NERC Board of Trustees at its February 2013 meeting. Future revisions of the NERC SPM will be used at the time of development of a NPCC regional standard if different from the elements listed below.

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 functional 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] Reliability Principles are available on the NERC website as amended from time to time
[9] Adequate Level of Reliability is available on the NERC website as amended from time to time
[10] 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 outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or 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. Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with NPCC Standards Staff and Compliance Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability 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 a 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)[11] 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.

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

Informational Elements: Elements to aid in the implementation of the regional standard.

Application Guidelines:	Guidelines or reference documents to support the implementation of the associated regional standard.
Procedures:	Procedures to support implementation of the associated regional standard.

IV. 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 a 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 shall be allowed to request that a 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 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 a 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.

MANAGER OF RELIABILITY STANDARDS

The NPCC Manager of Reliability Standards 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 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 STAFF

The Standards Staff is responsible for assisting the NPCC 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 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) to standards actions
- Participate in NPCC 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 (RSC)

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 (RCC)

The Reliability Coordinating Committee (RCC) supports the standards development process through the assignment of 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.

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 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 Staff shall coordinate a quality review of the "final draft" of the regional standard, implementation plan, VRFs and VSLs 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 Staff. It will not involve individuals who participated on the drafting team of the standard undergoing the Quality Review.

2. STANDARD DEVELOPMENT PROCESS STEPS

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

A Regional Standard Authorization Request[12] (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.

A RSAR shall be used to seek approval and initiate the development, modification or retirement of a NPCC regional standard. A RSAR is not used to seek a Clarification Request (CR) of a 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 within the geographical footprint of NPCC may request, via a submittal of a RSAR to the NPCC Manager of Reliability Standards, the development, modification, or deletion of a NPCC regional standard. The individual completing the form is referred to herein as the Requester.

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 a 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, via npccstandard@npcc.org, for processing.

STEP 2.1.B. NPCC MANAGER OF RELIABILITY STANDARDS ACTIONS

The NPCC Manager of Reliability Standards shall review the submitted RSAR and verify that the submitted form has been adequately completed. Within fifteen (15) calendar days[13] of receipt of the submitted RSAR, the NPCC Manager of Reliability Standards will electronically acknowledge

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

[13] 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 properly completed 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 properly completed RSAR wait for RSC action more than 60 calendar days from the date of receipt by the RSC.*

The RSC shall review the RSAR and take one of the following actions:

- 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 a 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

A 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 a NPCC Task Force, and notify the NPCC Manager of Reliability Standards of its decision within ten (10) calendar days.

After receipt of the notification of drafting team assignment, the NPCC Manager of Reliability Standards shall oversee solicitation and recommendation of a list of additional qualified[14] candidates over and above the appropriate NPCC Task Force members, for appointment to the drafting team. The Requester and a 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 RSC shall provide the drafting team with any preliminary development products including, but not limited to, a draft standard, comments, and related white papers.

The RSC shall designate one of its members to actively monitor and assist NPCC 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 resolving any issues.

STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS

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 shall regularly (at least quarterly) report progress against that aforementioned work plan to the NPCC Manager of Reliability Standards for presentation to the RSC.

> *Note: During the regional standards development, the drafting team will deliberate on whether the requirements in the regional standard are developed enough to begin the Cost Effectiveness Analysis (CEA) of the NPCC Cost Effectiveness Analysis Procedure (CEAP). When appropriate, the drafting team shall request that the RSC initiate the second phase (CEA) of the CEAP process.*

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

[14] 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 a RSAR.

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 2.4: POSTING FOR COMMENT PERIOD AND RESOLUTION OF COMMENTS

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.

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 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[15] 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.

[15] 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

> *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.*

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 [16] (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

[16] 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 2.6: 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 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: NERC BOARD OF TRUSTEES SUBMITTAL

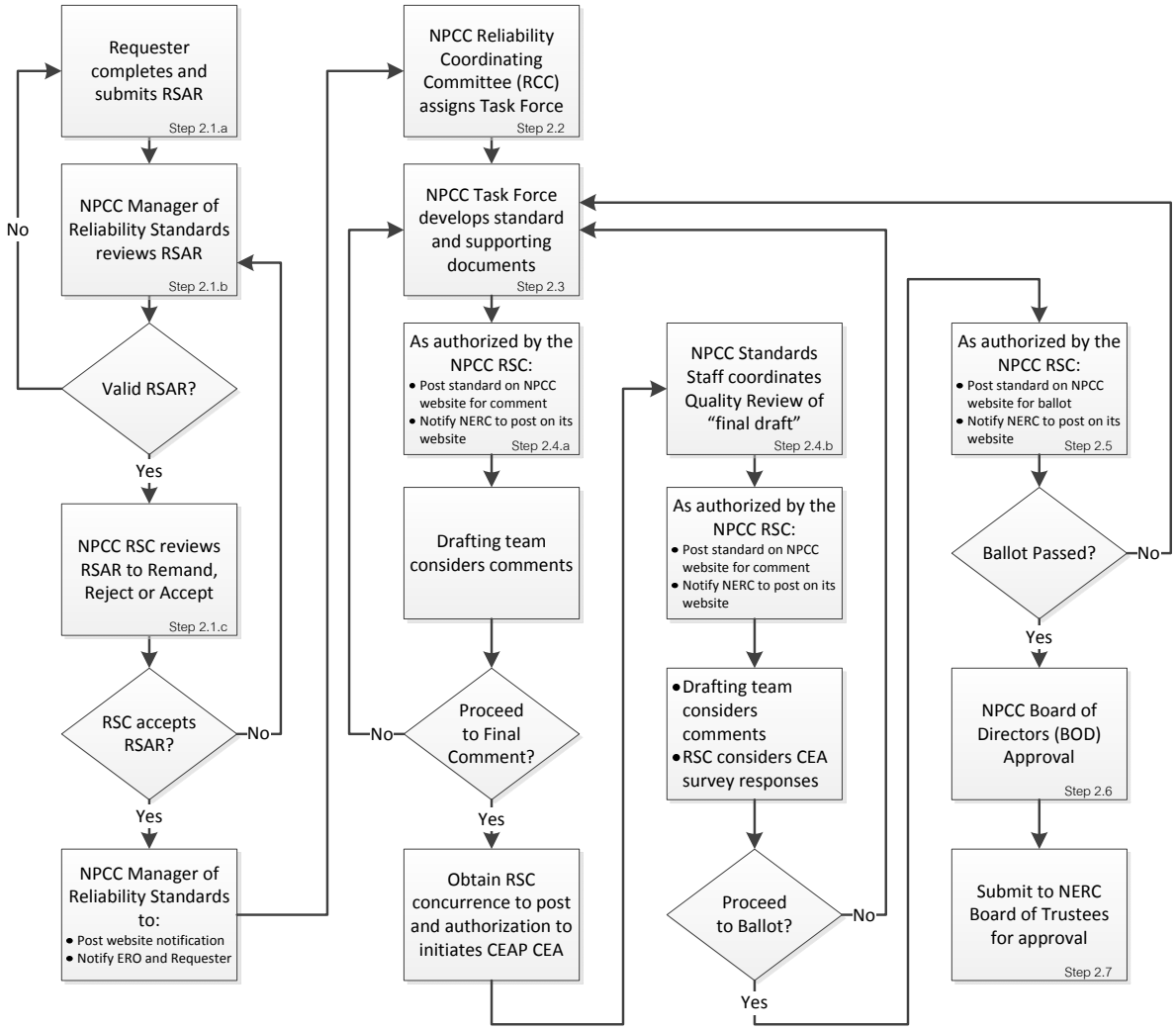
Upon approval by the NPCC Board of Directors, the NPCC Manager of Reliability Standards shall submit the regional standard to NERC, as the Electric Reliability Organization, for approval and subsequent filing with FERC and the applicable Canadian Provincial regulatory and/or governmental authorities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

STEP 2.8: IMPLEMENTATION OF A NPCC REGIONAL STANDARD

Following the approval of a NPCC regional standard by FERC and the applicable Canadian Provincial regulatory and/or governmental authorities, all users, owners, and operators of the Bulk Electric System in the NPCC geographic area are required to comply with the standard as of its enforcement date.

ERO approved Reliability Standards (both continent-wide and regional) are included in both the NERC and NPCC Compliance Monitoring and Enforcement Programs (CMEPs).

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[17] and are currently enforceable or have a future enforcement date. A clarification request 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 a 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 System shall be allowed to submit a Clarification Request (CR) for a 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[18] (CR) for a NPCC regional standard directly to the NPCC Manager of Reliability Standards, via npccstandard@npcc.org, for processing. Alternatively, the Requester can submit a Request for Interpretation (RFI) of a NPCC regional standard under the NERC process for developing an interpretation[19] to the NERC 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.

NERC 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 a NPCC regional standard, the NPCC Manager of Reliability Standards 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 will utilize, as necessary, the NPCC Standards Staff, NPCC Compliance and Legal Staffs when determining the validity of the CR. Based on this review, the NPCC Manager of Reliability Standards 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.

[17] Approval is granted by FERC and the Canadian Provincial regulatory and/or governmental authorities, as applicable.
[18] The NPCC Clarification Request form is included as Appendix D
[19] 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 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 a 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 a RSAR or 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 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, 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, 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 CR

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. Upon receipt of the proposed clarification response from the CDT, the NPCC Manager of

Reliability Standards 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 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 CR FOR COMMENT PERIOD AND RESOLUTION OF COMMENTS

As authorized by the RSC, the NPCC Manager of Reliability Standards 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 will assemble the comments on the proposed clarification response 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 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 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 3.5: DEVELOPMENT OF RESPONSE TO CR 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 to obtain RSC endorsement to the submitted CR response.

