Compliance Monitoring and Enforcement Report
Lindley Ellisor
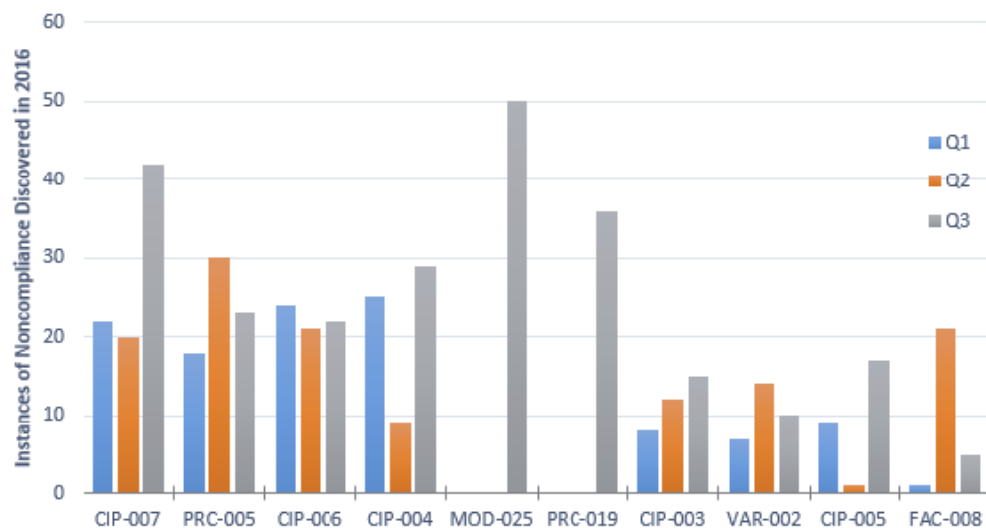
CMEP and Most Violated Standards

- What are the common standards most violated in 2015 and 2016 throughout NERC?

- How does Texas RE's Most Violated Standards List compare to all of NERC?

- Do we have any "Most Violated" standards that are not on the ERO/Regional Monitoring lists?

- Do you want to get more involved?

Most Violated Standards in NERC in 2015 and 2016

- CIP-003
- CIP-004
- CIP-005
- CIP-006
- CIP-007

- FAC-008
- PRC-005
- TOP-002
- VAR-002

NERC Q1-Q3 2016 Results Combined with Texas RE 2016 Results
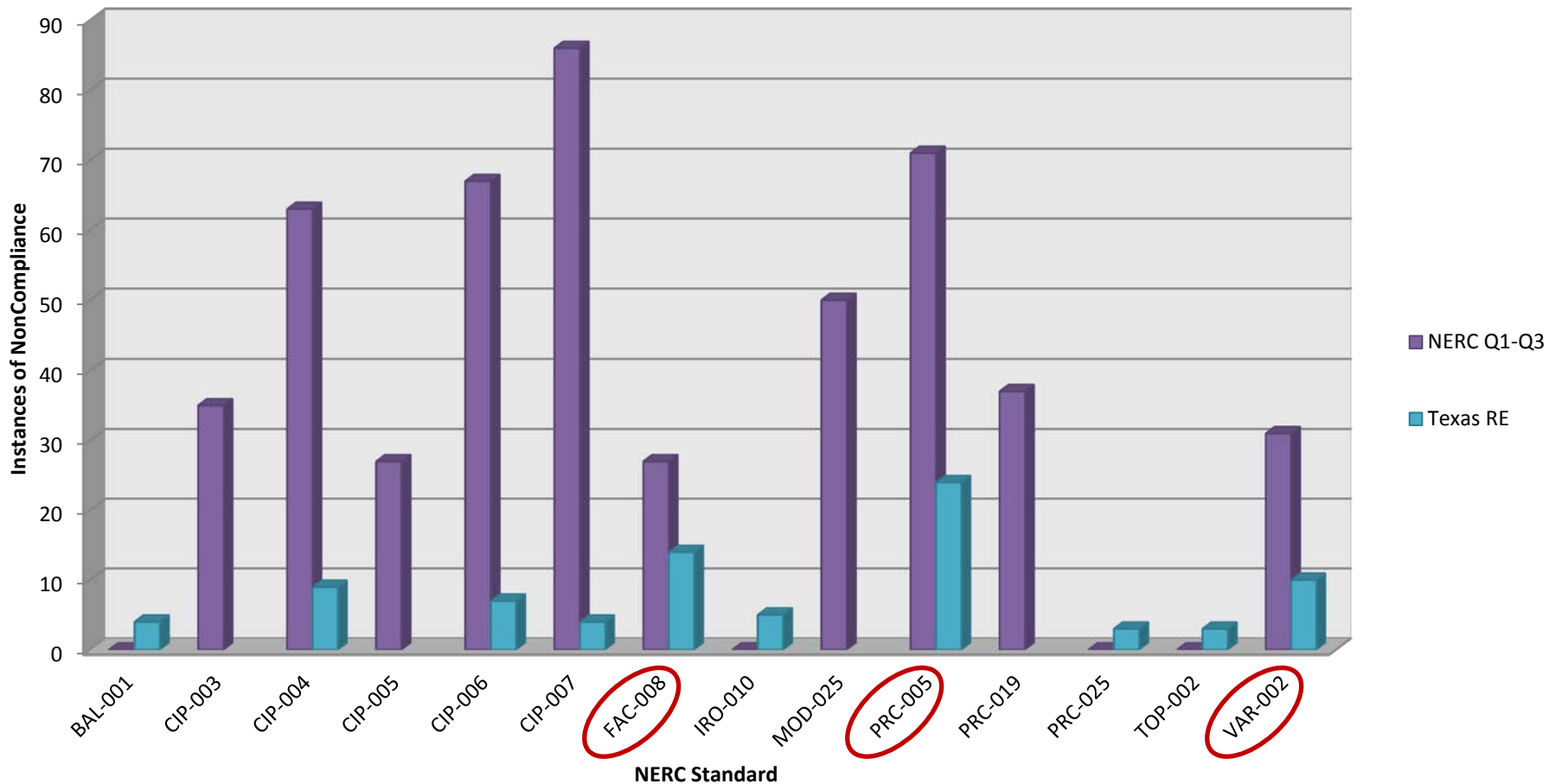
Most Violated Standards Discovered in 2016

