



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

# **Procedure for Requesting a Technical Feasibility Exception or a Material Change Report**

CP-07

Rev.4

Owner  
Assistant Vice President, Compliance

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## **Review and Re-Endorsed Requirements**

This document will be reviewed every two years from the effective date, or as appropriate for possible revision. The existing or revised document will be re-endorsed by the NPCC Compliance Committee, distributed to staff and committees/working groups, as applicable, and will be posted to the NPCC website for member reference.

## **1. Introduction**

- 1.1. All Responsible Entities within the NPCC Region may request and receive an exception from Strict Compliance with the terms of a requirement of certain specific NERC Critical Infrastructure Protection (CIP) Standards on the grounds of technical feasibility or technical limitations. Such an exception is referred to herein as a Technical Feasibility Exception (TFE).
- 1.2. A Material Change Report (MCR) is submitted by a Responsible Entity in the event of a change in the facts underlying an Approved TFE. NPCC has developed and implemented this procedure for review and approval of exception applications and MCRs submitted by Responsible Entities as permitted by Appendix 4D of the NERC Rules of Procedure. The goal of this Compliance Procedure is to ensure consistency in NPCC's review and assessment of all TFE Requests submitted.
- 1.3. The terminology used herein is as defined by Appendix 2 to the NERC Rules of Procedure, NERC Glossary of Terms, and NPCC Glossary.

## **2. Scope**

- 2.1. This procedure for requesting and obtaining approval of TFEs is applicable only to those Requirements of the CIP Standards that:
  - 2.1.1. expressly provide that compliance with the terms of a Requirement or Requirement Part is required where technically feasible; or
  - 2.1.2. FERC has directed that the Requirement or Requirement Part should be subject to a TFE or MCR.
- 2.2. Appendix 4D of the NERC Rules of Procedure, as approved by FERC and effective July 1, 2016, lists the following Applicable Requirements for which a Responsible Entity may request and receive an exception from Strict Compliance:
  - CIP-005-5: R1.4, R2.1, R2.2, R2.3
  - CIP-006-6 R1.3
  - CIP-007-6 R1.1, R4.3, R5.1, R5.6, R5.7
  - CIP-010-2: R1.5, R3.2
- 2.3. NERC is required to maintain a list of Applicable Requirements on its website reflecting any changes or modifications to the above list of Applicable Requirements.
- 2.4. A TFE does not relieve the Responsible Entity of its obligation to comply with the applicable Requirement. Rather, a TFE authorizes an alternative (to strict compliance) means of compliance with the applicable Requirement through the use of compensating measures and/or mitigating measures that achieve at least a comparable level of security for the Bulk Electric System as would strict compliance with the applicable Requirement.

- 2.5. A Responsible Entity that is a Canadian Entity seeking a TFE shall work with NPCC, NERC, and Applicable Canadian Governmental Authorities as applicable, to the extent permitted under Canadian federal or provincial laws, and without being obligated to authorize the disclosure of information prohibited by Canadian federal or provincial law from disclosure to FERC or other Applicable Governmental Authorities in the U.S., to comply with the requirements of Appendix 4D. A Canadian Entity shall not be required to subject itself to United States federal or state laws not otherwise applicable to the Canadian Entity in order to utilize Appendix 4D to obtain a TFE. NPCC shall implement this TFE Procedure in a manner consistent with their memoranda of understanding with Canadian Entities and Canadian Applicable Governmental Authorities concerning compliance monitoring and enforcement activities in particular provinces.
- 2.6. For Multi Regional Registered Entities (MRREs) where NPCC is the lead Regional Entity, Responsible Entities are required to submit TFE Requests and MCRs only to NPCC for review. NPCC will then notify the other Regional Entity(ies) where the assets are located as necessary.