STEP 3.7: REGIONAL STANDARDS COMMITTEE APPROVAL OF CR

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

- Endorse the proposed clarification response and direct the NPCC Assistant Vice President Standards 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 CR to revise the proposed clarification response

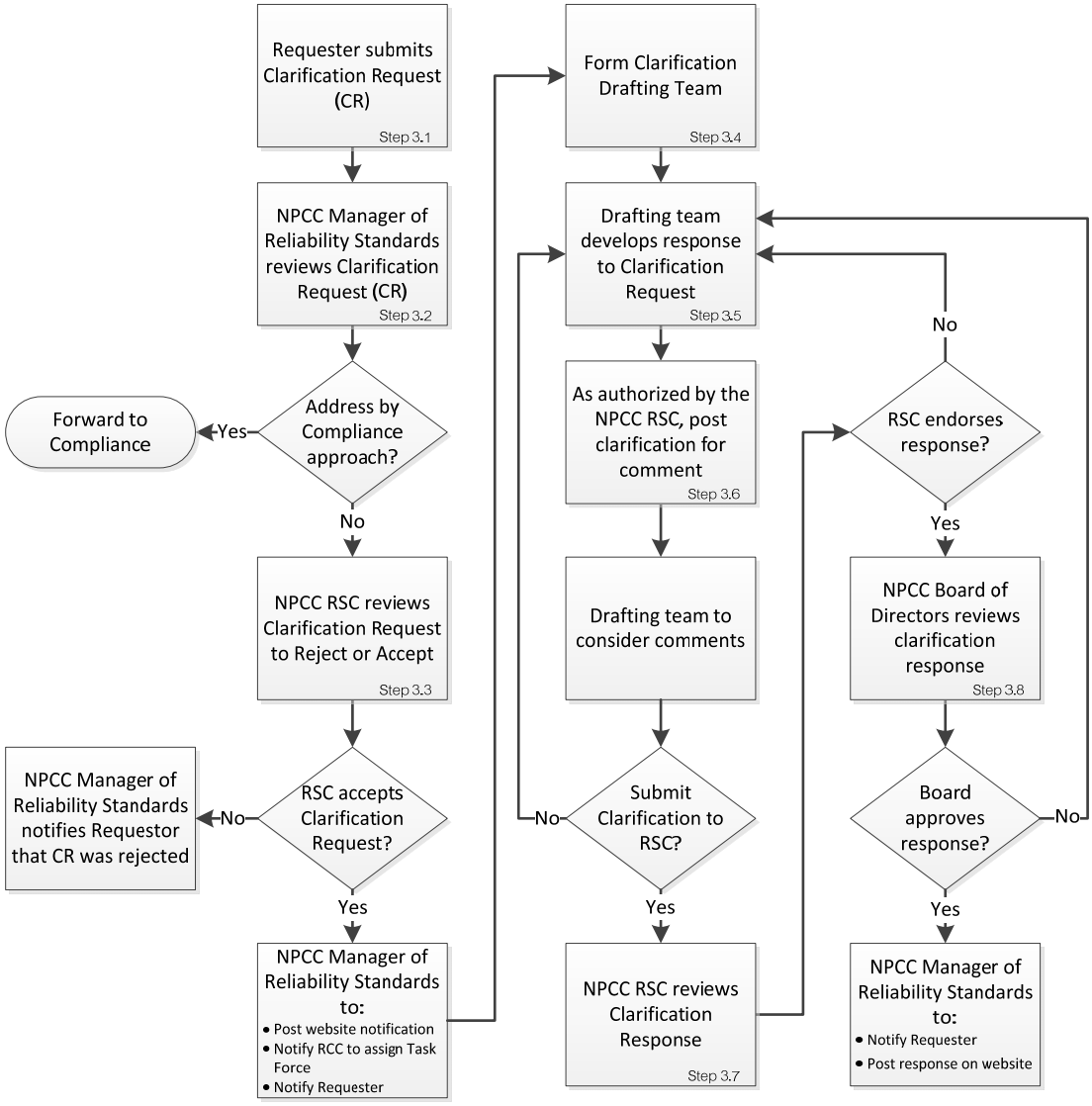
STEP 3.8: NPCC BOARD OF DIRECTORS APPROVAL OF CR

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 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 Governmental Authorities or has been filed but not yet approved by Applicable Governmental 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 will notify NERC Staff to petition the Applicable Governmental Authorities, 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 Applicable Governmental Authorities 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, a 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. Upon approval by the NPCC Members and the NPCC Board of Directors, the NPCC Manager of Reliability Standards shall submit the request for retirement to NERC, as the Electric Reliability Organization, 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 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 or cyber-attack on the Bulk Electric System
- 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 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 standard.

A waiver request may be submitted to the RSC by any entity or individual, including NPCC committees or subgroups and NPCC Standards Staff. Prior to consideration of any waiver request, the NPCC Manager of Reliability Standards 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 Standards process, the Assistant Vice President Standards shall report the exercise of this waiver provision to the NPCC Board of Directors prior to adoption of the related Reliability 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 may be discovered in a regional 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 agrees that the correction of the error does not change the scope or intent of the associated regional standard, and agrees that the correction has no material impact on the end users of the regional standard.

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

If a regional standard containing errata had received prior approval by the NPCC Board of Directors, the corrected regional standard shall be presented to the NPCC Board for approval. Upon approval by the Board, the corrected regional 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 standard that has received prior approval by the NPCC Board.

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 that describes the substantive or procedural action or inaction associated with a Reliability Standard or the standards process. The appellant describes in the complaint the actual or potential adverse impact to the appellant. Assisted by any necessary NPCC Standards Staff and Committee resources, the NPCC Manager of Reliability Standards 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 standard and posted with the 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, the NPCC Board of Directors shall appoint a 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 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. 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. 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 standard in question.

APPENDIX A: RSAR COMPLETION GUIDELINES

The Requester shall complete a 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 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, at npccstandard@npcc.org. The NPCC Manager of Reliability Standards shall be responsible for implementing and maintaining this form as needed to support the information requirements of the 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 Authority	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 an 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 standard.

Drafting Team 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
- Champions for standard development and promoters of the approval of the standard
- 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 standard. The SMEs should represent a cross section of the registered entities applicable to the 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, at npccstandard@npcc.org.

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 Staff at npccstandard@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 by the NPCC Regional Standards Committee (RSC). This means that if you are appointed to the DT you are expected to attend all (or at least the vast majority) of the face-to-face DT meetings as well as participate in all the DT meetings held via conference calls. Failure to do so shall result in your removal from the DT.

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 NERC Region that you represent:	Select each Industry Segment that you represent:	
☐ ERCOT ☐ FRCC ☐ MRO ☐ NPCC ☐ RFC ☐ SERC ☐ SPP ☐ WECC ☐ NA – Not Applicable	☐	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[20] 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	

[20] 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 five (5) years[21] after the first regulatory approval and follow the same process as in the case of a new standard. If no changes are warranted, the Regional Standards Committee (RSC) shall recommend to the NPCC Board that the 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 standard subject to revision will remain in effect until such time as the revised version has received FERC or applicable Provincial Governmental Authorities 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 five (5) years, or more frequently if needed, and subject to the same procedure as applies to the development of a Regional Standard. 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 Applicable Governmental Authorities in Canada.

[21] 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

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

Note: A valid clarification 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 Lee Pedowicz at 212-840-1070.

Request for an 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.

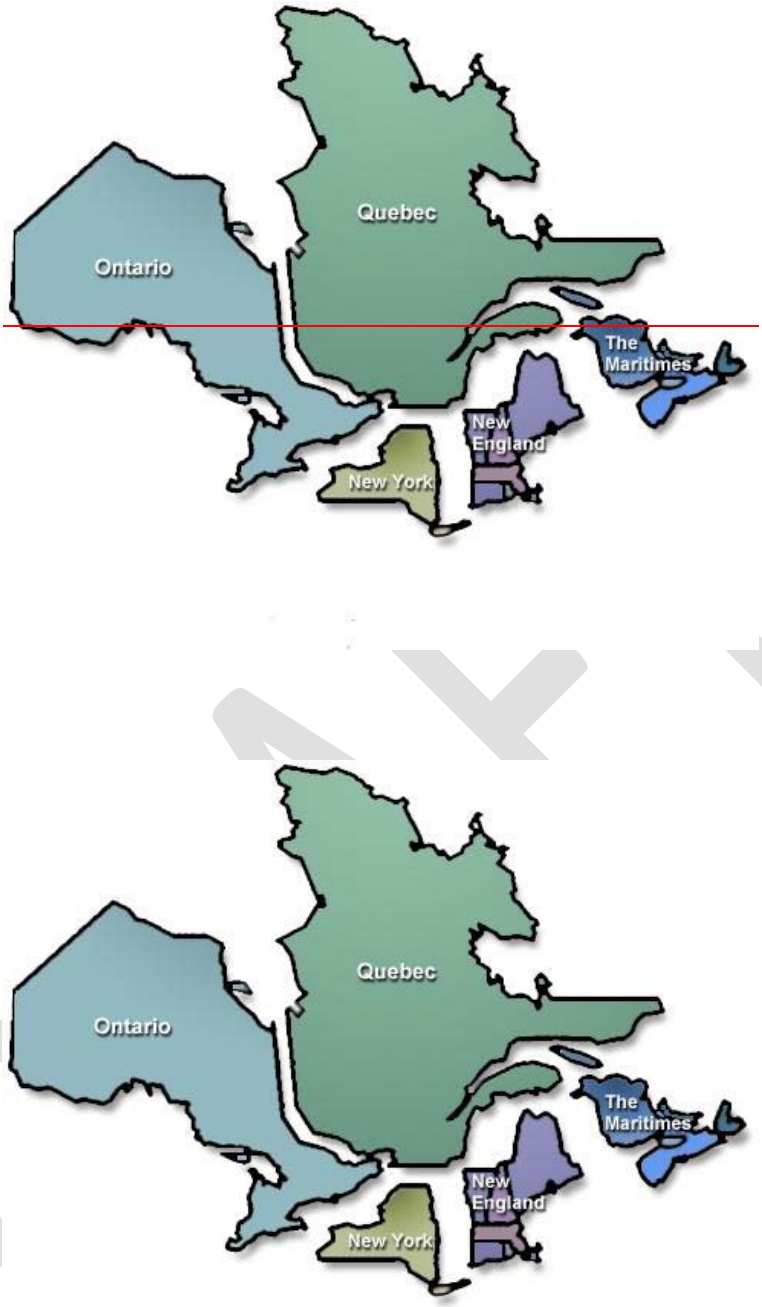
Attachment 2 (Redline)

NPCC, Inc.
NPCC, Inc.
NORTHEAST POWER COORDINATING COUNCIL, INC.
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782
1515 BROADWAY, NEW YORK, NY 10036-8901 TELEPHONE: (212) 840-1070 FAX: (212) 302-2782

Northeast Power Coordinating Council, Inc.

