

Documenting Compliance

Rashida Williams
Compliance Engineer

Objectives

- Compliance Processes
- Documentation of Compliance
- Evidence of Compliance
- Requirements and Expectations
- Verification of Compliance
- Actively Monitored Standards in 2008

Compliance Processes

Processes that may be used to monitor compliance:

- Compliance Audits
- Self-Certifications
- Spot-Checks
- Compliance Violation Investigations
- Complaints
- Periodic Data Submittals
- Self-Reporting
- Exception Reporting

Documenting Compliance

Texas RE understands the time and expense that is required to document compliance.

Texas RE is working on ways to make it easier and more convenient for entities to provide documentation.



Documenting Compliance (cont.)

- Texas RE will not tell you how to become compliant with a standard.
 - Entities may contact Texas RE to ask questions.
 - Texas RE may guide you to the correct source.
- Texas RE will not provide an interpretation of a standard.
 - All requests for interpretations should be submitted to NERC.

Evidence of Compliance

- It is important that the entity provide evidence of compliance.
- The entity must demonstrate compliance.
- The entity should not assume that Texas RE has any information besides the information that the entity has provided.
- The entity must supply answers or documentation to prove compliance.

Evidence of Compliance (cont.)

- The entity must make the link in its evidence.
- Even with a contractual agreement with another company, the entity is responsible for demonstrating compliance with the NERC standard.
 - If a contractor violates a NERC Standard that is assigned to the entity, Texas RE will issue a violation to the entity assigned to that function.

How Do You Determine Expectations?

- Review the Measures and Compliance sections of the NERC Reliability Standards.

Locate the NERC Reliability Standards:

<https://standards.nerc.net/>

- Review the Reliability Standard Auditors Work Sheet (RSAWS).

Locate RSAWS:

http://www.nerc.com/~comply/auditor_resources.html

Example: RSAW PRC-005-1 1

Measure: Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System that affects the reliability of the BES, shall have an associated Protection System maintenance and testing program as defined in Requirement 1

Audit approach and notes specific to R1:

- Review the evidence provided by the entity to determine if the entity has a transmission Protection System and/or a generation Protection System (see R2). If yes:
 - (R1.): Review the evidence provided by the entity to verify the entity has a maintenance and testing program for the Protection System. The maintenance and testing program should include (see note on page 2):
 - Protective relays
 - Associated communication systems
 - Voltage and current sensing devices
 - Station batteries
 - DC control circuitry
 - (R1.): Review the program and determine if it has the following
 - (R1.1.): Maintenance and testing intervals
 - (R1.1.): Basis for those intervals
 - (R1.2.): Summary of Maintenance and Testing procedures

Data Retention

- Data Retention requirements can be found within the standard.

- Example: **PRC-005-1**

1.3. Data Retention

The Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System, shall retain evidence of the implementation of its Protection System maintenance and testing program for three years.

Verifying Compliance

Determine expectations:

- Agreements, training, records, procedures, processes, plans, methodologies
- Verifications
- Perform
- Request, communicate, act
- Provide data or information
- Assessments, analyses, and follow-up plans
- Maintain data and models and develop ratings

Agreements, Training, Records, Procedures, Processes, Plans, and Methodologies

Requirement Type

Expectation

Have an agreement:

- Dated document
- Electronic communication with confirmation of agreement

Document authority:

- Dated job description that includes statement of authority with respect to other operating entities
- Dated letter declaring authority signed by corporate officer
- Dated department notice signed on corporate letterhead
- Dated agreement with authority documented

Have a specific record with no mention of update:

- Dated specified record in electronic or hard copy format

Agreements, Training, Records, Procedures, Processes, Plans, and Methodologies (cont.)

Requirement Type

Expectation

Have specific operational plan (real-time, next day, seasonal) with specified elements:

- Dated, actual plan with specified elements

Have a set of requirements, process, plan, procedure, methodology, or other document – no requirement to update:

- Dated, current, in-force document with specified elements

Have a set of requirements, process, plan, procedure, methodology, or other document – requirement to update:

- Dated, current, in-force document with specified elements and evidence of last issue

Verifications

Requirement Type	Expectation
Verify personnel qualifications:	▪ Dated, certification records ▪ Training records showing successful completion with description of training activity and employee name, date ▪ Supervisor check sheets showing employee name, date performance noted ▪ Records showing mastery or completion with employee name, date
Verify accuracy of data:	▪ Verification process and results with date verified
Verify accuracy of data – requirement to update on a specified periodicity:	▪ Verification process and results with date verified

Verifications (cont.)

