ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

Background

Northeast Power Coordinating Council

The Northeast Power Coordinating Council Inc. (NPCC) is one of six Regional Entities (REs) that have executed a Regional Delegation Agreement (RDA) with the North American Electric Reliability Corporation (NERC - the Electric Reliability Organization (ERO)). This RDA, effective as of January 1, 2021, authorizes NPCC to develop and enforce Reliability Standards applicable to all owners, operators, and users of the Bulk-Power System within geographic boundaries and execute its respective responsibilities in a transparent manner pursuant to Section 215 of the Federal Power Act to promote effective and efficient administration of Bulk-Power System reliability in accordance with ERO Regulations, and the NERC Rules of Procedure as approved by the Commission ("NERC Rules of Procedure").

New England Independent System Operator

The New England Independent System Operator, ISO New England Inc. (ISO-NE), is a not-for-profit corporation responsible for the reliable operation of New England's bulk power generation and transmission system. It also administers the region's wholesale electricity markets and manages the comprehensive planning of the regional bulk power system (BPS). ISO-NE is registered with NERC as a Reliability Coordinator, Balancing Authority, Planning Authority [Note: Planning Authority is currently referred to as Planning Coordinator], Resource Planner, Reserve Sharing Group, Transmission Operator, Transmission Planner and Transmission Service Provider.

NERC Compliance Monitoring and Enforcement Program

The Compliance Monitoring and Enforcement Program (CMEP) is the annual operating plan used by NERC in performing CMEP responsibilities and duties. NERC executes CMEP activities in accordance with the NERC Rules of Procedure (ROP) and the respective RDAs. An integral part of the CMEP involves Compliance Audits of NERC Reliability Standards and Requirements that are applicable to the function(s) for which an

entity has registered. NERC, in developing the annual CMEP with input from the Regional Entities, stakeholders, and regulators, identifies risk elements used to focus on compliance monitoring and enforcement activities and related NERC Reliability Standards and Requirements. Compliance with all NERC Reliability Standards is required, whether or not they are included in the subset of Reliability Standards and Requirements identified in the annual NERC CMEP Implementation Plan. Depending on regional or registered entity distinctions, the RE may focus compliance monitoring activities. The set of compliance procedures that document how NPCC will meet the obligations described in the NERC Rules of Procedure (ROP) and Appendices are posted to the NPCC website.

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Purpose of this Document

NPCC, in its role of administering the CMEP, performs periodic audits of Registered Entities that are users, owners, or operators of the Bulk Electric System (BES) within the ISO-NE Reliability Coordinator Area (RCA). In the conduct of such audits, the NPCC auditors and/or audited Registered Entities have frequently requested corroborating evidence, compliance guidance, or other information from ISO-NE, based on ISO-NE's substantial authorities and responsibilities as both a Regional Transmission Organization (RTO) and as defined by its aforementioned registrations with NERC. The corroborating evidence and guidance provided in this document is used by NPCC auditors to determine the applicability of the Requirement(s) of certain NERC Standards to a given Registered Entity and, for applicable Requirements, to assist NPCC auditors in assessing the compliance of that Registered Entity with those Requirements. This assessment takes into account the rules and procedures contained in the ISO New England Inc. Transmission, Markets, and Services Tariff (ISO-NE Tariff), which is accepted by the Federal Energy Regulatory Commission (FERC; the Commission) as just and reasonable.

Given the repetitive nature of many of these requests, NPCC and ISO-NE have joined to provide an agreed-upon set of "Corroborating Evidence Interpretations and Compliance Guidance" (CEICG) narratives containing corroborating evidence and/or compliance guidance to facilitate NPCC assessments of compliance with the Requirements of applicable NERC Reliability Standards. The supporting ISO-NE Operating Documents may be provided by the Registered Entity to NPCC, as audit evidence, in accordance with the ISO-NE Information Policy. The information contained in the CEICG document does not preclude other evidence that may be introduced by the Registered Entity and accepted by the NPCC auditing body. In addition, the information contained in the CEICG document may not be construed as modifying or contradicting any part of the ISO-NE Tariff, ISO-NE Filed Documents or any part of any ISO-NE Operating Document. In the event that a Registered Entity believes that any part of the CEICG document conflicts with the ISO-NE Tariff, ISO-NE Filed Documents or ISO-NE Operating Document, ISO-NE urges that Registered Entity to bring the matter to ISO-NE's attention immediately.

Document Revision and Control

The CEICG document will be reviewed on an annual basis, or more often, as necessary. Any updates to the CEICG document will be processed and posted to the ISO-NE public website in accordance with the following:

- For the CEICG document to become effective, both ISO-NE and NPCC must review and approve the document
- Any changes to the CEICG shall be presented to the Master/Local Control Center (M/LCC) Heads

Each revision to the CEICG document shall be assigned a Revision Number and a Revision Date

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Index of Standards Addressed by Current CEICG Narratives

[Note: a more detailed Index is provided in Appendix A of this document. A companion spreadsheet version of Appendix A (where the information can be filtered or sorted) is also provided on the ISO-NE public website.]

Index of Standards Addressed by Current CEICG Narratives		
NERC Standard (Requirement(s))	**Page #**	**CEICG Title (*CEICG #*)**
BAL-005-1 Balancing Authority Control (R7)	**11-12**	Standard pertaining to Dynamic Transfers does not apply within the ISO-NE RCA at this time (**CEICG-02**)
COM-001-3 Communications (R3, R4, R5, R7, R8, R10, R11)	**13-15**	Interpersonal Communication capabilities and protocols in New England (**CEICG-29**)
COM-002-4 Operating Personnel Communications Protocols (R5, R6, R7)	**16-18**	ISO-NE after-the-fact notifications to entities regarding its identification of time periods when an Operating Emergency has existed on the Bulk Electric System in New England (**CEICG-32**)
CIP-002-5.1a Cyber Security — BES Cyber System Categorization (R1 - item iv, Part 1.2, with associated Attachment 1 Impact Rating Criteria 2.3, 2.6, 2.7. 2.9 and 3.4)	**19-24**	ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability (**CEICG-30**)
EOP-005-3 System Restoration from Blackstart Resources (R10, R16)	**25-26**	Identification of TOPs and GOPs requested to participate in ISO-NE's system restoration exercises (**CEICG-21**)
FAC-002-3 Facility Interconnection Studies (R2, R3, R4, R5)	**27-29**	How GOs, TOs and DPs can provide evidence of coordination and cooperation with TP and PA on assessments for integration of new facilities (**CEICG-13**)
FAC-003-4 Transmission Vegetation Management (*All*)	**30-31**	ISO-NE notifies Transmission Owners if any of their transmission lines operated below 200 kV are identified by ISO-NE as an element of an IROL under NERC Standard FAC-014 (**CEICG-31**)
FAC-008-5 Facility Ratings (R8)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)

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Index of Standards Addressed by Current CEICG Narratives		
NERC Standard (Requirement(s))	**Page #**	**CEICG Title (*CEICG #*)**
IRO-001-4 Reliability Coordination – Responsibilities (R2, R3)	**13-15**	Interpersonal Communication capabilities and protocols in New England (**CEICG-29**)
IRO-001-4 Reliability Coordination – Responsibilities (R2, R3) **IRO-010-3** Reliability Coordinator Data Specification and Collection (R3) **IRO-017-1** Outage Coordination (R2)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)
MOD-025-2 Verification and Data Reporting of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability (*All*)	**40-42**	Describes the process for GOs and TOs to submit an outage request to ISO-NE for conducting a verification of real or reactive power capability to meet MOD-025-2 Requirements and to submit the results of such verifications to ISO-NE. ISO-NE serves as the "Lead" TP within the ISO-NE RCA (and the sole TP to receive such results) (**CEICG-33**)
MOD-026-1 Verification of Models and Data for Generator Excitation Control System or Plant Volt/Var Control Functions (*All*) **MOD-027-1** Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Control Functions (*All*)	**43**	ISO-NE serves as the "Lead" TP within the ISO-NE RCA and is the sole TP within the ISO-NE RCA responsible for maintaining models in accordance with MOD-026-1 and MOD-027-1. GO interactions with the TP pertaining to these standards should always be with ISO-NE. (**CEICG-23**)

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NERC Standard (Requirement(s))	**Page #**	**CEICG Title (*CEICG #*)**
MOD-027-1 Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Control Functions (R2)	**44-45**	ISO-NE requires governor model validation from any nuclear power station that provides under-frequency response and allows exemptions for those that don't (**CEICG-35**)
MOD-032-1 Data for Power System Modeling and Analysis (R2, R3)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)
NUC-001-4 Nuclear Plant Interface Coordination (R2)	**46-51**	The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA (**CEICG-22**)
NUC-001-4 Nuclear Plant Interface Coordination (R9.3.7)	**52-53**	As UVLS programs existing within the ISO-NE RCA are intended to provide local protection only, Standards pertaining to UVLS programs do not apply within the ISO-NE RCA at this time (**CEICG-06**)
PRC-002-2 Disturbance Monitoring and Reporting Requirements (R5, R8)	**54-55**	Based on the DDR capability requirements that ISO-NE has established and specified for the ISO-NE RCA, ISO-NE has notified certain TOs that certain of their BES elements require DDR data. (**CEICG-24**)
PRC-006-5 Automatic Underfrequency Load Shedding (R8)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)
PRC-006-5 Automatic Underfrequency Load Shedding (R10)	**56**	The ISO-NE UFLS program does not require TOs to provide automatic switching of its existing capacitor banks, transmission lines, and reactors to control over-voltage in support of underfrequency load shedding (**CEICG-26**)
PRC-006-NPCC-2 Automatic Underfrequency Load Shedding R4, R9, R11, R13 (Part 13.2), R16 (Part 16.3)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)

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NERC Standard (Requirement(s))	**Page #**	**CEICG Title (*CEICG #*)**
PRC-010-2 Undervoltage Load Shedding (*All*) **PRC-011-0** Undervoltage Load Shedding System Maintenance and Testing (*All*)	**52-53**	As UVLS programs existing within the ISO-NE RCA are intended to provide local protection only, Standards pertaining to UVLS programs do not apply within the ISO-NE RCA at this time (**CEICG-06**)
PRC-023-4 Transmission Relay Loadability (R3, R4)	**57-58**	How TOs, GOs and DPs within the ISO-NE RCA can comply with the Requirement to obtain agreement of the PC, TOP and RC regarding the calculated circuit capability in the setting of protective relays, such that they do not limit transmission system loadability and, for entities that use PRC-023-4 R1 criterion 2 as the basis for verifying transmission line relay loadability, how to comply with the Requirement to annually provide an updated list of circuits associated with those transmission line relays to their PC, TOP and RC (**CEICG-18**)
PRC-023-4 Transmission Relay Loadability (R6)	**59-60**	ISO-NE has identified circuits in its PC area for which TOs, GOs, and DPs must comply with PRC-023-4 Requirements R1 through R5 and provides the list of these circuits to the respective owners of those facilities and to NPCC (**CEICG-27**)
PRC-024-2 Generator Frequency and Voltage Protective Relay Settings (R3, R4)	**61-62**	Identifies ISO-NE as the "Lead" Transmission Planner for and instructs GOs required by PRC-024-2 Requirement R3, Part 3.1 and Requirement R4 to send information to their Transmission Planner to send that information to ISO-NE (and not to other TPs in New England) (**CEICG-34**).
PRC-026-1 Relay Performance During Stable Power Swings (R1, R2)	**63-67**	ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities. (**CEICG-36**)
TOP-001-5 Transmission Operations (R5, R6)	**13-15**	Interpersonal Communication capabilities and protocols in New England (**CEICG-29**)
TOP-001-5 Transmission Operations (R3, R4, R5, R6) **TOP-003-4** Operational Reliability Data (R5)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)

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Index of Standards Addressed by Current CEICG Narratives		
NERC Standard (Requirement(s))	**Page #**	**CEICG Title (*CEICG #*)**
TPL-001-4 Transmission System Planning Performance Requirements (R1)	**68**	ISO-NE serves as the PC and "Lead" TP within the ISO-NE PC Area and maintains models for all TPs within the ISO-NE PC Area (**CEICG-28**)
VAR-001-5 Voltage and Reactive Control (R6)	**69-70**	ISO-NE operations and planning processes do not result in ISO-NE identifying and requesting changes to GSU transformer tap settings (**CEICG-16**)
VAR-002-4.1 Generator Operation for Maintaining Network Voltage Schedules (R1, R3, R4, R5)	**32-39**	Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards (**CEICG-20**)
VAR-002-4.1 Generator Operation for Maintaining Network Voltage Schedules (R6)	**69-70**	ISO-NE operations and planning processes do not result in ISO-NE identifying and requesting changes to GSU transformer tap settings (**CEICG-16**)

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List of Retired CEICGs		
Retired CEICGs	**Retirement Date**	**Notes**
CEICG-01	7/1/2017	2017 changes to TOP/IRO Standards make this CEICG-01 no longer necessary. This CEICG applies to a TSP and, according to the NERC "Project 2014-03 – Revisions to TOP and IRO Reliability Standards Mapping Document" the NERC IRO Requirements applicable to this CEICG have been replaced by other NERC Requirements that no longer apply to TSPs
CEICG-03	7/1/2013	Requirement this CEICG addresses (VAR-001-2, R5) is one of the Paragraph 81 Requirements proposed for retirement
CEICG-04	7/1/2016	No longer needed because it applies solely to an LSE. LSE remains a function but it will have no compliance responsibilities. LSE, PSE & IA functions have been deactivated in NPCC CDAA. CEICG items do not apply to the LSE, PSE & IA functions.
CEICG-05	1/1/2019	No longer needed to show how GOPs and TOPs can provide evidence of Automatic Generation Control (AGC) inclusion in the ISO-NE BAA. Focus is now on acquiring data to calculate and report Area Control Error (ACE).
CEICG-07	7/1/2014	Applicable Requirements retired
CEICG-08	TBD	Retired; applicable content merged into CEICG-20
CEICG-09	7/1/2015	FERC Order on Risk Based Registration resulted in deactivation of the PSE function, which removed PSE obligations retroactive to March 19, 2015, so this CEICG item is no longer needed.
CEICG-10	7/1/2017	2017 changes to TOP/IRO Standards make this CEICG-10 no longer necessary. This CEICG had applied to compliance by Market Participants (GOPs) and TOPs with IRO-005-3.1a R10. As the Requirements replacing IRO-005-3.1a R10 (as noted in the NERC "Project 2014-03 – Revisions to TOP and IRO Reliability Standards Mapping Document") no longer pertain to GOPs, this CEICG is no longer needed for GOPs. For TOPs, ISO and the LCCs can show procedure evidence and actual evidence of operating to the most limiting parameter (so this CEICG provides no value to them or to NPCC).
CEICG-11	8/9/2012	CEICG-11 pertaining to EOP-003 R4 & R7 determined to no longer be necessary
CEICG-12	7/1/2013	New version of Standard (EOP-008-1) no longer includes the Requirement that CEICG-12 addressed

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List of Retired CEICGs		
Retired CEICGs	**Retirement Date**	**Notes**
CEICG-14	7/1/2017	2017 changes to TOP/IRO Standards make this CEICG-14 no longer necessary. In "Project 2014-03 – Revisions to TOP and IRO Reliability Standards Mapping Document" NERC indicated that, for TOP-001-1a, R6, GOPs were deleted from the Requirement since a GOP will only respond to such requests if they were in the form of an Operating Instruction from its TOP or BA, which is covered in TOP-001-3 R3, R4, R5 & R6. Assistance at the TOP level is provided through TOP-001-3 R7. For BAs and TOPs, ISO and the LCCs can show procedure evidence and actual evidence pertaining to rendering emergency assistance (so this CEICG provides no value to them or to NPCC).
CEICG-15	7/1/2014	Integrated into CEICG-1
CEICG-17	7/1/2017	2017 changes to TOP/IRO Standards make this CEICG-17 no longer necessary. The Requirements pertinent to this CEICG have been replaced by other Requirements, as detailed in "Project 2014-03 – Revisions to TOP and IRO Reliability Standards Mapping Document." The Requirements that replace the ones listed in this CEICG that pertain to a GOP are explained in CEICG-20.
CEICG-19	7/1/2017	Retired because the increased level of activity on the distribution system in recent years is presenting challenges to load forecasting. To help meet these challenges, ISO-NE will need data from Distribution Providers.
CEICG-25	7/1/2015	Not needed by NPCC auditors. Information in this CEICG has been incorporated into a Compliance Bulletin posted on ISO-NE's public website for use by New England UFLS entities.

