ERCOT CORPORATE STANDARD

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| Document Name: | Information Governance Corporate Standard |
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| Owner: | Vice President and General Counsel |
| Governs: | ERCOT Representatives |
| Approved: | Chad Seely on behalf of the Information Governance Steering Committee |

## 1. Purpose

This corporate standard and its operating procedures establish the requirements for the Information Governance (IG) program at ERCOT. The IG program maximizes the value of enterprise information while mitigating risks by:

* Managing the information lifecycle, including the retention, security, and ensuring compliance of enterprise information
* Leveraging the technologies used to create, manage, and dispose of information
* Providing a holistic approach to how information is created, managed, and disposed of at the end of its lifecycle
* Changing the culture around how ERCOT views and manages information
* Supporting ERCOT’s values, strategy, business process, and business operations.

## 2. Terms and Definitions

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| **Term** | **Definition** |
| Annual Review | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Business Information | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Director | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Disposition | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| ERCOT Representatives | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Information Governance | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Information Governance Coordinator | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Legal Hold | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Manager | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Metadata | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Retention Schedule (RS) | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |
| Taxonomy | [As defined in the ERCOT Master List of Terms and Definitions.](http://ep.ercot.com/docs/Policies%20and%20Procedures/SD1.1.1a%20ERCOT%20Master%20List%20of%20Terms%20and%20Definitions.docx) |

## 3. Standards

### 3.1 General

ERCOT’s IG program acknowledges that all information has a lifecycle and must be maintained appropriately. Proper management of ERCOT and stakeholder information is essential to:

* Support business needs
* Maintain stakeholder confidence
* Satisfy accountability and data protection requirements that reduce risk and associated costs
* Establish enterprise policies and standards to facilitate identification and lifecycle management of all ERCOT information
* Support employee efficiency and compliance with legal, regulatory, and fiscal requirements to retain information as evidence of business activities
* Support the consistent classification of information to aid the ability to find and access that information
* Coordinate with stakeholders throughout the organization to deliver IG program requirements
* Ensure information subject to a Legal Hold is not altered or destroyed, regardless of any established policies
* Ensure all ERCOT information is protected and handled according to the relative sensitivity of the information as defined in the Information Classification Corporate Standard (CS7.6)

### 3.2 Requirements

All ERCOT Representatives will cooperate in the advancement and implementation of the following additional key standards for ERCOT information:

* Manage Business Information in compliance with [Retention Schedule](http://ep.ercot.com/recm/Shared%20Documents/Records%20Retention%20Schedule/RSPublishedReport_CurrentRetentionSchedule.pdf) (RS) and destroy content once eligible if not subject to any active Legal Holds.
* Comply with active Legal Holds to ensure any information subject to the Legal Hold is not altered or destroyed, regardless of the retention period specified in the RS or IG Policy.
* Apply the appropriate storage controls and security classifications to ensure the ability to find, access, protect, and manage information against misplacement, damage, inadvertent destruction, misuse, or theft.
* Dispose of reference material and convenience copies of ERCOT business information determined to be redundant, obsolete, or no longer of reference value.

### 3.3 Training

All ERCOT Representatives are required to complete annual IG training, affirming their understanding of the requirements, policies, and procedures of the IG program. Additional training may be required as deemed necessary by the IG program.

Training on IG-related Director responsibilities is provided to each new department Director as soon as practicable. This training focuses on all elements of the IG program, responsibilities of department Directors, the ability of department Directors to delegate these responsibilities, and how to document compliance with IG program requirements through the annual attestation process.

### 3.4 Applying IG Program Requirements to Applications and Processes

All ERCOT departments must adhere to IG program requirements when (1) implementing any new policies/procedures or (2) procuring/creating a system or application to produce, store, and/or manage ERCOT Business Information. This ensures information is managed in accordance with the requirements defined in the Retention Schedule (RS) by either automated or manual processes.

All information must adhere to established standards for access, use, classification, security, and Disposition. At a minimum, ERCOT must follow these guiding principles:

* Market Participants, Stakeholders, and Personnel must have proper access to relevant data.
* All ERCOT information must be accurately described and managed.
* Appropriate controls and measures to manage ERCOT information must be in place to mitigate risks and control costs.
* Personnel must consider usability, integrity, and protection of the technology infrastructure and processes used to manage ERCOT information.
* Processes and technical solutions must be provided to Personnel to allow them to effectively meet the IG obligations associated with the information they own.

Various processes and controls exist throughout the enterprise to ensure IG requirements are captured and considered as part of routine planning and implementation of projects and initiatives.

