2012 SPP RE Stakeholder Satisfaction Survey Report
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Executive Summary

SPP RE strives to continuously improve its performance of its NERC-delegated functions. Each year SPP RE asks its Registered Entities to provide anonymous input on the organization’s programs and customer service to stakeholders.

SPP RE issued the 2012 Stakeholder Satisfaction Survey on September 10, 2012 to the 123 Primary Compliance Contacts who are registered in SPP RE’s compliance database (webCDMS). The survey had a 54% response rate (66 respondents), up from 38% in 2011.

Respondents were asked to assess seven SPP RE programs on their importance, how well they meet expectations, and customer service/responsiveness. Stakeholders were also asked to assess SPP RE’s performance in relation to other Regional Entities, to rate performance in five categories from 2010-2012, and to provide qualitative comments.

The majority of respondents work in compliance (51%) or operations (20%). Half interact with SPP RE a few times per year; 26% interact monthly and 12% weekly.

Of the 32 respondents who interact with other Regional Entities, 59% rated SPP RE about the same, 25% rated SPP RE somewhat better, and 16% rated SPP RE much better. None indicated that SPP RE’s performance is worse.

On a scale of 1-5 in which 5 represents the most favorable score, average ratings throughout the survey were in the 3-4 range. No average ratings were unfavorable (below 3), yet none were in the extremely favorable range (above 4.1).

When asked how important SPP RE’s programs and services are, all received average scores between 3 (important) and 4 (very important). Electronic Tools and Enforcement were rated the most important at 3.8, while Event Analysis/Reliability Assessments was rated least important at 3.4.
When asked how well SPP RE’s programs and services meet expectations, respondents rated all with average scores between 3 (meets expectations) and 3.4 (4 is exceeds expectations). The outreach program received the highest score of 3.4, while CIP Monitoring and Events Analysis/Reliability Assessments received the lowest at 3.0.

When asked to rate employees’ customer service ability or programs’ responsiveness to needs, respondents rated all with average scores between 3.8 (3 is average) and just above 4 (good). Enforcement staff and 693 Monitoring received the highest scores of 4.1, while CIP Monitoring received the lowest at 3.8.
Ratings have annually increased in five major categories from 2010-2012:
Regarding overall satisfaction with SPP RE, 2012 average and below average ratings decreased, good ratings were slightly less than in 2011 but higher than 2010, and excellent ratings increased over 2010 and 2011.

Respondents could answer open-ended questions regarding each program and SPP RE in general. More negative than positive comments were submitted. The majority of dissatisfied comments related to confusing communications, a lack of responsiveness, SPP RE and OATI electronic tools, and a concern that SPP RE staff and contractors added their own interpretations to the standards. There were several dissatisfied comments about the relationship between compliance and Events Analysis and the need for Event Analysis training and guidance. One respondent commented that 30 days is not enough time for Self-Certifications.

There were also numerous positive observations regarding staff’s customer service, communications, and overall satisfaction.

Stacked bar charts throughout this report indicate the number of people who responded in each category, not the percentage.

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1 Stacked bar charts throughout this report indicate the number of people who responded in each category, not the percentage.
Demographics

What is your role within your organization?

- Compliance: 51%
- Operations: 20%
- Executive: 8%
- Policy/Regulatory/Legal: 11%
- Engineering: 6%
- Other: 4%

n=66

How often do you interact with SPP RE?

- A few times per year: 51%
- Monthly: 26%
- Weekly: 12%
- Rarely: 11%

n=66
Interaction with other REs

Do you interact with other Regional Entities?

If "yes", how does SPP RE compare with the Regional Entities with which you interact most often?
Traditional (693) Compliance Monitoring

How well does our Traditional (693) Compliance Monitoring program meet your expectations?²

![Bar chart showing self-certifications, self-reports, and audits for compliance monitoring]

Please rate the Traditional (693) Compliance Monitoring staff’s customer service ability (responsiveness, professionalism, problem solving and communication skills):

![Bar chart showing customer service ratings]

How important is our Traditional (693) Compliance Monitoring Program to you or your organization?

