**SPP RE News: January 2012**

**Feb. 6 Cutoff for Spring Workshop Room Block**

Reserve your room at the Baton Rouge Capitol Center by Feb. 6 for the SPP RE room block rate of $129. You may also register to attend the Feb. 28-29 workshop via net conference. Our workshop is followed by the March 1 SPP RE Compliance Forum, which requires separate registration.

In addition to staff presentations, our agenda includes guest speakers from FERC, NERC, OATI, OG&E, Sunflower, Cleco, AECC, BES Standard Drafting Team, and the SPP RTO.

**CIP Workshop Registration Open - May 22-23**

Registration is open for our May 22-23 CIP Workshop in Dallas. We are working on the agenda now; it will focus on technical information about how to maintain compliance with CIP standards.

**Upcoming Webinars**

*Stakeholder Input on Summer Assessment*, March 15, 2:30 CST

*Best Practices-Planning for and Executing Event-Driven Standards*, April 19, 9:00 CST

**From Stacy Dochoda’s Desk: Looking Back on a Successful 2011**

2011 was a successful year in which we streamlined internal processes while working with NERC to tighten our focus on issues with the biggest reliability and security impacts. We disposed of more violations than we recorded and processed 43 Find, Fix, Track, and Report-remediated actions. Self-reported violations continue to rise, increasing from 36% of our caseload in 2009 to 68% in 2011. We are very encouraged by Registered Entities’ willingness to self-report and implement mitigation.

We improved our audit processes by enhancing pre-audit evidence review, creating efficiencies for Registered Entities and helping control SPP RE’s costs. We also implemented improvements to webCDMS. Our staff and contractors attended three internal workshops,
one led by a Big Four audit firm, to ensure everyone representing SPP RE is working from the same baseline knowledge.

FERC audited SPP RE and concluded we successfully completed the 20 recommendations from the 2008 audit; we have already addressed their new recommendations.

We increased our Event Analysis activity, processing 22 events, up from 9 in 2011. We participated with NERC and FERC in reviewing the February 2011 Southwest Cold Weather Event and conducted a survey of ~100 entities concerning winter preparations. We were encouraged by survey results, which indicate that many preventative measures are already included in our region’s plans, and Registered Entities are adding steps to help us be even better prepared for severe winter weather.

We developed winter, summer, and long-term reliability assessments. The 2011 long-term assessment shows adequate reserve margins for the SPP RTO footprint and noted that EPA regulations could impact regional reliability. SPP RE Trustees signed a letter to the EPA describing CSAPR’s reliability impacts on the SPP RE footprint using the EPA’s models.

The registered ballot body approved SPP RE’s first regional standard, which documents requirements for automatic underfrequency load shedding programs to arrest declining frequency and assist recovery following underfrequency events. The SPP Board of Directors will make an advisory vote on the standard this month.

We were pleased that Registered Entities rated all SPP RE programs and services between 3 and 3.5 on a scale of 1-5 (1-fails to meet expectations, 5-greatly exceeds expectations) in our annual satisfaction survey. Employees’ customer service ability was rated between 3.5 and 4. Our year-over-year scores increased in all five major categories from 2009-2011.

We increased our outreach with monthly newsletters, three workshops with ~400 participants, and 16 webinars with 650 registrants. This outreach is for your benefit, so we welcome your ideas for newsletter, webinar, and workshop topics.

We look forward to working with you in 2012 to continue improving regional reliability. Read the full 2011 SPP RE Year End Report.

Mitigation Plan Milestones Requirement - Update

As we have previously discussed, SPP RE is increasing our emphasis on tracking mitigation plan (MP) milestones. To increase our efficiency in tracking and reviewing milestones, please do not identify as milestones any mitigating activities that occurred before the MP submission date. These “historical” mitigating activities should be described in the webCDMS MP Plan Details tab in the text box Specific task(s) and action(s) for mitigation. MPs that are submitted as complete should have a single milestone denoting MP completion. MPs submitted with historical milestones will be rejected. We greatly appreciate your attention and assistance.

Note: webCDMS now works with Internet Explorer 9.
Most Violated Standards

Based on rolling 12-months through 12/31/11, following are the most violated standards in SPP RE, compared to NERC's all-time violations list:

1. CIP-007 **Systems Security Management**, 33 violations - #2 NERC
2. CIP-005 **Electronic Security Perimeters**, 20 violations - #6 NERC
3. PRC-005 **Protection System Maintenance**, 19 violations - #1 NERC
4. CIP-006 **Physical Security-Critical Assets**, 19 violations - #5 NERC
5. CIP-001 **Sabotage Reporting**, 9 violations - #4 NERC
6. CIP-002 **Critical Cyber Asset Identification**, 9 violations - #9 NERC
7. CIP-004 **Personnel & Training**, 9 violations - #3 NERC
8. CIP-003 **Security Management Controls**, 7 violations - #7 NERC
9. TOP-002 **Normal Operations Planning**, 7 violations - #11 NERC
10. PRC-008 **UFLS Maintenance**, 6 violations - #15 NERC

2012 Reporting Requirements Deadlines

The [2012 Reporting Requirements and Schedule](#) includes the upcoming deadlines:
- Exception Reporting: Jan.31
- TFE Data Submittals: Jan.31
- PRC-004 Data Submittal: Feb.29

Revised Form OE-417 Granted Three-Year Extension

The Electric Emergency Incident and Disturbance Report ([Form OE-417](#)) has been granted a three year extension. In the revised Form, the time to submit a Final Report has been extended from within 48 to 72 hours of the incident. This Form should be used for all OE-417 filings. The [online Form](#) has been updated to match the revised Form.

NERC News

**Rules of Procedure Appendix 4D Updated**

This filing explains the changes to the approved version, effective Jan.10, 2012.