Regional ~~Reliability~~ Standards Process Manual (RSPM)

~~Development Procedure~~



Adopted by FERC: XXXX XX, 20XX

Approved by NERC Board of Trustees: XXXX XX, 20XX

Approved by NPCC Board of Directors: XXXX XX, 20XX

~~**September 19, 2007**~~
~~**Approved by NERC BOT October 23, 2007**~~
~~**Adopted by FERC March 21, 2008**~~

~~NPCC~~

Revision History

Version	NPCC Board Of Directors Approval	NERC Board Of Trustees Approval	FERC Approval
0	9/19/07	10/23/07	3/21/08
1	xx/xx/xx	xx/xx/xx	xx/xx/xx

NPCC REGIONAL RELIABILITY STANDARDS PROCESS MANUAL

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY

The NPCC Bylaws state "NPCC shall develop a Regional Reliability Standards Development Procedure

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~~I. EXECUTIVE SUMMARY~~

~~The purpose of the Northeast Power Coordinating Council, Inc. ("NPCC"), is to enhance the reliability of the international, interconnected bulk power system in Northeastern North America through the development of more stringent and specific regional reliability standards and compliance assessment and enforcement of continent-wide and regional reliability standards pursuant to the execution and implementation of a Regional Delegation Agreement with the Electric Reliability Organization ("ERO") and applicable Canadian Memoranda of Understanding~~ that ~~are backstopped by the Federal Energy Regulatory Commission ("FERC") and~~ 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~~. In the development and enforcement of Regional Reliability Standards, NPCC, to the extent possible, facilitates attainment of fair, effective, efficient, and competitive electric markets.~~

~~General Membership in NPCC is voluntary and is open to any person or entity, including any entity participating in the Registered Ballot Body of the ERO that has an interest in the reliable operation of the Northeastern North American bulk power system.~~."

The NPCC Regional Reliability Standards Development Procedure ~~describes~~was originally adopted by the ~~procedures, policies~~NPCC Board of Directors on September 19, 2007. The NPCC Reliability Standards Staff in concert with the NPCC Regional Standards Committee (RSC) has completed a revision to the NPCC Regional Reliability Standards Process Manual to incorporate process improvements, provide greater clarity and reflect the new NPCC Cost Effectiveness Analysis Procedure (CEAP).

Key changes addressed in this revision include:

- Expanding the interpretation Section narrative into process steps and including an associated flowchart
- Creating separate sections for: 1) Withdrawal Of A Regional Standard Pending Approval; 2) Retirement Of An Approved NPCC Regional Standard; and 3) Approval Of Process Waiver; 4) Process For Correcting Errata
- Recognizing the new NPCC Cost Effectiveness Analysis Procedure (CEAP)
- Identifying the Reliability Standard Audit Worksheet (RSAW) as a companion document to a regional standard that needs to be collaboratively developed by the Drafting Team and NPCC Compliance Staff
- Creating three new appendices: 1) Appendix A: Regional Standard Authorization Request (RSAR) Completion Guidelines and Form; 2) Appendix B: Selection Of Drafting Team Members and Nomination Form; and 3) Appendix C: Maintenance Of Regional Standards and Process

In addressing areas for improvement in the NPCC Regional Reliability Standards Development Procedure, recent improvements made to the NERC Standards Process Manual (e.g., Standards Process Input Group (SPIG) recommendations) as well as the manuals of other Regional Entities were benchmarked to identify best practices ~~implemented~~for inclusion in this manual.

The process improvements and clarity captured in this revision to the NPCC Regional Reliability Standards Development Procedure, will result in a more timely and efficient manner to address the development of regional standards to ensure the reliability of the Bulk Electric System within the NPCC geographical area.

II. INTRODUCTION

PURPOSE~~an~~

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, formally interpreted 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"~~ process for the transparent initiation, development, implementation and revision of NPCC Regional Reliability Standards necessary for the reliable operation~~."

NPCC regional standards address the reliability of the international and interconnected ~~bulk power system~~Bulk Electric System in Northeast North America. ~~These Standards~~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/Electric Reliability Organization (NERC/ERO) ~~Reliability Standards. The procedure will not unnecessarily delay the development of the proposed reliability standards. Each regional reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of the reliability of the regional bulk power system. Each standard shall also be consistent with all of pertinent reliability principles and criteria, thereby ensuring that no standard undermines reliability through an unintended consequence~~continent-wide Reliability Standards.

~~II.~~ 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 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) and the applicable regulatory authorities in the United States (FERC) and Canada.

BACKGROUND

Northeast Power Coordinating Council, Inc. (NPCC) is responsible for promoting and improving the reliability of the international, interconnected Bulk Electric System 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

[1] Available on the NERC website: Reliability Principles

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 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.

As a condition of NPCC membership, NPCC General and Full Members[2] agree to adhere to 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. REGIONAL STANDARD ~~DEVELOPMENT PROCEDURE~~CHARACTERISTICS AND ELEMENTS

1. ~~1.~~ CHARACTERISTIC ATTRIBUTES

~~The NPCC Regional Reliability Standards Development Procedure is:~~

~~**Open** — The NPCC Regional Reliability Standards Development Procedure provides any person the ability to participate in the development of~~ 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~~. Any entity~~, 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 FERC and Canadian Authorities for their approvals.

- **Openness** — Participation in the NPCC regional standards development process is open to all persons and organizations that ~~is~~are directly and materially affected by the reliability of the NPCC's ~~bulk power system has the ability to participate in the development and approval of reliability standards~~Bulk Electric System. There ~~are~~is no undue financial ~~barriers~~burden to participation. Participation ~~in the open comment process is~~shall not ~~conditional~~be conditioned upon membership in the ERO, NPCC or any organization, and ~~participation is~~shall not be unreasonably restricted on the basis of technical qualifications or other such requirements. ~~NPCC utilizes a website to accomplish this. Online posting and review of standards and the real time sharing of comments uploaded to the website allow complete transparency.~~

- **Inclusive** — ~~The NPCC Regional Reliability Standards Development Procedure provides any person~~Any entity (person, organization, company, government agency, individual, etc.) with a direct and material interest in the reliability of NPCC's Bulk Electric System has the right to participate by: (a) expressing an opinion and its basis~~, have that~~; (b) having their

[2] As defined in the NPCC By-Laws – available on the NPCC website

position considered, and ~~appealed~~(c) having the right to appeal a response through an established ~~appeals~~appeal process ~~if adversely affected.~~.

- ~~**Balanced** — The NPCC Regional Reliability Standards Development Procedure has a balance of interests and all those entities that are directly and materially affected by the reliability of the NPCC's bulk power system are welcome to participate~~**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. ~~This will be accomplished through~~Pursuant with the NPCC ~~Bylaws defining eight~~By-Laws[3] there are seven (7) stakeholder voting sectors ~~(categories)~~and the votes for ~~voting.~~each sector are weighted to achieve an appropriate balance.

  - ~~**Fair Due Process** — The NPCC Regional Reliability Standards Development Procedure provides for reasonable notice and opportunity for public comment. The procedure includes public notice of the intent to develop a standard, a 45 calendar day public comment period on the proposed standard request, or standard with due consideration of those public comments, and responses to those comments will be posted on the NPCC website. A final draft will be posted for a 30 calendar day pre-balloting period, and then a ballot of NPCC Members will be conducted. Upon approval by the NPCC Members, the NPCC Board then votes to approve submittal of the Regional Standard to NERC.~~

- **Transparent** — All actions material to the development of ~~Regional Reliability Standards~~NPCC regional standards are transparent and information regarding the progress ~~is posted~~of a standard's development action is made available to the public through postings on the NPCC website as well as through ~~extensive email~~E-mail lists.

- **Without undue delay** — The NPCC regional standards development process shall be performed within a reasonable time.

In as much as NPCC is one of ~~several regional entities~~six Regional Entities within the Eastern Interconnection of North America, there will be no presumption of validity by the ERO for any NPCC ~~Regional Reliability Standard.~~regional standard. In order to receive the approval of the ERO, the NPCC ~~Reliability Standards Development Process~~regional standards development process must also achieve the following objectives:

- **No Adverse Impact on Reliability of the Interconnection** —~~An~~ A NPCC ~~Regional Reliability Standard~~regional standard provides a level of ~~bulk power system~~Bulk Electric System reliability that is necessary and adequate to protect public health, safety, welfare, and North American security and will not have an adverse impact on the reliability of the Interconnection or other Regions within the Interconnection.

  - ~~**Justifiable Difference** — An NPCC Regional Reliability Standard is based on justifiable differences between Regions, such as different electrical systems or~~

[3] NPCC By-Laws are available on the NPCC website

~~facilities, sensitivity of load to disruptions, sensitivity of generation to disruptions, frequency and voltage sensitivity, system operating limit development and facilities ratings process, electrical system interactions, etc.~~

- ~~**Uniformity** - NPCC Regional Reliability Standards shall provide for as much uniformity as possible with reliability standards across the interconnected bulk power system of the North American continent. A NPCC Reliability Standard shall be more stringent than a continent-wide reliability standard, may include a regional variation that addresses matters that the continent-wide reliability standard does not, or shall be a regional difference necessitated by a physical difference in the northeast's bulk power system, where the interpretation 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.~~

- **Justifiable Difference** — A NPCC regional standard addresses a justifiable difference within the NPCC geographical area that results from a physical difference[4] or operating difference in the Northeast's Bulk Electric System. Although a justifiable difference allows for a unique regional standard, a NPCC regional standard shall be no less stringent than a continent-wide standard.
- **Uniformity** — To the extent possible, the NPCC regional standards provides uniformity with Reliability Standards across the interconnected Bulk Electric System of North America.
- **No Undue Adverse Impact on Commerce** — ~~An~~A NPCC ~~Regional Reliability Standard~~regional standard will not cause any undue adverse impact on business activities that are not necessary for reliability of the Region and its interconnected Regions. All regional ~~reliability~~ standards shall be consistent with NERC's market principles[5].