### 3.5 IG Program Compliance Reporting

On an annual basis, the IG program staff, through the direction of the IG steering committee, distributes an attestation to all ERCOT department Directors. (NOTE: In cases where a Director does not exist for a given department the attestation will be sent to the responsible Vice President in charge.) While ERCOT Directors are accountable for ensuring that the IG attestation is completed, the attestation may also be directed to Managers, IG Coordinators, or subject matter experts (SME), as determined by the IG steering committee. Additionally, Directors (or other accountable party) may delegate individual tasks associated with the attestation to a Manager, IG Coordinator, or SME to verify compliance or to provide additional detail on the departments’ IG activities. Failure to complete and return the form will result in a notification of non-compliance to the IG executive steering committee.

Department Directors (or their designees) are required to attest to the state of their department’s compliance with IG program requirements. In addition, the attestation also addresses the most critical program areas as determined by the IG steering committee, including, but not limited to, the following:

* **(General) Information Governance**

Example: *Application of IG policy and management of ERCOT information promoting reductions in risk and increased employee efficiency*

* **Information Retention**

Example: *Verification of the accuracy and completeness of the RS*

* **Taxonomy and Metadata**

Example: *Verification of the accuracy and completeness of the ERCOT Taxonomy and application of metadata standards*

* **Access and Security**

Example: *Verification that data is being appropriately managed in relation to security standards, access needs, and data sensitivity*

The IG program staff submits the annual attestation form to Directors no later than December 15th of each year with completed forms due back no later than February 15th of the following year.

Depending on the responses received during the attestation process, IG program staff may follow up with the departments to address any necessary changes or to provide assistance to the department in achieving program compliance.

## 4. Roles and Accountabilities

This section explains the roles and accountabilities for the IG program at ERCOT.

### 4.1 Executive Support

#### Executive Sponsor – General Counsel

The General Counsel is accountable for the overall IG program, including documentation and training. The General Counsel is responsible for developing and administering the IG program, educating ERCOT Representatives, and providing support for the organization to carry out day-to-day activities related to the IG program. The General Counsel also has the authority to institute and remove a Legal Hold on specified ERCOT information. The General Counsel may delegate these responsibilities within the Legal Department.

#### 4.1.2 IG Executive Steering Committee

The Executive Steering Committee is a subset of ERCOT executives with an interest in the IG program at ERCOT. The responsibility of the Executive Steering Committee is to support the IG program and initiatives at an executive level, offer guidance, and encourage participation throughout all areas of the organization.

### 4.2 IG Program Staff

#### 4.2.1 IG Program Manager

The IG Program Manager takes direction from the Executive Sponsor, Executive Steering Committee, and the IG Steering Committee. The IG Program Manager leads the IG program through project planning, implementation, training, and program evangelism.

**4.2.2 IG Specialist**

The IG Specialist performs responsibilities delegated by the General Counsel and the IG Program Manager, including, but not limited to, providing guidance, coordinating elements of the annual IG review and attestation, maintaining the RS, managing off-site storage, and providing eDiscovery and litigation support.

**4.2.3 Taxonomy Manager**

The Taxonomy Manager’s responsibility is to facilitate the Taxonomy change process, administer a master set of classification categories (facets) and terms, review Taxonomy inputs, interact with repository owners, assess metrics, and make recommendations regarding opportunities to implement the Taxonomy to the IG Steering Committee.

### 4.3 Business Units

#### 4.3.1 Department Director

Each department Director is responsible for implementing the requirements of the IG program throughout their department and ensuring compliance with this corporate standard and associated operating procedures.

Each department Director is responsible for completing an Annual Review and attestation of the IG activities for their department, which can include questions on various elements of the IG program such as requirements related to the proper management of ERCOT Business Information, or the Retention Schedule. Details on the requirements of the annual IG attestation are located in OP4.1.1 Information Governance Operating Procedure. The department Director may gather the information from any manager or information custodian in order to complete the attestation, but the department Director is ultimately responsible for completion and submission of the attestation.

#### 4.3.2 IG Steering Committee

The IG Steering Committee is a group of senior members of the organization representing a cross-functional group of stakeholders that provide oversight and help to shape the direction of IG at ERCOT. For additional information, please refer to the IG Steering Committee Charter document on the [IG Program Wiki page](https://wiki.ercot.com/pages/viewpage.action?spaceKey=IGO&title=IG+Steering+Committee+Charter).

#### 4.3.4 ERCOT Representatives

ERCOT Representatives receive, create, use, and maintain a wide variety of information in order to perform their daily work. For this reason, the success of the IG program at ERCOT depends upon ERCOT Representatives who understand and comply with their responsibilities.

ERCOT Representatives are responsible for creating and maintaining Business Information sufficient to support their ongoing operations and complying with the requirements of the IG program.,