![Bar chart showing importance ratings]

Please share your suggestions for improving our Traditional (693) Compliance Monitoring program:

- Newly registered so I have not fully interacted with SPP RE on all facets of compliance.

² “n” represents the number of people who responded to that question, while “x” denotes the average response. Respondents were asked to skip questions that were irrelevant to them or their organization rather than making a neutral selection.
• The average mark in customer service ability is based on many communications being overly complex/confusing, and a high percentage of corrective follow-up communications after initial issue. These communications are something entities deal with almost every day. Otherwise, as far as professionalism and responsiveness, the 693 staff rates very high.

• None.

• I like the way the SPP RE audits the PRC-004, EOP-009 and TPL Standards through periodic data submittals. I would encourage SPP to continue and expand these efforts. This method provides timely compliance guidance to the registered entities so that we are staying on the right track. Additionally, it saves time and resources for both the SPP RE and registered entities.

• Too much non usable info for this small City

• Requests for information should be honored with a response, even if it is related to a tough issue that would require the RE to stake a position. Uncertainty does not equal transparency.

• When people call you need to return their calls even if just to say you are busy.

• Have not participated in a 693 Audit

• Being a PSE only, we'd prefer to only provide self-certification and exception reporting to one RE.

• We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.

• Our most recent 693 Audit was thorough and well organized by the compliance staff. There was some confusion during the data request as to when the Rat-Stats was to be submitted. The deadline for submission of the Rat-Stats was not listed in the audit package. Also, the audit should be kept within the scope of the standards being audited. There were comments by contract auditor as to how he wouldn’t operate his system like that. The auditors were courteous, however contract auditors need to act more professional and have better training on audit protocol before coming onsite. The Self-Report and Self-Certification programs are electronic and easy to use. The 30 day deadline for self-certifications is a challenge to meet so quickly after the end of the quarter. EPA allows 90 days to self-certify. The Compliance Monitoring Staff have always been responsive and professional.
Critical Infrastructure Protection (CIP) Compliance Monitoring

How well does our CIP Compliance Monitoring program meet your expectations?

Please rate the CIP Compliance Monitoring staff's customer service ability (responsiveness, professionalism, problem solving and communication skills):

How important is our CIP Compliance Monitoring Program to you or your organization?

Please share your suggestions for improving our CIP Compliance Monitoring program:

- Skipped this section because we do not own or operate any Critical Cyber Assets in the SPP region
- Newly registered so I have not fully interacted with SPP RE on all facets of compliance.
- The low mark in CIP audits is based on the auditors penchant for interpreting Standards based on information not included in the Standard language.
- None.
The CIP Compliance Monitoring program is very important to our organization, due to the significant amount of time and resources that are being consumed by it. The current CIP Standards were written to provide registered entities some flexibility in how to identify and protect their cyber assets, something that our organization has done for many years prior to the CIP Standards. However, the SPP RE CIP Compliance Monitoring staff has imposed their expectations for what they believe the Standards should require, instead of auditing to the plain language of the standard. This is part of the reason why the number of violations for CIP Standards has surpassed all of the other NERC Standards. If the SPP RE CIP Compliance Monitoring staff cannot put aside their ideological beliefs and audit with independence, then registered entities and SPP will continue to spend valuable time and resources processing violations that could “potentially impact” reliability. Meanwhile, we hear from NERC that the industry needs to focus more effort on the ones that we know impact reliability.

Keep subjectivity out of auditing process.

[ ] needs to audit the standards as written and not what he thinks the standards should say.

Have not participated in a CIP Audit or dealt with SPP RE CIP Staff

Do not have CIP Assets in SPP

SPP RE provides good input into the CIPWG of the SPP RTO

We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP’s fault though.

