1. Expedite mitigation of High Impact (HI) Violations

Objective: Encourage Registered Entities to mitigate HI violations as soon as possible.

The Enforcement staff identifies HI violations based on the intersection of the risk determination\(^1\) and the assigned Violation Risk Factor (“VRF”).

<table>
<thead>
<tr>
<th>Risk Determination</th>
<th>VRF</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lower</td>
</tr>
<tr>
<td>Minimal</td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td></td>
</tr>
<tr>
<td>Severe</td>
<td>X</td>
</tr>
</tbody>
</table>

Enforcement shall fast track HI violations to ensure they are mitigated as soon as possible. To accomplish this metric, Enforcement will solicit the submission of an acceptable Mitigation Plan, issue a Notice of Alleged Violation or Proposed Penalty or Sanction (“NAVAPS”), or issue a remedial action directive within 100 days of receiving the possible violation from the Compliance staff.\(^2,3\)

Measure: Average number of days to MP Acceptance, issuance of a NAVAPS, or issuance of a Remedial Action Directive from receipt by Enforcement for all HI violations.

\[(\text{As applicable, the date of MP acceptance, issuance of a remedial action directive, or issuance of the NAVAPS}) - (\text{the date the HI violation is sent to Enforcement}) = \text{days}\]

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of days</td>
<td>115</td>
<td>100</td>
<td>70</td>
</tr>
</tbody>
</table>

Weight: 10%

Comments:

i. A review of the HI violations processed in 2013 showed that a substantial number of these violations did not pose a substantial risk to the Bulk Electric System (“BES”). SPP RE proposes to modify the 2014 HI metric to ensure the HI designation is assigned to those violations that pose a substantive risk to the BES.

ii. The average days for each performance contribution were reduced by 5 days to reflect improvements in efficiency.

iii. This metric is aligned with and supports the ERO Enterprise Performance Metric 3: Risk Mitigation Effectiveness which is designed to identify, select, and mitigate high priority risks. Additionally, the metric directly supports the ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric F, which is aimed at improving the mitigation aging curve.

---

\(^1\) The initial risk determination will be made during the hand-off meeting between the Enforcement staff and Compliance staff following the Preliminary Screen.

\(^2\) HI violations may be exempted from HI treatment with Sanction Review Team approval.

\(^3\) HI violations without an accepted mitigation plan, issuance of a remedial action directive, or issuance of a NAVAPS on 1/1/14 will be included in the 2014 metric.
2. **Maintain caseload of no more than one year**

Objective: Maintain 2014 violation processing capability and efficiency to achieve a one-year caseload by 1/1/15.

As of 12/31/13, the SPP RE caseload is 186 violations. To achieve the metric, in 2014 SPP RE will send to NERC completed dispositions (i.e. compliance exceptions, settlements, Notice of Confirmed Violations (“NOCV”), Find Fix & Track (“FFT”), Spreadsheet Notice of Penalty, dismissals, and NAVAPS⁴) equivalent to 100% of the 12/31/13, Enforcement caseload.

Measure: \[
\text{Performance contribution} = \frac{\text{Number of completed dispositions}}{\text{Caseload on 12/31/13}} \times 100\%
\]

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>120%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent completed</td>
<td>80%</td>
<td>100%</td>
<td>120%</td>
</tr>
</tbody>
</table>

Weight: 10%

Comments: i. The weighting was changed from 15% to 10% to reflect the addition of metric 5, which also relates to the completion of violation dispositions in 2014.

ii. This metric is aligned with and directly supports the ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub Metric D, which is related to reducing the violation caseload and the time required to process violations.