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CEICG Narratives

CEICG-02	***Standard pertaining to Dynamic Transfers does not apply within the ISO-NE RCA at this time***
NERC Standard	**BAL-005-1** **Balancing Authority Control**
Applicable Requirement(s)	**R7.** Each **Balancing Authority** shall ensure that each Tie-Line, Pseudo-Tie, and Dynamic Schedule with an Adjacent Balancing Authority is equipped with: **7.1.** a common source to provide information to both Balancing Authorities for the scan rate values used in the calculation of Reporting ACE; and, **7.2.** a time synchronized common source to determine hourly megawatt-hour values agreed-upon to aid in the identification and mitigation of errors.
Functional Entities to which Requirement and CEICG Applies	**Balancing Authority**
ISO-NE Disposition: BAL-005-01, R7	Explanation of why this Requirement of this Standard does not apply within the ISO-NE Balancing Authority Area (BAA) at this time BAL-005-1 R7 pertains, in part, to Pseudo-Ties and Dynamic Schedules. ISO-NE currently only dispatches generation within the ISO-NE BAA operational jurisdiction footprint and, therefore, per the NERC definitions, there are no Dynamic Schedules or Pseudo-Ties within the ISO-NE BAA. Therefore, this Requirement is **not** applicable to entities in the ISO-NE BAA. Neither ISO-NE nor any of its neighboring BAs implement Dynamic Interchange at this time. As a general matter, ISO-NE modifies eTags, as appropriate, when schedules are modified via ISO-NE's external transaction scheduling software. ISO-NE also communicates the release of the limit to both the Sink and Source BA. Any initiating or reloading (i.e., restoring) of a curtailment of an interchange transaction within the ISO-NE BAA would be performed by ISO-NE and implemented through its external transaction scheduling software in an automated fashion and there would be no need for any Market Participant to respond. We note that language pertaining to Dynamic scheduling was removed from the ISO-NE Tariff, by Docket #ER19-2565-000 Import Transaction Requirement Updates, effective October 23, 2019. As a result, as stated above, at this time there are no Dynamic Schedules or

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CEICG-02	***Standard pertaining to Dynamic Transfers does not apply within the ISO-NE RCA at this time***
	Transfers within the ISO-NE BAA. However, should Dynamic Scheduling be instituted within the ISO-NE BAA in the future ISO-NE will provide advance notice to NPCC's Manager, Compliance Audit Program (NPCCCI@npcc.org). [1] In the *Glossary of Terms Used in NERC Reliability Standards,* A Dynamic Interchange Schedule or Dynamic Schedule is defined as "A time-varying energy transfer that is updated in Real-time and included in the Scheduled Net Interchange (NIS) term in the same manner as an Interchange Schedule in the affected Balancing Authorities' control ACE equations (or alternate control processes)." A Dynamic Transfer is defined as "The provision of the real-time monitoring, telemetering, computer software, hardware, communications, engineering, energy accounting (including inadvertent interchange), and administration required to electronically move all or a portion of the real energy services associated with a generator or load out of one Balancing Authority Area into another." [2] In the *Glossary of Terms Used in NERC Reliability Standards,* A Pseudo-Tie is defined as "A time-varying energy transfer that is updated in Real-time and included in the Actual Net Interchange term (NIA) in the same manner as a Tie Line in the affected Balancing Authorities' Reporting ACE equation (or alternate control processes)."

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CEICG-29	*Interpersonal Communication capabilities and protocols in New England*
NERC Standard	**COM-001-3** **Communications**
Applicable Requirement(s)	**R3.** Each **Transmission Operator** shall have Interpersonal Communication capability with the following entities (unless the **Transmission Operator** detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply): …**3.3.** Each **Distribution Provider** within its **Transmission Operator** Area. **3.4.** Each **Generator Operator** within its **Transmission Operator** Area. **3.5.** Each adjacent **Transmission Operator** synchronously connected. **R4.** Each **Transmission Operator** shall designate an Alternative Interpersonal Communication capability with the following entities: …**4.3.** Each adjacent **Transmission Operator** synchronously connected. **R5.** Each **Balancing Authority** shall have Interpersonal Communication capability with the following entities (unless the **Balancing Authority** detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply): …**5.3.** Each **Distribution Provider** within its **Balancing Authority** Area. **R7.** Each **Distribution Provider** shall have Interpersonal Communication capability with the following entities (unless the **Distribution Provider** detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply): **7.1.** Its **Balancing Authority**. **7.2.** Its **Transmission Operator**. **R8.** Each **Generator Operator** shall have Interpersonal Communication capability with the following entities (unless the **Generator Operator** detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply): …**8.2.** Its **Transmission Operator**. **R10.** Each **Reliability Coordinator**, **Transmission Operator**, and **Balancing Authority** shall notify entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer. **R11.** Each **Distribution Provider** and **Generator Operator** that detects a failure of its Interpersonal Communication capability shall consult each entity affected by the failure, as identified in Requirement R7 for a **Distribution Provider** or Requirement R8 for a **Generator Operator**, to determine a mutually agreeable

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	action for the restoration of its Interpersonal Communication capability.
NERC Standard	**IRO-001-4** **Reliability Coordination - Responsibilities**
Applicable Requirement(s)	**R2**. Each **Transmission Operator**, **Balancing Authority**, **Generator Operator**, and **Distribution Provider** shall comply with its **Reliability Coordinator**'s Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. **R3.** Each **Transmission Operator**, **Balancing Authority**, **Generator Operator,** and **Distribution Provider** shall inform its **Reliability Coordinator** of its inability to perform the Operating Instruction issued by its **Reliability Coordinator** in Requirement R1. (R1: Each **Reliability Coordinator** shall act to address the reliability of its **Reliability Coordinator** Area via direct actions or by issuing Operating Instructions.).
NERC Standard	**TOP-001-5** **Transmission Operations**
Applicable Requirement(s)	**R5.** Each **Transmission Operator**, **Generator Operator**, and **Distribution Provider** shall comply with each Operating Instruction issued by its **Balancing Authority**, unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. **R6.** Each **Transmission Operator**, **Generator Operator**, and **Distribution Provider** shall inform its **Balancing Authority** of its inability to comply with an Operating Instruction issued by its **Balancing Authority**.
Functional Entities to which Requirement(s) and CEICG Apply	**Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, Transmission Operator**
ISO-NE Disposition: COM-001-3, R3, R4, R5, R7, R8, R10, R11	Explanation of Interpersonal Communication capabilities and protocols in New England COM-001-3 requires the establishment of Interpersonal Communication capabilities to interact, consult, or exchange information, as necessary, to maintain reliability. In New England, ISO-NE and the Local Control Centers (LCCs) comply with applicable NERC Standards in accordance with established, FERC-approved documents, such as the Transmission Operating Agreement (TOA) (See Sections 3.05 The ISO's Responsibilities and 3.06 Each PTO's (Participating Transmission Owners) Responsibilities) and ISO-NE Operating Procedures. In accordance with such documents, Operating Instructions or directives may be issued:

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- To a Generator Operator (GOP) by either ISO-NE (which is the typical situation) or, in some cases, by an LCC (Local Control Center / Transmission Operator (TOP))
- To a Distribution Provider (DP) by an LCC (**not** by ISO-NE).

The following table clarifies and summarizes how certain Requirements of COM-001-3 are met with respect to Interpersonal Communications capabilities (ICC) in New England.

Req.	Part(s)	ICC	ISO-NE	LCC	Notes
R3 R7 R10 R11	3.3 7.2	TOP-DP	No	Yes	DPs communicate with their LCC (**not** with ISO-NE)
R3 R8 R10 R11	3.4 8.2	TOP-GOP	Yes	Yes	GOPs communicate with both ISO-NE and their LCC
R3 R4 R10	3.5 & 3.6 4.3 & 4.4	TOP-adjacent TOP	Yes	Yes	ISO-NE and each LCC communicate with all of their respective adjacent TOPs, with one exception: ISO-NE only communicates with TOPs in adjacent areas that are also RCs/BAs (e.g., ISO-NE does **not** communicate with NIMO, a registered TOP in NY)
R5 R7 R10 R11	5.3 7.1	RC/BA-DP	No	No	In New England, there are no communications between ISO-NE (as the BA or as any other function for which ISO-NE has registered) and a DP. Communications with a DP are pertinent to the TOP function are always between the DP and that DP's LCC (*see TOP-DP ICC described above*).

Also, certain aspects of other NERC Standard Requirements, which pertain to issuance of Operating Instructions by ISO-NE to DPs, do not apply within the ISO-NE RCA because LCCs (not ISO-NE) communicate with DPs, so there would never be an Operating Instruction issued by ISO-NE to a DP [IRO-001-4 R2, R3 and TOP-001-5, R5 and R6].

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CEICG-32	***ISO-NE after-the-fact notifications to entities regarding its identification of time periods when an Operating Emergency has existed on the Bulk Electric System in New England***
NERC Standard	**COM-002-4** **Operating Personnel Communications Protocols**
Applicable Requirement(s)	**R5.** Each **Balancing Authority**, **Reliability Coordinator**, and **Transmission Operator** that issues an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either: • Confirm the receiver's response if the repeated information is correct (in accordance with Requirement R6). • Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver, or • Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
	R6. Each **Balancing Authority**, **Distribution Provider**, **Generator Operator**, and **Transmission Operator** that receives an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either: • Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or • Request that the issuer reissue the Operating Instruction.
	R7. Each **Balancing Authority**, **Reliability Coordinator**, and **Transmission Operator** that issues a written or oral single-party to multiple-party burst Operating Instruction during an Emergency shall confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.
Functional Entities to which Requirement(s) and CEICG Apply	**Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, Transmission Operator**
ISO-NE Disposition: COM-002-4, R5, R6, R7	Explanation of ISO-NE identification of periods when an Operating Emergency has existed on the New England Bulk Electric System (BES) and how, after the Operating Emergency has ended, ISO-NE notifies any entity that received an Operating Instruction to mitigate the Operating Emergency to confirm that the Operating Instruction was issued while an Operating Emergency existed on the New England BES. To reduce the possibility of miscommunication that could lead to action or inaction harmful to BES reliability, COM-002-4 requires that entities follow specified communications protocols when Operating Instructions are issued or

CEICG-32	ISO-NE after-the-fact notifications to entities regarding its identification of time periods when an Operating Emergency has existed on the Bulk Electric System in New England
	received during an Operating Emergency. In New England, an Operating Instruction may be issued by: • ISO-NE to a Transmission Operator (TOP), which in New England, would be one of the Local Control Center (LCC) TOPs, • ISO-NE (the typical situation) or an LCC (much less typical) to a Generator Operator (GOP) • LCC to a Distribution Provider (DP) **ISO-NE after-the-fact notifications to entities that received an Operating Instruction during an Operating Emergency:** As soon as possible after an Operating Emergency has ended and the event has been reviewed, ISO-NE will notify (via email) the Compliance Contact of each entity that received a verbal Operating Instruction issued for the purpose of mitigating the Operating Emergency during the period while the Operating Emergency existed, informing them of the date(s) and time(s) that the Operating Instruction(s) was (were) issued. NPCC will be copied on each of these notifications (NPCCCI@npcc.org). Exceptions: • ISO-NE will **not** make such notifications regarding Operating Instructions for load shedding, as it should be readily apparent to entities that receive a load shed Operating Instruction that it is being issued during an Operating Emergency. • ISO-NE considers an "Operating Instruction issued during an Emergency" (as referenced in COM-002-4) to be limited to an Operating Instruction issued expressly to mitigate an Operating Emergency. • Other operating instructions that may be issued during the period when an Operating Emergency exists that are not related to or issued to address the Operating Emergency are not pertinent to COM-002-4 Requirements R5, R6 or R7, so ISO-NE does **not** make notifications regarding such operating instructions. **ISO-NE's criteria for conditions that define an Operating Emergency:** In Master/Local Control Center Procedure No. 13, ISO and LCC Communication Practices (M/LCC 13), ISO-NE and the LCCs have established criteria identifying when an Operating Emergency is considered to exist on the New England BES. These criteria are in alignment with the definition of "Emergency or BES Emergency" in the Glossary of Terms Used in NERC Reliability Standards:

<table>
<tr><th>CEICG-32</th><th>ISO-NE after-the-fact notifications to entities regarding its identification of time periods when an Operating Emergency has existed on the Bulk Electric System in New England</th></tr>
<tr><td></td><td>
"Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System."

The following table from M/LCC 13 Section 4.5 ISO and LCC Communications During Operating Emergencies summarizes these criteria:
<table>
<tr><th>Point at which Operating Emergency Begins</th><th>Point at which Operating Emergency Ends</th></tr>
<tr><td>Any Real-Time exceedance of a thermal or voltage Short Time Emergency IROL</td><td>Real-Time IROL exceedance ended</td></tr>
<tr><td>An IROL exceedance [Real Time Contingency Analysis (RTCA) or interface] for period greater than 20 minutes (must resolve in 30 min.)</td><td>IROL exceedance ended</td></tr>
<tr><td>OP-4 Action 6 or greater implemented*</td><td>The last of implemented OP-4 Actions 6 or greater are cancelled</td></tr>
<tr><td>Load shed operating instruction issued</td><td>Load shed has mitigated the Operating Emergency.</td></tr>
</table>
* If Action 10 or 11 is implemented at a time prior to an actual capacity deficiency or transmission reliability issue or extended beyond an actual capacity deficiency or transmission reliability issue (e.g., extended heatwave), ISO or the applicable LCC is not considered to be in an Operating Emergency until the time that the actual capacity deficiency or transmission reliability issue occurs (which will be the point at which the Operating Emergency begins) and will remain in the Operating Emergency until implemented OP-4 Actions 6 or greater are cancelled (which will be the point at which the Operating Emergency ends).
</td></tr>
</table>

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-30	***ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability***
NERC Standard	**CIP-002-5.1a** **Cyber Security — BES Cyber System Categorization**
Applicable Requirement(s)	**R1**. Each **Responsible Entity** shall implement a process that considers each of the following assets for purposes of parts 1.1 through 1.3: i. Control Centers and backup Control Centers; ii. Transmission stations and substations; iii. Generation resources; iv. Systems and facilities critical to system restoration, including Blackstart Resources and Cranking Paths and initial switching requirements; v. Special Protection Systems that support the reliable operation of the Bulk Electric System; and vi. For **Distribution Providers**, Protection Systems specified in Applicability section 4.2.1 above. **…1.2.** Identify each of the medium impact BES Cyber Systems according to Attachment 1, Section 2, if any, at each asset; and **1.3.** Identify each asset that contains a low impact BES Cyber System according to Attachment 1, Section 3, if any (a discrete list of low impact BES Cyber Systems is not required). **CIP-002-5.1a - Attachment 1 - Impact Rating Criteria** **… 2. Medium Impact Rating (M)** Each BES Cyber System, not included in Section 1 above (High Impact Rating (H)), associated with any of the following: … 2.3. Each generation Facility that its **Planning Coordinator** or **Transmission Planner** designates, and informs the **Generator Owner** or **Generator Operator**, as necessary to avoid an Adverse Reliability Impact in the planning horizon of more than one year. … 2.6. Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its **Reliability Coordinator**, **Planning Coordinator**, or **Transmission Planner** as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies. 2.7. Transmission Facilities identified as essential to meeting Nuclear Plant Interface Requirements. … 2.9. Each Special Protection System (SPS), Remedial Action Scheme (RAS), or automated switching System that operates BES Elements, that, if destroyed, degraded, misused or otherwise rendered unavailable, would cause one or more Interconnection Reliability Operating Limits (IROLs) violations for failure to operate as designed or cause a reduction in one or more IROLs if destroyed,

CEICG-30	***ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability***
	degraded, misused, or otherwise rendered unavailable. … 3. Low Impact Rating (L) BES Cyber Systems not included in Sections 1 or 2 above that are associated with any of the following assets and that meet the applicability qualifications in Section 4 - Applicability, part 4.2 – Facilities, of this standard: … 3.4. Systems and facilities critical to system restoration, including Blackstart Resources and Cranking Paths and initial switching requirements.
Functional Entities to which Requirement(s) and CEICG Apply	**Various Functional Entities, as specified in the Section 4. "Applicability" of the Standard**
ISO-NE Disposition: CIP-002-5.1a, R1	Explanation of how ISO-NE identifies assets within certain categories of facilities identified in the CIP Standards as impactive to reliability and notifies entities of the assets identified. Entities need certain information for them to identify and categorize BES Cyber Systems and their associated BES Cyber Assets in accordance with CIP-002-5.1a R1. ISO-NE identifies assets within certain categories of facilities identified in CIP-002-5.1a - Attachment 1 - Impact Rating Criteria as impactive to reliability and notifies entities of the assets identified. The following information is provided below: • Identification of the types of facilities and systems that ISO-NE has identified that meet certain criteria in CIP-002-5.1a - Attachment 1 - Impact Rating Criteria • Descriptions of how ISO-NE identifies assets that meet these criteria • Lists of the names of the Lead Market Participants (for generation) or owners (for transmission) that are responsible for the assets and that received notifications from ISO-NE of which asset(s) ISO-NE identified as meeting one or more of the criteria in CIP-002-5.1a - Attachment 1 - Impact Rating Criteria. **Criterion 2.3** – Facilities necessary to avoid BES Adverse Reliability Impacts in the planning horizon of one year or more **Criterion 2.6** – BES Cyber Systems for those Transmission Facilities that have been identified as critical to the derivation of IROLs and their associated contingencies, as specified by FAC-014-2, Establish and Communicate System