~~**Other Attributes of the NPCC Regional Reliability Standards Development Procedure include;**~~

- ~~**Maintenance of Regional Reliability Standards** - NPCC Regional Standards will be reviewed for possible revision at least every three years and follow the same process as a new standard. The old standard will remain in place until such time as the revised version has passed through the entire process, at which point the old standard will be retired in accordance with any applicable new implementation plan associated with the approved revised standard. The review process shall be conducted by soliciting comments from the stakeholders and through open posting on the NPCC website. If no changes are warranted, Regional Standards Committee (RSC) shall recommend to the NPCC Board that the standard be reaffirmed. If the review~~

[4] The interpretation 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.

[5] Available on the NERC website: www.nerc.com

~~indicates a need to revise or withdraw a standard, a regional standard authorization request shall be prepared by the RSC and submitted in accordance with the standards development process contained in this procedure.~~

- ~~**Maintenance of Regional Reliability Standards Development Procedure** This NPCC Regional Reliability Standards Development Procedure will be reviewed for possible revision at least once every five years or more frequently if needed and subject to the same procedure as that of the development of a standard. All such revisions shall be subject to approval by the NPCC Board, NERC, FERC, and could be subject to approval, if required, by applicable authorities in Canada. The NPCC RSC has the authority to make non-substantive changes to this procedure and subsequently notify the NPCC Board for their concurrence at their next scheduled meeting.~~

- ~~**Interpretation of Standards** All persons who are directly and materially affected by the NPCC's bulk power system reliability shall be permitted to request an interpretation of a standard. The person requesting an interpretation will send an email request to the Regional Standards Process Manager (RSPM), as noted on the NPCC website, explaining the specific circumstances surrounding the request and what clarifications are required as applied to those circumstances. The request should indicate the material impact to the requesting party or others caused by the lack of clarity or a possibly incorrect interpretation of the standard. The RSPM along with guidance from the RSC will forward the request to the originating Task Force which acted as the drafting team for that regional reliability standard. The Task Force will address, through a written response, the request for clarification as soon as practical, but not more than 45 business days from its receipt by the Task Force. This written interpretation will be posted along with the final approved and adopted standard and will stand until such time as the standard is revised through the normal RSAR process, at which time the standard will be modified to incorporate the clarifications provided by the interpretation.~~

2. ELEMENTS OF A ~~RELIABILITY~~REGIONAL STANDARD

- ~~**Elements of a Regional Reliability Standard**~~

To ensure uniformity of regional ~~reliability~~standards and avoid inconsistency with NERC continent-wide standards, a NPCC regional ~~reliability~~ standard shall ~~consist of~~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. ~~This~~The application of a systematic discipline is necessary ~~to~~for achieving regional standards that are measurable, enforceable, and consistent~~.~~ as well as results oriented[6], i.e.:

[6] Results-based Standards see http:www.nerc.com/filez/standards/Project2010-06_Results-based_Reliability_Standards.html

~~All mandatory requirements of a regional reliability standard shall be within the standard document. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself.~~

~~The most current version of the approved NERC Reliability Standard template and its associated elements as or if applicable, will be used at the time of the development of the NPCC Regional Reliability Standard to ensure all essential elements are contained therein to achieve consistency and uniformity and meet all statutory requirements. A sample of the elements contained in the standard appears in Table 1 below, however the latest ERO Board approved Standard template, that may be found on the NERC website, will supersede the list below at the time the regional standard is developed.~~

~~Table 1- Elements of a Regional Reliability Standard~~

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

TYPES OF RELIABILITY REQUIREMENTS

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. 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, i.e. an effect that can be measured using power system data or trends.

b) **Risk-based** - defines actions of entities that reduce a stated risk to the reliability of the Bulk Electric System and can be measured by evaluating a particular product or outcome resulting from the required actions.

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

Each regional standard shall enable or support one or more of the reliability principles[7] as 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 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

[7] Available on the NERC website: Reliability Principles
[8] Available on the NERC website: Adequate Level of Reliability
[9] Available on the NERC website: Market Principles

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. The components of a NPCC regional standard identified below are based on the NERC Standard Processes Manual (SPM) that was approved by the NERC Board of Trustees at its February 2013 meeting. Future revisions of the NERC SPM will be used at the time of development of a NPCC regional standard if different from the elements listed below.

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 functional 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.
~~***Identification Number:***~~	A unique identification number assigned in accordance with ~~an administrative~~a published classification system to facilitate tracking and reference~~. (i.e. "NPCC-BAL-002-0-Date" which refers~~ to ~~NPCC Regional Standard, referencing NERC BAL-002 Version 0, with NPCC Effective Date-final adoption by all Regional Authorities)~~the regional standards.
~~***Title*** ***Purpose:***~~	~~A brief, descriptive phrase identifying~~The reliability outcome achieved through compliance with the ~~topic~~requirements of the regional standard.
Applicability:	~~Clear identification of~~Identifies which entities are assigned reliability requirements; i.e., the specific functional ~~classes of~~ entities ~~responsible for complying with~~and facilities to which the regional standard~~, noting any specific additions or exceptions.~~ ~~The standard will be applicable to the Bulk Power System unless otherwise noted~~ applies.
Effective ~~**Date and Status**~~ ***Dates:***	~~The effective date of the standard or, prior to approval of the standard, the proposed effective date.~~Identification of the date or pre-conditions determining when each Requirement becomes effective in each jurisdiction.

~~**Purpose**~~	~~The purpose of the standard. The purpose shall explicitly state what outcome will be achieved or is expected by this standard.~~
~~**Requirement(s)**~~	~~Explicitly stated technical, performance, and preparedness requirements. Each requirement identifies what entity is responsible and what action is to be performed or what outcome is to be achieved. Each statement in the requirements section shall be a statement for which compliance is mandatory.~~

~~**Risk Factor(s)**~~ ***Requirement:***	~~The potential reliability significance of each requirement, designated as a High, Medium, or Lower Risk Factor in accordance with the criteria listed below:~~ ~~A High Risk Factor requirement (a) is one that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures; or (b) is a requirement in a planning timeframe that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.~~ ~~A Medium Risk Factor requirement (a) is a requirement that, if violated, could directly affect the electrical state or the capability of the bulk power system, or the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures; or (b) is a requirement in a planning timeframe that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system, but is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk power system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.~~ ~~A Lower Risk Factor requirement is administrative in nature and (a) is a requirement that, if violated, would not be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor and control the bulk power system; or (b) is a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system.~~An explicit statement that identifies the functional entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each requirement shall be a statement for which compliance is mandatory.
~~**Measure(s)**~~	~~Each requirement shall be addressed by one or more measures. Measures are used to assess performance and outcomes for the purpose of determining compliance with the requirements stated above. Each measure will identify to whom the measure applies and the expected level of performance or outcomes required demonstrating compliance. Each measure shall be tangible, practical, and as objective as is practical. It is important to~~

	~~realize that measures are proxies to assess required performance or outcomes. Achieving the measure should be a necessary and sufficient indicator that the requirement was met. Each measure shall clearly refer to the requirement(s) to which it applies.~~

~~**Table 2 —**~~ Compliance Elements: Elements to aid in the administration of ~~**a Regional Reliability Standard**~~compliance monitoring and enforcement responsibilities.

Measure:

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

~~**Compliance Monitoring Process**~~***Violation Risk Factors and Violation Severity Levels:***

~~Defines for each measure:~~

- ~~The specific data or information that is required to measure performance or outcomes.~~
- ~~The entity that is responsible for providing the data or information for measuring performance or outcomes.~~
- ~~The process that will be used to evaluate data or information for the purpose of assessing performance or outcomes.~~
- ~~The entity that is responsible for evaluating data or information to assess performance or outcomes.~~
- ~~The time period in which performance or outcomes is measured, evaluated, and then reset.~~
- ~~Measurement data retention requirements and assignment of responsibility for data archiving.~~

~~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. Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the Drafting Team, working with NPCC Standards Staff, at the same time as the associated Reliability Standard, but are not part of the Reliability 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 a 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.

~~*Supporting Information Elements*~~

Informational Elements: Elements to aid in the implementation of the regional standard.

~~Interpretation~~	~~Any interpretation of regional reliability standard that is developed and approved in accordance with the "Interpretation of Standards" section of Appendix A of this procedure, to expound on the application of the standard for unusual or unique situations or to provide clarifications.~~

~~Implementation Plan~~*Application Guidelines:*	~~Each regional reliability standard shall have an associated implementation plan describing the effective date of the standard or effective dates if there is a phased implementation. The implementation plan may also describe the implementation of the standard in the compliance program and other considerations in the initial use of the standard, such as necessary tools, training, etc. The implementation plan must be posted for at least one public comment period and is approved as part of the ballot of the standard.~~Guidelines to support the implementation of the associated regional standard.

