What's New At SPP RE

From General Manager Stacy Dochoda’s Desk: New SPP RE Strategic Plan and Highlights from FERC Audit

We have drafted our first three-year SPP RE Strategic Plan (agenda item 4a), which includes our mission statement, value proposition, and three foundational strategies for success. Our mission and value proposition are consistent with those of SPP, Inc. while addressing the unique role and responsibilities of a Regional Entity. We will discuss the draft plan with the RE Trustees at our meeting next week in Santa Fe. If you have thoughts or comments on the SPP RE Strategic plan please email spprecompliance@spp.org by EOB Friday, Oct. 21 and we will share your comments with the Trustees.

Last November FERC began an audit of SPP RE as a follow-up to its 2008 audit. The final audit report, issued October 5, concluded that SPP RE had successfully implemented the 20 recommendations from the 2008 audit and has made “tremendous” progress in ensuring strong separation between the SPP RE and RTO.

FERC audit staff noted five areas of weaknesses in SPP RE’s Compliance Monitoring and Enforcement program (CMEP) and recognized we had already taken specific corrective actions prior to or during the audit for three out of five findings. Completed corrective actions include our adoption of specific performance metrics/goals, creation of a separate enforcement group, and adding additional staff and contractors. We have also enhanced our Compliance Data Management System and are participating in NERC and RE working groups to implement process improvements such as the new Find, Fix, Track, and Report enforcement initiative.

The FERC audit provided a beneficial review of our processes and procedures. We appreciated FERC’s helpful observations regarding our CMEP, as we are committed to continuous improvement.
New Focus on Mitigation Plan Milestone Tracking and Completion

In a continuing effort to ensure reliability, the SPP RE enforcement group is now tracking the completion of milestone activities associated with accepted Mitigation Plans. Lead Compliance Engineer Bob Reynolds, a new staff member, is responsible for ensuring timely completion of milestones and tracking Mitigation Plans to completion in accordance with Section 6 of the NERC CMEP. Upon completion of a milestone, all evidence necessary to verify completion should be submitted to SPP RE; the actual completion date should be entered in webCDMS. If a milestone activity will not be completed on time, an extension request should be made in webCDMS at least five business days prior to the original milestone completion date. Please contact Bob with questions (bdreynolds.re@spp.org or 501.688.8227).

Fall Workshop Survey Reminder

Thank you to those who attended our Fall Workshop. If you have not yet provided your feedback, please take a moment to complete an anonymous survey. Just answer the questions you find relevant; we are very interested in your suggestions for future workshops.

Webinars and Meetings

• Oct. 24: Santa Fe - SPP RE Trustees Meeting


• Oct. 26-28, Atlanta - NERC Standards and Compliance Workshop

• Nov. 3, Atlanta - NERC Board of Trustees

• Nov. 14, 10:30 CST – SPP RE Webinar SPP RE 2012 Implementation Plan

• Nov.18, 11:00 ET – NERC webinar on Establishing an Electronic Security Perimeter Where None Previously Existed

• Nov 29, Washington, DC - FERC Technical Conference on policy issues relating to bulk power system reliability

• Dec. 13, 2:00 CST - SPP RE Webinar CIP-003-3 R4 Information Protection
NERC News

NERC Filing Uses New Compliance Enforcement Initiative

NERC made its first FERC filing using its new Compliance Enforcement Initiative that is designed to handle issues more efficiently, focus on issues posing a higher reliability risk, streamline administrative paperwork, and continue to encourage self-reporting and mitigation. You may access the Find, Fix, and Track spreadsheet on NERC.com.

Electricity Sector Cybersecurity Risk Management Process Guideline Posted for Comment

The Department of Energy, in collaboration with the National Institute of Standards and Technology and NERC, has released a draft of the Electricity Sector Cybersecurity Risk Management Process (RMP) Guideline for public comment through Oct. 28. The RMP is designed to help utilities better understand their cybersecurity risks, assess severity, and allocate resources more efficiently to manage those risks. The RMP Guideline offers a flexible approach to managing cybersecurity risks across all levels of the organization.

Standards Under Development

There has been a lot of recent activity regarding NERC Standards Under Development. To receive a detailed weekly Standards Under Development update from the SPP Regional Transmission Organization, select SPP Compliance Contacts on our email list page. NERC's Standards Progress Report is also helpful. To subscribe to NERC email lists for specific projects or standards in general, contact Mallory Huggins.

- The Bulk Electric System definition passed with a 72% approval rate. Now the drafting team will consider all comments received and decide whether to make additional revisions to the BES definition, its implementation plan, and/or the Detailed Information to Support an Exception Request application form. The drafting team is working to meet FERC’s filing deadline of Jan. 25, 2012.

NERC is requesting public comments through Oct. 27 on the second draft of a new procedure for facility-by-facility determinations of BES inclusions or exclusions.

To learn more about the BES project visit the BES project page, download a fact sheet, or listen to the Definition of Bulk Electric System and Rules of Procedure webinar.

- A recirculation ballot on revisions to Project 2007-07 Transmission Vegetation Management passed with an 86% approval rate.

- Project 2007-17, Protection System Maintenance and Testing failed its most recent ballot with a 61% approval rate (it required 2/3 approval to pass). View webinar.