CEICG-30	ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability
	Operating Limits, R5.1.1 and R5.1.3. **Criterion 2.9** – BES Cyber Systems for those Special Protection Systems (SPS), Remedial Action Schemes (RAS), or automated switching Systems installed to ensure BES operation within IROLs. The degradation, compromise or unavailability of these BES Cyber Systems would result in exceeding IROLs if they fail to operate as designed. ISO-NE identifies IROLs, in accordance with applicable NERC Standards. As part of this effort, ISO-NE identifies which facilities or systems are considered critical to the derivation of IROLs and their associated contingencies. ISO-NE has developed a methodology and criteria for identifying IROLs in accordance with FAC-010-3 — System Operating Limits Methodology for the Planning Horizon and FAC-011-3 — System Operating Limits Methodology for the Operations Horizon. As part of this effort, ISO-NE designated the facilities or systems that were considered critical to the derivation of IROLs and their associated contingencies. CIP-002-5.1a includes Attachment 1, which lists Impact Rating Criteria. The Medium Impact Rating Criteria includes the two criteria that were part of the basis for ISO-NE's list of facilities: • Applying Criterion 2.6 led to the inclusion of not only the IROL transmission elements themselves, but also the limiting contingencies that ISO-NE monitors in real-time for thermal or voltage (or as otherwise noted in ISO-NEs Transmission Operating Guides). • Applying Criterion 2.9 led to the inclusion of a small number of substations based upon Type 1 SPS/RAS in New England included on the NPCC RAS/SPS list. Once each calendar year, ISO-NE notifies the owners (for transmission) or Lead Market Participants (for generation) of facilities or systems that meet one or more of the criteria 2.3, 2.6 and 2.9 to inform them of which facilities or systems meet one or more of the criteria. If ISO-NE determines that a facility that once met the criteria no longer meets the criteria, ISO-NE notifies that entity within 30 days of that determination and reflects the revised list of entities below in the next update of this CEICG document, as necessary. An entity listed below would be expected to provide notification(s) received from ISO-NE as evidence supporting their compliance with CIP Standards during an NPCC audit. The following is a list of entities that have received notifications from ISO-NE that one or more of their facilities or systems meets one or more of the criteria 2.3, 2.6 and 2.9:

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-30	***ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability***

- Transmission facilities (2021 notification):
  - ANP Bellingham
  - AVANGRID [Central Maine Power Company, United Illuminating Company]
  - Connecticut Transmission Municipal Electric Energy Cooperative
  - Cross-Sound Cable Company, LLC
  - Eversource Energy [The Connecticut Light and Power Company, NSTAR, Public Service Company of New Hampshire]
  - National Grid USA (NGRID)
  - New Hampshire Transmission, LLC
  - Vermont Transco LLC
  - Versant Power

- Generation facilities (2020 notification):

GEN_ID	GEN_NAME
47390	BUCKSPORT
365	CANAL 1
366	CANAL2
38310	CANAL 3
1649	EP NEWINGTON ENERGY, LLC
359	J. COCKWELL 1
360	J. COCKWELL 2
14614	KLEEN ENERGY
40338	MAINE INDEPENDENCE STATION 1
40339	MAINE INDEPENDENCE STATION 2
12505	MIDDLETOWN 12
37366	MIDDLETOWN 13
37367	MIDDLETOWN 14
37368	MIDDLETOWN 15
482	MIDDLETOWN 4
484	MILLSTONE POINT 2
485	MILLSTONE POINT 3
513	NEW HAVEN HARBOR
15477	NEW HAVEN HARBOR UNIT 2
40052	NEW HAVEN HARBOR UNIT 3
40053	NEW HAVEN HARBOR UNIT 4
508	NEWINGTON 1
14217	NORTHFIELD MOUNTAIN 1
14218	NORTHFIELD MOUNTAIN 2

CEICG-30	ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability

14219	NORTHFIELD MOUNTAIN 3
14220	NORTHFIELD MOUNTAIN 4
555	SEABROOK
14177	WESTBROOK ENERGY CENTER G1
14178	WESTBROOK ENERGY CENTER G2
642	YARMOUTH 4

Criterion 2.7 – Transmission Facilities identified as essential to meeting Nuclear Plant Interface Requirements

The Transmission Facilities essential to meeting Nuclear Plant Interface Requirements (NPIRs) in New England are the transmission lines serving the off-site ac power sources to the nuclear power stations in New England. These transmission lines serving the off-site ac power sources are identified in the following confidential documents:

- Master/LCC Procedure No. 1 - Nuclear Plant Transmission Operations, Attachment C - Millstone Nuclear Power Station
- Master/LCC Procedure No. 1 - Nuclear Plant Transmission Operations, Attachment D - Seabrook Nuclear Power Station

The following entities own one or more transmission lines serving the off-site ac power sources to the nuclear power stations in New England:

- Eversource Energy Service Company (The Connecticut Light and Power Company (CL&P))
- New Hampshire Transmission, LLC (NH Transmission)
- Eversource Energy Service Company (New Hampshire; Eversource)

These entities review and approve the M/LCC 1 documents listed above that contain the NPIRs applicable to them and that list the transmission lines serving the off-site ac power sources. These entities are expected to provide the applicable M/LCC 1 Attachment listed above as evidence supporting their compliance with CIP Standards during an NPCC audit.

Criterion 3.4 – Facilities critical to system restoration

Lead Market Participants or owners of facilities identified in the New England Reliability Coordinator System Restoration Plan (the Plan) may use information provided by ISO-NE to identify and categorize BES Cyber Systems and their associated BES Cyber Assets. ISO-NE, in collaboration with the Local Control

CEICG-30	***ISO-NE notifications to entities regarding its identification of assets within certain categories of facilities identified in the CIP Standards as impactive to reliability***
	Centers (LCCs), has developed the Plan in accordance with EOP-005 — System Restoration from Blackstart Resources and EOP-006 — System Restoration Coordination. As part of the development of the Plan (and in accordance with M/LCC 11 - Maintenance and Verification of New England System Restoration Plan), ISO-NE develops and maintains a list of facilities in the Plan: M/LCC11-Attachment D-Restoration Plan Resources List (M/LCC11D). In accordance with EOP-005 R2, ISO-NE provides the Lead Market Participants or owners of Plan facilities with a description of any changes to their roles and specific tasks. These notifications include a list of their facilities identified in the Plan and the classifications of the facilities (such as Designated Blackstart Resource (DBR), Initial Cranking Path Facility (ICPF), etc.). Entities will use this information to make the appropriate designations of "critical" facilities for their CIP evaluations. The most recent notifications to all entities in the Plan occurred in the 4th quarter of 2016. All future notifications are by exception, as needed, when there are changes to the Plan and are documented in M/LCC11D. Whenever ISO-NE updates its list of restoration plan facilities, ISO-NE sends a copy of the full list to NPCC (to email address NPCCCI@npcc.org). [Note: the information in this CEICG is current as of 07/01/2021. ISO-NE annually reviews the lists of facilities and systems that meet the CIP-002-5.1a criteria described in this CEICG, and updates these lists, as necessary. Soon after this annual review and update of these lists is completed, ISO-NE notifies entities affected by changes to each list and updates this CEICG, as necessary.]

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-21	***Identification of TOPs and GOPs requested to participate in ISO-NE's system restoration exercises***
NERC Standard	**EOP-005-3** **System Restoration from Blackstart Resources**
Applicable Requirement(s)	**R10**. Each **Transmission Operator** shall participate in its **Reliability Coordinator**'s restoration drills, exercises, or simulations as requested by its **Reliability Coordinator**. **R16**. Each **Generator Operator** shall participate in its **Reliability Coordinator**'s restoration drills, exercises, or simulations as requested by its **Reliability Coordinator**.
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Operator, Reliability Coordinator, Transmission Operator**
ISO-NE Disposition: **EOP-005-3,** **R10,** **R16**	Explanation of the determination of Generator Operator (GOP) and Transmission Operator (TOP) applicability for the Requirements to participate in system restoration exercises of the Reliability Coordinator (RC) Applicability and compliance determinations by NPCC regarding EOP-005-3, R10 (applicable to TOPs) and EOP-005-3, R16 (applicable to GOPs), both of which pertain to participation in the RC's restoration drills, exercises, or simulations, depend, in part, on the specifics of the requests for participation in ISO-NE's Cycle 1 System Restoration Plan (Plan) Training exercises (Cycle 1 Training) sent to the TOPs and GOPs. As the RC, ISO-NE conducts Cycle 1 Training and requests TOPs and GOPs to participate, in accordance with **EOP-006-3, R8 and R8.1:** **R8.** Each Reliability Coordinator shall conduct two System restoration drills, exercises, or simulations per calendar year, which shall include the Transmission Operators and Generator Operators as dictated by the particular scope of the drill, exercise, or simulation that is being conducted. **R8.1.** Each Reliability Coordinator shall request each Transmission Operator identified in its restoration plan and each Generator Operator identified in the Transmission Operators' restoration plans to participate in a drill, exercise, or simulation at least once every two calendar years. In the requests for participation in ISO-NE's Cycle 1 Training, ISO-NE provides specifics (such as what type(s) of individuals and how many

CEICG-21	*Identification of TOPs and GOPs requested to participate in ISO-NE's system restoration exercises*
	individuals from each entity's organization) that the System Restoration Working Group (SRWG) would like to see included in the text of the ISO requests that are sent to TOPs and GOPs identified in the Plan. ISO-NE includes NPCC as a "cc" on the emailed invitations (sending them to email address NPCCCI@npcc.org) and maintains records of such requests. NPCC uses this information to determine applicability of EOP-005-3, R10 and EOP-005-3, R16 to TOPs and GOPs, respectively, and to assess the compliance of TOPs and GOPs with these Requirements.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-13	***How GOs, TOs and DPs can provide evidence of coordination and cooperation with TP and PA on assessments for integration of new facilities***
NERC Standard	**FAC-002-3** **Facility Interconnection Studies**
Applicable Requirement(s)	**R2.** Each **Generator Owner** seeking to interconnect new generation Facilities, or to materially modify existing interconnections of generation Facilities, shall coordinate and cooperate on studies with its **Transmission Planner** or **Planning Coordinator**, including but not limited to the provision of data as described in **R1, Parts 1.1-1.4.** **R3.** Each **Transmission Owner** and each **Distribution Provider** seeking to interconnect new transmission Facilities or electricity end-user Facilities, or to materially modify existing interconnections of transmission Facilities or electricity end-user Facilities, shall coordinate and cooperate on studies with its **Transmission Planner** or **Planning Coordinator**, including but not limited to the provision of data as described in **R1, Parts 1.1-1.4.** **R4.** Each **Transmission Owner** shall coordinate and cooperate with its **Transmission Planner** or **Planning Coordinator** on studies regarding requested new or materially modified interconnections to its Facilities, including but not limited to the provision of data as described in **R1, Parts 1.1-1.4.** **R5.** Each applicable **Generator Owner** shall coordinate and cooperate with its **Transmission Planner** or **Planning Coordinator** on studies regarding requested interconnections to its Facilities, including but not limited to the provision of data as described in **R1, Parts 1.1-1.4.**
Functional Entities to which Requirement(s) and CEICG Apply	**Distribution Provider, Generator Owner, Planning Coordinator, Transmission Owner, Transmission Planner**
ISO-NE Disposition: **FAC-002-3,** **R2,** **R3,** **R4,** **R5**	Explanation of how Generator Owners (GOs), Transmission Owners (TOs) and Distribution Providers (DPs) can provide evidence of coordination and cooperation with the Transmission Planner (TP) and Planning Authority/Planning Coordinator (PA/PC) on assessments for integration of new facilities A GO, TO or DP can provide evidence of its coordination and cooperation with the TP and PA/PC on assessments for integration of new facilities through their participation in the Proposed Plan Application process, as established in Section I.3.9 of the ISO New England Inc. Transmission,

CEICG-13	***How GOs, TOs and DPs can provide evidence of coordination and cooperation with TP and PA on assessments for integration of new facilities***
	Markets, and Services Tariff (ISO-NE Tariff). This process, which may involve studies and discussions by ISO-NE and NEPOOL stakeholders, is documented on the ISO-NE public website - PPAs. In accordance with Section I.3.9 General Terms and Conditions - Review of Market Participant's Proposed Plans: "Each Market Participant and Transmission Owner shall submit to the ISO at least (60) days prior to the proposed in service date in such form, manner and detail as the ISO may reasonably prescribe, (i) any new or materially changed plan for additions to or changes to any generating and demand resources or transmission facilities rated 69 kV or above subject to control of such Market Participant or Transmission Owner, and (ii) any new or materially changed plan for any other action to be taken by the Market Participant or Transmission Owner, except for retirements of or reductions in the capacity of a generating resource or a demand resource, which may have a significant effect on the stability, reliability or operating characteristics of the Transmission Owner's transmission facilities, the transmission facilities of another Transmission Owner, or the system of a Market Participant."[1] Schedule 22 Large Generator Interconnection Procedures, Schedule 23 Small Generator Interconnection Procedures and Schedule 25 Elective Transmission Upgrade Interconnection Procedures of Section II Open Access Transmission Tariff (OATT) of the ISO Tariff also contain requirements for coordinating with ISO-NE and submitting data for studies to ISO-NE. [1] Section I.3.9 provides, in full, that: "In the case of changes to transmission facilities-developed through the Solutions Study process or the competitive solution process, no significant action (other than engineering reasonably necessary to support the Solutions Study or competitive solution process) shall be taken. Unless the ISO notifies the Market Participant or Transmission Owner in writing within sixty (60) days of the submittal (or ninety (90) days if the ISO determines that it requires additional time), that it has determined that implementation of the plan will have a significant adverse effect upon the reliability or operating characteristics of the Transmission Owner's transmission facilities, the transmission facilities of another Transmission Owner, or the system of a Market Participant, the Market Participant or Transmission Owner shall be free to proceed. The ISO shall maintain on its website a list of such applications that are currently under review and the status of each such application. The ISO shall provide notice of any action taken with respect to any such applications, including an explanation of its reasons for

CEICG-13	***How GOs, TOs and DPs can provide evidence of coordination and cooperation with TP and PA on assessments for integration of new facilities***
	such action, to each Market Participant or Transmission Owner as soon as reasonably practicable after such action is taken. The time limits provided by this section may be changed with respect to any such submission by agreement between the ISO and the Market Participant or Transmission Owner."

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-31	***ISO-NE notifies Transmission Owners if any of their transmission lines operated below 200 kV are identified by ISO-NE as an element of an IROL under NERC Standard FAC-014***
NERC Standard	**FAC-003-4** **Transmission Vegetation Management**
Applicable Requirement(s)	**CEICG pertains to *all* Requirements of Standard FAC-003-4.** Purpose: To maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.
Functional Entities to which Requirement(s) and CEICG Apply	**Transmission Owner** Note: Applicability of FAC-003-4 includes: **4.2 Transmission Facilities:** Defined below (referred to as "applicable lines"), including but not limited to those that cross lands owned by federal[1], state, provincial, public, private, or tribal entities: 4.2.2 "Each overhead transmission line operated below 200 kV identified as an element of an IROL under NERC Standard FAC-014 by the **Planning Coordinator**." [1] EPAct 2005 section 1211c: *"Access approvals by Federal agencies."* **Generator Owner** Note: Applicability of FAC-003-4 includes: **4.3. Generation Facilities:** Defined below (referred to as "applicable lines"), including but not limited to those that cross lands owned by federal[2], state, provincial, public, private, or tribal entities: **4.3.1.** Overhead transmission lines that (1) extend greater than one mile or 1.609 kilometers beyond the fenced area of the generating station switchyard to the point of interconnection with a **Transmission Owner**'s Facility or (2) do not have a clear line of sight[3] from the generating station switchyard fence to the point of interconnection with a **Transmission Owner**'s Facility and are: (4.3.1.2) Operated below 200 kV identified as an element of an IROL under NERC Standard FAC-014 by the **Planning Coordinator** [2] *Id.* [3] "Clear line of sight" means the distance that can be seen by the average person without special instrumentation (e.g., binoculars, telescope, spyglasses, etc.) on a clear day.
ISO-NE Disposition: FAC-003-4, *All*	Explanation of ISO-NE's process of identifying generation facilities and transmission lines operated below 200 kV that are an element of an IROL under NERC Standard FAC-014 "Establish and Communicate System Operating Limits" and notifications to the owners of such facilities. ISO-NE establishes IROLs in accordance with NERC Standard FAC-014-2,

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-31	***ISO-NE notifies Transmission Owners if any of their transmission lines operated below 200 kV are identified by ISO-NE as an element of an IROL under NERC Standard FAC-014***

	ISO-NE Planning Procedure 3 "Reliability Standards for the New England Area Pool Transmission Facilities" and the ISO New England Available Transfer Capability Implementation Document (ATCID) posted to OASIS under ATC Information. The list of facilities developed by ISO-NE for purposes of FAC-003-4 applicability includes all 115 kV, 230 kV and 345 kV elements for all of the New England IROL interfaces monitored by ISO-NE. The FAC-003-4 Standard does not speak to any other type of element to consider (for example, limiting contingencies), and as a consequence, ISO-NE did not include any other facilities (which explains why this list of facilities differs from the list of facilities developed for CIP-002-5.1a and why the associated list of Transmission Owners listed in this CEICG-31 differs from the list of Transmission Owners listed in CEICG-29). If any transmission line or generation facility operated below 200 kV is identified by ISO-NE as an element of an IROL (based on FAC-003-4 criteria), ISO-NE notifies the owner (for transmission) or Lead Market Participant (for generation) of the facility by email.
	• ISO-NE has not identified any generation facilities operated below 200 kV that are an element of an IROL
	• ISO-NE has identified certain transmission lines operated below 200 kV that are an element of an IROL and has notified the following Transmission Owners of this:
	  ○ AVANGRID [Central Maine Power Company (CMP), United Illuminating Company (UI)]
	  ○ Eversource Energy Transmission Ventures, Inc. [The Connecticut Light and Power Company (CL&P), NSTAR Electric Company, Public Service Company of New Hampshire (PSNH)]
	  ○ National Grid USA
	  ○ Vermont Transco LLC
	  ○ Versant Power
	
	[Note: this list is current as of 07/01/2021, but is subject to change. If additional entities are notified that one or more of their facilities or systems are either being added or removed from this list, this list will be updated at the next opportunity (typically this document is updated at least annually). An entity listed above would be expected to provide the notification received from ISO-NE as evidence supporting their compliance with FAC-003-4 during an NPCC audit. If entities have questions about this list, they may contact ISO-NE Participant Support.]