Pulled from NERC CMEP Report Q3, 2016

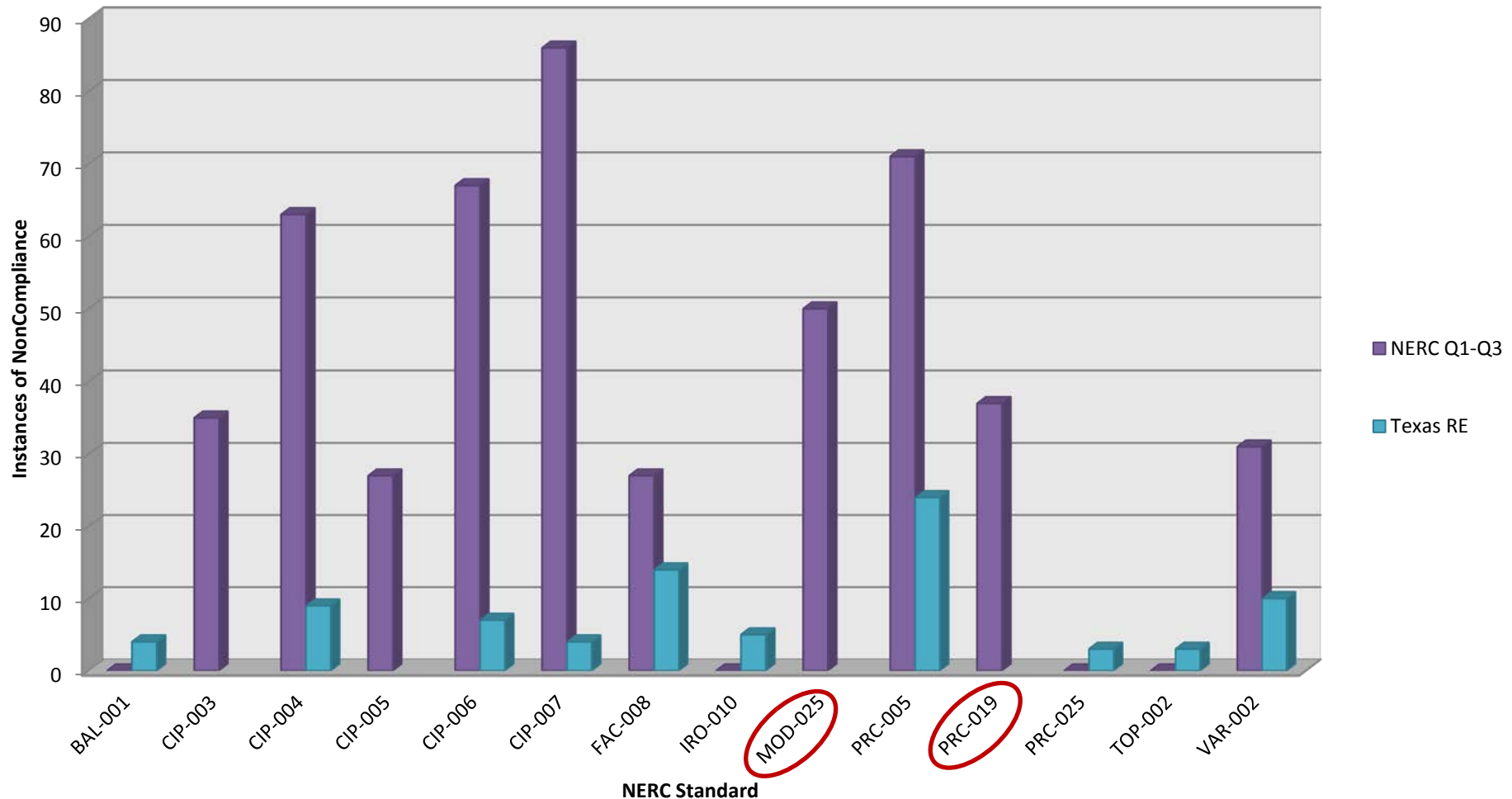| Standard	# Violations
PRC-005	24
FAC-008	14
FAC-009	12
VAR-002	10
CIP-004	9
CIP-006	7
IRO-010	5
BAL-001	4
CIP-007	4
PRC-025	3
TOP-002	3
Total	95