The communication skills and professionalism of CIP compliance staff (specifically, [ ]) require improvement. Specifically, [ ] for [ ]’s 2012 CIP audit failed to formally request firewall rule information for off-site audit team review, and this resulted in a significant misunderstanding as to whether [ ] could provide this confidential restricted information for the audit team’s off-site review. In addition, [ ] withheld information about the identification of three significant ‘areas of concern’ with [ ], until one hour prior to the audit exit meeting, leaving no time to brief participants in that meeting, let alone do anything to rectify or address the concerns before the audit closing.

I believe the self reporting stage should always reflect self reporting, even if it is the month before an audit. Often there are times when you might not catch a compliance issue until details are reviewed during audit preparation. This is not the ideal situation but still reflects a culture of compliance if reported.

CIP Compliance is critical to our entity. We have posed questions to SPP staff during mitigation and at times it has taken weeks to get a response. Due to the timely nature of compliance, it would be beneficial for highly technical CIP staffing to be available for all questions and concerns.
Enforcement

How well does our Enforcement program meet your expectations?

- Violation processing
  - 1-Fails to Meet: 1
  - 2-Avoids: 2
  - 3-Almost Meets: 31
  - 4-Exceeds: 10
  - 5-Greatly Exceeds: 1
  - n=45
  - x̄=3.2
  - Average=3.3

- Mitigation Plan processing
  - 1-Fails to Meet: 2
  - 2-Avoids: 30
  - 3-Almost Meets: 14
  - 4-Exceeds: 1
  - n=47
  - x̄=3.3
  - Average=3.3

Please rate the Enforcement staff’s customer service ability (responsiveness, professionalism, problem solving and communication skills):

- Customer Service
  - 1-Poor: 10
  - 2-Below Average: 22
  - 3-Average: 17
  - 4-Good: 0
  - 5-Excellent: 0
  - n=49
  - x̄=4.1

How important is our Enforcement program to you or your organization?

- Importance
  - 1-Not Important: 1
  - 2-Moderately Important: 3
  - 3-Important: 13
  - 4-Very Important: 24
  - 5-Critical: 10
  - n=66
  - x̄=3.8

Please share your suggestions for improving our Enforcement program:

- Newly registered so I have not fully interacted with SPP RE on all facets of compliance.
- Requests for follow-up information for mitigation items seems to come in a flurry as Enforcement staff are doing write-ups for FERC/NERC. This is inconvenient for entities as the data/information was likely prepared some time ago at the time of milestone completion and may not be readily available later. Also, the granularity of the information would be better dealt with at the time of milestone due date rather than reaching back to delve deeper in the final stages of violation processing.
- None.
- It takes too long to process violations. The Enforcement program would benefit greatly from receiving fewer violations to process. Hopefully the Compliance Enforcement Initiative underway at NERC will eventually be implemented and we can stop wasting valuable time and resources on issues that pose minimal or no risk to reliability.

- Never had to work with enforcement Folks.

- Have not worked with Enforcement to determine an answer.

- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.

- While expectations are generally met regarding SPP RE’s CIP Compliance Monitoring program, [   ] has some suggestions for SPP RE to improve its program. While [   ] appreciates the sharing of SPP RE’s experience and industry best practices, at times the line between “best practice” and “compliance” is blurred. For example, the audit staff tends to expect performance beyond that which is required by the standards, pushing to best practices. While it may be helpful to discuss the auditor’s understanding of the intent versus the specific language of the requirement, any findings should be based on the approved standard. [   ] would find it beneficial if mitigation plans could be reviewed more quickly. [   ] would like to see milestone requirements in line with other regions. While SPP RE does not allow historic milestones, the other regions do allow them. In working through mitigation plans, many times the Enforcement staff will change their mind on what they need, or what evidence must be provided. After accepting a mitigation plan, and in preparation for our filing of a certificate of completion, they changed their mind and asked that we add additional steps to the mitigation plan. Once those steps were completed, they then changed their minds on the evidence that should be submitted for prior completed milestones, making it very difficult to know exactly what was expected and when the milestones and plans would be completed.

- The enforcement process has been very lengthy in the past but is improving.

