

NEW YORK STATE RELIABILITY COUNCIL
MEETING 209: September 2nd, 2016
Report for Agenda Item 8.1: Michael Forte
NPCC Board of Directors Report

The upcoming NPCC Board of Directors (BOD) meeting will be held on September 8th, with a Strategy Session on September 7th. The following is a summary of the NPCC Implementation of NERC's Compliance Guidance Policy.

NPCC Implementation of NERC's Compliance Guidance Policy

In November 2015, the NERC Board of Trustees approved the Compliance Guidance Policy, which includes two types of approved Compliance Guidance documents:

- i. Implementation Guidance, which provides examples for implementing a standard; and
- ii. Compliance Monitoring and Enforcement Program (CMEP) Practice Guides, which provide direction to Electric Reliability Organization (ERO) Enterprise CMEP staff on approaches to carry out compliance monitoring and enforcement activities.

This report will summarize the two Compliance Guidance documents.

I. Implementation Guidance

a. Overview

- i. Implementation Guidance is developed by industry and vetted through pre-qualified organizations.
- ii. Vetted Implementation Guidance examples can then be submitted to the ERO Enterprise for endorsement and, if endorsed, the ERO Enterprise would give the example deference during CMEP activities.
- iii. The NPCC Compliance Committee (CC) is a pre-qualified organization and, therefore, may develop and vet examples proposed for Implementation Guidance

b. NPCC Implementation Guidance Process

- i. Any CC member or NPCC Staff member may request the CC develop and/or vet an example proposed for Implementation Guidance.
- ii. The CC shall select an *Implementation Guidance Development Team* that will consist of at least three (3) persons, including the individual making the request.
- iii. All CC members and NPCC staff shall have 30 days to provide written comments on submitted draft Implementation Guidance. Written comments must be provided to the CC via email.
- iv. Comments will be reviewed and responded to prior to the *Implementation Guidance Development Team's* vote.
- v. Upon approval by the CC, the Chair of the CC or his/her designee shall submit the CC vetted and approved Implementation Guidance example to the ERO via email (ComplianceGuidance@nerc.net) for ERO Enterprise endorsement.

II. CMEP Practice Guides

a. Overview

- i. CMEP Practice Guides are developed solely by the ERO Enterprise to reflect the independent, objective professional judgment of ERO Enterprise CMEP staff.
- ii. Following development, the CMEP Practice Guides are posted for transparency on the NERC website.

b. NPCC Input

- i. While CMEP Practice Guides are developed and maintained by the ERO Enterprise, in some cases the ERO will hold policy discussions with industry stakeholders.