3. **Accept or reject Mitigation Plans within 30 days of submission by the Registered Entity**

Objective: To accept submitted mitigation plans (“MP”) in accordance with Compliance Management Enforcement Program (“CMEP”) requirements

Measure: \[
\text{Contribution} = \sum \text{Months where 100% MPs accepted/rejected} \leq 30 \text{ days} \times 100\%
\]

<table>
<thead>
<tr>
<th>Contribution</th>
<th>\sum \text{Months where 100% MPs accepted/rejected} \leq 30 \text{ days} / 12 \times 100%</th>
<th>Enforcement must achieve a 100% success rate for acceptance/rejection \leq 30 \text{ days} in 2014 before becoming eligible for a performance contribution above 100%.</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal</td>
<td>100% MPs accepted/rejected \leq 30 \text{ days} / month</td>
<td>Average number of days to accept/reject = 20</td>
<td></td>
</tr>
</tbody>
</table>

⁴ The number of dismissals shall include those dismissals not requiring NERC approval but approved by the SRT. Disposition will include those violations presently on hold for which NERC has directed the REs to issue NAVAPS.

⁵ The 100% performance contribution is based on the number of months 100% of submitted mps are accepted/rejected within 30 days. For example, if Enforcement accepted/rejected 100% of the mps submitted within 30 days for 11 of 12 months in 2013 then the performance contribution would equal 11/12 x 100% or 91.6%. The 120% performance contribution is determined on an annual basis and is not available unless Enforcement achieves 100% mps accepted/rejected within 30 days for all 12 months.
Weight: 5.0 %

Comments: i. This metric is aligned with CMEP requirements and supports the ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub Metric F, aimed at improving the mitigation aging curve.

4. **Complete Mitigation Plan completion reviews within 25 days of Registered Entity notification of completion**

Objective: To complete the review of MP completions in accordance with SPP RE requirements.

Measure: Average MP completion review days

\[
\text{Days} = (\text{“certification received by region on” date in webCDMS}) - (\text{“mitigation verified on” date in webCDMS})
\]

<table>
<thead>
<tr>
<th>Performance Contribution</th>
<th>50%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avg. days for review of MP completion</td>
<td>35</td>
<td>25</td>
<td>15</td>
</tr>
</tbody>
</table>

Weight: 5.0%

Comments: i. The average days for each performance contribution was reduced by 5 days. The changes were made to reflect the historical performance of the SPP RE Enforcement staff and projected manpower availability.

ii. This Metric directly supports the ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub Metric F, aimed at improving the mitigation aging curve.

5. **Process pre-2013 violations and send to NERC by 11/20/14.**

Objective: To ensure older violations are processed in a timely manner.

Measure: (number of pre-2013 violation processed by 11/20/14) / (number of pre-2013 violation in the Enforcement caseload)

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>50%</th>
<th>75%</th>
<th>100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent sent to NERC</td>
<td>80%</td>
<td>90%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Weight: 7.5 %

Comments: i. This metric is aligned with a metric NERC established for its Enforcement staff. NERC’s goal is to ensure the timely processing of violations. SPP RE Enforcement is required to report to NERC monthly the status of violations older than the prior year. This metric adds an age component to the violations that SPP RE Enforcement must process in 2014.

---

6 FFT, Spreadsheet NOP, and Full NOP violations must be filed with NERC. For dismissals the Letter of Dismissal must be sent to NERC. This metric does not include violations on hold at NERC’s direction.

7 Multi-region pre-2013 violations where SPP RE is not the lead are not included in the metric.
ii. This metric is also aligned with and supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub Metric D*, which is related to reducing the violation caseload and time required to process violations.

6. **Complete incoming possible violation triage within 60 days of Compliance staff sending the possible violation to Enforcement**

**Objective:** To improve the speed and efficiency of the Enforcement process, SPP RE will determine the proposed disposition method for incoming violations and provide the Registered Entity with a Notice of Possible Violation or issue a compliance exception within 60 days of Compliance staff sending the possible violation to Enforcement, i.e., completion of the Preliminary Screen.

**Measure:** 
\[
\sum ((\text{date violation triage complete})^8 - (\text{date the violation was sent to Enforcement})) / (\text{violations sent to Enforcement between 1/1/14 and 11/1/14}) = \text{average days to complete violation triage}
\]

<table>
<thead>
<tr>
<th>Performance Contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average triage completion (days)</td>
<td>75</td>
<td>60</td>
<td>45</td>
</tr>
</tbody>
</table>

**Weight:** 5%

**Comments:**

i. This metric is aligned with the *Self-Report Improvements and FFT Enhancements* NERC has identified in the Reliability Assurance Initiative (“RAI”) Project. NERC’s goal is to improve efficiency and reduce the processing burden associated with minimal and moderate risk violations. Although SPP RE is not participating in a pilot project, this metric puts in place one aspect of the *Self-Report Improvement and FFT Enhancements* project designed to improve the enforcement process flow and communications with Registered Entities.

ii. This metric also supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub Metric G*, which is related to implementation of the RAI reforms.