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
NERC Standard	**FAC-008-5** **Facility Ratings**
Applicable Requirement(s)	**R8.** Each **Transmission Owner** (and each **Generator Owner** subject to Requirement **R2**) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated **Reliability Coordinator**(s), **Planning Coordinator**(s), **Transmission Planner**(s), **Transmission Owner**(s) and **Transmission Operator**(s): **8.1.** As scheduled by the requesting entities: **8.1.1.** Facility Ratings **8.1.2.** Identity of the most limiting equipment of the Facilities **8.2.** Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center: **8.2.1.** Identity of the existing next most limiting equipment of the Facility **8.2.2.** The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.
NERC Standard	**IRO-001-4** **Reliability Coordination - Responsibilities**
Applicable Requirement(s)	**R2**. Each **Transmission Operator**, **Balancing Authority**, **Generator Operator**, and **Distribution Provider** shall comply with its **Reliability Coordinator**'s Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. **R3.** Each **Transmission Operator**, **Balancing Authority**, **Generator Operator**, and **Distribution Provider** shall inform its **Reliability Coordinator** of its inability to perform the Operating Instruction issued by its **Reliability Coordinator** in **Requirement R1**. (**R1:** Each Reliability Coordinator shall act to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions).
NERC Standard	**IRO-010-3** **Reliability Coordinator Data Specification and Collection**
Applicable Requirement(s)	**R3**. Each **Reliability Coordinator**, **Balancing Authority**, **Generator Owner**, **Generator Operator**, **Transmission Operator**, **Transmission Owner**, and

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	Distribution Provider receiving a data specification in **Requirement R2** shall satisfy the obligations of the documented specifications using: 3.1 A mutually agreeable format 3.2 A mutually agreeable process for resolving data conflicts 3.3 A mutually agreeable security protocol (**R2:** The Reliability Coordinator shall distribute its data specification to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.)
NERC Standard	**IRO-017-1** **Outage Coordination**
Applicable Requirement(s)	**R2**. Each **Transmission Operator** and **Balancing Authority** shall perform the functions specified in its **Reliability Coordinator**'s outage coordination process.
NERC Standard	**MOD-032-1** **Data for Power System Modeling and Analysis**
Applicable Requirement(s)	**R2**. Each **Balancing Authority**, **Generator Owner**, Load Serving Entity, **Resource Planner**, **Transmission Owner**, and **Transmission Service Provider** shall provide steady-state, dynamics, and short circuit modeling data to its **Transmission Planner**(s) and **Planning Coordinator**(s) according to the data requirements and reporting procedures developed by its **Planning Coordinator** and **Transmission Planner** in Requirement R1. For data that has not changed since the last submission, a written confirmation that the data has not changed is sufficient. **R3.** Upon receipt of written notification from its **Planning Coordinator** or **Transmission Planner** regarding technical concerns with the data submitted under Requirement R2, including the technical basis or reason for the technical concerns, each notified **Balancing Authority**, **Generator Owner**, Load Serving Entity, **Resource Planner**, **Transmission Owner**, or **Transmission Service Provider** shall respond to the notifying **Planning Coordinator** or **Transmission Planner** as follows: **3.1.** Provide either updated data or an explanation with a technical basis for maintaining the current data; **3.2.** Provide the response within 90 calendar days of receipt, unless a longer time period is agreed upon by the notifying **Planning Coordinator** or **Transmission Planner**.
NERC Standard	**PRC-006-5** **Automatic Underfrequency Load Shedding**
Applicable Requirement(s)	**R8.** Each **UFLS entity** [*in New England, could include **TOs, GOs** and **DPs***] shall provide data to its **Planning Coordinator**(s) according to the format and schedule specified by the **Planning Coordinator**(s) to support maintenance of each

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	Planning Coordinator's UFLS database.
NERC Standard	**PRC-006-NPCC-2** **Automatic Underfrequency Load Shedding**
Applicable Requirement(s)	**R4.** Each **Distribution Provider** or **Transmission Owner** in the Eastern Interconnection portion of NPCC that does not meet the UFLS program parameters specified in Attachment C, Table 1-3, and each **Distribution Provider** or **Transmission Owner** in the Quebec Interconnection that does not meet the UFLS program parameters specified by its **Planning Coordinator** shall: • Within 30 calendar days of determining that it does not meet the specified parameters, notify its **Planning Coordinator** that it does not meet the UFLS program parameters; and • Within the following 180 calendar days from notification of the **Planning Coordinator**, (1) develop a Corrective Action Plan and a schedule for implementation that is mutually agreed upon with its **Planning Coordinator** or (2) provide its **Planning Coordinator** with a technical study that demonstrates that the deviations from the program parameters will not result in failure of UFLS performance criteria being met for any island. The technical study must be acceptable to the **Planning Coordinator** prior to implementing deviations from program parameters and shall demonstrate coordination with UFLS programs of all entities residing within the same island(s) identified by the **Planning Coordinator** in **Requirement R2**. The technical study shall also demonstrate coordination with other UFLS programs of adjoining **Planning Coordinator**s, or (3) provide its **Planning Coordinator** with an analysis demonstrating that no alternative load shedding solution is available that would allow the **Distribution Provider** or **Transmission Owner** to comply with UFLS Attachment C Table 2 or Attachment C Table 3. **R9.** Each **Transmission Owner** and **Distribution Provider** shall annually provide documentation, with no more than 15 calendar months between updates, to its **Planning Coordinator** of the actual net Load that would have been shed by the UFLS relays at each UFLS stage. The actual net Load shall be coincident with the entity's integrated hourly peak net Load during the previous year, as determined by measuring or calculating Load through the switches that would disconnect load if triggered by the UFLS relays. If measured data is unavailable then calculated data may be used. **R11**. Each **Generator Owner** shall transmit the generator underfrequency trip setting and time delay within 45 days of the **Planning Coordinator**'s request.

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	R13. (Part **13.2**) For existing non-nuclear units in service prior to July 1, 2015, that have underfrequency protections set to trip above the appropriate curve in Figure 2: (See Standard – Underfrequency Load Shedding Program – Thresholds for Setting Underfrequency Trip Protection for Generators): … **13.2** Each **Generator Owner** shall transmit the existing underfrequency settings and any changes to the underfrequency settings along with the technical basis for the settings to the **Planning Coordinator.** **R16**. (Part **16.3**) Each **Generator Owner** of existing nuclear generating plants with units that have underfrequency relay threshold settings above the Eastern Interconnection generator tripping curve in Figure 2 (See Standard – Underfrequency Load Shedding Program – Thresholds for Setting Underfrequency Trip Protection for Generators) based on their licensing design, shall: …**16.3** Transmit the initial frequency trip setting and any changes to the setting and the technical basis for the settings to the **Planning Coordinator**.
NERC Standard	**TOP-001-5** **Transmission Operations**
Applicable Requirement(s)	**R3**. Each **Balancing Authority**, **Generator Operator**, and **Distribution Provider** shall comply with each Operating Instruction issued by its **Transmission Operator**(s), unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. **R4.** Each **Balancing Authority**, **Generator Operator**, and **Distribution Provider** shall inform its **Transmission Operator** of its inability to comply with an Operating Instruction issued by its **Transmission Operator**. **R5.** Each **Transmission Operator**, **Generator Operator**, and **Distribution Provider** shall comply with each Operating Instruction issued by its **Balancing Authority**, unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. **R6.** Each **Transmission Operator**, **Generator Operator**, and **Distribution Provider** shall inform its **Balancing Authority** of its inability to comply with an Operating Instruction issued by its **Balancing Authority**.
NERC Standard	**TOP-003-4** **Operational Reliability Data**
Applicable Requirement(s)	**R5**. Each **Transmission Operator**, **Balancing Authority**, **Generator Owner**, **Generator Operator**, **Transmission Owner**, and **Distribution Provider** receiving a

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	data specification in Requirement R3 or R4 shall satisfy the obligations of the documented specifications using: **5.1.** A mutually agreeable format **5.2.** A mutually agreeable process for resolving data conflicts **5.3.** A mutually agreeable security protocol
NERC Standard	**VAR-002-4.1** **Generator Operation for Maintaining Network Voltage Schedules**
Applicable Requirement(s)	**R1.** The **Generator Operator** shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (with its automatic voltage regulator (AVR) in service and controlling voltage) or in a different control mode as instructed by the **Transmission Operator** unless: 1) the generator is exempted by the **Transmission Operator**, or 2) the **Generator Operator** has notified the **Transmission Operator** of one of the following: • That the generator is being operated in start-up, shutdown, or testing mode pursuant to a Real-time communication or a procedure that was previously provided to the **Transmission Operator**; or • That the generator is not being operated in automatic voltage control mode or in the control mode that was instructed by the **Transmission Operator** for a reason other than start-up, shutdown, or testing. **R3.** Each **Generator Operator** shall notify its associated **Transmission Operator** of a status change on the AVR, power system stabilizer, or alternative voltage controlling device within 30 minutes of the change. If the status has been restored within 30 minutes of such change, then the **Generator Operator** is not required to notify the **Transmission Operator** of the status change. **R4.** Each **Generator Operator** shall notify its associated **Transmission Operator** within 30 minutes of becoming aware of a change in reactive capability due to factors other than a status change described in Requirement R3. If the capability has been restored within 30 minutes of the **Generator Operator** becoming aware of such change, then the **Generator Operator** is not required to notify the **Transmission Operator** of the change in reactive capability. • Reporting of status or capability changes as stated in Requirement R4 is not applicable to the individual generating units of dispersed power producing resources identified through Inclusion I4 of the Bulk Electric System definition. **R5**. The **Generator Owner** shall provide the following to its associated **Transmission Operator** and **Transmission Planner** within 30 calendar days of a

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	request. **5.1**. For generator step-up and auxiliary transformers[5] with primary voltages equal to or greater than the generator terminal voltage: **5.1.1**. Tap settings. **5.1.2**. Available fixed tap ranges. **5.1.3**. Impedance data. [5] For dispersed power producing resources identified through Inclusion I4 of the Bulk Electric System definition, this requirement applies only to those transformers that have at least one winding at a voltage of 100 kV or above.
Functional Entities to which Requirement(s) and CEICG Apply	**Balancing Authority, Distribution Provider, Generator Operator, Generator Owner, Planning Authority (Planning Coordinator), Reliability Coordinator, Resource Planner, Transmission Operator, Transmission Owner, Transmission Planner, Transmission Service Provider**
ISO-NE Disposition: **FAC-008-5, R8** **IRO-001-4, R2, R3** **IRO-010-3, R3** **IRO-017-1, R2** **MOD-032-1 R2, R3** **PRC-006-5 R8** **PRC-006-NPCC-2, R5 (parts 5.2 & 5.4), R12, R14, R16 (Part 16.2), R19 (Part 19.3)** **TOP-001-5, R3, R4, R5, R6** **TOP-003-4,**	Explanation of how adherence by Market Participants (MPs) and Transmission Owners (TOs) to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards. ISO-NE performs reliability functions for the New England Area [including Reliability Coordinator (RC), Balancing Authority (BA), Transmission Operator (TOP), Planning Authority (PA)/Planning Coordinator (PC), and Transmission Planner (TP), as defined by NERC]. ISO-NE relies on compliance with its issued Operating Instructions and Resource performance that is consistent with submitted operational characteristics to perform its RC, BA and TOP functions. Accurate and complete data is critical to the creation of the database models used by ISO-NE in real-time reliability operations, Market operations, operations planning and long-term planning, and to the computer applications that operate on those models. ISO-NE therefore relies on Resource owners' submitting accurate operating characteristics in order to issue Operating Instructions in response to real-time system events, and to assess the long-term needs of the New England system, to fulfill its various reliability functions (RC, BA, TOP, PA/PC and TP). Under various system conditions, issuing an Operating Instruction based on inaccurate operating characteristics may contribute to ISO-NE violating obligations under NERC Standards Requirements, and, in extreme cases, may lead to instability, cascading, or uncontrolled separation. Per the ISO-NE documents (such documents include, but may not be limited to, the ISO New England Transmission, Markets, and Services Tariff , the Market

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
R5 **VAR-002-4.1,** **R1, R3, R4, R5**	Participant Service Agreement, Transmission Operating Agreement, and ISO-NE Operating Documents), generally, all Market Participants and Transmission Owners must comply with Operating Instructions from ISO-NE. For the Generator Asset Resources within the ISO-NE Reliability Coordinator Area (RCA), operational characteristics are submitted to ISO-NE through various means: • Market System (unit offer data such as maximum output, etc. ramp rate, response rate), • NX-12 and NX-12 D data (Resource capability, blackstart ability, voltage/reactive capability, etc.) • ISO-NE Outage Scheduling software • Redeclarations (real-time changes in capability) For the Transmission Resources within the ISO-NE RCA, operational characteristics are submitted to ISO-NE through: • NX-9 transmission system data application for submittal of physical characteristics, ratings, and operational data of transmission system equipment • ISO-NE Outage Scheduling software For long-term planning purposes, ISO-NE has provided a comprehensive guide to the types of data required, and how they are submitted, in Compliance Bulletin – MOD-032 and ISO New England's Model Data Requirements and Reporting Procedures (Compliance Bulletin – MOD-032) . If an MP or TO: • fails to respond to an ISO-NE request for data, • fails to coordinate with ISO-NE, • fails to perform the applicable functions of ISO-NE's outage coordination process, or • fails to notify ISO-NE of changes in equipment capabilities and characteristics within the requirements and timeframes described in ISO-NE Operating Procedures, ISO-NE may research incidents of failures to provide Generator Asset or transmission data and evaluate such failures with respect to compliance with the applicable Standards, ISO-NE Tariff and/or relevant ISO-NE Operating Procedures.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-20	***Adherence by MPs and TOs to certain ISO-NE requirements (comply with Operating Instructions, provide information to, notify and coordinate with ISO-NE) is evidence of compliance with certain comparable Requirements of NERC Standards***
	NPCC has requested that ISO-NE corroborate evidence of compliance with NERC Standards provided to NPCC by MPs and TOs regarding compliance with Operating Instructions issued by ISO-NE, provision of data to ISO-NE, notifications to ISO-NE or coordination with ISO-NE, as such actions are required by the NERC Standards listed in CEICG-20 and by related requirements in the ISO-NE Tariff and Operating Procedures. ISO-NE and NPCC have agreed that such corroborating evidence provided by ISO-NE will be by exception, as necessary and appropriate.

CEICG-33	***Describes the process for GOs and TOs to submit an outage request to ISO-NE for conducting a verification of real or reactive power capability to meet MOD-025-2 Requirements and to submit the results of such verifications to ISO-NE. ISO-NE serves as the "Lead" TP within the ISO-NE RCA (and the sole TP to receive such results). (CEICG-33).***
NERC Standard	**MOD-025-2** **Verification and Data Reporting of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability**
Applicable Requirement(s)	**R1.** Each **Generator Owner** shall provide its **Transmission Planner** with verification of the Real Power capability of its applicable Facilities as follows: **1.1.** Verify the Real Power capability of its generating units in accordance with Attachment 1. (See Standard MOD-025 Attachment 1 – Verification of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability). **1.2.** Submit a completed Attachment 2 (see Standard MOD-025 Attachment 2 – One-line Diagram, Table, and Summary for Verification Information Reporting) (or a form containing the same information as identified in Attachment 2) to its **Transmission Planner** within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.
	R2. Each **Generator Owner** shall provide its **Transmission Planner** with verification of the Reactive Power capability of its applicable Facilities as follows: **2.1.** Verify, in accordance with Attachment 1 (see Standard MOD-025 Attachment 1 – Verification of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability), (i) the Reactive Power capability of its generating units and (ii) the Reactive Power capability of its synchronous condenser units. **2.2.** Submit a completed Attachment 2 (see Standard MOD-025 Attachment 2 – One-line Diagram, Table, and Summary for Verification Information Reporting) (or a form containing the same information as identified in Attachment 2) to its **Transmission Planner** within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.
	R3. Each **Transmission Owner** shall provide its **Transmission Planner** with verification of the Reactive Power capability of its applicable Facilities as follows: **3.1.** Verify, in accordance with Attachment 1 (see Standard MOD-025 Attachment 1 – Verification of Generator Real and Reactive Power Capability and Synchronous Condenser Reactive Power Capability), the Reactive Power capability of its synchronous condenser units.

CEICG-33	***Describes the process for GOs and TOs to submit an outage request to ISO-NE for conducting a verification of real or reactive power capability to meet MOD-025-2 Requirements and to submit the results of such verifications to ISO-NE. ISO-NE serves as the "Lead" TP within the ISO-NE RCA (and the sole TP to receive such results). (CEICG-33).***
	3.2. Submit a completed Attachment 2 (see Standard MOD-025 Attachment 2 – One-line Diagram, Table, and Summary for Verification Information Reporting) (or a form containing the same information as identified in Attachment 2) to its **Transmission Planner** within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Transmission Owner, Transmission Planner**
ISO-NE Disposition: MOD-025-2, *All* R1, R2, R3	Explanation of how Generator Owners (GOs) and Transmission Owners (TOs) submit an outage request to ISO-NE for conducting a verification of real or reactive power capability to meet MOD-025-2 Requirements and submit the results of such verifications to ISO-NE. ISO-NE serves as the "Lead" Transmission Planner (TP) within the ISO-NE Planning Coordinator Area (PCA) (and the sole TP to receive such results). NERC Standard MOD-025-2 requires GOs and TOs to verify generator real and reactive power capability and synchronous condenser reactive power capability and to report results of such verifications to its TP. While ISO-NE and seven other entities within the ISO-NE PCA are each registered as a TP, ISO-NE serves as the "Lead" TP for New England. Accordingly, all GOs and TOs in the New England PCA submit the results of their MOD-025-2 verifications of generator real and reactive power capability and synchronous condenser reactive power capability, as applicable, to ISO-NE. ISO-NE has forms and procedures for scheduling outages to conduct these verifications and for reporting the results to ISO-NE that can serve to facilitate GO and TO compliance with MOD-025-2 Requirements. GOs and TOs should note that the information contained in this CEICG pertains solely to compliance with MOD-025-2 Requirements and does **not** pertain to the separate ISO-NE requirements for verification of real and reactive power capability contained in ISO New England Operating Procedure No. 23 - Resource Auditing. While information provided in this CEICG is intended to facilitate GO or TO compliance with MOD-025-2, ultimately, the responsibility for meeting and documenting compliance with the MOD-025-2 Standard lies with the GO or applicable TO.