Requirement Type	Expectation
Verify facility meets specified criteria:	▪ Dated demonstration that facility meets criteria ▪ Dated equipment specification showing facility meets criteria ▪ Dated installation documentation showing that facility meets criteria ▪ Dated test results to show that facility meets criteria ▪ Dated computer output to show that facility meets criteria
Verify specific training occurred – no minimum hour requirement:	▪ Actual training program materials or description with dated completion records for employees
Verify specific training occurred – minimum hour requirement:	▪ Actual training program materials or description with dated completion records for employees and # of course hours

Perform

Requirement Type	Expectation
Perform a mathematical calculation via computer and report results on a periodic basis:	▪ Dated data to support the calculation retained in an electronic format ▪ Dated hard copy of output of mathematical calculation plus documented formula and input ▪ Dated copies of periodic reports
Perform maintenance in accordance with schedule:	▪ Schedule plus maintenance records showing date and what was done
Perform testing or simulation in accordance with schedule:	▪ Schedule plus test records (or simulation records) showing date of test, type of test, what was tested, test procedure, test results

Request, Communicate, Act

Requirement Type	Expectation
Request data or information:	▪ Dated paper or electronic notice used to request data showing data, recipient, and data or information requested
Communicate operating information (requirements to notify, direct, inform, or communicate operating information to others who need the information to take action):	▪ Dated operator logs ▪ Voice recordings or transcripts of voice recordings
Take a control action on the BES:	▪ Dated computer printouts, operator logs

Request, Communicate, Act (cont.)

Requirement Type

Expectation

Operate within defined parameters:

- Dated parameters and report of any event with operation outside defined parameters including date, time, duration, details of how far outside parameters

Respond to reliability-related concerns:

- Paper or electronic notice of response showing date, name and title of responder and any action to be taken in response to reliability-related concerns

Provide Data or Information

Requirement Type	Expectation
Distribute or make a set of limits, procedure, process, plan, report or other prepared document available to others:	▪E-mail notice with updated web page ▪Postal receipt showing recipient, date, contents
Post information on Web and ensure entities know of updated information:	▪Link to Web page and either a copy of the electronic notice sent to advise recipients of the posting or a postal receipt showing recipient, date and contents
Post updated information on Web:	▪Link to Web page

Provide Data or Information (cont.)

Requirement Type	Expectation
Submit operating data or information as requested and according to schedule:	▪Request for data with schedule accompanied by copy of transmittal notice including identification of data submitted, date submitted
Submit planning data or information as requested and according to schedule:	▪Request for data with schedule accompanied by copy of transmittal notice including identification of data submitted, date submitted
Submit data related to a disturbance or event:	▪Request for data with transmittal notice including identification of data submitted, date submitted

Assessments, Analyses, and Follow-up Plans

Requirement Type

Expectation

Assessment (impact of connecting new facilities; effectiveness of SPS; SPS operations; long-range plan):

- Results of assessment with assumptions, contingencies, models used

Analysis of an event with a follow up plan (mitigation plan, corrective action plan):

- Analysis report and follow-up plan that includes time table for implementation

Implement follow-up plan:

- Follow-up plan that includes timetable for implementation with checklist to show date each milestone achieved

Maintain Data and Models and Develop Ratings

Requirement Type

Expectation

Maintain specified data:

- Database with specified data
- List in hard copy or electronic format with specified data

Have a model:

- Model

Develop ratings or limits according to methodology:

- Methodology accompanied by ratings or limits
- Demonstrate limits developed according to methodology

Miscellaneous

Requirement Type

Expectation

Have and follow a maintenance, testing, or other program (vegetation management):

- Paper or electronic copy of program with schedule and records showing what was done to implement the program with dates and activities accomplished

Staff with certified operators:

- Staffing plan
- Certification numbers for personnel in staffing plan

Actively Monitored Standards in 2008

- 57 NERC reliability standards are to be monitored (Black and Blue) in 2008
- 20 (Blue) are additional standards that have been added to the list from 2007 (Black)
- Two are WECC Regional Standards not applicable to ERCOT region
 - BAL-STD-002-0 (WECC Regional Standard)
 - IRO-STD-006-0 (WECC Regional Standard)

Actively Monitored Standards in 2008 (cont.)

BAL-001-0 BAL-002-0 BAL-003-0 BAL-004-0 BAL-005-0 BAL-006-1	COM-001-1 COM-002-2	CIP-001-1 CIP-002-1 thru CIP-009-1	EOP-001-0 EOP-002-2 EOP-003-1 EOP-004-1 EOP-005-1 EOP-006-1 EOP-008-0 EOP-009-0	FAC-003-1 FAC-008-1 FAC-009-1 FAC-013-1	INT-001-2 INT-003-2 INT-004-1
IRO-001-1 IRO-003-2 IRO-004-1 IRO-005-1 IRO-006-3 IRO-014-1 IRO-015-1 IRO-016-1	PER-002-0 PER-003-0 PER-004-1	PRC-004-1 PRC-005-1 PRC-008-0 PRC-010-0 PRC-011-0 PRC-016-0 PRC-017-0 PRC-021-1	TOP-002-2 TOP-003-0 TOP-004-1 TOP-005-1 TOP-007-0	TPL-001-0 TPL-002-0 TPL-003-0 TPL-004-0	VAR-001-1 VAR-002-1

Questions?



You may also submit questions to information@texasre.org