---

*Violation triage is complete the earlier of the date the issuance of a compliance exception letter, Notice of Possible Violation or a Letter of Dismissal is sent to the Registered Entity.*
7. **Complete documentation close-out of all violations within 60 days of issuance of the Notice of Completion of Enforcement Action.**

**Objective:** To ensure Enforcement case records and webCDMS are complete and include all documentation necessary to support the processing of a violation.

**Measure:** Violation documentation close-out has successfully occurred when:

1. SPP RE File Clerk has synced a Notice of Completion of Enforcement Action ("NCEA") to NERC, causing the violation status to shift to “closed” status within webCDMS.
2. Case Manager reviews the Violation Case Record and the Case Record folder is complete.
3. Substantive and relevant violation documentation has been copied to the violation Enforcement Docket folder and the folder is complete.
4. Documents required for sync with NERC have been uploaded to webCDMS.
5. webCDMS data fields have been completed and verified as accurate.
6. SPP RE File Clerk signs a Certification of Case Record Close-Out and saves the certification to the Enforcement Docket folder.

Percent completed violation documentation close-out within 60 days of NCEA = (Total number of violations with documentation close-out completed <= 60 Days) / (Total number of violations closed as of 11/1/14)

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent violation documentation close-out completed within 60 days</td>
<td>80%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Weight:** 5%

**Comments:**

i. This metric is a continuation of the 2013 metric but has been modified to only address violations closed during 2014. Because Enforcement has substantially completed the backfill of information and documentation in webCDMS and the Enforcement Docket, this metric was changed to reflect the ongoing need to properly close-out violations once the NCEA has been issued.

ii. The weighting was reduced from 7.5% to 5% to reflect the importance of the metric in relation to other metrics.

iii. The upper-end performance contribution was eliminated since no significant benefit is derived from completing the violation close-out of violation in less than 60 days.

iv. This metric indirectly supports *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric K*, related to stakeholder satisfaction and perception by supporting the speedy close-out of violations.

---

9 A violation is closed when the NCEA is issued. For metric purposes, the closed violations subject to the metric will be derived from the NCEA’s issued between 1/1/14 and 11/1/14.
8. **Publish non-public off-site audit report to NERC**

**Objective:** To ensure non-public off-site audit reports are issued in a timely manner.

**Measure:** Average number of calendar days as measured from the last day of the audit to submission of the non-public audit report to NERC.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>120%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of days</td>
<td>55</td>
<td>50</td>
<td>45</td>
</tr>
</tbody>
</table>

**Weight:** 7.5%

**Comments:**

i. The average number of days associated with the 80% and 100% performance contribution were reduced by 5 days. Additionally, the weighting was reduced to 7.5% from 10%. The changes were made to reflect historical performance and changes in the audit report requirements.

ii. This metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric D*, which is related to the transparency and timeliness of compliance results.

9. **Publish non-public on-site audit report to NERC**

**Objective:** To ensure non-public on-site audit reports are issued in a timely manner.

**Measure:** Average number of calendar days as measured from last day of the audit to submission of the non-public audit report to NERC.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>120%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of days</td>
<td>80</td>
<td>70</td>
<td>60</td>
</tr>
</tbody>
</table>

**Weight:** 7.5%

**Comments:**

i. The number of days associated with the 100% and 120% performance contribution were reduced by 5 days. Additionally, the weighting was reduced to 7.5% from 10%. The changes were made to reflect historical performance and changes in the audit report requirements.

ii. This metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric D*, which is related to the transparency and timeliness of compliance results.
10. **Review and issue determination for BES registration and deactivation requests**

Objective: To ensure new registration and deactivation requests submitted are reviewed and issued in a timely manner.\(^{10}\)

Measure: Average number of business days from SPP RE’s receipt of completed forms, including one-lines and all requested supporting data, to notifying the Registered Entity of the registration/deactivation decision.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>120%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of days</td>
<td>15</td>
<td>10</td>
<td>5</td>
</tr>
</tbody>
</table>

Weight: 5%

Comments: i. This is a new metric to address anticipated Registered Entity requests for registration/deactivation changes based on BES definition changes effective 7/1/14.

ii. This metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric C*, which is related to the implementation of risk-based registration criteria.