CEICG-33	***Describes the process for GOs and TOs to submit an outage request to ISO-NE for conducting a verification of real or reactive power capability to meet MOD-025-2 Requirements and to submit the results of such verifications to ISO-NE. ISO-NE serves as the "Lead" TP within the ISO-NE RCA (and the sole TP to receive such results). (CEICG-33).***
	Scheduling outages to conduct verifications to meet MOD-025-2 Requirements: GOs or TOs that want their facility to operate at a predefined schedule for purposes of verifying real or reactive power capability must submit an outage request to ISO-NE in accordance with one of the following procedures, as applicable: • *For Generator Assets:* ISO New England Operating Procedure No. 5 - Resource Maintenance and Outage Scheduling (see "Owner Test Request") • *For synchronous condensers:* ISO New England Operating Procedure No. 3 - Transmission Outage Scheduling For reactive capability verifications, a GO or TO must also complete the ISO New England Operating Procedure No. 23 - Resource Auditing - Appendix H - Reactive Capability Audit Request Form posted on the ISO-NE public website, under ISO Operating Procedures. This form must then be attached to an outage request in the outage scheduling software at least five (5) business days prior to the date of the verification. ***Submitting results of verifications to meet MOD-025-2 Requirements to ISO-NE:*** MOD-025-2 Attachment 2 One-line Diagram, Table, and Summary for Verification Information Reporting is a form listing the verification information required to be documented and submitted. Verification information may be submitted using the Attachment 2 form or other form containing equivalent information. ISO-NE has posted a spreadsheet Compliance Bulletin for MOD-025 Spreadsheet Form on its public website that could be used as an alternative to the Attachment 2 form for all information except the one-line diagrams, which must be submitted separately. The MOD-025-2 Standard requires submittal of verification information within 90 calendar days of the date when the verification was performed. All MOD-025-2 verification information, regardless of the form utilized, must be emailed to ISO-NE at the following address: MOD25@iso-ne.com.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-23	***ISO-NE serves as the "Lead" TP within the ISO-NE RCA and is the sole TP within the ISO-NE RCA responsible for maintaining models in accordance with MOD-026-1 and MOD-027-1. GO interactions with the TP pertaining to these standards should always be with ISO-NE.***
NERC Standard	**MOD-026-1** **Verification of Models and Data for Generator Excitation Control System or Plant Volt/Var Control Functions**
Applicable Requirement(s)	**CEICG pertains to *all* Requirements of Standard MOD-026-1** Purpose: To verify that the generator excitation control system or plant volt/var control function model (including the power system stabilizer model and the impedance compensator model) and the model parameters used in dynamic simulations accurately represent the generator excitation control system or plant volt/var control function behavior when assessing Bulk Electric System (BES) reliability.
NERC Standard	**MOD-027-1** **Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Control Functions**
Applicable Requirement(s)	**CEICG pertains to all Requirements of Standard MOD-027-1** Purpose: To verify that the turbine/governor and load control or active power/frequency control model and the model parameters, used in dynamic simulations that assess Bulk Electric System (BES) reliability, accurately represent generator unit real power response to system frequency variations.
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Transmission Planner**
ISO-NE Disposition: **MOD-026-1, *All*** **MOD-027-1, *All***	Explanation of how ISO-NE is the Transmission Planner (TP) within the ISO-NE Planning Coordinator Area (PCA) with which Generator Owners (GOs) should interact While ISO-NE and seven other entities within the ISO-NE PCA are each registered as a TP, ISO-NE serves as the "Lead" TP for New England and maintains models in accordance with MOD-026 and MOD-027. ISO-NE is the sole TP in New England responsible for meeting all TP Requirements of MOD-026-1, including maintaining models to assess New England Bulk Electric System (BES) reliability and providing information to GOs. For matters pertaining to MOD-026-1 and MOD-027-1 requiring interaction with a TP, GOs should contact ISO-NE and/or provide information to ISO-NE. GOs can contact ISO-NE Participant Support for instructions on how to obtain and/or provide model information. ISO-NE Participant Support contact information is posted to the ISO-NE public website.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-35	***ISO-NE requires governor model validation from any nuclear power station that provides under-frequency response and allows exemptions for those that don't***
NERC Standard	**MOD-027-1** **Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency Control Functions**
Applicable Requirement(s)	**R2.** Each **Generator Owner** shall provide, for each applicable unit, a verified turbine/governor and load control or active power/frequency control model, including documentation and data (as specified in Part 2.1) to its **Transmission Planner** in accordance with the periodicity specified in MOD-027 Attachment 1 (Turbine/Governor and Load Control or Active Power/Frequency Control Model Periodicity).
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Transmission Planner**
ISO-NE Disposition: MOD-027-1, R2	<u>Explanation of why ISO-NE requires governor model validation from any nuclear power station that provides under-frequency response and allows exemptions for those that don't.</u> In New England, ISO-NE has determined that the reliability need regarding Generator Asset real power response to system frequency variations pertains only to under-frequency excursion events (and not over-frequency excursion events). Accordingly, ISO-NE allows Generator Assets that are only capable of responding to over-frequency (and not capable of responding to under-frequency) to get the same exemption from the MOD-027-1 R2 model verification Requirements that the Standard allows for Generator Assets that are not responsive to *both* over- and under-frequency excursion events. According to MOD-027 Attachment 1, Row Number 7, Verification Condition: "Applicable unit is not responsive to both over and under frequency excursion events (The applicable unit does not operate in a frequency control mode, except during normal start up and shut down, that would result in a turbine/governor and load control or active power/frequency control mode response.); OR Applicable unit either does not have an installed frequency control system or has a disabled frequency control system." Then, according to MOD-027 Attachment 1, Row 7, Required Action: "Requirement R2 is met with a written statement to that effect transmitted to the Transmission Planner."

CEICG-35	***ISO-NE requires governor model validation from any nuclear power station that provides under-frequency response and allows exemptions for those that don't***
	As mentioned above, ISO-NE has no reliability need for governor model validation from nuclear power stations that do not provide under-frequency response (even if they do provide over-frequency response). Therefore, In New England, nuclear power stations may meet Requirement R2 by providing a written statement to ISO-NE, as applicable, stating that the nuclear power station is either: • not responsive to both over- and under-frequency excursion events; or • not responsive to under-frequency excursion events. Nuclear power stations that are responsive to under-frequency excursion events must meet MOD-027-1 R2 model verification Requirements, as must all other types of Generator Assets.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-22	***The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA***
NERC Standard	**NUC-001-4** **Nuclear Plant Interface Coordination**
Applicable Requirement(s)	**R2.** The **Nuclear Plant Generator Operator** and the applicable **Transmission Entitie**s shall have in effect one or more Agreements[1] that include mutually agreed to NPIRs and document how the **Nuclear Plant Generator Operator** and the applicable **Transmission Entities** shall address and implement these NPIRs. [1] Agreements may include mutually agreed upon procedures or protocols in effect between entities or between departments of a vertically integrated system.
Functional Entities to which Requirement(s) and CEICG Apply	Each New England Nuclear Plant Generator Operator (NPGOP) has agreed upon certain Nuclear Plant Interface Requirements (NPIRs) with certain "Transmission Entities" (TEs) (as per NUC-001-4). In New England, these TEs include certain Transmission Operators (TOPs), Transmission Planner (TP) and Transmission Owners (TOs). As a result, these NPGOPs and TEs are therefore subject to NUC-001-4 Requirements.
ISO-NE Disposition: **NUC-001-4, R2**	Explanation of the nature of the agreements between NPGOPs and TEs pertaining to NPIRs and how the NPIRs are addressed and implemented, as well as a description of the process by which these NPIRs are agreed upon Scope: This document pertains to the NPIRs that have been agreed upon by New England NPGOPs and TEs, in accordance with NERC Standard NUC-001-4, R2. This narrative includes the following: 1. Table listing of the NPGOPs and TEs to which one or more NPIRs apply 2. Description of the nature of the agreements between the NPGOPs and TEs that contain the NPIRs and that describe how NPIRs are addressed and implemented 3. A description of the process by which the NPIRs are agreed upon

CEICG-22	*The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA*

Nuclear Power Station:		**Millstone**	**Seabrook**
Name of Registered Entity	→	**Dominion Energy Nuclear Connecticut, Inc.** **[NCR07065]**	**NextEra Energy Resources, LLC** **[NCR10019]**
↓		(NP)GOP	(NP)GOP
ISO-NE **[NCR07124]**		TOP, TP	TOP, TP
Eversource Energy Service Company **[NCR07176]** [LCC TOPs: for Millstone-CONVEX; for Seabrook-New Hampshire TO: Millstone-CL&P,		TO, TOP	TOP
TO: **Seabrook** **New Hampshire Transmission, LLC** [NH Transmission] **[NCR07091]**			TO

Agreements (procedures) that contain the NPIRs:

Master/Local Control Center Procedure No. 1 (M/LCC 1) - Nuclear Plant Transmission Operations contains

- Master/LCC Procedure No. 1 - Nuclear Plant Transmission Operations, Attachment C - Millstone Nuclear Power Station
- Master/LCC Procedure No. 1 - Nuclear Plant Transmission Operations,

CEICG-22	*The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA*
	Attachment D - Seabrook Nuclear Power Station The M/LCC 1 Attachments for the nuclear power stations with applicable NPIRs each contain a table that lists all NPIRs pertinent to that nuclear power station applicable to the NPGOP and to the TEs that perform the TOP, TP or TO functions (in Table 1 List of Nuclear Plant Interface Requirements (NPIRs), Section 10 List of NPIRs). **NOTE:** The M/LCC 1 and Attachment documents are operating procedures that pertain to the operation of the Bulk Electric System (BES). For this reason, NPIRs that apply to the DP function (if any) **are not** contained in M/LCC 1 Attachments. Any NPIR applicable to the DP function would be contained and addressed in other document(s) that have been mutually-agreed-upon between the NPGOP and DP through a process that is separate and distinct from the M/LCC 1 approval process described herein. *Structure and Content of the Table 1 List of NPIRs in the M/LCC 1 Attachments:* The first column of the NPIR Table 1 in each of the M/LCC 1 Attachments C and D contains the text of the NPIR. Each of the other columns of the NPIR table contains information regarding the TEs that have agreed to one or more of these NPIRs, including: • Name of the TE (as registered with NPCC, with associated NCR #) • Name of the TE (as referenced in the M/LCC 1 Attachment) • Reliability function type(s) that pertain to how NPIR is met (GOP, TOP, TP, TO) **Agreements (procedures) that describe how the NPGOP and applicable TEs address and implement these NPIRs and NUC-001-4 Requirements:** In accordance with NUC-001-4, agreements for meeting Requirement 2 can include mutually-agreed-upon procedures in effect between the NPGOP and TE. In New England, such documents can include any mutually-agreed-upon procedure or any procedure/document which both the NPGOP and TE are obligated to follow. Such procedures/documents include those vetted through

CEICG-22	*The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA*
	the NEPOOL stakeholder process (such as the ISO Tariff and ISO-NE Operating Procedures and Planning Procedures, etc.) and any other mutually-agreed-upon procedure/document. NPIRs are met by the NPGOPs and TEs through their respective implementation of and adherence to, various mutually-agreed upon operating and planning procedures. Documents that contain provisions pertaining to how the NPGOP and applicable TEs address and implement the NPIRs agreed to through the M/LCC 1 approval process are posted to the ISO-NE website and include, but are not limited to: • M/LCC 1 – Master/Local Control Center Procedure No. 1 - Nuclear Plant Transmission Operations (and Attachments, some of which are confidential and contain Critical Energy Infrastructure Information (CEII)) • OP-1A – ISO New England Operating Procedure No. 1 - Central Dispatch Operating Responsibilities and Authority - Appendix A - Assignment of Responsibilities • PP3 – ISO New England Planning Procedure No. 3 - Reliability Standards for the New England Area Pool Transmission Facilities • PP5-3 – ISO New England Planning Procedure 5-3 - Guidelines for Conducting and Evaluating Proposed Plan Application Analyses • ISO-NE Tariff – ISO New England Inc. Transmission, Markets, and Services Tariff NUC-001-4 R9 requires the NPGOP and TEs to include a variety of elements within the agreement(s) (procedures) identified by the NPGOPs and TEs in accordance with R2 that show how the NPIRs are addressed and implemented. Such elements pertain to • Technical requirements and analysis, • Operations and maintenance coordination, • Communications and training Administrative elements. There is at least one mutually-agreed upon procedure (and often there are more) that includes each element specified in R9. However, not every element

CEICG-22	*The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA*
	called for in R9 is contained in every mutually-agreed upon procedure identified by the NPGOPs and TEs as one that demonstrates how NPIRs are addressed and implemented. Each TE and NPGOP maintains an internal "mapping" document that summarizes how each Requirement of NUC-001-4 is met (referencing applicable agreed-upon procedures, etc.). Finally, in accordance with agreed-upon procedures, NPGOPs and TEs take appropriate actions to meet NPIRs. If system conditions or other factors impact the ability to meet the NPIRs, the NPGOPs and TEs have procedures that can be implemented for communications to be made and corrective actions to be taken to address the inability to meet the NPIRs. **Agreements (procedures) that document how NPIRs are reviewed and approved:** The NPIRs in Section 10, Table 1 of M/LCC 1 Attachments C and D are those that have been agreed-upon between NPGOPs and TOPs, TOs or TPs through a review and approval process described in M/LCC 1 (See especially Section 4 – Periodic Review, Update and Approval of M/LCC 1 and Attachments) . The highlights of this process are as follows: • For any modification to M/LCC 1 or an M/LCC 1 Attachment to become effective, it shall be reviewed and approved by the applicable M/LCC1 Parties (as listed in Table A of M/LCC 1 Nuclear Plant Transmission Operations) in accordance with Section 4 of this document (M/LCC1). • Approval of M/LCC 1, Attachment C – Millstone Nuclear Power Station (Att. C) or Attachment D – Seabrook Nuclear Power Station (Att. D) constitutes agreement by the applicable M/LCC 1 Parties to the applicable NPIRs in Section 10, Table 1 of such Attachment. Documentation of such approval is through: • Internal review of the M/LCC 1 document revision by ISO, as well as the review and approval of the revision by the M/LCC Heads, in accordance with ISO SOP-RTMKTS.0210.0010 - Develop, Revise & Control SOP, OP, M/LCC Documents.

