



NORTHEAST POWER COORDINATING COUNCIL, INC.  
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November 11, 2010

Members, Reliability Coordinating Committee  
and  
Mr. Randy Crissman  
Mr. Gabriel Adam  
Ms. Anie Phillip  
Mr. Edward A. Schwedt

**Subject: Implementation Plan ---Regional Reliability Directory No. 8 *System Restoration*  
Requirement R10.3 (Test KF-3).**

Attached for your review and approval is a copy of the Implementation Plan governing Requirement 10.3 (Test KF-3) in Directory No.8 *System Restoration*.

The Implementation Plan provides background and a timeline associated with the testing of applicable **key facilities**.

The Task Force on Coordination of Operation (TFCO) approved the Implementation Plan at its meeting on October 14, 2020.

Yours truly,

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### **Implementation Plan for Directory No. 8 Requirement 10.3 (Test KF-3)**

This Implementation Plan is applicable to non-Transmission Owner functional entities and provides for KF-3 testing in accordance with the revised NPCC Regional Reliability Reference Directory No.8 *System Restoration* (TFCO Revision Review Record 2017-10-06), Requirement R10, sub-requirement 10.3, Test KF-3 to be completed as follows:

*Non-Transmission Owner Functional Entities with an applicable **key facility** shall complete Test KF-3 within 60 calendar months from the date of the TFCO Revision Review Record 2017-10-06, or when modifications are made to the **key facility**.*

#### Background:

Per NPCC Directory No.8 *System Restoration* (Revision Review Record: October 22, 2010), Test ST-3 was specifically applicable to the Transmission Owner.

“5.7.4.3 Reconfirm Critical Component Load Connections:

*The Transmission Owner’s design and commissioning requirements must ensure that all critical component loads are supplied from batteries and battery charger as part of the engineering and design. If, and when, modifications are made, and/or every five years, the Transmission Owner shall reconfirm through its design review and/or through testing that all critical component loads are connected to the battery and the battery charger. (Reference: Table 1; Test ST-3)”*

In a subsequent version of Directory No. 8 *System Restoration* (Revision Review Record: October 6, 2017), Test procedure references were updated and Appendix C-Table 2 was introduced to show the comparison between the “New Directory No.8 Test No.” and the “Equivalent Test No. in Previous Directory #8 Versions”. Test KF-3 is mapped to Test ST-3.

Test KF-3, which is associated with Requirement R10, sub-requirement 10.3, is applicable to the functional entity, and not specifically applicable to the Transmission Owner. Thus, for a non-Transmission Owner (e.g. Generator Owner) performing Test KF-3 (which has a mapping to the previous Test ST-3), an Implementation Plan for Test KF-3 should have accompanied the revisions to allow for non-Transmission Owner functional entities to come into compliance with Test KF-3.

Accordingly, Non-Transmission Owner Functional Entities with an applicable **key facility** shall complete Test KF-3 within 60 calendar months from the date of the TFCO Revision Review Record 2017-10-06 (End date of October 31, 2022), or when modifications are made to the **key facility**.