**TADS Proposed 100-199kV Outage Data Request**
NERC requests public comment on its proposed revision to the Transmission Availability Data System data collection to include 100-199 kV facilities.

**NERC Webinars and Workshops**

CEI Find, Fix, Track Update, Feb. 2

Improving Human Performance on the Grid, March 27-29, Atlanta. (more info TBA)

ERO Auditor Overview, Industry Seminar, Feb. 23-24, WECC, Salt Lake City, Utah

**New Online**

NERC Assessment Identifies Key Findings for Future Industry Dependency on Natural Gas

Slides posted for Order 754 - Data Request - The Study of Single Point of Failure Webinar

Third Quarter 2011 Vegetation-Related Transmission Outage Report

**Lessons Learned:**
- Plant Onsite Material and Personnel Needed for a Winter Weather Event
- Plant Operations Training to Prepare for a Winter Weather Event
- Transmission Facilities and Winter Weather Operation

**NERC Standards Under Development and CANS**

To get a detailed weekly update from NERC, email subscribe-standards@listserv.nerc.com. To be added to the distribution list for a particular standards project, email Mallory Huggins mallory.huggins@nerc.net.

**Recent Ballot Results/Recirculation Ballots**

Project 2010-17 — Definition of Bulk Electric System - The NERC Board of Trustees approved the definition, implementation plan, exception form, and Rules of Procedure work; the documents are now pending regulatory filing. The draft Standard Authorization form for Phase 2 is open for comment through Feb. 3.

For the following, next steps are for Standard Drafting Teams to consider comments and determine whether to make additional changes:
- Project 2007-12 Frequency Response Initial ballot results - Approval: 31%
- Project 2009-01 Disturbance and Sabotage Reporting Initial ballot results - Approval: 36%
- Project 2008-06 Cyber Security -Order 706 -CIP-002 through CIP-009 (Version 5 CIP Standards): All approval rates below 42%

**Other Deadlines for Commenting/Voting**

- Order 754: Request for Data or Information in accordance with NERC Rule of Procedure 1600 Feb. 6
- Project 2010-17: Definition of Bulk Electric System (Phase 2) Standard Authorization
Request Feb. 3
-Project 2006-06: Reliability Coordination Feb. 8

CANS
Two CANS were posted as final on Dec. 30: BAL-003 R2 and R5: Frequency Bias Calculation and PRC-005: Protection System Maintenance and Testing Evidence

Standard Drafting Team Vacancies
Project 2007-12 Frequency Response: Seeking individual representing Transmission Dependent Utilities with experience in analyzing or modeling frequency response

Project 2010-07 Generator Requirements at the Transmission Interface: Seeking NERC-certified System Operator

Quick Reference
SPP RE
2012 Compliance Plan/Schedules - Homepage - Calendar - Entity Registration Application/Change Form - File Clerk - Compliance and Enforcement - Regional Standards Under Development - Subscribe to SPP email lists - Training and Education - webCDMS

NERC

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

RE Trustees
John Meyer, Chairman and Trustee
Gerry Burrows, Trustee
Dave Christiano, Trustee

Stakeholders can share concerns or feedback directly with the SPP RE Trustees by calling 888-394-2292. The phone line is staffed by a third-party provider who will ask the caller if s/he wants to remain anonymous. While SPP RE staff is always available to answer questions and discuss issues, this phone line gives stakeholders another tool for addressing compliance concerns.
RE General Manager
Stacy Dochoda, General Manager, (501) 688-1730
Sheila Scott, Administrative Assistant II, (501) 688-1798

Finance and Process Improvement
Alice Wright, Manager of Finance and Process Improvement, (501) 688-1773
Andrea Doucette, Administrative Assistant II, (501) 688-8207
Emily Pennel, Training and Education Specialist, (501) 614-3337

Compliance Monitoring, Critical Infrastructure Protection, System Events & Reliability Assessments
Ron Ciesiel, Executive Director, (501) 614-3265

Compliance Monitoring
Jeff Rooker, Lead Compliance Engineer, (501) 614-3278
Greg Sorenson, Senior Compliance Engineer, (501) 688-1713
Thomas Teafatiller, Senior Compliance Engineer, (501) 688-2514
Jim Williams, Lead Compliance Specialist, (501) 614-3261

Critical Infrastructure Protection (CIP)
Kevin Perry, Director of Critical Infrastructure Protection, (501) 614-3251
Shon Austin, Senior Compliance Specialist-CIP, (501) 614-3273
Steven Keller, Senior Compliance Specialist-CIP, (501) 688-1633
Leesa Oakes, Compliance Specialist II-CIP, (501) 614-3274
Jeremy Withers, Compliance Specialist II-CIP, (501) 688-1676

System Events & Reliability Assessments
Deborah Currie, Lead Engineer, (501) 688-8228
Alan Wahlstrom, Lead Engineer, (501) 688-1624

Enforcement
Joe Gertsch, Manager, Enforcement and Legal, (501) 688-1672

Attorneys
Jimmy Cline, Compliance Enforcement Attorney, (501) 688-1759
Clay Layson, Compliance Enforcement Attorney, (501) 688-1762
Tasha Ward, Compliance Enforcement Attorney, (501) 688-1738
Tyler Morgan, Compliance Enforcement Attorney, (501) 614-3521

Other Enforcement Staff
Jenny Anderson, Senior Compliance Analyst, Enforcement, (501) 614-3299
Daniel Haney, Law Clerk, (501) 688-2502
Stephanie Kimp, Law Clerk, (501) 688-2501
Bob Reynolds, Lead Compliance Engineer-Enforcement, (501) 688-8227
Machelle Porter, Paralegal, (501) 688-1681
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 at (501) 614-3337.

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.