CEICG-22	***The nature of Agreements pertaining to NUC-001-4 compliance within the ISO-NE RCA***
	• Final review and approval of the M/LCC 1 document revision by the M/LCC 1 Parties (e-mail process – M/LCC 1 Section 4 Periodic Review, Update and Approval of M/LCC 1 and Attachments) • Document finalization and posting process in accordance with ISO-NE SOP-RTMKTS.0210.0010 – Develop, Revise & Control SOP, OP, M/LCC Documents • Revision History section of the respective M/LCC 1 Attachments C and D documents. • Development and retention of documentation of the approval of the M/LCC 1 document by completing Table A of M/LCC 1 and storing it, along with the associated document final approval emails from M/LCC 1 Parties • Notification to M/LCC 1 Parties by email that the revised M/LCC 1 document has been approved by the M/LCC 1 Parties and has been posted • Notification to ISO-NE System Planning that the M/LCC 1 document has been revised and posted • Transmittal by the ISO-NE Principal Nuclear & System Reliability Coordinator to the ISO-NE Reliability and Operations Compliance (ROC) Analyst for archiving as RSAW evidence in the Corporate Compliance Program (CCP) SharePoint

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-06	***As UVLS programs existing within the ISO-NE RCA are intended to provide local protection only, Standards pertaining to UVLS programs do not apply within the ISO-NE RCA at this time***
NERC Standard	**NUC-001-4** **Nuclear Plant Interface Coordination**
Applicable Requirement(s)	**R9**. The **Nuclear Plant Generator Operator** and the applicable **Transmission Entities** shall include the following elements in aggregate within the Agreement(s) (identified in R2): **9.3**. Operations and maintenance coordination: **9.3.7**. Coordination of the NPIRs with transmission system Remedial Action Schemes and any programs that reduce or shed load based on underfrequency **or undervoltage**.
NERC Standard	**PRC-010-2** **Undervoltage Load Shedding**
Applicable Requirement(s)	**CEICG pertains to *all* Requirements of Standard PRC-010-2.** Purpose: To establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs (UVLS Programs). [*Applicable to certain entities that develop, assess, own, or operate a UVLS program – PC, TP, TO, DP*]
NERC Standard	**PRC-011-0** **Undervoltage Load Shedding System Maintenance and Testing**
Applicable Requirement(s)	**CEICG pertains to *all* Requirements of Standard PRC-011-0.** Purpose: Provide system preservation measures in an attempt to prevent system voltage collapse or voltage instability by implementing an Undervoltage Load Shedding (UVLS) program. [*Applicable to certain entities that own or operate a UVLS program – TO, DP*]
Functional Entities to which Requirement(s) and CEICG Apply	Any of the following that own or operate an Undervoltage Load Shedding (UVLS) System or program: Distribution Provider, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, Transmission Planner, including any "Transmission Entity" (as pertains to certain elements of NUC-001-4 R9.3.7)
ISO-NE Disposition: **NUC-001-4,** **R9.3.7** **PRC-010-2,** ***All*** **PRC-011-0,** ***All***	Explanation of why these Standards or identified Requirements do not apply to: • Distribution Providers (DPs), • Generator Owners (GOs), • Generator Operators (GOPs), • Planning Coordinators (PCs)/Planning Authorities (PAs), • Transmission Owners (TOs), • Transmission Operators (TOPs), • Transmission Planners (TPs) or • Transmission Entities (TEs – as defined in NUC-001-4) within the ISO-NE Reliability Coordinator Area (RCA)

CEICG-06	***As UVLS programs existing within the ISO-NE RCA are intended to provide local protection only, Standards pertaining to UVLS programs do not apply within the ISO-NE RCA at this time***
	Although there are UVLS programs provided by Market Participants operating within the ISO-NE RCA, none are intended to mitigate the risk of voltage collapse or voltage instability of the Bulk Electric System (BES). Those UVLS programs existing within the ISO-NE RCA are intended to provide local protection only. An "NPCC Assessment of Under-Voltage Load Shedding (UVLS)" report was published on November 29, 2005. This report provided conclusions and recommendations based on limited steady-state analysis conducted by the *SS-37 Working Group*. The SS-37 report did not recommend general use of, and drew no conclusion about, the practicality of UVLS schemes. The report left it to individual areas to assess the benefits against the costs and risks of deployment of UVLS schemes in specific situations. Further, the SS-37 report concluded that UVLS schemes cannot be universally and unconditionally applied as a means to limit cascading outages, as they can potentially have a counterproductive effect. In addition, the final conclusion of the SS-37 report stated, "If UVLS schemes are found to be potentially beneficial, more detailed steady state and transient stability studies will be required to thoroughly assess if a UVLS scheme should be pursued." On 1/31/07 the NPCC *Task Force on System Studies* (TFSS) recommended not to pursue further generic studies of UVLS, stating that further action should only be taken if a member system in the Eastern Interconnection proposes a specific UVLS application, which can then be studied in more detail. [1] For NUC-001-4, R9.3.7, the Agreements between the Nuclear Plant Generator Operator (NPGOP) and the Transmission Entity (TE) required by NUC-001-4 R2 do not need to include provisions pertaining to coordination of the Nuclear Plant Interface Requirements (NPIRs) with transmission system UVLS programs (because there are no such programs). [1] Letter, David Conroy, Chair-TFSS to Guy Zito, Assist. V.P. Standards, Re- UVLS Study Recommendations.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-24	***Based on the DDR capability requirements that ISO-NE has established and specified for the ISO-NE RCA, ISO-NE has notified certain TOs that certain of their BES elements require DDR data.***
NERC Standard	**PRC-002-2** **Disturbance Monitoring and Reporting Requirements**
Applicable Requirement(s)	**R5.** Each Responsible Entity [Eastern Interconnection – **Planning Coordinator**: ISO-NE] shall: **5.1** Identify BES Elements for which dynamic Disturbance recording (DDR) data is required, including the following: … [*See Standard for details*] **5.2** Identify a minimum DDR coverage, inclusive of those BES Elements identified in Part 5.1 … [*See Standard for details*] **5.3** Notify all owners of identified BES Elements, within 90-calendar days of completion of Part 5.1, that their respective BES Elements require DDR data when requested. **5.4** Re-evaluate all BES Elements at least once every five calendar years in accordance with Parts 5.1 and 5.2, and notify owners in accordance with Part 5.3 to implement the re-evaluated list of BES Elements as per the Implementation Plan.
	R8. Each **Transmission Owner** and **Generator Owner** responsible for DDR data for the BES Elements identified in Requirement R5 shall have continuous data recording and storage. If the equipment was installed prior to the effective date of this standard and is not capable of continuous recording, triggered records must meet the following… [*see Standard for further details*]
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Planning Coordinator, Transmission Owner**
ISO-NE Disposition: **PRC-002-2,** **R5,** **R8**	**<u>Identification of the entities that ISO-NE has requested to install DDR equipment.</u>** ISO-NE, as the Planning Coordinator (PC)/(Planning Authority (PA)) in New England, has identified Bulk Electric System (BES) elements for which Dynamic Disturbance Recording (DDR) data are required, in accordance with PRC-002-2 R5. The entities for which ISO-NE has specified DDR capability requirements are all Transmission Owners (TOs). ISO-NE's DDR capability requirements do not include any Generator Owners (GOs) or other registered entities. ISO-NE has notified applicable TOs of identified BES elements, of which BES elements require DDR data. **Note:** in accordance with the "Rationale" for PRC-002-2 R5, for an interconnection between a TO and a GO, ISO-NE has determined that the TOs will provide the data.

CEICG-24	***Based on the DDR capability requirements that ISO-NE has established and specified for the ISO-NE RCA, ISO-NE has notified certain TOs that certain of their BES elements require DDR data.***

	The following is the list of TOs for which ISO-NE has specified DDR capability requirements and that have been notified:
	
	• AVANGRID
	  ○ Central Maine Power Company,
	  ○ United Illuminating Company
	• Eversource Energy
	• National Grid USA (NGRID)
	• New Hampshire Transmission, LLC (NHT)
	• Town of Wallingford Department of Utilities
	• Vermont Transco LLC (VELCO)
	• Versant Power
	
	These TOs are the only entities within the ISO-NE Planning Coordinator Area (PCA) for which ISO-NE has specified DDR capability requirements and they are the only entities within the ISO-NE Reliability Coordinator Area (RCA) that must comply with PRC-002-2 R8 and other applicable PRC-002-2 Requirements.
	
	If there are any changes to ISO-NE's DDR capability requirements, ISO-NE would notify the applicable entities and update this list, as necessary.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-26	***The ISO-NE UFLS program does not require TOs to provide automatic switching of its existing capacitor banks, transmission lines, and reactors to control over-voltage in support of underfrequency load shedding***
NERC Standard	**PRC-006-5** **Automatic Underfrequency Load Shedding**
Applicable Requirement(s)	**R10**. Each **Transmission Owner** shall provide automatic switching of its existing capacitor banks, Transmission Lines, and reactors to control over-voltage as a result of underfrequency load shedding if required by the UFLS program and schedule for implementation, including any Corrective Action Plan, as determined by the **Planning Coordinator**(s) in each **Planning Coordinator** area in which the **Transmission Owner** owns transmission.
Functional Entities to which Requirement(s) and CEICG Apply	**Planning Coordinator, Transmission Owner**
ISO-NE Disposition: PRC-006-5, R10	Explanation of how ISO-NE's UFLS program does not require Transmission Owners (TOs) to provide automatic switching of any of its equipment. As the Planning Coordinator (PC)/(Planning Authority (PA)) in New England, ISO-NE has developed an underfrequency load shedding (UFLS) program in accordance with the Requirements of NERC Reliability Standard PRC-006-5 and NPCC Regional Reliability Reference Directory #12 - Underfrequency Load Shedding Program Requirements. The ISO-NE UFLS program is described in ISO New England Operating Procedure No. 13, Standards for Voltage Reduction and Load Shedding Capability (OP-13) and OP-13 Appendices. As part of ISO-NE's UFLS program, ISO-NE provides notification of and a schedule for the implementation by UFLS entities within its area in the following documents: • ISO New England Operating Procedure No. 13 - Standards for Voltage Reduction and Load Shedding Capability • OP-13 Appendix B - Underfrequency Load Shedding Program Requirements (OP-13B) As explained in OP-13B, the ISO-NE UFLS program does not require any TOs to provide automatic switching of their existing capacitor banks, transmission lines, and reactors to control over-voltage as a result of underfrequency load shedding. Therefore, TOs within the ISO-NE Reliability Coordinator Area (RCA) do not need to provide automatic switching for such equipment.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-18	***How TOs, GOs and DPs within the ISO-NE RCA can comply with the Requirement to obtain agreement of the PC, TOP and RC regarding the calculated circuit capability in the setting of protective relays, such that they do not limit transmission system loadability and, for entities that use PRC-023-4 R1 criterion 2 as the basis for verifying transmission line relay loadability, how to comply with the Requirement to annually provide an updated list of circuits associated with those transmission line relays to their PC, TOP and RC***
NERC Standard	**PRC-023-4** **Transmission Relay Loadability**
Applicable Requirement(s)	**R3**: Each **Transmission Owner**, **Generator Owner**, and **Distribution Provider** that uses a circuit capability with the practical limitations described in Requirement R1, criterion 7, 8, 9, 12, or 13 shall use the calculated circuit capability as the Facility Rating of the circuit and shall obtain the agreement of the **Planning Coordinator**, **Transmission Operator**, and **Reliability Coordinator** with the calculated circuit capability. **R4**. Each **Transmission Owner**, **Generator Owner**, and **Distribution Provider** that chooses to use Requirement R1 criterion 2 as the basis for verifying transmission line relay loadability shall provide its **Planning Coordinator**, **Transmission Operator**, and **Reliability Coordinator** with an updated list of circuits associated with those transmission line relays at least once each calendar year, with no more than 15 months between reports.
Functional Entities to which Requirement(s) and CEICG Apply	**Distribution Provider, Generator Owner, Planning Coordinator, Reliability Coordinator, Transmission Operator, Transmission Owner**
ISO-NE Disposition PRC-023-4, R3, R4	<u>Explanation of how Transmission Owners (TOs), Generator Owners (GOs) and Distribution Providers (DPs) provide information to ISO-NE to comply with PRC-023-4 R3 and R4</u> In accordance with PRC-023-4 R6, ISO-NE determines the circuits in its Planning Coordinator Area (PCA) for which certain Registered Entities must comply with Requirements R1 through R5. ISO-NE CEICG-27 lists the TOs, GOs and DPs that own the applicable terminals of these circuits and that must comply with PRC-023-4 R1 through R5. To meet PRC-023-4 R3 and R4, identified TOs, GOs and DPs must provide information to ISO-NE (and, for R3, must also obtain agreement from ISO-NE).

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-18	***How TOs, GOs and DPs within the ISO-NE RCA can comply with the Requirement to obtain agreement of the PC, TOP and RC regarding the calculated circuit capability in the setting of protective relays, such that they do not limit transmission system loadability and, for entities that use PRC-023-4 R1 criterion 2 as the basis for verifying transmission line relay loadability, how to comply with the Requirement to annually provide an updated list of circuits associated with those transmission line relays to their PC, TOP and RC***
	To meet PRC-023-4 **R3**, each identified TO, GO and DP that owns the applicable terminal of these circuits with transmission relays set according to PRC-023-4 R1, criterion 7, 8, 9, 12, or 13 must use the calculated circuit capability as the Facility Rating of the circuit and obtain agreement from ISO-NE on the resulting Facility Rating. To obtain such agreement from ISO-NE, each identified TO, GO and DP must send the pertinent Facility Rating calculations (e.g., Facility Rating spreadsheets or Facility Rating database) to ISO-NE *Operations Support Services* group at the following ISO-NE email address: prc_setting@iso-ne.com. ISO-NE's review of, and agreement to, the Facility Ratings submitted in accordance with PRC-023-4 would be limited to the line rating change and the selection of the method used for the calculation of the line rating. ISO-NE will provide an email response indicating whether it agrees or disagrees with the Facility Ratings proposed by a TO, GO or DP. To meet PRC-023-4 R4, each identified TO, GO and DP that owns the applicable terminal of these circuits and that chooses to use PRC-023-4 R1, criterion 2 as the basis for verifying transmission line relay loadability must provide ISO-NE with an updated list of circuits associated with those transmission line relays (if any) at least once each calendar year, with no more than 15 months between provision of updates (the updated list may either be a full list, a list of incremental changes to the previous list, or a statement that there are no changes to the previous list). ISO-NE has established a **target date of April 15th** for all annual transmittals from a TO, GO or DP pertaining to PRC-023-4 R4 Requirements. These annual transmittals should be sent to the ISO-NE *Operations Support Services* group at the following ISO-NE email address: prc_setting@iso-ne.com. Note: each TO, GO and DP maintains its own records of these email transmittals, for audit purposes.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-27	***ISO-NE has identified circuits in its PC area for which TOs, GOs, and DPs must comply with PRC-023-4 Requirements R1 through R5 and provides the list of these circuits to the respective owners of those facilities and to NPCC.***
NERC Standard	**PRC-023-4** **Transmission Relay Loadability**
Applicable Requirement(s)	**R6**. Each **Planning Coordinator** shall conduct an assessment at least once each calendar year, with no more than 15 months between assessments, by applying the criteria in PRC-023-4, Attachment B to determine the circuits in its **Planning Coordinator** area for which **Transmission Owner**s, **Generator Owner**s, and **Distribution Provider**s must comply with Requirements R1 through R5. The **Planning Coordinator** shall: **6.1**. Maintain a list of circuits subject to PRC-023-4 per application of Attachment B, including identification of the first calendar year in which any criterion in PRC-023-4, Attachment B applies. **6.2**. Provide the list of circuits to all Regional Entities, **Reliability Coordinators**, **Transmission Owners**, **Generator Owners**, and **Distribution Providers** within its **Planning Coordinator** area within 30 calendar days of the establishment of the initial list and within 30 calendar days of any changes to that list.
Functional Entities to which Requirement(s) and CEICG Apply	**Distribution Provider, Generator Owner, Planning Coordinator, Reliability Coordinator, Transmission Owner**
ISO-NE Disposition: PRC-023-4, R6	Explanation of how ISO-NE has identified circuits in its Planning Coordinator (PC) area for which Transmission Owners (TOs), Generator Owners (GOs), and Distribution Providers (DPs) must comply with PRC-023-4 Requirements R1 through R5 and provides the list of these circuits to the respective owners of those facilities and to NPCC. As required by PRC-023-4 R6, ISO-NE conducts an annual assessment to determine the circuits in its Planning Coordinator Area (PCA) for which TOs, GOs and DPs must comply with PRC-023-4 R1 through R5 with respect to circuit terminals to prevent phase protective relay settings from limiting transmission system loadability while maintaining reliable protection of the Bulk Electric System (BES) for all fault conditions. As required by PRC-023-4 R6, Part 6.1, ISO-NE maintains a list of these identified circuits. An assigned ISO-NE *Reliability & Operations Compliance* Analyst provides this list of circuits to NPCC (NPCCCI@npcc.org) and to the respective TOs, GOs and DPs that own circuits on that list, in accordance with PRC-023-4 R6, Part 6.2. The latest list of circuits developed by ISO-NE and sent to TOs, GOs, DPs and NPCC includes the following TOs, GOs and DPs that own the applicable terminals of these circuits and that must comply with PRC-023-4 R1 through R5:

<table>
<tr><td>CEICG-27</td><td>ISO-NE has identified circuits in its PC area for which TOs, GOs, and DPs must comply with PRC-023-4 Requirements R1 through R5 and provides the list of these circuits to the respective owners of those facilities and to NPCC.</td></tr>
<tr><td></td><td>
<table>
<tr><th>TOs, GOs and DPs that Received Notifications from ISO-NE and that Must Comply with PRC-023-4 R1-R5</th><th>Date of Most Recent ISO-NE Notification to Owner</th></tr>
<tr><td>AVANGRID, Inc. (Avangrid) (TO)
• Central Maine Power Company (CMP),
• United Illuminating Company (UI)</td><td>12/1/2020</td></tr>
<tr><td></td><td></td></tr>
<tr><td>Eversource Energy Services Company (Eversource) (TO)</td><td>12/1/2020</td></tr>
<tr><td>Fitchburg Gas and Electric Light Company, Inc. (FG&E) (DP)</td><td>12/1/2020</td></tr>
<tr><td>National Grid USA (NGRID) (TO)</td><td>12/1/2020</td></tr>
<tr><td>Reading Municipal Light Department (Reading) (DP)</td><td>12/1/2020</td></tr>
<tr><td>Vermont Electric Power Company, Inc. (VELCO) (TO)</td><td>12/1/2020</td></tr>
<tr><td>Versant Power (TO)</td><td>12/1/2020</td></tr>
<tr><td>Wallingford Electric Division (Wallingford) (DP)</td><td>12/1/2020</td></tr>
</table>

If and when this list changes, ISO-NE would notify NPCC and the applicable TOs, GOs or DPs within 30 days and would reflect these changes in the next revision of this CEICG.
</td></tr>
</table>

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-34	***Identifies ISO-NE as the "Lead" Transmission Planner for and instructs GOs required by PRC-024-2 Requirement R3, Part 3.1 and Requirement R4 to send information to their Transmission Planner to send that information to ISO-NE (and not to other TPs in New England) (CEICG-34).***
NERC Standard	**PRC-024-2** **Generator Frequency and Voltage Protective Relay Settings**
Applicable Requirement(s)	**R3.** Each **Generator Owner** shall document each known regulatory or equipment limitation that prevents an applicable generating unit with generator frequency or voltage protective relays from meeting the relay setting criteria in Requirements R1 or R2 including (but not limited to) study results, experience from an actual event, or manufacturer's advice. **3.1.** The **Generator Owner** shall communicate the documented regulatory or equipment limitation, or the removal of a previously documented regulatory or equipment limitation, to its **Planning Coordinator** and **Transmission Planner** within 30 calendar days of any of the following: • Identification of a regulatory or equipment limitation. • Repair of the equipment causing the limitation that removes the limitation. • Replacement of the equipment causing the limitation with equipment that removes the limitation. • Creation or adjustment of an equipment limitation caused by consumption of the cumulative turbine life-time frequency excursion allowance.
	R4. Each **Generator Owner** shall provide its applicable generator protection trip settings associated with Requirements R1 and R2 to the **Planning Coordinator** or **Transmission Planner** that models the associated unit within 60 calendar days of receipt of a written request for the data and within 60 calendar days of any change to those previously requested trip settings unless directed by the requesting **Planning Coordinator** or **Transmission Planner** that the reporting of relay setting changes is not required.
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Planning Coordinator, Transmission Planner**

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-34	***Identifies ISO-NE as the "Lead" Transmission Planner for and instructs GOs required by PRC-024-2 Requirement R3, Part 3.1 and Requirement R4 to send information to their Transmission Planner to send that information to ISO-NE (and not to other TPs in New England) (CEICG-34).***
ISO-NE Disposition: PRC-024-2, R3, Part 3.1 R4	Explanation of how Generator Owners (GOs) required by PRC-024-2 Requirement R3, Part 3.1 and Requirement R4 to send information to their Transmission Planner (TP) should send that information to ISO-NE only. PRC-024-2 requires that GOs send certain information pertaining to generator protective relays to their TP according to certain criteria and within specific timeframes specified in the Standard. This includes information pertaining to: • Limitations that prevent a generating unit with generator frequency or voltage protective relays from meeting the relay setting criteria [as per R3, Part 3.1] • Generator protection trip settings [as per R4] Such information should be sent to ISO-NE (and only to ISO-NE) at email address prc_setting@iso-ne.com. While ISO-NE and seven other entities within the ISO-NE Planning Coordinator Area (PCA) are each registered as a TP, ISO-NE serves as the "Lead" TP for the New England PCA, so all such information should be sent only to ISO-NE.

