



Peter Brandien  
Vice President, System Operations

June 15, 2017

Mr. Edward Schwerdt  
Northeast Power Coordinating Council  
1040 Avenue of the Americas, 10<sup>th</sup> Floor  
New York, NY 10018

Ed,

I'm writing you today to request that NPCC undertake a comprehensive evaluation of the need for the NPCC regional criteria. ISO New England appreciates NPCC's periodic reviews of existing criteria and the ongoing effort to evaluate the application of NPCC Document A-10, "Classification of Bulk Power System Elements". As noted in the request for comments on the A-10 document, in the past, a key purpose of regional criteria was for NPCC members to "identify their most critical facilities as Bulk Power System elements and hold those facilities to a more stringent, regionally specific set of reliability criteria." That practice has been useful and beneficial to the New England region. However, that practice was developed at a time when there were no mandatory Reliability Standards and continued to be needed to supplement the voluntary national standards that were created. With the passage of the Energy Policy Act of 2005 (EPACT), Reliability Standards are now mandatory, audited, and enforced. Further, in the 12 years since the EPACT of 2005 was passed, the work on ever more comprehensive and stringent Reliability Standards has been continuous. ISO New England believes that the mandatory Reliability Standards, such as the TPL standards, are robust and have supplanted the need for NPCC's regional criteria.

While ISO New England has a number of concerns with the methodology and application described in Document A-10, it is most important to first consider the fundamental purpose that A-10 serves. A-10 defines the means to establish the NPCC Bulk Power System elements to which the regional criteria apply. In the United States, the NERC Reliability Standards apply to the bulk electric system (BES), which is now defined as 100 kV and above. With the establishment of well-vetted Reliability Standards, ISO New England believes that the NPCC Membership should evaluate the cost-effectiveness of NPCC's separate set of regional criteria. Previous reviews of the regional criteria focused on duplications or conflicts with the NERC Reliability Standards but did not evaluate whether there continues to be a need for the regional criteria due to gaps in the NERC Reliability Standards or whether any additional stringency in NPCC's criteria is necessary and/or cost-effective. Therefore, ISO New England believes that NPCC should evaluate which, if any, of the regional criteria are needed in addition to the NERC Reliability Standards. If NPCC Membership determines that these additions to the NERC Reliability Standards are necessary to "provide for reliable operation of the bulk-power system", then NPCC and/or its Members should submit a Standard Authorization Request to NERC.

ISO New England looks forward to working with NPCC and its Members on this evaluation to ensure NERC Reliability Standards provide for an adequate level of reliability.

Sincerely,

A handwritten signature in blue ink that reads "Peter Brandien".

Peter Brandien  
Vice President, System Operations