### **3. Basis for Approval of a TFE**

- 3.1. A Responsible Entity may request and obtain approval for a TFE on the grounds that strict compliance with an applicable Requirement evaluated in the context or environment of the Responsible Entity's covered asset that is the subject of the TFE Request:
  - 3.1.1. is not technically possible or is precluded by technical limitations; or
  - 3.1.2. is operationally infeasible or could adversely affect reliability of the Bulk Electric System to an extent that outweighs the reliability benefits of Strict Compliance with the Applicable Requirement; or
  - 3.1.3. while technically possible and operationally feasible, cannot be achieved by the Responsible Entity's Compliant Date for the Applicable Requirement, due to factors such as, but not limited to, scarce technical resources, limitations on the availability of required equipment or components, or the need to construct, install or modify equipment during planned outages; or
  - 3.1.4. would pose safety risks or issues that, in the determination of the Regional Entity, outweigh the reliability benefits of Strict Compliance with the Applicable Requirement; or
  - 3.1.5. would conflict with, or cause the Responsible Entity to be non-compliant with, a separate statutory or regulatory requirement applicable to the Responsible Entity, the Covered Asset or the related Facility that must be complied with and cannot be waived or exempted; or
  - 3.1.6. would require the incurrence of costs that, in the determination of the Regional Entity, far exceed the benefits to the reliability of the Bulk Electric System of Strict Compliance with the Applicable Requirement, such as for example by requiring the retirement of existing equipment that is not capable of Strict Compliance with the Applicable Requirement but is far from

the end of its useful life and replacement with newer-generation equipment that is capable of Strict Compliance, where the incremental risk to the reliable operation of the Covered Asset, the related Facility and the Bulk Electric System of continuing to operate with the existing equipment is minimal in the determination of the Regional Entity.

- 3.2. In accordance with the provisions of Appendix 4D, the burden to justify approval of a TFE Request lies with the Responsible Entity. It is the responsibility of the NPCC, subject to oversight by NERC as provided in Appendix 4D, to make all determinations as to whether a TFE Request has met the criteria for approval. For participants, in the MRRE program, NPCC may consult with other regional entities as necessary.
- 3.3. NPCC may approve a TFE Request that does not have a specified Expiration Date. However, in the event of a Material Change to the facts underlying an approved TFE, the Responsible Entity shall submit a MCR providing continuing justification for the TFE or verifying Strict Compliance with the applicable requirement has been achieved.

#### **4. Submission of a TFE Request or MCR**

- 4.1. A Responsible Entity shall submit a TFE Request or a MCR using NPCC's CMEP Data Administration Application (CDAA) portal. The CDAA will automatically assign a unique identifier to the submitted TFE. This identifier will be used for all future reference and tracking of the TFE Request or MCR.
- 4.2. Responsible Entities may submit a single TFE Request or MCR for a TFE from the same Applicable Requirement for multiple Covered Assets at one or more locations when all of the following criteria have been met:
  - 4.2.1. The Covered Assets are located within the NPCC geographic boundaries, or where NPCC is designated as the lead region for an MRRE.
  - 4.2.2. The basis for the TFE is the same for all Covered Assets.
  - 4.2.3. The Covered Assets will use the same compensating/mitigating measures.
  - 4.2.4. The same proposed TFE Expiration Date applies to all of the Covered Assets listed in the request.
- 4.3. Required Information for TFE Request Form and MCR
  - 4.3.1. A TFE Request or a Material Change Report for one or more Covered Assets shall consist of all information in Appendix 4D.
  - 4.3.2. Upon receipt of a TFE Request or MCR, NPCC will make an initial review of the submittal to ensure it contains the required information as set forth in Section 4.2 of Appendix 4D. This should include a signed and dated statement by the Responsible Entity's CIP Senior Manager or Delegate confirming:
    - 4.3.2.1. That he/she has read the TFE Request or MCR; and