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

CEICG-36	***ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities (CEICG-36).***
NERC Standard	**PRC-026-1** **Relay Performance During Stable Power Swings**
Applicable Requirement(s)	**R1.** Each **Planning Coordinator** shall, at least once each calendar year, provide notification of each generator, transformer, and transmission line BES Element in its area that meets one or more of the following criteria, if any, to the respective **Generator Owner** and **Transmission Owner**: Criteria: 1. Generator(s) where an angular stability constraint exists that is addressed by a System Operating Limit (SOL) or a Remedial Action Scheme (RAS) and those Elements terminating at the Transmission station associated with the generator(s). 2. An Element that is monitored as part of an SOL identified by the **Planning Coordinator**'s methodology[1] based on an angular stability constraint. 3. An Element that forms the boundary of an island in the most recent underfrequency load shedding (UFLS) design assessment based on application of the **Planning Coordinator**'s criteria for identifying islands, only if the island is formed by tripping the Element due to angular instability. 4. An Element identified in the most recent annual Planning Assessment where relay tripping occurs due to a stable or unstable[2] power swing during a simulated disturbance. [1] NERC Reliability Standard FAC-014-2 – Establish and Communicate System Operating Limits, Requirement R3. [2] An example of an unstable power swing is provided in the Guidelines and Technical Basis section, "Justification for Including Unstable Power Swings in the Requirements section of the Guidelines and Technical Basis."

CEICG-36	***ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities (CEICG-36).***
	R2. Each **Generator Owner** and **Transmission Owner** shall: **2.1** Within 12 full calendar months of notification of a BES Element pursuant to Requirement R1, determine whether its load-responsive protective relay(s) applied to that BES Element meets the criteria in PRC-026-1 – Attachment B where an evaluation of that Element's load-responsive protective relay(s) based on PRC-026-1 – Attachment B criteria has not been performed in the last five calendar years. **2.2** Within 12 full calendar months of becoming aware[3] of a generator, transformer, or transmission line BES Element that tripped in response to a stable or unstable[4] power swing due to the operation of its protective relay(s), determine whether its load-responsive protective relay(s) applied to that BES Element meets the criteria in PRC-026-1 – Attachment B. [3] Some examples of the ways an entity may become aware of a power swing are provided in the Guidelines and Technical Basis section, "Becoming Aware of an Element That Tripped in Response to a Power Swing." [4] An example of an unstable power swing is provided in the Guidelines and Technical Basis section, "Justification for Including Unstable Power Swings in the Requirements section of the Guidelines and Technical Basis."
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Planning Coordinator, Transmission Owner**
ISO-NE Disposition: PRC-026-1, R1, R2	<u>Explanation of how ISO-NE has identified Bulk Electric System (BES) Elements in its Planning Coordinator Area (PCA) for which Transmission Owners (TOs) and Generator Owners (GOs) must comply with PRC-026-1 Requirements R1 and R2 and provides the list of these Elements to the respective owners of those facilities.</u> As required by PRC-026-1 R1, ISO-NE conducts assessments to determine the BES Elements (generator, transformer and transmission line) in its PCA that meet one or more of the criteria specified in PRC-026-1 R1. BES Elements identified by ISO-NE as meeting the criteria must comply with PRC-026-1 R2 Requirements to ensure that load-responsive protective relays are expected to not trip in response to stable power swings during non-Fault conditions. At least once every calendar year (or more often, as necessary), ISO-NE Transmission Planning provides notification of each generator, transformer, and transmission line BES Element in its PCA that meets one or more of the PRC-026-1 R1 criteria, to the respective GO and TO. ISO-NE

CEICG-36	ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities (CEICG-36).

typically provides these notifications in the fourth quarter of each year.

ISO-NE's latest list of BES Elements that meet one or more of the criteria specified in PRC-026-1 R1 were sent to applicable TOs and GOs listed in the table below. These are TOs and GOs that own applicable terminals of these BES Elements and that must comply with PRC-026-1 R2:

TOs and GOs that Received Notifications from ISO-NE and that Must Comply with PRC-026-1 R2	Date of Most Recent ISO-NE Notification to Owner
American PowerNet Management, LP	11/24/20
AVANGRID [Central Maine Power Company (CMP)]	11/24/20
AVANGRID [United Illuminating Company (UI)]	11/24/20
Braintree Electric Light Department, Town of (BELD)	11/24/20
Brookfield Renewable Energy LP	11/24/20
Calpine Energy Services, LP	11/24/20
Connecticut Municipal Electric Energy Cooperative (CMEEC)	11/24/20
Cogentrix Energy, LLC	11/24/20
Consolidated Edison Energy, Inc.	11/24/20
Cross-Sound Cable Company, LLC	11/24/20
Connecticut Transmission Municipal Electric Energy Cooperative (CTMEEC)	11/24/20
Dominion Energy Generation Marketing, Inc.	11/24/20
Energy New England LLC	11/24/20
Eversource Energy Transmission Ventures, Inc.	11/24/20
Eversource Energy Transmission Ventures, Inc. [Public Service Company of New Hampshire (PSNH)]	11/24/20
Exelon	11/24/20
FirstLight Power Resources Management, LLC	11/24/20
Great River Hydro, LLC	11/24/20
Ironclad Energy	11/24/20
Maine Electric Power Company, Inc. (MEPCO)	11/24/20
Massachusetts Municipal Wholesale Electric Company (MMWEC)	11/24/20
National Grid USA (NGRID)	11/24/20
New Hampshire Transmission, LLC	11/24/20
NextEra Energy Marketing, LLC	11/24/20
TOs and GOs that Received Notifications from ISO-NE and that Must Comply with PRC-026-1 R2	**Date of Most Recent ISO-NE Notification to Owner**
NRG Power Marketing LLC	11/24/20

CEICG-36	ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities (CEICG-36).

PSEG Energy Resources & Trade LLC	11/24/20
Star West Generation LLC	11/24/20
Talen Energy Marketing, LLC	11/24/20
Tenaska Power Services Co.	11/24/20
Town of Wallingford CT Department of Public Utilities Electric Division	11/24/20
Twin Eagle Resource Management, LLC	11/24/20
Vermont Electric Power Company (VELCO)	11/24/20
Versant Power	11/24/20
Vistra Energy Corp.	11/24/20

If ISO conducts an assessment that results in a change to this list, ISO-NE will notify the applicable TO(s) or GO(s) within 30 days of the completion of the assessment and will reflect these changes in the next revision of this CEICG.

Hypothetical examples of R2 Part 2.1 compliance obligations:
Example 1: Assuming a change (in year 2021) to ISO's initial list of BES Elements that meet R1 criteria:

- ISO performs its 2019 R1 notification to a TO on 12/1/2019.
- The TO conducts its R2 Part 2.1 evaluation of an applicable Element's load-responsive protective relay(s) based on PRC-026-1 – Attachment B criteria on 11/1/2020 (to demonstrate its compliance with R2 Part 2.1 prior to the 1/1/2021 Effective Date).
- ISO performs its 2020 annual R1 notifications on 12/1/2020, with no changes to the list; and the TO's 11/1/2020 evaluation continues to serve to meet the R2 Part 2.1 Requirements (because the list is unchanged and the evaluation is less than five years old)
- ISO performs its 2021 R1 notification on 12/1/2021 and ISO adds a BES Element to the list.
- The TO must conduct a new evaluation to meet R2 Part 2.1 within 12 full calendar months of ISO's 12/1/2021 notification (i.e., by 12/31/2022) because an evaluation has not been performed for the newly identified BES Element.

Example 2: Assuming no change (in year 2021) to ISO's initial list of BES Elements that meet R1 criteria:

- ISO performs its 2019 R1 notification to a TO on 12/1/2019.
- The TO conducts its R2 Part 2.1 evaluation of an applicable Element's load-responsive protective relay(s) based on PRC-026-1 – Attachment B criteria on 11/1/2020 (to demonstrate its compliance with R2 Part 2.1 prior to the 1/1/2021 Effective Date).

CEICG-36	***ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities (CEICG-36).***
	• ISO continues to perform its annual R1 notifications on December 1st of each year, for the period 2020 through 2023; and the TO's 11/1/2020 evaluation continues to serve to meet the R2 Part 2.1 Requirements (because the list is unchanged and the evaluation is less than five years old) • ISO performs its 2024 R1 notification on 12/1/2024. • The TO must conduct a new evaluation to meet R2 Part 2.1 within 12 full calendar months of ISO's 12/1/2024 notification (i.e., by 12/31/2025) because, even though the list is unchanged, its previous evaluation (which was performed on 11/1/2020) would be more than five years old.

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CEICG-28	***ISO-NE serves as the PC and "Lead" TP for the ISO-NE PC Area and maintains models for all TPs within the ISO-NE PC Area***
NERC Standard	**TPL-001-4** **Transmission System Planning Performance Requirements**
Applicable Requirement(s)	**R1.** Each **Transmission Planner** and **Planning Coordinator** shall maintain System models within its respective area for performing the studies needed to complete its Planning Assessment. The models shall use data consistent with that provided in accordance with the MOD-010 and MOD-012 standards, supplemented by other sources as needed, including items represented in the Corrective Action Plan, and shall represent projected System conditions…
Functional Entities to which Requirement(s) and CEICG Apply	**Planning Coordinator, Transmission Planner**
ISO-NE Disposition: TPL-001-4, R1	Explanation of how ISO-NE maintains the System models used by all Transmission Planners (TPs) within the ISO-NE Planning Coordinator Area (PCA) to conduct Planning Assessments ISO-NE serves as the Planning Coordinator (PC) and "Lead" TP for the ISO-NE PCA. As the "Lead" TP, ISO-NE maintains the System models for the ISO-NE transmission system, in accordance with TPL-001-4 R1. ISO-NE and all other TPs within the ISO-NE PCA use these System models for performing the studies needed to complete their respective Planning Assessments.

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CEICG-16	***ISO-NE operations and planning processes do not result in ISO-NE identifying and requesting changes to GSU transformer tap settings***
NERC Standard	**VAR-001-5** **Voltage and Reactive Control**
Applicable Requirement(s)	**R6.** After consultation with the **Generator Owner** regarding necessary step-up transformer tap changes and the implementation schedule, the **Transmission Operator** shall provide documentation to the **Generator Owner** specifying the required tap changes, a timeframe for making the changes, and technical justification for these changes.
NERC Standard	**VAR-002-4.1** **Generator Operation for Maintaining Network Voltage Schedules**
Applicable Requirement(s)	**R6**. After consultation with the **Transmission Operator** regarding necessary step-up transformer tap changes, the **Generator Owner** shall ensure that transformer tap positions are changed according to the specifications provided by the **Transmission Operator**, unless such action would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement. **6.1.** If the **Generator Owner** cannot comply with the **Transmission Operator**'s specifications, the **Generator Owner** shall notify the **Transmission Operator** and shall provide the technical justification.
Functional Entities to which Requirement(s) and CEICG Apply	**Generator Owner, Transmission Operator**
ISO-NE Disposition: VAR-001-5, R6 **VAR-002-4.1, R6**	Explanation of how ISO-NE operations and planning processes do not result in ISO-NE identifying and requesting changes to generator step-up (GSU) transformer tap settings In New England, VAR-001-5 R6 and VAR-002-4.1 R6 do not apply because the Transmission Operators [ISO-NE and the Local Control Centers (LCCs)] do not specify or request changes to GSU transformer tap settings. Generator Owners (GOs) determine GSU transformer tap settings that are appropriate for their Generator Assets and inform ISO-NE of the settings they are proposing to use. Any change to a GSU transformer tap setting could be considered a material change to the system and would be processed through the ISO-NE planning process in accordance with Section I.3.9 of the ISO Tariff. In accordance with ISO-NE Planning Procedure 5-1, "Procedure for Review of Market Participant's or Transmission Owner's Proposed Plans (Section I.3.9 Applications: Requirements, Procedures and Forms)" (Section 2.2 Transmission Changes), "All transmission changes that change the topology or characteristics of the transmission system or that change the thermal capability of a portion of the system by replacement of transmission facilities…require a Proposed Plan Application (PPA)" under Section I.3.9 of the ISO Tariff. This requirement applies to Generator Asset leads

CEICG-16	***ISO-NE operations and planning processes do not result in ISO-NE identifying and requesting changes to GSU transformer tap settings***
	and associated equipment, such as GSU transformers. Also, ISO-NE does not specifically review and request GSU transformer tap changes for voltage/reactive control in real-time. Generator Assets are required to maintain a specified voltage schedule within a tolerance band. If ISO-NE or an LCC identifies a voltage issue, a study would likely be conducted and the results of such a study could lead to a list of potential solutions, which may (or may not) include changes to GSU transformer tap settings. ISO-NE would then inform the Generator Asset Lead Market Participant (Lead MP) of the voltage issue and potential solution(s). The Lead MP may (or may not) choose to address the issue through a modification to a generator tap setting, but that would be their determination (not ISO-NE's or an LCC's). If the Generator Asset Lead MP opts to resolve the voltage issue through a change to a GSU transformer tap setting, it may be processed through the ISO-NE planning process described above or would be accepted by ISO-NE based on the study already conducted by ISO-NE.