- The mitigation plan and violation process is online and easy to use. Enforcement staff are always professional and very helpful. We feel very comfortable picking up the phone to call SPP enforcement staff to ask a question. However, there have been a few times when we have had a hard time getting a response for a CIP question.
### Event Analysis/Lessons Learned and Reliability Assessments

How well do our Event Analysis/Lessons Learned and Reliability Assessment programs meet your expectations?

<table>
<thead>
<tr>
<th>Reliability Assessments</th>
<th>1-Fails to Meet</th>
<th>2-Almost Meets</th>
<th>3-Meets</th>
<th>4-Exceeds</th>
<th>5-Greatly Exceeds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Event Analysis/Lessons Learned</td>
<td>2</td>
<td>2</td>
<td>36</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>n=47 x=3.0</td>
</tr>
</tbody>
</table>

Please rate our Event Analysis/Lessons Learned and Reliability Assessment staff’s customer service ability (responsiveness, professionalism, problem solving and communication skills):

<table>
<thead>
<tr>
<th>Responsiveness</th>
<th>1-Poor</th>
<th>2-Below Average</th>
<th>3-Average</th>
<th>4-Good</th>
<th>5-Excellent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Event Analysis/Lessons Learned</td>
<td>1</td>
<td>13</td>
<td>25</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>n=49 x=3.9</td>
</tr>
</tbody>
</table>

How important are our Event Analysis/Lessons Learned and Reliability Assessment programs to you or your organization?

<table>
<thead>
<tr>
<th>Importance</th>
<th>1-Not Important</th>
<th>2-Moderately Important</th>
<th>3-Important</th>
<th>4-Very Important</th>
<th>5-Critical</th>
</tr>
</thead>
<tbody>
<tr>
<td>Event Analysis/Lessons Learned</td>
<td>1</td>
<td>3</td>
<td>24</td>
<td>20</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>n=66 x=3.4</td>
<td></td>
</tr>
</tbody>
</table>

Please share your suggestions for improving our Event Analysis/Lessons Learned and Reliability Assessment programs:

- Newly registred so I have not fully interacted with SPP RE on all facets of compliance.
- None.
- More outreach and training needed on event analysis techniques and expectations. I think entities are doing things differently but trying to reach the same goal - analyze events. RE could provide much needed guidance, direction and help. Also, compliance needs to stay out of EA.

- The lessons that we can learn from these events is very valuable to our organization. We have reviewed these in the past and found them very informative. However, there is concern over how these reported events are being used in Compliance audits. This could discourage registered entities from voluntarily reporting.

- Again we are small operation Not that many events.

- There is/was still much confusion as to the requirements around the events analysis program. Our company was told it was mandatory by the RE, then we were told it was voluntary by the RE based on the NERC ROP. It is not clear when the Events Analysis (EA) team is completed with an EA and when the enforcement team has taken over an investigation of a EA. Better communications and procedures are needed overall with this program. We do understand it is a somewhat new program.

- N/A.

- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.
Outreach

How well does our Outreach program meet your expectations?

<table>
<thead>
<tr>
<th>Outreach</th>
<th>1-Fails to Meet</th>
<th>2-Average Meets</th>
<th>3-Meets</th>
<th>4-Exceeds</th>
<th>5-Greatly Exceeds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workshops</td>
<td>2</td>
<td>2</td>
<td>31</td>
<td>16</td>
<td>7</td>
</tr>
<tr>
<td>Newsletters</td>
<td>2</td>
<td>1</td>
<td>33</td>
<td>20</td>
<td>4</td>
</tr>
<tr>
<td>Webinars</td>
<td>3</td>
<td></td>
<td>33</td>
<td>18</td>
<td>3</td>
</tr>
</tbody>
</table>

Please rate our Outreach program's responsiveness to your needs:

<table>
<thead>
<tr>
<th>Responsiveness</th>
<th>1-Poor</th>
<th>2-Below Average</th>
<th>3-Average</th>
<th>4-Good</th>
<th>5-Excellent</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>11</td>
<td></td>
<td>34</td>
<td></td>
<td>14</td>
</tr>
</tbody>
</table>

How important is our Outreach program to you or your organization?