- 4.3.2.2. That he/she has approved the proposed compensating and/or mitigating measures and the implementation plan; and
- 4.3.2.3. That he/she believes that approval of the TFE Request or MCR is warranted pursuant to the criteria set forth in Section 3.1 of Appendix 4D.
- 4.3.3. NPCC may, at its discretion, request additional information as necessary or appropriate and verify submitted information at a subsequent Compliance Audit, Spot Check or other form of monitoring.
- 4.3.4. Appendix 4D states that removal of a device from a TFE containing multiple devices of the same category does not require the filing of a MCR. However, due to applications in the CDAA, NPCC recommends that the Responsible Entity submit a MCR and maintain the asset list for each category, identifying all retired or removed devices, including applicable dates, in order that the information can be accurately communicated during the next required compliance monitoring review.
- 4.4. Material Change Report (MCR)
  - 4.4.1. When a Responsible Entity submits a MCR due to a Material Change in the facts underlying an Approved TFE, NPCC must review and confirm:
    - 4.4.1.1. The MCR has been submitted within sixty (60) calendar days of identification or discovery of the Material Change.
    - 4.4.1.2. The MCR includes information supporting the continuing need and justification for the Approved TFE or verifying that they have achieved Strict Compliance with the Applicable Requirement.
    - 4.4.1.3. If necessary, NPCC may consult with other Regional Entities when the MCR involves an MRRE.
  - 4.4.2. A MCR may be filed for a change in compensating/mitigating measures, replacement of a device, a change in statement of basis for approval for the TFE, a change in expiration date of the TFE or when the Responsible Entity has achieved Strict Compliance with the Applicable Requirement.

## **5. Review/Determination by NPCC**

- 5.1. NPCC Compliance personnel evaluate TFE requests or MCRs in accordance with Appendix 4D. All TFE requests or MCRs are submitted by the Responsible Entity via NPCC's CMEP Data Acquisition Administration portal (CDAA). NPCC Compliance personnel performing the initial review and approval/disapproval of submitted TFEs/MCRs do so separate and apart from NPCC Compliance personnel evaluating the controls implemented by the Responsible Entity. NPCC requires:
  - 5.1.1. NPCC Compliance personnel conduct the initial evaluation of a TFE request or MCR submitted by the Responsible Entity. The Compliance personnel may consult with additional NPCC Compliance staff members and/or auditors having subject matter expertise of the assets referenced in the

TFE/MCR, as necessary, prior to making a determination of approval/disapproval of the TFE/MCR.

- 5.1.2. NPCC Compliance personnel evaluate TFE requests or MCRs in accordance with Appendix 4D.
- 5.2. Each evaluation of a TFE request or MCR includes a review of the Responsible Entity's proposed compensating and/or mitigating measures to confirm that the risk(s) depicted in the underlying requirement have been identified, accurately addressed, and documented.
- 5.3. NPCC shall complete its review and make its determination of approval/disapproval of a TFE Request or MCR within 60 days after receipt of the submittal. As part of its review, NPCC may:
  - 5.3.1. Request additional information as necessary to further support the TFE Request;
  - 5.3.2. Conduct one or more physical inspections of the Covered Assets and related facility(ies);
  - 5.3.3. Engage in discussions with the Responsible Entity concerning possible revisions to the submittal.
  - 5.3.4. Consult with other Regional Entities for TFE Requests or MCRs of MRRE participants.
- 5.4. NPCC may extend the 60-day time period for individual TFE Requests or MCRs by issuing a notice to the Responsible Entity stating the revised date by which NPCC will issue its notice of Approval/Disapproval.
- 5.5. NPCC must either approve or disapprove the TFE Request or MCR in whole or in part, even if the TFE Request is for two or more Covered Assets subject to the same Applicable Requirement or if it covers class-based categories of devices.
- 5.6. If NPCC approves the TFE Request or MCR, a notice will be issued to the Responsible Entity stating that the TFE Request or MCR is approved.
- 5.7. If NPCC disapproves the TFE Request, a notice shall be issued to the Responsible Entity, stating that the TFE Request is disapproved and stating the reasons for the disapproval. At its discretion, NPCC may include suggested revisions that if included may result in NPCC's approval of the TFE Request.
- 5.8. A notice disapproving a TFE Request shall state a TFE Termination Date, which shall be no less than sixty-one (61) calendar days and no more than ninety-one (91) calendar days after the date of issuance of the notice, unless NPCC determines there are exceptional circumstances that justify a later TFE Termination Date.
- 5.9. Following the TFE Termination Date, the Responsible Entity is subject to issuance of a Notice of Alleged Violation by NPCC with respect to the Applicable Requirement that was the subject of the disapproved TFE Request or MCR, unless the Responsible Entity has achieved Strict Compliance with

the Applicable Requirement. Provided, that if the TFE Termination Date occurs prior to the Responsible Entity's Compliant Date for the Applicable Requirement, then the Responsible Entity is not subject to issuance of a Notice of Alleged Violation until the Compliant Date. A Notice of Alleged Violation issued with respect to the Applicable Requirement shall be processed in accordance with Sections 5.0, 6.0 and 7.0 of the CMEP.