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ISO-NE Public Use

Appendix A - ISO-NE Corroborating Evidence Interpretations and Compliance Guidance (CEICG) Document Index (Rev. 11a, October 1, 2021)

				Functional Entities to which Requirement and CEICG Apply										
NERC Standard	**Req.**	**CEICG**	**Page #**	BA	DP	GO	GOP	PA/PC	RC	RP	TO	TOP	TP	TSP
BAL-005-1	R7	CEICG-02	11-12	x										
COM-001-3	R3, R4, R5, R7, R8, R10, R11	CEICG-29	13-15	x	x		x		x			x		
COM-002-4	R5, R6, R7	CEICG-32	16-18	x	x		x		x			x		
CIP-002-5.1a	R1	CEICG-30	19-24	x	x	x	x	x	x		x	x	x	
EOP-005-3	R10, R16	CEICG-21	25-26				x		x			x		
FAC-002-3	R2, R3, R4, R5	CEICG-13	27-29		x	x		x			x		x	
FAC-003-4	*All*	CEICG-31	30-31			x					x			
FAC-008-5	R8	CEICG-20	32-39			x		x	x		x	x	x	
IRO-001-4	R2, R3	CEICG-29	13-15	x	x		x		x			x		
IRO-001-4	R2, R3	CEICG-20	32-39	x	x		x		x			x		
IRO-010-3	R3	CEICG-20	32-39	x	x	x	x		x		x	x		
IRO-017-1	R2	CEICG-20	32-39	x					x			x		
MOD-025-2	*All*	CEICG-33	40-42			x					x		x	
MOD-026-1	*All*	CEICG-23	43			x							x	
MOD-027-1	*All*	CEICG-23	43			x							x	
MOD-027-1	R2	CEICG-35	44-45			x							x	
MOD-032-1	R2, R3	CEICG-20	32-39	x		x		x		x	x		x	x
NUC-001-4	R2	CEICG-22	46-51				x				x	x	x	
NUC-001-4	R9.3.7	CEICG-06	52-53				x				x	x		
PRC-002-2	R5, R8	CEICG-24	54-55			x		x			x			
PRC-006-5	R8	CEICG-20	32-39		x	x		x			x			
PRC-006-5	R10	CEICG-26	56					x			x			
PRC-006-NPCC-2	R4, R9, R11, R13, R16	CEICG-20	32-39		x	x		x			x			
PRC-010-2	*All*	CEICG-06	52-53		x	x	x	x			x	x	x	
PRC-011-0	*All*	CEICG-06	52-53		x	x	x				x	x		
PRC-023-4	R3, R4	CEICG-18	57-58		x	x		x	x		x	x		
PRC-023-4	R6	CEICG-27	59-60		x	x		x	x		x			
PRC-024-2	R3, R4	CEICG-34	61-62			x		x					x	
PRC-026-1	R1, R2	CEICG-36	63-67			x		x			x			
TOP-001-5	R5, R6	CEICG-29	13-15	x	x		x					x		
TOP-001-5	R3, R4, R5, R6	CEICG-20	32-39	x	x		x					x		
TOP-003-4	R5	CEICG-20	32-39	x	x	x	x				x	x		
TPL-001-4	R1	CEICG-28	68					x					x	
VAR-001-5	R6	CEICG-16	69-70			x						x		
VAR-002-4.1	R1, R3, R4, R5	CEICG-20	32-39			x	x					x	x	
VAR-002-4.1	R6	CEICG-16	69-70			x						x		

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Document History

Rev. No.	Date	Reason
Rev 0	2009 – 2012	Separate Corroborating Evidence Interpretation (CEI) documents were developed and updated as necessary by ISO-NE during the period January 2009 through August 2012. These documents were approved by NPCC and posted on the ISO-NE public Web site throughout that period. There were various revisions to these documents throughout the period, but for the intent and purpose of moving forward with a consolidated document, all such revision shall be considered "Rev 0" to the initial version of the consolidated CEICG document (Rev 1).
Rev 1	08/09/12	Consolidated all CEIs into a single Compliance Evidence Interpretations and Compliance Guidance (CEICG) document and made other miscellaneous editorial and formatting changes.
Rev 1a	12/13/12	Updated to reference the latest versions of NERC Standards and to make a few other non-material editorial changes. Added columns for page numbers to both the Index on page 3 and to the more detailed Appendix A Index and populated them with page numbers. The only substantive change made was to expand CEICG-1/CEICG15 to include TOP-002-2.1.b, R3, to address the fact that, per ISO-NE Tariff and Market Rules, a Load Serving Entity does not coordinate operations with ISO.
Rev 2	07/01/13	Revised "Index of Standards Addressed by CEICGs in this Document: (1) added applicable Requirement #s; (2) replaced Title of Standard with Title of CEICG; (3) deleted CEICGs if revision to or elimination of Standard made the CEICG unnecessary; (4) consolidated Standards into a single row if they all were addressed by the same CEICG. Added CEICGs for: (1) EOP-005-2 (CEICG-21); and (2) NUC-001-2 (CEICG-22). Retired CEICG-12 because new version of Standard (EOP-008-1) no longer includes the requirement that CEICG-12 addressed. Retired CEICG-3 because the requirement this CEICG addresses (VAR-001-2, R5) is one of the Paragraph 81 requirements proposed for retirement. Revised titles of some CEICGs to make them more descriptive of their purpose/intent. Made other editorial changes; used acronyms in titles to shorten them, where possible.

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Rev. No.	Date	Reason
Rev 3	07/01/14	1. Incorporated new CEICGs: • CEICG 23, for MOD-026 & -027 • CEICG 24, for PRC-002-NPCC R13 • CEICG 25, for PRC-006 R2, R9 • CEICG 26, for PRC-006 R10 • CEICG 27, for PRC-023 R6 • CEICG 28, for TPL-001 R1 2. Deleted CEICG-7 because FAC-008-3 no longer includes two of the three requirements that were referenced and the requirement that remained did not justify keeping the CEICG) 3. Modified CEICG-22 to reflect fact that New England Power Company no longer has a NPIR applicable to it (as of 2/25/14) 4. Changed CEICG-1/CEICG-15 (combined) to be just CEICG-1 (retired CEICG-15 because its scope is effectively covered in CEICG-1) 5. Added two Standards to CEICG-6 because each of them contains a requirement that is not applicable due to the fact that UVLS programs are for local protection only • EOP-003-2 R2, R7 • NUC-001-2. R9.3.7 6. Revised certain CEICGs to sharpen their focus and eliminate redundant or unnecessary text (including rewording of several of the CEICG “Purpose” statements) 7. Added Requirement #s to the Standard listings in for each “ISO-NE Disposition” cell 8. Updated Standard references to reflect current versions 9. Updated ISO-NE procedure titles and updated quoted text to reflect procedure changes, as necessary 10. Clarified, as applicable, that certain CEICGs have a dual purpose (to determine applicability and assess compliance) 11. Changed most references to “in New England” to “within the ISO-NE RCA” (to account for the fact that MPS, in Maine is not within the ISO-NE footprint) 12. Revised to make structure, content and terminology more consistent throughout the document 13. Added table below Index table to document retired CEICGs 14. Made all fonts Calibri
Rev 3a	08/01/2014	Non-material change to CEICG-27 (Page 45) to correct an error in the list of registered entities that own the applicable terminals of these circuits - deleted the UNITIL entry and replaced it with the UNITIL operating company that actually owns the equipment and that is registered separately (Fitchburg Gas and Electric Light Company (DP)).
Rev 3b	11/05/2014	By way of an email from Garth Arnott sent to ISO-NE on November 5, 2014, NPCC signed off on the following non-material changes: (1) for CEICG-27, added two entities to the list of those that own the applicable terminals of circuits subject to PRC-023-3 and that must comply with PRC-023-23 R1 through R5; (2) updated to reflect revised versions of Standards that became effective 10/1/14 (for PRC-023-3, updated CEICG-18 & CEICG-27 and for VAR-002-3, updated CEICG 8 & CEICG 16); (3) added non-material clarifications to CEICG 8 and CEICG 16

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Rev. No.	Date	Reason
Rev 4	07/01/2015	1. Changed CEICG numbering format to improve sorting capabilities in companion spreadsheet, adding leading zeroes to CEICG-1 through CEICG-9 (*e.g.*, CEICG-1 becomes CEICG-01). 2. Modified text for certain CEICG Titles in the Index of Standards at the beginning of the document to align them with the CEICG Titles within the body of the document. 3. Deleted references to INT-001 Standard, which in now inactive. 4. Changed references of the email address to which ISO sends information from Ben Eng to a more generic NPCC auditors email address. 5. Deleted all references to NCR #s. 6. Added note to CEICG-01 to indicate that in some situations it may be necessary for an LCC to issue an operating instruction to a GOP to take real-time operations action, which GOPs must also follow. 7. Modified CEICG-02 to add BAL-003-0.1b R2 (which also applies to dynamic scheduling), reflect new version of INT-004, add footnote explaining “Pseudo-Tie” and to slightly rearrange the narrative. 8. Deleted CEICG-9 due to FERC Order on Risk Based Registration resulted in deactivation of the PSE function, which removed PSE obligations retroactive to March 19, 2015. Also removed other references to PSE throughout the document. 9. In CEICG-20, deleted reference to old memo (from 2011) and added language from current ISO-NE procedures that addresses topics covered in the memo. 10. Modified CEICG-22 to add a note to the NPIR table to indicate that, effective upon the 12/29/2014 retirement of Vermont Yankee Power Station, there were no longer any NPIRs applicable to the Vermont Yankee Power Station. 11. For CEICG-24, modified names of entities to more exactly reflect names of the entities as listed in ISO-NE records. 12. Deleted CEICG-25 because it is not needed by NPCC auditors. [Note: Information in this CEICG has been incorporated into a Compliance Bulletin posted on ISO-NE’s public website for use by New England UFLS entities.] 13. Revised CEICG-27 to add the list of entities that that own the applicable terminals of circuits and that must comply with PRC-023-3 R1 through R5. Also, revised names of entities to more exactly reflect names of the entities as listed in ISO-NE records. 14. Added CEICG-29 regarding COM-001-2 to explain certain Interpersonal Communication capabilities in New England. 15. Added CEICG-30 regarding CIP-002-5.1 to explain ISO-NE identification of assets critical to: (a) system restoration; and (b) the derivation of IROLs and their associated contingencies. 16. Added CEICG-31 regarding FAC-003-3 applicability as pertains to facilities operated below 200 kV identified as an element of an IROL by ISO-NE, as the Planning Coordinator. 17. Checked all website links and updated, as necessary. 18. Other miscellaneous editorial changes.

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Rev. No.	Date	Reason
Rev 5	7/1/2016	Removed references to LSE (LSE remains a function but it will have no compliance responsibilities; LSE, PSE & IA functions have been deactivated in NPCC CDAA). Deleted CEICG-04 entirely (it only applied to LSEs). Updated references to Standards and text of Requirements, as needed, to reflect versions as of 7/1/16. Updated references to ISO-NE Procedures and other documents, as needed. Converted web URLs to hyperlinks. COM-002-4 – created **new** CEICG-32 for ISO-NE notifications to entities (with Cc to NPCC) regarding its identification of time periods when an emergency condition has existed on the BES in N.E. CIP-002-5.1 – revised CEICG-30 to delete TransCanada Power Marketing, LLC from list of owners of generation facilities that meet one or more of the criteria 2.3, 2.6 or 2.9. MOD-016 through MOD-021 – revised CEICG-19 to delete references to MOD-016 – MOD-021 except MOD-020 and add reference to MOD-031-1 (enforceable 7/1/2016), which will supersede those MOD Standards (except for MOD-020). Also, modified narrative to describe how ISO-NE builds a load forecast based on Settlements data and does not need information from TPs, DPs or other entities to develop a load forecast. MOD-025-2 – created **new** CEICG-33 for MOD-025-2 (enforceable 7/1/2016) incorporating information from ISO-NE Compliance Bulletin for MOD-025, stating that ISO-NE is a TP and the PC for N.E. and, as such, collects all data for MOD-025-2. PRC-002-2 – revised CEICG-24 to update list of GOS and TOs designated with DDR under PRC-002-2. Changed PRC-002-NPCC references to PRC-002-2 (PRC-002-NPCC to be retired 7/1/16). PRC-006-2 – revised CEICG-26 to eliminate material that is now contained in OP-13B; simply noted in CEICG-26 that the information is contained in OP-13B. PRC-023-3 – modified CEICG-18 to specify target month of April for annual submittals to ISO-NE by TO, GO or DP and made other clarifying edits. Also, modified CEICG-27 to note that on 4/28/15 ISO-NE notified TransCanada that they were being removed from the list and should not have been on the list in the first place. PRC-024-2 – created **new** CEICG-34 to identify ISO-NE as the "Lead" TP for Part 3.1 of R3 and note that ISO-NE (and only ISO-NE) receives all information that the Standard requires to be sent to the TP. VAR-002-4 R6 – revised CEICG-16 to indicate that ISO-NE operations and planning processes do not ever result in ISO-NE identifying and requesting changes to generator step-up (GSU) transformer tap settings (so VAR-002-4 R6 does not apply in N.E.).

ISO-NE Corroborating Evidence Interpretations and Compliance Guidance for NPCC Compliance Audits of NERC Reliability Standards

Rev. No.	Date	Reason
Rev 6	7/1/2017	Revised “Background section (moved some text, and deleted other text and modified to reflect current CMEP practices). Generally, updated to reflect modifications to NERC Standards and make other editorial changes to reflect updates to ISO-NE documents, etc. Retired CEICG-01, CEICG-10, CEICG-14, CEICG-17 and CEICG-19 (see explanatory notes regarding retired CEICGs, located in the document just after Table of Contents). CEICG-02 – deleted references to inactive BAL-003 requirements. CEICG-06 – deleted references to EOP-003-2 R4 & R7. EOP-003-2 was retired and these requirements were not reflected in the EOP-011-1 that superseded it on 4/1/17. CEICG-20 – added reference to new IRO-017-1 R2 requirement regarding outage coordination, updated to reflect other revisions to TOP/IRO Standards and expanded applicability to include DPs. CEICG-22 – deleted references to NPIRs for Vermont Yankee and deleted text regarding collaborative NPGOP/TE reviews of the “mapping” of NUC-001-3 requirements to the procedures that describe how those requirements are met (this is now performed by individual entities independently). CEICG-27 – updated table that lists the TOs, GOs and DPs that ISO-NE notified that had circuits that would require the entities to comply with PRC-023. CEICG-30 – regarding criteria 2.3, 2.6 and 2.9, updated list of Generation facilities. Also, regarding criteria 3.4, modified to reflect that, after 2017, ISO will notify entities with facilities in the system restoration plan only when a plan change affects the role or task of an entity owning a facility in the plan (rather than sending notifications to all entities each year, as ISO-NE had done in the past). CEICG-32 – changed “emergency condition” to “Operating Emergency” to conform to M/LCC 13 and M/LCC 20.
Rev 6a	8/2/2017	Revised CEICG-27 to add Fitchburg and delete Unitil from the list. Fitchburg was erroneously removed from this list and replaced with Unitil (parent company) for the 7/1/17 CEICG revision; Fitchburg has actually been on the list (or should have been on the list) continuously since 7/1/14.
Rev 7	12/1/2017	Retired CEICG-08, integrating elements of it into CEICG 20 (and updated “Retired CEICGs” table to include CEICG-08). Integrated applicable elements of retired CEICG-08 (related to VAR-002-4.1, R5) into CEICG-20. Also, added other data-related or notification requirements to CEICG-20: FAC-008-3, R7 & R8; MOD-032-1 R2 & R3; PRC-006-2, R8; PRC-006-NPCC-1, R5 (parts 5.2 & 5.4), R12, R14, R16 (Part 16.2), R19 (Part 19.3); and VAR-002-4.1, R1, R3 & R4. Updated Index of Standards to reflect additional Standards covered under CEICG-20 and made other minor editorial changes to CEICG-20. Modified the Index of Standards (at the beginning of the document) to create separate rows for certain Standards that covered multiple CEICGs within the same row. Added hyperlinks to Index of Standards for each reference to each CEICG and associated page number(s) for the CEICGs to facilitate quick navigation to the CEICG narratives from the Index. Updated version numbers of Standards and requirement text, as necessary, to reflect updates to Standards since the last posting of this document. Updated page numbers and Appendix A to conform them to other edits made to the document. Changed formatting of tables, including those containing CEICG narratives, to: (1) add title to table (as necessary); and (2) have the heading (title) row of each table repeat at the top of all subsequent pages (for all CEICG narratives that extend beyond one page). Also, re-ordered table containing list of retired CEICGs to be sorted by CEICG # (rather than by Retirement Date).

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Rev. No.	Date	Reason
Rev 8	7/1/2018	Expanded CEICG-29 to address communications protocols and to include within its scope IRO-001-4 (R2, R3) and TOP-001-4 (R5, R6) to indicate that they are not applicable within the ISO-NE RCA because LCCs (not ISO-NE) communicate with DPs, so there would never be an operating instruction issued by ISO-NE to a DP. Expanded CEICG-20 to include additional Standards pertaining to corroborating evidence of compliance with operating instructions [IRO-001-4 (R2, R3) and TOP-001-4 [R3, R4, R5, R6)]. Added CEICG-36 regarding compliance with PRC-026-1 requirements, to describe how ISO-NE has identified BES Elements in its PC area for which TOs and GOs must comply with PRC-026-1 Requirement R2 and provides the list of these Elements to the respective owners of those facilities, as required by R1. Updated various lists of entities who received notifications from ISO (entity names and notification dates), including, for Eversource and AVANGRID, consolidating the entries for each of their respective operating companies (or former operating companies) under a single entry of Eversource or AVANGRID, as applicable. Updated version numbers of Standards and requirement text, as necessary, to reflect updates to Standards since the last posting of this document. Updated page numbers and Appendix A to conform them to other edits made to the document.
Rev 9	6/17/2019	Minor edits for clarification and consistency and to display proper names for Standards, Operating Procedures and related documents. Global change for NERC Glossary of Terms to Glossary of Terms Used in NERC Reliability Standards. Noted names of Attachments where referenced. Deleted CEICG-02 references for BAL-005-0.2b Automatic Generation Control due to enforcement of BAL-005-1 Balancing Authority Control. Retired CEICG-05 for BAL-005-0.2b Automatic Generation Control. Revised CEICG-13 to include Schedule 23. Updated CEICG-16 from VAR-001-4.2 to VAR-001-5. Deleted CEICG-21 references for EOP-005-2 due to enforcement of EOP-005-3. Deleted CEICG-22 reference to VY. Also, made revisions to reflect new process for approving M/LCC 1 documents via email rather than through NPIMs. Updated CEICG-31 for ATC documentation. Inclusion of all responsible Functional Entities in text for consistency. Updated Appendix A.
Rev 9a	01/31/2020	List names of generator facilities per CIP-002-5.1a criterion 2.3, 2.6 and 2.9 in CEICG-30. Eliminated references to Pilgrim Nuclear Power Station and M/LCC1 Attachment A Updated Appendix A – ISO-NE Corroborating Evidence Interpretations and Compliance Guidance (CEICG) Document Index (rev. 9a, January 31, 2020).
Rev 10	07/01/2020	Annual review of CEICG content. Verified use of term Generator/s; relevant instances changed to Generator Asset. Updated all tables for notifications. Updated for PRC-006-NPCC-2 effective 04/01/20.
Rev 11	07/01/2021	Annual review of document. INT-004-2 became inactive; removed associated language. Updated all tables for notifications. Updated for 04/01/21 enforcement date Standards.
Rev 11a	10/01/2021	Intermediate update of document FAC-008-5 – Facility Ratings R7 eliminated. Clarification to provision of ISO-NE Operating Documents as audit evidence.