<table>
<thead>
<tr>
<th>Importance</th>
<th>1-Not Important</th>
<th>2-Moderately Important</th>
<th>3-Important</th>
<th>4-Very Important</th>
<th>5-Critical</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td></td>
<td>19</td>
<td></td>
<td>25</td>
</tr>
</tbody>
</table>

Please share your suggestions for improving our Outreach program:

- None.
- Waste of our time!!!!
- Have not had an opportunity to attend a workshop
- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.
- If you could supply us more staffing we could take more advantage of what is offered. :)
The Quarterly Newsletter, Workshops and Webinars are all very helpful. We try to attend as many SPP and NERC events as possible to help us refine our Internal Compliance Program.

It would be helpful to have more information about developing an Internal Compliance Program. Small entities find it especially difficult to establish a program with limited resources. It would be beneficial to hear what internal controls or programs have worked well for other entities.
Electronic Tools

How well do our electronic tools meet your expectations?

- **webCDMS-CMEP Activities**
  - 1-Fails to Meet: 2
  - 2-Almost Meets: 5
  - 3-Meets: 36
  - 4-Exceeds: 17
  - 5-Greatly Exceeds: 4
  - n=64
  - x=3.3

- **EFT Server - Secure Document Transmittal**
  - 1-Fails to Meet: 2
  - 2-Almost Meets: 3
  - 3-Meets: 34
  - 4-Exceeds: 12
  - 5-Greatly Exceeds: 3
  - n=54
  - x=3.2

- **RE webpages of SPP.org**
  - 1-Fails to Meet: 3
  - 2-Almost Meets: 3
  - 3-Meets: 44
  - 4-Exceeds: 11
  - 5-Greatly Exceeds: 1
  - n=62
  - x=3.1

Average=3.2

How important are our electronic tools to you or your organization?

- **Importance**
  - 1-Not Important: 4
  - 2-Moderately Important: 16
  - 3-Important: 38
  - 4-Very Important: 8
  - 5-Critical: 8
  - n=66
  - x=3.8

Please share your suggestions for improving our electronic tools:

- It is still hard to find information on the SPP webpage without bookmarks.
- Tools are too difficult to use.
- None.
- The OATI Folks sent WAY To Many Emails OUT!!!
- Many Regional Entities are now using webCDMS, but unfortunately OATI has designed log on to be separate for each region, requiring different user credentials for each region a participant is in. Some time ago, a couple of the regions recognized this inefficiency and said they would address with OATI, but nothing has happened. There should be one log on for each user, and then once inside webCDMS I should be able to select through drop down or other menu, the region I want to perform actions, like self certification, for. One access for each user, to get at all the regions, rather than one user requiring different access for each region.
- The SPP RE website should not be embedded within the SPP RTO website.
- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.
For possible violations that are being processed by another region, please don’t show “work in progress” status in CDMS. This is confusing and misleading. For example, in WECC’s CDMS they show “dismissed” as the action status for a violation when it is being processed by another region.

CDMS and the EFT Server have been easy to use. It is sometimes difficult to find specific information on the SPP RE website.
Standards Under Development

How well does our Standards Under Development program meet your expectations?

- Monitoring and communicating about regional standards:
  - 1-Fails to Meet: 1
  - 2-Almost Meets: 35
  - 3-Meets: 14
  - 4-Exceeds: 3
  - 5-Greatly Exceeds: 3
  - Total: 55
  - Average: 3.3

- Monitoring and communicating about NERC standards:
  - 1-Fails to Meet: 1
  - 2-Almost Meets: 34
  - 3-Meets: 12
  - 4-Exceeds: 3
  - 5-Greatly Exceeds: 3
  - Total: 53
  - Average: 3.3

How important are Standards Under Development to you or your organization?