- 5.10. When NPCC processes a TFE Request or MCR, having no exceptional circumstances, within the required 60-day time period, NPCC shall direct the Responsible Entity to retain all associated records and information used as a basis for NPCC to make its determination and will make them available to NERC upon their request. If NPCC disapproves a TFE Request or MCR and determines that there were exceptional circumstances justifying a TFE Termination date more than 91 days after issuing the notice, NPCC will send NERC a copy of the notice and include a description of such exceptional circumstances.

## **6. Responsible Entity Reporting to NPCC**

- 6.1. When a TFE Request has been approved with a TFE Expiration Date, the responsible Entity will be required to implement steps, or conduct research and analysis towards achieving Strict Compliance with the Applicable Requirements and eliminating the TFE, in accordance with the schedule set forth in the approved TFE.
- 6.2. If there is a Material Change in the facts underlying approval of the TFE, the Responsible Entity shall submit a MCR to NPCC within sixty (60) calendar days of identification or discovery of the Material Change, supporting the continuing need and justification for the approved TFE or verifying that they have achieved Strict Compliance with the Applicable Requirement. NPCC must review the MCR within sixty (60) days in accordance with Appendix 4D of the NERC Rules of Procedure.
- 6.3. When a Responsible Entity fails to implement or maintain their compensating and/or mitigating measures or fails to conduct research or analysis towards achieving Strict Compliance in accordance with an Approved TFE, the Responsible Entity is:
  - 6.3.1. Required to file a Self-Report in accordance with Section 3.5 of the CMEP; and
  - 6.3.2. Subject to issuance of a Notice of Alleged Violation for non-compliance with the applicable standard by NPCC. Any such issued Notice of Alleged Violation shall be processed in accordance with Sections 5.0, 6.0 and 7.0 of the CMEP.

## **7. Responsible Entity Request for Reconsideration**

- 7.1. In accordance with Appendix 4D section 5.2.8, a Responsible Entity may submit to NERC information that the Responsible Entity believes demonstrates that the approval or disapproval by NPCC of a TFE Request or MCR submitted by the Responsible Entity constitutes an inconsistent application of the criteria



specified in Section 3.1 of Appendix 4D as compared to other determinations of TFE Requests or MCRs made by NPCC or another Regional Entity for the same type of Covered Assets.

- 7.2. The Responsible Entity may ask that NERC request NPCC to reconsider its approval or disapproval of the TFE Request or MCR. A Responsible Entity's submission to NERC under Appendix 4D section 5.2.8 shall be in writing and shall include the following:
- 7.2.1. The TFE Request or MCR for which the Responsible Entity received a determination that the Responsible Entity believes represents an inconsistent application of the criteria specified in Appendix 4D Section 3.1.
- 7.2.2. A copy of NPCC's notice of approval or disapproval of the TFE Request or Material Change Report, and
- 7.2.3. A description of the inconsistency in determinations that the Responsible Entity believes has occurred, including specific reference(s) to any other determinations of TFE Requests or MCRs for the same type of Covered Assets that the Responsible Entity believes constitutes inconsistent application of the criteria specified in Section 3.1 of Appendix 4D.

## **8. No Findings of Violations or Imposition of Penalties**

- 8.1. The Responsible Entity shall not be subject to imposition of any findings of violations, or imposition of Penalties or sanctions for violations, for failure to be in Strict Compliance with an Applicable Requirement that is the subject of a TFE Request or MCR, for the period from:
- (i) The date that is sixty (60) calendar days after submission of the TFE Request or MCR,
- to:
- (ii) (A) The date of NPCC notice that the TFE Request or MCR is approved, or (B) the TFE Termination Date of NPCC notice that the TFE Request or MCR is disapproved, whichever is applicable.