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

~~Supporting References~~*~~Procedures:~~*

~~This section references related documents that~~ Procedures to support ~~reasons for, or otherwise provide additional information related to~~ implementation of the associated regional ~~reliability~~ standard. ~~Examples include, but are not limited to:~~

- ~~Glossary of terms~~
- ~~Developmental history of the standard and prior versions~~
- ~~Notes pertaining to implementation or compliance~~
- ~~Standard references~~
- ~~Standard supplements~~
- ~~Procedures~~
- ~~Practices~~
- ~~Training references~~
- ~~Technical references~~
- ~~White papers~~
- ~~Internet links to related information~~

~~3. Terms And Functions~~

- ~~**Regional Standards Committee (RSC)** – An NPCC committee charged with management of the NPCC Standards Procedure under a sector based voting structure as described in the NPCC Bylaws. The NPCC RSC will consider requests for new or revised standards and be available for advisement to the NPCC Board on the standards.~~

  ~~The RSC may not itself modify the standard without issuing a new notice to stakeholders regarding a vote of the modified standard. Any RSC action will only be activated in the event of a minor correction of a standard such as errata.~~

  ~~The RSC is an open and balanced stakeholder committee inclusive of all stakeholder interests that provide for or are materially impacted by the reliability of the bulk power system.~~

  ~~The RSC disposition regarding the regional standard authorization request, which will in all cases be within 60 calendar days of receipt of a completed standard request, shall include:~~

  - ~~Accept the standard request as a candidate for development of a new standard, revision of an existing standard, or deletion of an existing standard. The RSC may, at its discretion, expand or narrow the scope of the standard request under consideration. The RSC shall prioritize the development of standards in relation to other proposed standards, as may be required based on the volume of requests and resources.~~

- ~~Reject the standard request. If the RSC rejects a standard request, a written explanation for rejection will be delivered to the requester within 30 calendar days of the decision.~~
- ~~Remand the standard request back to the requester for additional work. The standards process manager will make reasonable efforts to assist the requester in addressing the deficiencies identified by the RSC. The requester may then resubmit the modified standard request using the process above. The requester may choose to withdraw the standard request from further consideration prior to acceptance by the RSC.~~

IV. ~~The NPCC~~ REGIONAL STANDARDS DEVELOPMENT PROCESS

1. ROLES IN THE NPCC REGIONAL STANDARD PROCESS ~~responsibilities of the RSC will include:~~

- ~~Review of NPCC Draft Standards for such factors as completeness, sufficient detail, rational result, and compatibility with existing standards; clarifying standard development issues not specified in this procedure. Under no circumstance will the RSC change the substance of a draft standard.~~
- ~~Due consideration to the work of the drafting team as well as the comments of stakeholders and minority objections, in approving a proposed regional reliability standard to go to ballot.~~
- ~~Approve standards for pre-ballot posting under a sector based voting structure as described later in the NPCC Inc. Bylaws or~~
- ~~Remand the standard back to the Task Force acting as the drafting team for further work or recommend a change in those participating in the drafting team (i.e. a new drafting team).~~

- ~~**Regional Standards Process Manager (RSPM)** - The Regional Reliability Standards Procedure shall be administered by a NPCC staff Regional Standards Process Manager. The RSPM is responsible for ensuring that the development and revision of standards is in accordance with this manual. The RSPM works to ensure the integrity of the process, format, consistency of quality, and completeness of the reliability standards. The RSPM facilitates all steps in the process.~~

- ~~**RELIABILITY COORDINATING COMMITTEE (RCC)** - The RCC, will support the standards development process through the assignment of NPCC Task Forces. They will also provide a technical advisory role in the Regional Reliability Standards development procedure through recommendations.~~

~~REQUESTER~~ ~~**A Requester is any individual or an entity**~~ NOMINATION, REVISION, INTERPRETATION, OR RETIREMENT OF A STANDARD:

Any member of NPCC or group within the NPCC region shall be allowed to request that a NPCC regional standard be developed, modified, interpreted, or retired. Additionally, any person (organization, company, government ~~authority~~agency, individual, etc.) ~~that submits a complete~~

~~request for development, revision, or withdrawal of a standard. Any person or an entity that~~ who is directly and materially affected by ~~an existing standard or the need for a new standard may submit a~~ the reliability of the NPCC Bulk Electric System shall be allowed to request ~~for a new standard or revision to a standard. The Requester is assisted by the RSAR drafting team (if one is appointed by the RSC) to respond to comments and to decide if and when the RSAR is forwarded to the RSC with a request to draft a standard. The Requester is responsible for the RSAR, assisted by the RSAR drafting team and Regional Standards~~ that a NPCC regional standard be developed, modified, interpreted, 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 for the regional standards development process steps and associated flowchart.

PROCESS ~~**Manager, until such time the RSC authorizes**~~ ROLES AND RESPONSIBILITIES

BOARD OF DIRECTORS

The NPCC Board of Directors (Board) shall consider for adoption regional standards, definitions, variances and interpretations and associated implementation plans that have been processed according to the processes identified in this manual. Once the Board adopts a regional standard, definition, variance or interpretation, the Board shall direct NPCC Standards Staff to submit the document(s) for approval to the NERC Board of Trustees.

COMPLIANCE COMMITTEE (CC)

The NPCC Compliance Committee, a committee of the NPCC Board of Directors, manages the NPCC Compliance Monitoring and Enforcement Program (CMEP). The CMEP is used to monitor, assess and enforce mandatory compliance with both NERC continent-wide and NPCC regional standards. The CC aides in the regional standards development, as necessary, by: (1) performing compliance reviews of technical requirements, (2) assisting the Drafting Team with the development of ~~the standard. The Requester has the option at any time to allow the RSAR drafting team to assume full~~Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs), Reliability Standard Audit Work Sheets (RSAWs) and (3) participating on quality review teams.

DRAFTING TEAM

The Drafting Team develops standards-related regional products as directed by the NPCC RSC and within the scope of an approved Regional Standard Authorization Request (RSAR) or a formal Request for Interpretation (RFI). 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 a 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.

MANAGER OF RELIABILITY STANDARDS

The NPCC Manager of Reliability Standards has the overall responsibility for ~~the RSAR. The Requester may chose to~~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 ~~subsequent standard drafting efforts related to the RSAR.~~the balloting of regional standards. Any entity or person, including non-NPCC members, may submit comments during the open process comment periods for standards.

NON-NPCC MEMBERS

Any entity or person that is neither a General nor Full Members 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 STAFF

The Standards Staff is responsible for assisting the NPCC 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~~. The committees, task forces and working groups~~ within NPCC~~,~~ serve an active role in the standards process. Activities performed by these groups include, but are not limited to, the following:

- Identify the need for new or modified regional standards~~ 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) to standards actions~~.~~
- ~~•~~ Participate in NPCC Standard drafting~~.~~
- ~~•~~ Provide technical oversight in response to changing industry conditions ~~—~~and ERO Requirements~~.~~
- ~~•~~ Conduct Field Tests, as required

REGIONAL STANDARDS COMMITTEE (RSC)

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 Standards Process Manual (RSPM), including the endorsement of RSPM revisions for NPCC Board review and approval.

RELIABILITY COORDINATING COMMITTEE (RCC)

The Reliability Coordinating Committee (RCC) supports the standards development process through the assignment of 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.

REQUESTER

4. ~~PROCEDURE DESCRIPTION~~

~~***STEPS 1 AND 2: REQUEST TO DEVELOP A NEW REGIONAL STANDARD***~~

~~Requests to develop a new Regional Reliability Standard shall be submitted to the RSPM by completing a **Regional Standard Authorization Request** (RSAR) ***(see Appendix A)***. The RSAR is a description of the new or revised standard in sufficient detail to clearly define the scope, purpose, and importance of the Regional Standard, impacted parties or other relevant information. A "needs" statement will provide the justification for the development of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard. The RSPM shall maintain the RSAR form and make it available electronically on the NPCC website.~~

~~Any person or entity ("Requester") directly or materially affected by an existing standard or the need for a new or revised standard may initiate a RSAR.~~

~~The Requester will submit the RSAR to the RSPM electronically and the RSPM will acknowledge receipt of the RSAR immediately, through electronic receipt. The RSAR, as a minimum, needs to contain the following information in order to be qualified for consideration. The NPCC RSPM will assist the Requester to ensure all the following information is submitted (on the RSAR) in a form appearing in Appendix A:~~

~~1. Proposed Title and Date of New RSAR~~
~~2. Requester's Name and Contact Information~~

Any individual representing an organization (entity, company, government agency, etc.) that is directly and materially affected by the reliability of the Bulk Electric System within the NPCC geographical area may request a regional standard be developed or an existing regional standard be modified, interpreted, or deleted.

QUALITY REVIEW TEAM

The NPCC Standards Staff shall coordinate a quality review of the "final draft" of the regional standard, implementation plan, VRFs and VSLs to assess whether the documents are within the scope of the associated RSAR, and whether the regional standard is clear and enforceable as written. The Quality Review Team may be comprised of legal and compliance representatives, a technical writer, and NPCC Standards Staff. It will not involve individuals who participated on the Drafting Team of the standard undergoing the Quality Review.

2. STANDARD DEVELOPMENT PROCESS STEPS

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

A Regional Standard Authorization Request[11] (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.

A RSAR shall be used to seek approval and initiate the development, modification or retirement of a NPCC regional standard. A RSAR is not used to seek a formal Request for Interpretation (RFI) of a NPCC regional standard. The initiation and handling of a RFI is covered in Step 3 STANDARD INTERPRETATION PROCESS STEPS, of this manual.

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

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 a 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, via npccstandard@npcc.org, for processing.

STEP 2.1.B. NPCC MANAGER OF RELIABILITY STANDARDS ACTIONS

The NPCC Manager of Reliability Standards shall review the submitted RSAR and verify that the submitted form has been adequately completed. Within fifteen (15) calendar days[12] of receipt of the submitted RSAR, the NPCC Manager of Reliability Standards will electronically acknowledge 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 decide on how to proceed.

3. Within ten (10) calendar days of the receipt of an adequately completed RSAR, the NPCC Manager of Reliability Standards **PURPOSE** ~~of the Regional Standard~~
4. ~~Description of Industry Need~~
5. ~~Provide a Brief Description of the Standard~~
6. ~~Identification of the Entities in the Functional Model as being responsible to adhere to the standard.~~
7. ~~Necessary information to assist the drafting the team, to the extent feasible, to allow them to draft the standard.~~
8. ~~A cross references to existing NPCC or NERC documents~~

[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.