- Importance:
  - 1-Not Important: 2
  - 2-Moderately Important: 22
  - 3-Important: 26
  - 4-Very Important: 7
  - 5-Critical: 7
  - Total: 66
  - Average: 3.7

Please share your suggestions for improving our Standards Under Development program:

- Newly registered so I have not fully interacted with SPP RE on all facets of compliance.
- None.
- We typically rely on other resources for Std Under Development information.
- NERC VERY GOOD Program!!
- I just can't keep up with the changes on my own, though I realize it is my responsibility to do so. Having you follow it, too, help me do my job.
- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. Not SPP's fault though.
Importance and Satisfaction

All satisfaction (how well the program meets expectations) and importance scores fall within a small range of 3.0 and 3.8. Enforcement and E-Tools are rated most important. Event Analysis is rated least important and, with CIP Monitoring, at the lowest satisfaction. While CIP Monitoring has lowest satisfaction, it has moderate importance. Outreach has the highest satisfaction with lower importance. Standards Under Development, Enforcement, and Traditional (693) Monitoring have higher satisfaction and importance scores.
Satisfaction 2010-2012

Please help us gauge how satisfaction has changed from 2010-2012:

Major Categories 2010-2012

- CMEP
  - 2012: 3.8
  - 2011: 3.7
  - 2010: 3.5

- Outreach
  - 2012: 4.0
  - 2011: 3.9
  - 2010: 3.7

- Electronic tools
  - 2012: 3.8
  - 2011: 3.7
  - 2010: 3.6

- Customer Service
  - 2012: 4.0
  - 2011: 4.0
  - 2010: 3.6

- SPP RE Overall
  - 2012: 4.0
  - 2011: 3.8
  - 2010: 3.6

SPP RE Overall

<table>
<thead>
<tr>
<th>Year</th>
<th>1-Poor</th>
<th>2-Below Average</th>
<th>3-Average</th>
<th>4-Good</th>
<th>5-Excellent</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>15</td>
<td>31</td>
<td>14</td>
<td>40</td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>1</td>
<td>33</td>
<td>7</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>4</td>
<td>24</td>
<td>6</td>
<td>70</td>
<td></td>
</tr>
</tbody>
</table>
Qualitative - Dissatisfaction

Please share other comments regarding your dissatisfaction with SPP RE

- None.

- We need to get back to focusing on reliability and not issuing violations. There is no benefit to chasing after administrative items that offer little to no benefit to our industry. This has created an adversarial relationship within our organizations (compliance personnel vs. SMEs) and between the SPP RE and registered entities. Hopefully the Compliance Enforcement Initiative at NERC will be developed and implemented soon.

- Cut down on newsletter and emails We realy dont care about all that stuff !!!

- Questions sent via email are often never answered.

- We are very small and has almost no impact to the BES. The paper work and other requirements seem to be excessive. I know it is not SPP's fault, but I am just getting it out there.

- We realize the information requested in SPP Surveys is very helpful to the RE. However, frequent survey requests can be very resource intensive for small entities. Also, it would be helpful to have a printable format for our responses to SPP Surveys.

- No complaints.
Qualitative - Satisfaction

Please share other comments regarding your satisfaction with SPP RE:

- None.

- Enforcement staff is great to work with.

- I was pleased to see the appointment of Ron Ciesiel to GM. I think Ron brings the experience and common sense needed to improve relations with the registered entities.

- Way too many of yall working when 4 or 5 Folks used to do it! [redacted due to inappropriate language]

- Our recent PSE Audit went very smoothly, as the lead auditor was very organized and responsive. As a side not, we feel very strongly that the PSE function at the NERC level should not be a NERC Registered Entity, as the function has no impact on the reliability of the BES.

- SPP does do their best to help with any questions or paper work that I do have. I have no complaints about what they are doing.

- We appreciate SPP's interest to improve their program by getting feedback from entities.

- SPP RE's staff, all areas, are professional at all times. SPP RE auditors are knowledgeable not only about the electric industry in general, but also about the types of registered entities that they audit. The auditors are thorough and fair in their reviews of our evidence. Our SMEs have engaged in several very productive interviews with the Order 693 and CIP auditors, and SPP RE's suggestions and recommendations have been incorporated into our procedures.