Provided, that:

- (i) While a TFE Request or Material Change Report is undergoing review, NPCC shall not issue a Notice of Alleged Violation to the Responsible Entity for being noncompliant with the Applicable Requirement that is the subject of the TFE Request or Material Change Report during the period on and after the TFE Request or Material Change Report was submitted;
- (ii) If the TFE Request or Material Change Report is approved, the Responsible Entity shall not be subject to imposition of any findings of violations, or imposition of Penalties or sanctions for violations, for failure to be in Strict Compliance with an Applicable Requirement that is the subject of the TFE Request or Material Change Report, during the period from submission of the TFE Request to the date of NPCC

notice that the TFE Request or Material Change Report is approved;  
and

- (iii) If the TFE Request or Material Change Report is disapproved, and is found by NPCC, NERC or FERC to have been fraudulent or submitted not in good faith, the provisions of Section 5.3 of Appendix 4D shall not apply, the Responsible Entity shall be subject to imposition of findings of violations and imposition of Penalties or sanctions for violations, for failure to be in Strict Compliance with the Applicable Requirement that was the subject of the TFE Request or Material Change Report, for the entire period subsequent to the date the TFE Request or Material Change Report was submitted, and the Responsible Entity's fraudulent or not-in-good-faith submission of the TFE Request or Material Change Report shall be an aggravating factor in determining the amounts of Penalties or sanctions to be imposed on the Responsible Entity for such violations.

## **9. Amendment of a Pending TFE Request**

- 9.1. NPCC shall allow a Responsible Entity to amend a pending TFE Request that is under review by NPCC during the 60-day review period for the purpose of providing additional or revised Required Information.

## **10. Termination of an Approved TFE**

- 10.1. An Approved TFE shall remain in effect until:
  - 10.1.1. The stated TFE Expiration Date or it is terminated at an earlier date;
  - 10.1.2. The Responsible Entity achieves Strict Compliance with the Applicable Requirement; or
  - 10.1.3. Determination that there exists a material misrepresentation by the Responsible Entity as to the facts relied upon by NPCC for approving the TFE.
- 10.2. The Responsible Entity may terminate an Approved TFE by submitting notice to NPCC stating their intention to terminate the TFE and providing the TFE Termination Date.
- 10.3. NPCC may notify a Responsible Entity of the intent to terminate early or revise an approved TFE provided there is a basis for such action based on compliance monitoring results (e.g. Spot Check, audit findings) and provide the Responsible Entity opportunity to submit a response to NPCC.
- 10.4. NPCC shall issue a notice of termination to the Responsible Entity stating the TFE Termination Date. The TFE Termination Date shall be no less than sixty-one (61) and no more than ninety-one (91) calendar days after the date of issuance of the notice of termination unless NPCC determines there are exceptional circumstances that justify a later TFE Termination Date. NPCC shall include a detailed statement of such exceptional circumstances in their notice of termination to both the Responsible Entity and NERC.

- 10.5. NPCC shall not issue the Responsible Entity any findings of violation or impose any sanctions for violations for failure to be in Strict Compliance with the Applicable Requirement(s) of the TFE until the TFE Termination Date set forth in the notice of termination.

### **11. Audit Requirements for an Approved TFE**

- 11.1. After a TFE Request has been approved, subsequent CMEP activities, including but not limited to Compliance Audits, Spot Checks and Inherent Risk Assessments (IRAs), of the Responsible Entity may include review of :
  - 11.1.1. The implementation and maintenance of the compensating and/or mitigating measures stated in the approved TFE in accordance with the time schedule set forth in the TFE.
  - 11.1.2. The implementation of steps and conduct of research and analyses towards achieving Strict Compliance with the Applicable Requirement in accordance with the time schedule set forth in the TFE.
- 11.2. The first Compliance Audit of the Responsible Entity after the Expiration Date of the TFE shall include audit of the Responsible Entity's Strict Compliance with the Applicable Requirement of the Approved TFE, whether or not that Requirement was otherwise scheduled to have been included in the Audit.