~~The RSPM~~ shall forward ~~all~~the properly completed ~~RSARs to the RSC. The RSC shall meet at established intervals to review all pending RSARs. The frequency of this review process will depend on workload, but in no case shall a properly completed RSAR wait for~~ 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~~ action more than 60 calendar days from the date of receipt. The RSC may~~) 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 properly completed RSAR wait for RSC action more than 60 calendar days from the date of receipt by the RSC.

The RSC shall review the RSAR and take one of the following actions:

- ~~•~~ Remand the RSAR back to the ~~RSPM~~NPCC Manager of Reliability Standards for additional work. In this case, the ~~RSPM~~NPCC Manager of Reliability Standards may request additional information or clarification for the RSAR from the Requester.

  ~~• Accept~~Reject the RSAR ~~as a candidate for a new or revised standard~~. In this case, the RSC will ~~forward the RSAR to the RCC to assign a NPCC Task Force to provide technical support and analysis of comments for that RSAR, and assist the Requester and the RSPM in the remaining steps of the process. The RSPM shall post notification of intent to develop a standard on both NPCC and ERO websites within 30 calendar days of acceptance.~~
- ~~• 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 ~~30~~ten (10) calendar days of the rejection decision.

~~STEPS 3, 4, AND 5: RSC ACCEPTS RSAR AND RCC ASSIGNS TF TO DRAFT NEW OR REVISED STANDARD~~

Note: Before the RSC can accept a 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 5 RETIREMENT OF AN APPROVED NPCC REGIONAL STANDARD.

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

A RSAR that ~~is~~has been accepted by the RSC ~~will~~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~~. Within 60 calendar days the~~). The RCC shall, within sixty (60) calendar days, assign the development of the regional standard to a NPCC Task Force, and notify the NPCC Manager of Reliability Standards of its decision within ten (10) calendar days.

After receipt of the notification of Drafting Team~~. The RSPM shall solicit and recommend~~ assignment, the NPCC Manager of Reliability Standards shall oversee solicitation and recommendation of a list of additional qualified[13] candidates over and above the appropriate NPCC Task Force members, for appointment to the ~~team and~~Drafting Team. The Requester and a 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 ~~to the RSC.~~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 RSC shall provide the Drafting Team with any preliminary development products including, but not limited to, a draft standard, comments, and related white papers.

STEP 2.3: DEVELOPMENT OF A REGIONAL STANDARD AND ASSOCIATED DOCUMENTS

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 ~~list shall include the Requester. The RSC may select other individuals to serve, with the Task Force to draft the Standard. This team shall~~work plan must be submitted to the RSC for its concurrence. When a Drafting Team begins its work, it shall regularly (at least quarterly) report progress against that aforementioned work plan to the NPCC Manager of Reliability Standards for presentation to the RSC.

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

Note: During the regional standards development, the Drafting Team will deliberate on whether the requirements in the regional standard are developed enough to begin the Cost Effectiveness Analysis (CEA) of the NPCC Cost Effectiveness Analysis Procedure (CEAP). When appropriate, the Drafting Team shall request that the RSC initiate the second phase (CEA) of the CEAP process.

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 ~~a small group of people who collectively have the necessary technical expertise and work process skills.~~ the following

- ~~The RSPM shall assign~~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 ~~staff personnel to~~criteria that will be deleted, in part or whole, or otherwise impacted by the implementation of the draft regional standard
- 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

NPCC Standards Staff can assist in the drafting of the regional standard including compliance ~~measure~~measures, process and elements. The drafting of measures and compliance administration aspects of the standard will be coordinated with the NPCC Compliance ~~Program.~~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 ~~*6: SOLICIT PUBLIC*~~ 2.4: POSTING FOR COMMENT PERIOD AND RESOLUTION OF COMMENTS ~~*ON DRAFT STANDARD*~~

~~Once a draft standard has been verified by the RSC to be within the scope and purpose of the RSAR, the RSPM will post the draft standard for the purpose of soliciting public comments. The posting of the draft standard will be linked to the RSAR for reference. In addition to the standard, an implementation plan shall be posted to provide additional details to the public and aid in their commenting and decision process. Comments on the draft standard will be accepted for a 45 calendar day period from the public notice of posting. Comments will be accepted on-line using the NPCC Open Process web-based application.~~

~~Final draft standards will be concurrently posted on the ERO website for comments.~~

~~*STEPS 7, 8, AND 9: OPEN PROCESS POSTING AND ANALYSIS OF THE COMMENTS*~~

~~The RSPM~~

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.

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 ~~new~~ draft regional standard and ~~distribute those~~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 ~~to the Task Force acting as the standard drafting team. The Task Force shall give prompt consideration to the written views and comments of all participants. An effort to address all expressed comments shall be made~~shall be addressed, and each commenter shall be advised of the disposition ~~of the comment and the reasons therefore, in addition to public posting of the responses.~~, 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.

~~The Task Force acting as the Standard Drafting Team shall take one of the following actions:~~

- ~~Submit the draft standard for RCC endorsement as it stands, along with the comments received and responses to the comments. Based on the comments received, the Task Force acting as the standard drafting team may include revisions that are not substantive. A substantive change is one that directly and materially affects the application of the standard, including, for example: changing "shall" to "should," changing "should" to "shall"; adding, deleting, or revising requirements; or adding, deleting, or revising measures for which compliance is mandatory.~~

- ~~Make substantive revisions to the draft standard and reposts it for further open review and comment.~~

- ~~Task Force recommends Field Test if necessary to RSC.~~

~~Requester also may withdraw the request for a standard.~~

~~RCC submits proposed RRS to the RSC along with its recommendation based on comments, Task Force statements and any field test results.~~

~~STEPS 10 AND 11: RSC APPROVES OF THE NEW OR REVISED STANDARD FOR POSTING~~

If the RSC, acting with consideration of any recommendations by the RCC and utilizing the composite sector voting structure, as outlined in the NPCC, votes to post the draft standard for approval, the draft standard, all comments received, and the responses to those comments shall be posted electronically for the NPCC Members, by the RSPM and made public through the NPCC Website (www.npcc.org) for a 30 calendar day "pre-ballot review" and request for balloting. If the RSC decides more work is needed, the draft standard will be remanded back to the drafting Task Force. All actions of the RCC, Task Forces acting as drafting teams and the Regional Standards Committee will be recorded in regular minutes of the group(s) and posted on the NPCC website. Once the notice for a ballot has been issued, no substantive modifications may be made to the proposed standard unless the revisions are posted and a new notice of the vote is issued

STEPS 12, 13 AND 14: BALLOT OF STANDARD

Upon notification of a ballot, the Members of NPCC's registered ballot body will cast their vote consistent with the NPCC Bylaws. This ballot shall commence no sooner than 15 calendar days and no later than 30 calendar days following the notification of ballot. All members of the NPCC are eligible to participate in the voting on proposed, standard revisions or deletions of regional standards. The ballot period will typically begin immediately following the 30 calendar day pre-ballot posting and will last at least 10 business days.

The NPCC registered ballot body comprises all entities or individuals that qualify for one of the eight NPCC stakeholder sectors and are registered with NPCC as potential ballot participants in the voting on standards. Each member of the NPCC registered ballot body is eligible to vote on standards.

In order for a NPCC Regional Standard to be approved;

- A quorum must be established by at least 50% of the NPCC Members of at least 60% of the Voting Sectors on the roster of Members maintained by NPCC.
- A two-thirds majority of the total weighted sector votes cast must be affirmative. The number of votes cast is the sum of affirmative and negative votes, excluding abstentions, and non-responses. Weighted sector vote will be calculated as follows;
  - Affirmative votes cast in each sector will be divided by the sum of affirmative and negative votes cast, in that same sector, to determine the fractional affirmative vote for each sector. Abstentions and non-responses will not be counted for the purposes of determining the fractional affirmative vote for a sector.
  - The sum of the fractional affirmative votes from all sectors divided by the number of sectors voting will be used to determine if a two-thirds majority has been achieved. (A sector will be considered as "voting" if any member of the sector in the ballot pool casts either an affirmative or a negative vote.)
  - A standard will be approved if the sum of fractional affirmative votes from all sectors divided by the number of voting sectors is at least 2/3.

Ballots will be cast electronically and alternatives are as follows;

- Affirmative
- Affirmative with Comments

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 to assess whether the documents are within the scope of the associated RSAR, and whether the regional standard is clear and enforceable as written. 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

[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.

- 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 and implementation plan for ballot and concurrently provide an information copy to the RCC.

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

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.

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
  - ~~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 ~~RSPM~~ NPCC Manager of Reliability Standards shall post the final outcome of the ballot process~~.~~ on the NPCC website.

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

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

If ~~the~~ 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 ~~is rejected, it may be withdrawn~~. 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 curtailment of the regional standard development by ~~either~~soliciting the ~~RCC or the original~~ Requester~~, or the standard may be remanded~~ to withdraw the RSAR or by soliciting the RSC ~~back to the Task Force acting as the drafting team to address the issues. All~~ to reject the RSAR pursuant with STEP 2.1.C. NPCC REGIONAL STANDARDS COMMITTEE (RSC) ACTIONS. The NPCC Manager of Reliability Standards, in the event of a curtailment of the development of a regional standard, shall post a notice of the curtailment and will post and archive all comments submitted during the process ~~will be posted and archived~~ for future consideration ~~when redrafting~~, if required. The NPCC Manager of Reliability Standards will also notify NERC to process the proposed regional standard ~~upon~~in accordance with NERC's regional standards review~~.~~ procedure, as applicable.

~~The~~ 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~~, once~~ 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~~, and a recommendation will~~ 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 2.6: 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 ~~modifications~~revisions to the standard~~. If~~.]
- Remand the ~~Board does not approve the~~ regional standard ~~for transmittal~~back to the RSC and the Drafting Team to address their concerns.