Pulled from MRC December 2016 Report

Most Violated Standards 2016

Texas RE Violations Account for 1/2-1/4* of ALL Violations for these Standards
*Estimated due to lack of NERC Q4 Statistics

Most Violated Standards 2016

All Violations Occurred in Q3, when Standards went into Effect

ERO Risk Elements from 2016 CMEP

- CIP-002
- CIP-005
- CIP-006
- CIP-007
- CIP-014
- COM-002
- EOP-001
- EOP-002
- EOP-010
- FAC-003
- FAC-008
- FAC-014
- IRO-005
- PER-005
- PRC-001
- PRC-004
- PRC-005
- TOP-006
- TOP-007
- TPL-001

Out of the 10 Most Violated Standards in the Texas RE Region, 4 are on this list

Texas RE had entities Self-Certify to 2 of the Standards

Texas RE had entities submit Periodic Data Submittals for 2 of the Standards on the list

Regional Risk Elements 2016 CMEP

Regional Risk Elements

- Critical Voltage Support
- Operational Communications
- SOL/IROL Management
- SPS Management
- UFLS Management
- UVLS Management

Most Violated Standards

- IRO-010
- TOP-002
- VAR-002

ERO Risk Elements from 2017 CMEP with Most Violated from 2016 Highlighted

- CIP-002
- CIP-005
- CIP-006
- CIP-007
- CIP-014
- COM-002
- EOP-001
  - Replaced by EOP-011 on 04/01
- EOP-002
  - Replaced by TOP-002 on 04/01
- EOP-010
- FAC-003

- FAC-008
- FAC-014
- IRO-005
  - Replaced by IRO-002 on 04/01
- PER-005
- PRC-001
- PRC-004
  - Changes versioning on 04/02
- PRC-005
- TOP-006
  - Replaced by TOP-001 on 04/01
- TOP-007
  - Replaced by TOP-001, and IRO-001 on 04/01
- TPL-001

Regional Risk Elements
2016 vs. 2017 CMEP

2016	2017
• Critical Voltage Support	• Critical Voltage Support
• Operational Communications	• Facility Ratings
• SOL/IROL Management	• Operational Communication
• SPS Management	• SOL/IROL Management
• UFLS Management	• SPS Management
• UVLS Management	• UFLS Management
	• UVLS Management

Do you Want to Get More Involved?

- Attend the Member Representatives Committee ("MRC")
  - NERC Initiatives
  - FERC Audits
  - NERC Activities
  - Program Area Quarterly Reports
  - Committee and Working Group Updates
- Keep attending the NSRS/NRWG Meetings!

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Questions or Concerns?

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