### **12. Hearings and Appeals Process for Responsible Entities**

- 12.1. A Responsibility Entity may raise issues relating to the disapproval of its TFE Request or the termination of an approved TFE in a hearing concerning the TFE.

### **13. Confidentiality of TFE Requests, MCRs, and Related Information**

- 13.1. NPCC shall maintain as confidential all submissions, reviews, approval or disapproval of TFE Requests or MCRs as well as the implementation and termination of approved TFEs.

### **14. Records and Reporting**

- 14.1. NPCC maintains the history of approved or disapproved TFE or MCR requests and provides NERC the following:
  - 14.1.1. The name(s) of the NPCC staff personnel who perform the initial evaluation of the TFE request or MCR are included on the submittal form from the Responsible Entity maintained in CDAA. Notification of the submittal and determination is automatically forwarded to NERC via CDAA.
  - 14.1.2. The name(s) of the NPCC personnel (staff and/or independent contractor) who perform evaluations of active TFEs during compliance monitoring processes (audit, spot check, etc.) are included in the reports submitted and filed with NERC.
  - 14.1.3. Data captured in the CDAA submittal form and deemed by NERC as necessary for completion of the annual report for FERC.

- 14.2. In accordance with terms set forth in the respective Provincial Memorandum of Understanding (MOU), all requests and supporting information submitted by Canadian Entities are specifically redacted from this report by NPCC prior to filing with NERC.
- 14.3. In accordance with NPCC senior management directives, all supporting evidence and records, relative to TFE or MCR submittals and subsequent evaluations, remain in possession of the Responsible Entity, and are available upon request for inspection by NPCC or NERC.

### **15. Consistency in Approval/Disapproval of TFE Requests and MCRs**

- 15.1. NPCC participates in the TFE Task Force (TFETF), a committee comprised of representatives from NERC and each of the Regional Entities (REs) in accordance with Appendix 4D, Section 11. Information provided to NERC for the annual report is reviewed by the TFETF to establish consistency in Regional Entity(RE) determinations when considering the following:
- 15.1.1. Types of Covered Assets that are subject to the same Applicable Requirement
- 15.1.2. Application of the criteria specified in Section 3.1 in Appendix 4D (e.g., precluded by technical limitations; would pose safety risks or issues that outweigh the reliability benefits of Strict Compliance, etc.)
- 15.1.3. The types of mitigating and compensating measures that are deemed as appropriate and sufficient to support approval of TFE Requests or MCRs.

### **16. References**

- 16.1. Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation – Appendix 4D of the Rules of Procedure Section 500 dated January 30, 2014.
- 16.2. NERC Mandatory Reliability Standards for Critical Infrastructure Protection
- 16.3. FERC Order No. 706
- 16.4. FERC Order 788
- 16.5. FERC Order 822

### **17. Revision History**

Version	Date	Changes Made/Comments	Reviewed by:	Date of Compliance Committee Approval
0	11/12/11	Original procedure	M. Kozub	12/1/2011

1	5/7/2014	FERC issued a revised Appendix 4D on September 3, 2013 requiring major changes to this document. Subsequently, following industry comments, additional revisions were made by FERC resulting in Appendix 4D version dated January 30, 2014, which are also included	M. Kozub	5-7-2014
2	3/8/2016	Made necessary changes to comply with CIP V5 Standard Requirements. This includes: changes to applicable Standards; Language changes: process for review and audit confirmation of implementation of compensating/mitigating measures and process for handling TFEs/MCRs for MRREs.	M. Kozub	3/15/2016
3	1/31/2018	Included changes to address revised requirements of FERC Order 706. Specifically: 1. separation of approval and evaluation roles of NPCC staff; 2.reporting of names of NPCC staff participants to NERC; 3. Creation of and participation in NERC committee for consistency in review and determination of evaluations for TFEs . Added language for Responsible Entity appeals process.	Marie Kozub	3/22/18
4	6/5/2020	1. Updated the following sections: 3.2, 4.1, 4.4.2, 5.1, 5.11, 5.12, 5.4, 5.6, 5.7, 6.3, & 10.4.  2. Added new sections: 5.9, 7, & 8  3. General update and reformatting	D. Le	6/17/20