STEP 2.7: NERC BOARD OF TRUSTEES SUBMITTAL

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

STEP 2.8: IMPLEMENTATION OF A NPCC REGIONAL STANDARD

Following the approval of a NPCC regional standard by FERC and the applicable Canadian Provincial regulatory and/or governmental authorities, all users, owners, planners, and operators of the Bulk Electric System in the NPCC geographic area are required to comply with the standard as of its enforcement date.

ERO approved Reliability Standards (both continent-wide and regional) are included in both the NERC and NPCC Compliance Monitoring and Enforcement Programs (CMEPs).

FIGURE 1: FLOWCHART OF REGIONAL STANDARDS DEVELOPMENT PROCESS

Placeholder for flowchart

3. STANDARD INTERPRETATION PROCESS STEPS

This section applies to NPCC regional standards that have been approved[16] and are currently enforceable or have a future enforcement date. A request for interpretation is not permitted for regional standards under development. For regional standards under development, clarification

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

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 REQUEST FOR INTERPRETATION (RFI)

Any member of NPCC or group within the NPCC region shall be allowed to submit a formal Request for Interpretation (RFI) of a 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 System shall be allowed to submit a formal Request for Interpretation (RFI) of a NPCC regional standard.

> *Note: A valid interpretation 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.*

Request for Interpretation of a NPCC regional standard shall be initiated under the NERC process for developing an interpretation. The entity requesting the interpretation shall submit a Request for Interpretation form[17] to the NERC Reliability Standards Staff explaining the clarification required, the specific circumstances surrounding the request, and the impact of not having the interpretation provided. A copy of the completed RFI form should also be sent to the NPCC Manager of Reliability Standards.

Upon receipt of a RFI for a requirement of a NPCC regional standard, NERC Reliability Standards Staff shall forward the RFI to the NPCC Manager of Reliability Standards and in doing so shall delegate the validation of and response to the RFI to NPCC.

STEP 3.2: REVIEW AND VALIDATION OF REQUEST FOR INTERPRETATION (RFI)

Upon receipt of the NERC delegation to NPCC to validate and respond to a RFI for a requirement of a NPCC regional standard, the NPCC Manager of Reliability Standards shall review the RFI to determine whether:

- It meets the requirements for a valid interpretation
- A compliance process or approach could be used in lieu of an interpretation

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

The following examples identify situations that may warrant a recommendation from the NPCC Manager of Reliability Standards to reject the RFI:

- 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 RFI)

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

- 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 ~~will be remanded back to the RSC.~~requests clarification of any element of a regional standard other than a requirement

- ~~If~~Where a question has already been addressed in the record
- Where the interpretation identifies an issue and proposes the development of a new or modified regional or continent-wide standard ~~is approved, the standard will~~(such issues should be ~~submitted to the NERC/ERO Board of Trustees for approval.~~addressed via submission of a RSAR or SAR)

- ~~**STEPS 15, 16 AND 17: IMPLEMENTATION OF**~~ Where an interpretation seeks to expand the scope of a regional standard
- Where the requirement of the regional standard is clear

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

~~Upon approval within the NPCC , the standard will be~~The RSC shall review the RFI along with the recommendation from the NPCC Manager of Reliability Standards and take one of the following actions:

- Reject the RFI. 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 RFI to the entity requesting the interpretation within ten (10) calendar days of the decision to reject.
- Accept the RFI. In this case, the RSC will provide its determination to the NPCC Manager of Reliability Standards, who will then: 1) post notification on the NPCC website of the intent to develop an interpretation; 2) notify the ERO for processing in accordance with its process, as applicable; and 3) notify the Requester of the acceptance of the RFI.

STEP 3.4: FORMATION OF DRAFTING TEAM FOR RESPONSE TO RFI

A RFI that has been accepted by the RSC shall, within ten (10) calendar days of the acceptance of the RFI, be assigned by the NPCC Manager of Reliability Standards to the responsible NPCC Task Force to make up the interpretation Drafting Team and develop the RFI response.

STEP 3.5: DEVELOPMENT OF RESPONSE TO RFI

> *Note: A valid interpretation 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.*

The Drafting Team shall submit a proposed interpretation response within forty-five (45) calendar days, from the receipt of the RFI, to the NPCC Manager of Reliability Standards to obtain RSC concurrence to post the proposed response for comment.

If the RSC concurrence is not received, the Drafting Team will continue to refine the interpretation response.

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

STEP 3.6: POSTING RFI FOR COMMENT PERIOD AND RESOLUTION OF COMMENTS

As authorized by the RSC, the NPCC Manager of Reliability Standards shall post the proposed interpretation response on the NPCC website for a forty-five (45) calendar day comment period. NPCC Manager of Reliability Standards shall also notify NERC for processing 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 proposed interpretation response 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 proposed interpretation response 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 3.5: DEVELOPMENT OF RESPONSE TO RFI to revise the proposed interpretation response.
- Accept the proposed interpretation response "as is" to move forward through the remainder of the process.

Upon Completion of the final comment period the Drafting Team shall submit the proposed interpretation response to the NPCC Manager of Reliability Standards to obtain RSC concurrence to submitted ~~to~~ proposed interpretation response.

The NPCC Manager of Reliability Standards shall also publicly post all of the ~~NERC/ERO~~Drafting Team's responses to stakeholder comments on the NPCC website.

STEP 3.7: REGIONAL STANDARDS COMMITTEE APPROVAL OF RFI

Upon receipt of the RFI response from the NPCC Manager of Reliability Standards, the RSC shall elect to:

- Endorse the proposed interpretation response

- Direct the Drafting Team to return to STEP 3.5: DEVELOPMENT OF RESPONSE TO RFI to revise the proposed interpretation response
- Direct the Assistant Vice President Standards to forward the RFI to the NPCC Board of Directors for final Regional approval~~(s)~~

STEP 3.8: NPCC BOARD OF DIRECTORS APPROVAL OF RFI

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

- Approve the interpretation response as presented
- Approve the interpretation response with ~~FERC~~comments to incorporate non-substantive revisions. [The NPCC Board of Directors may not make substantive revisions to the interpretation response.]
- Remand the interpretation response back to the RSC and the Drafting Team to address their concerns

Upon receipt of Board approval, the NPCC Manager of Reliability Standards shall notify NERC of the approved interpretation for processing in accordance with NERC procedures, as applicable ~~Canadian~~.

FIGURE 2: FLOWCHART OF REGIONAL STANDARDS INTERPRETATION PROCESS

Placeholder for flowchart

4. WITHDRAWAL OF A REGIONAL STANDARD PENDING APPROVAL

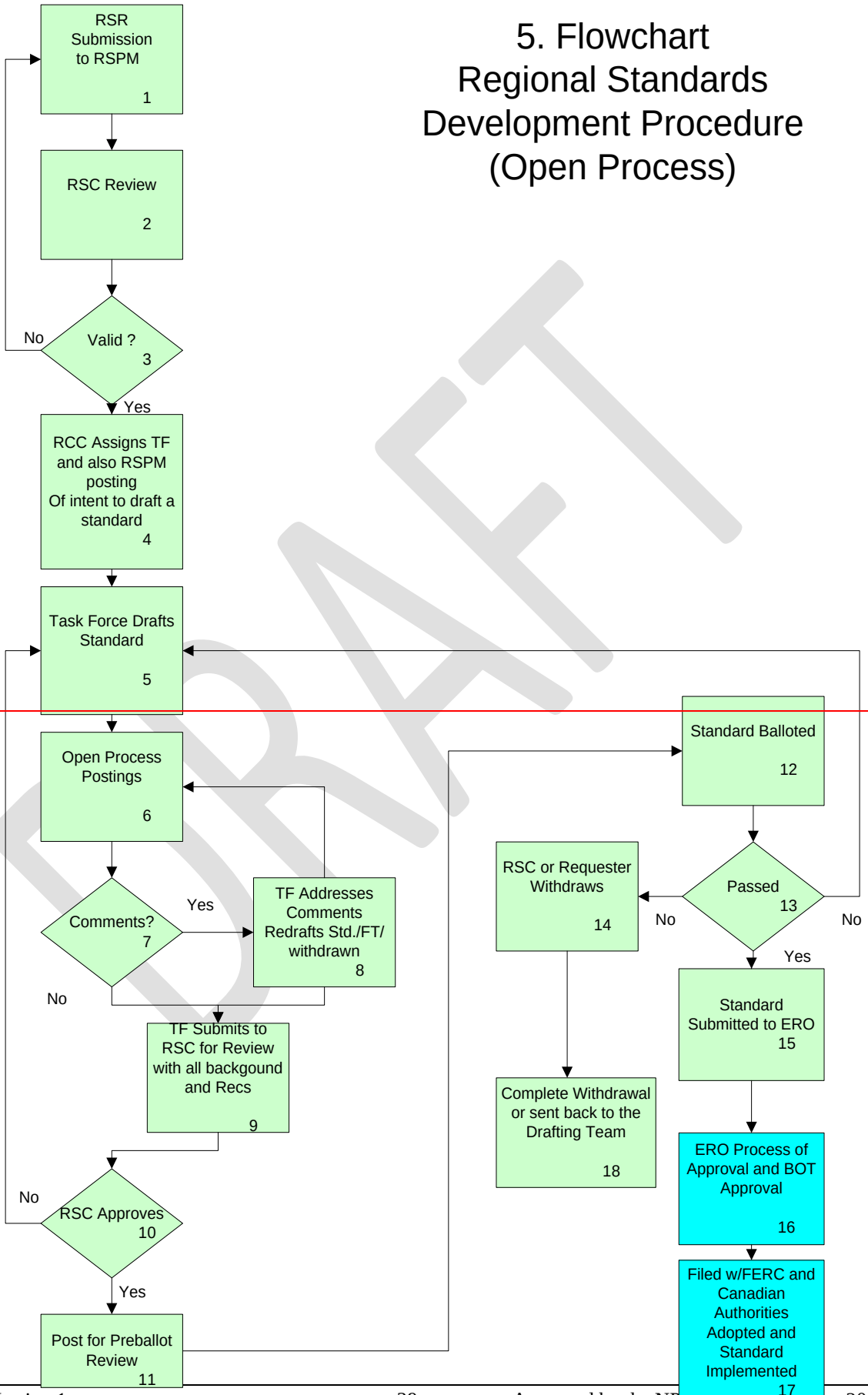
The term "withdrawal" as used herein, refers to the revocation of a request for approval of a regional standard, variance, interpretation or definition that has been approved by the NPCC Board of Directors and has not been filed with Applicable Governmental ~~and/or Regulatory~~ Authorities ~~for adoption.~~or has been filed but not yet approved by Applicable Governmental Authorities. The RSC may withdraw a regional standard, variance, interpretation or definition for good cause upon approval by the NPCC Board of Directors. Upon approval by the NPCC Board of Directors, the NPCC Manager of Reliability Standards will notify NERC Staff to petition the Applicable Governmental Authorities, as necessary, to allow for withdrawal.