- Ballot pool registration for Interpretation of MOD-028 for Florida Power & Light Company is open through Nov. 2. Comments are accepted through Nov. 16.
• Ballot pool registration for **Project 2009-22 Interpretation of COM-002-2 for ISO/RTO Council** is open through Nov. 3. Comments are accepted through Nov. 17.

• Ballot pool registration for **Project 2010-07 Generator Requirements at the Transmission Interface** is open through Nov. 4. Comments are accepted through Nov. 18. [Watch webinar.](#)

• Ballot pool registration for **Project 2008-10 Interpretation of CIP-006-x R1 for Progress Energy** is open through Nov. 10. Comments are accepted through Nov. 21.

• **SERC’s Regional Reliability Standards Development Procedure** is posted for comment through Nov. 18.

• FERC invites public comment in **Docket No. RD11-10-000** on a proposed collection of information that relates to proposed FAC-008-3 -- Facility Ratings.

• A great way to make your organization’s voice heard on NERC standards under development is by joining a standards drafting team. There are a number of [vacancies that need to be filled](#).

• Registered Ballot Body members and others interested in NERC Reliability Standards are encouraged to [submit nominations for industry segment representatives on the Standards Committee](#).

### Compliance Application Notices (CANs)

The [CAN Process](#) has been posted as final and the [CAN Status spreadsheet](#) that indicates where each CAN is in the development process has been updated.

The following **RE-DRAFTED CANs** have been posted for a 21-day industry comment period ending October 31:

- **CAN-0010**: [Definition of “Annual” and Implementation of Annual Requirements](#)
- **CAN-0012**: [Completion of Periodic Activity Requirements During Implementation Plan](#)
- **CAN-0013**: [PRC-023 R1 and R2 Effective Dates for Switch-on-to-Fault Schemes](#)
- **CAN-0015**: [Unavailability of NERC Software Tools](#)
- **CAN-0022**: [VAR-002-1.1b R1 and R3 Generator Operation in Manual Mode](#)
- **CAN-0024**: [CIP-002 R3 Routable Protocols and Data Diode Devices](#)
- **CAN-0026**: [TOP-006 R3 Protection Relays](#)
- **CAN-0028**: [TOP-006-1 R1.2 Reporting Responsibilities](#)
**New Standards in Effect October 1**

A number of new standards went into effect October 1: EOP-002-3, FAC-002-1, IRO-002-2, IRO-005-3a, IRO-008-1, IRO-009-1, IRO-010-1a, TOP-003-1, TOP-005-2a, TOP-006-2, and VAR-001-2. Read the standards or review slides from SPP RE’s webinar for more information. Reliability Standard Audit Worksheets have been developed to reflect the new/revised standards and should be posted to NERC.com soon.

**Member Representatives Committee Elections**

NERC is holding its annual elections to replace the Member Representatives Committee Sector members whose terms expire in Feb. 2012. Please review the Steps for Nominating and Electing Members to the Member Representatives Committee during your sectors’ election. The nomination period closes November 11.

**Recently posted:**

- 2011 Risk Assessment of Reliability Performance report, which marks a new approach to assessing reliability performance.

- 2011 Roadmap to Achieve Energy Delivery Systems Cybersecurity

- Electric Reliability Organization Compliance Analysis Report NERC Organization Certifications

- FERC Order Approving Interpretations to Reliability Standards PRC-004-1 and PRC-005-1

- Lessons Learned on Transmission Line Splice Failure, Generating Unit Temperature Design Parameters and Extreme Winter Conditions, and Adequate Maintenance and Inspection of Generator Freeze Protection

- NERC Compliance Registry and Registration Appeals

- Self-Reported Violations Dismissal Analysis

- Slides from 2012 CMEP Implementation Plan and Actively Monitored List and FAC Recommendations webinars.

- TOP-002

- Vegetation-Related Transmission Outage Report
Quick Reference

SPP RE

Homepage - Calendar - CDMS - Entity Registration Application/Change Form - File Clerk - Lessons Learned - Regional Standards Under Development - Subscribe to SPP email lists

NERC


Our Staff

We are happy to help you with any questions or concerns.

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This newsletter was sent to:
Board/Members Committee exploder
Critical Infrastructure Protection Working Group exploder
Markets and Operations Policy Committee exploder
Operating Reliability Working Group exploder
RE Authorizing Officers
RE News
RE Primary Compliance Contacts
RE Standards Development exploder
RE Trustees exploder
SPP Compliance Contacts exploder

To subscribe, visit our email list page and select Regional Entity News. Back issues are also posted. If you have questions about this publication, please contact Emily Pennel.

To receive a weekly Standards Under Development update from the SPP Regional Transmission Organization, select SPP Compliance Contacts on our email list page.

SPP RE is an independent and functionally separate division of SPP, Inc. that promotes and works to improve bulk electric system (BES) reliability. SPP RE oversees the development of regional reliability standards; monitors and enforces registered entities’ compliance with reliability standards; assesses and evaluates BES reliability; and provides technical expertise and assistance to BES owners, operators, and users - in particular to registered entities located within SPP RE’s eight-state footprint that includes all or parts of Arkansas, Kansas, Louisiana, Mississippi, Missouri, New Mexico, Oklahoma, and Texas.