~~Once a reliability standard is adopted and made effective, all users, owners, planners, and operators of the Bulk Power System in the NPCC geographic area of the Northeast are required to comply with the standard. The NERC/ERO Board of Trustees has established a separate compliance program, also administered in the Northeast by NPCC , to measure compliance with the standards and administer sanctions as appropriate. After adoption of a NPCC Regional Standard, the standard will be forwarded to the compliance program for compliance monitoring and enforcement.~~

~~**STEP 18: WITHDRAWAL OF STANDARD**~~

~~Upon rejection of a proposed standard, the RCC or the requester may withdraw the standard completely or remand it back to the Task Force acting as the standard drafting team for further work.~~

5. Flowchart Regional Standards Development Procedure (Open Process)



~~**6. ERO and Regulatory Process and Approvals**~~

- ~~**NERC/ERO Comment Period** – NERC/ERO shall publicly notice and request comment on the NPCC Regional Reliability Standard, allowing a minimum of 45 calendar days for comment on NERC's website and actively notify all adjoining Regions. Concurrent with this regional posting, final drafts will be forwarded to NERC for posting on the NERC website to ensure full industry awareness of the standard and expedite and coordinate all commenting. All comments will be responded to electronically through a posted response on the NPCC website or a link on the NERC website. NPCC shall have an opportunity to resolve any objections identified in the comments and may choose to withdraw the request, revise the NPCC Regional Reliability Standard and request another posting for comment, or submit the NPCC Regional Reliability Standard along with a response to any objections received, for approval by NERC.~~

- ~~**NERC/ERO Approval of NPCC Regional Reliability Standards** – Proposed regional reliability standards shall be subject to approval by the NERC/ERO who shall have a process to evaluate and recommend whether a proposed non-Interconnection-wide NPCC Regional Reliability Standard has been developed in accordance with all applicable procedural requirements and whether NPCC has considered and addressed stakeholder objections. NPCC Board, having been notified of the results of the regional ballot concerning a NPCC Regional Reliability Standard, shall vote to submit the Standard to the NERC/ERO Board for approval as a NERC Reliability Standard. The NERC/ERO Board shall consider NPCC's request, the scope and implications of the Standard, the recommendation for action on the Standard, any unresolved stakeholder comments, and NPCC's consideration of comments and unresolved issues if any, in determining whether to approve the NPCC Regional Reliability Standard as a NERC Reliability Standard.~~

- ~~**Regulatory Authority Approval** – An NPCC Regional Reliability Standard that has been approved by the NERC/ERO board shall be filed with FERC and applicable Canadian Governmental and/or Regulatory Authorities for approval and shall become effective and enforceable within the U.S., per Section 215 of the Federal Power Act, only when adopted by FERC, and within Canada, only when adopted by applicable Canadian Governmental and/or Regulatory Authorities. The regional reliability standard, once adopted will be made part of the body of NERC reliability standards and shall be mandatory and enforceable on all applicable bulk power system owners, operators, and users within the NPCC Region, regardless of membership status.~~

5. Retirement of an Approved NPCC Regional Standard

The term "retirement" refers to the discontinuation of a regional standard, variance, interpretation or definition that: 1) has been approved by Applicable Governmental Authorities and 2) is not being superseded by or merged into a new or revised regional standard, interpretation or definition.

Upon identification of a need to retire a regional standard, variance, interpretation or definition, where the item will not be superseded by a new or revised version, a RSAR containing the proposal to retire a regional standard, variance, interpretation or definition will be posted for a comment period and ballot in the same manner as a Reliability Standard. 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. Upon approval by the NPCC Members and the NPCC Board of Directors, the NPCC Manager of Reliability Standards shall submit the request for retirement to NERC, as the Electric Reliability Organization, for approval and to subsequently petition the Applicable Governmental Authorities to allow for retirement.

6. 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, interpretation 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 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 or cyber-attack on the Bulk Electric System
- 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, interpretation or definition has already been vetted by the industry through the 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 standard.

A waiver request may be submitted to the RSC by any entity or individual, including NPCC committees or subgroups and NPCC Standards Staff. Prior to consideration of any waiver request, the NPCC Manager of Reliability Standards 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 Standards process, the Assistant Vice President Standards shall report the exercise of this waiver provision to the NPCC Board of Directors prior to adoption of the related Reliability Standard, interpretation, definition or variance. Actions taken pursuant to an approved waiver request will be posted on the NPCC Standards webpage.

In addition,

7. Process For Correcting Errata

From time to time, an error may be discovered in a regional 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 agrees that the correction of the error does not change the scope or intent of the associated regional standard, and agrees that the correction has no material impact on the end users of the regional standard.

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

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

- Pending filing with NERC for approval, the corrected regional standard approved by the RSC shall be filed with NERC for approval in lieu of the regional standard approved by the NPCC Board of Directors
- Filed with NERC for approval, then the correction shall be filed for approval with NERC

~~7.~~8. 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 ~~development,~~ approval, revision, reaffirmation, or withdrawal of a regional ~~reliability~~ standard (appellant) shall have the right to appeal. This appeals process applies only to the regional standards process as defined in this ~~procedure~~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 ~~RSPM~~NPCC Manager of Reliability Standards that describes the substantive or procedural action or inaction associated with a ~~reliability standard~~Reliability Standard or the standards process. The appellant describes in the complaint the actual or potential adverse

impact to the appellant. Assisted by any necessary ~~staff~~NPCC Standards Staff and ~~committee~~Committee resources, the ~~RSPM~~NPCC Manager of Reliability Standards 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 standard and posted with the 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 ~~regional standards process manager~~NPCC Manager of Reliability Standards, the ~~RSPM~~NPCC Board of Directors shall ~~convene~~appoint a five member panel to serve as a Level 2 Appeals Panel. ~~This panel shall consist of five members total appointed by the NPCC's board.~~

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

The ~~RSPM~~NPCC Manager of Reliability Standards shall post the complaint and other relevant materials and provide at least a thirty (30) calendar ~~days~~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.~~Reliability 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~~Board decides whether to adopt a particular ~~reliability standard~~Reliability 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 standard in question.

APPENDIX A-: RSAR COMPLETION GUIDELINES

The Requester shall complete a 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 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 ~~Regional~~Manager of Reliability Standards ~~Process Manager,~~, at ~~NPCCstandard@npcc.org~~ .npccstandard@npcc.org. The NPCC ~~Regional~~Manager of Reliability Standards ~~Process Manager~~ shall be responsible for implementing and maintaining this form as needed to support the information requirements of the 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.**)~~

~~Industry Need (Provide **a detailed statement justifying the need for the proposed standard, along with any supporting documentation.**)~~

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

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 Authority	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 power systems~~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 power systems~~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 power systems~~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 power systems~~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 power systems.~~Bulk Electric System.
☐	6. Personnel responsible for planning and operating interconnected ~~bulk power systems~~Bulk Electric System shall be trained, qualified, and have the responsibility and authority to implement actions.
☐	7. The security of the interconnected ~~bulk power systems~~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 an Common Attribute of a robust North American economy:	
1. A reliability standard shall not give any market participant an unfair competitive advantage~~. Yes~~. Yes	
2. A reliability standard shall neither mandate nor prohibit any specific market structure. ~~Yes~~ Yes	
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. ~~Yes~~ 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~~ 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 standard.

Drafting team 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
- Champions for standard development and promoters of the approval of the standard
- 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 standard. The SMEs should represent a cross section of the registered entities applicable to the 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, at npccstandard@npcc.org.

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 Staff at npccstandard@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 by the NPCC Regional Standards Committee (RSC). This means that if you are appointed to the DT you are expected to attend all (or at least the vast majority) of the face-to-face DT meetings as well as participate in all the DT meetings held via conference calls. Failure to do so shall result in your removal from the DT.

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 NERC Region that you represent:	**Select each Industry Segment that you represent:**	
☐ ERCOT	☐	1 — Transmission Owners
☐ FRCC	☐	2 — RTOs, ISOs
☐ MRO	☐	3 — Load-serving Entities
☐ NPCC	☐	4 — Transmission-dependent Utilities
☐ RFC	☐	5 — Electric Generators
☐ SERC	☐	6 — Electricity Brokers, Aggregators, and Marketers
☐ SPP	☐	7 — Large Electricity End Users
☐ WECC	☐	8 — Small Electricity End Users
☐ NA – Not Applicable	☐	9 — Federal, State, and Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities
	☐	NA – Not Applicable

Select each Function[18] 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

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

☐ Planning Coordinator	

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 Standards Process 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 five (5) years after the first regulatory approval and follow the same process as in the case of a new standard. If no changes are warranted, the Regional Standards Committee (RSC) shall recommend to the NPCC Board that the 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 standard subject to revision will remain in effect until such time as the revised version has received FERC or applicable Provincial Governmental Authorities 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 five (5) years, or more frequently if needed, and subject to the same procedure as applies to the development of a Regional Standard. 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 Applicable Governmental Authorities in Canada.