11. **Publish internally completed assessment of Self-Certification/periodic data submittals**

Objective: Complete and publish internal assessments of Self-Certification and periodic data submittals by the due dates established in the SPP RE reporting requirements schedule.

Measure: \[
\text{(number of assessments completed by the due date) / (total number of assessments for 2014) = percent completed on time}
\]

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>90%</th>
<th>100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent completed on time</td>
<td>80%</td>
<td>90%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Weight: 5%

Comments: i. The 2013 performance contribution was changed to eliminate the 110% performance contribution associated with 100% achievement of the goal and include appropriate performance contributions for corresponding goal completions. The weighting was changed from 2.5% to 5% to reflect a greater emphasis on completion of the assessments.

ii. This metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric D*, which is related to the transparency and timeliness of compliance results.

\(^{10}\)This metric does not include processing Self-determination notifications or Exception related to individual elements.
12. **Process incoming possible violations to NERC through webCDMS in 5 business days or less**

**Objective:** To ensure possible violations are processed in webCDMS in a timely manner.

**Measure:** Average number of business days to enter possible violations into webCDMS as measured from the date of the Registered Entity exit presentation (audit, spot-check, etc.), or from the date the Registered Entity self-reported, as applicable, to completion of the Preliminary Screen.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>120%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of days</td>
<td>7</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

**Weight:** 5%

**Comments:**

i. The 110% performance contribution was increased to 120% and the days associated with the 80% performance contribution was changed from 6 days to 7 days to provide a more appropriate relationship between performance contribution and number of days.

ii. This metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric D*, which is related to the transparency and timeliness of compliance results.

13. **Control out-of-pocket expenses for on-site/off-site audits (contractor billings and travel)**

**Objective:** Reduce out-of-pocket travel expense for on-site audits and contractor billings for on-site and off-site audits by improving efficiency and expanding the role Compliance staff plays in the production of audit reports.

**2014 Budget (per audit):**

- **On-Site:**
  - CIP: $44,691
  - O&P: $42,070

- **Off-Site:**
  - CIP: $0
  - O&P: $5,470

**Measure:** 

\[
\frac{[(2014 \text{ budget}) \ - \ (2014 \text{ actual})]}{[2014 \text{ budget}]} = \text{percent increase/decrease in expenses}
\]

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent difference</td>
<td>+10%</td>
<td>0%</td>
<td>-10%</td>
</tr>
</tbody>
</table>

**Weight:** 10%

**Comments:**

i. This metric tracks out-of-pocket expense for audits (It does not track internal man-hours or fixed overhead expense.) The total of contractor billings and travel expense for audits is tracked and monitored. The 2013 actual expense was used as a starting point, and the 2014 budget was used as the basis. An adjustment was made to reflect one
additional contractor per on-site audit for CIP audits. The travel expense was adjusted to reflect recent increases in airfare, and hotel prices.

**ii.** This metric’s weighting was changed from 7.5% to 10% to reflect its importance in relation to the other metrics.

**iii.** A 10% reduction is associated with the 150% performance contribution to reflect the difficulty in achieving budget reductions on top of those achieved in 2013. The 80% performance contribution is achieved by limiting expenditures to less than 110% of the budget.

### 14. **Continue outreach/assessment to maintain or improve protective relay operations success rate for 4Q2013 – 3Q2014**

**Objective:**

Improve the operations success rate for transmission and generation protective relay systems (i.e. reduce the rate of misoperations) through various outreach mechanisms, i.e. System Protection and Control Working Group, compliance workshops, and webinars.

**Measure:**

\[
\text{performance contribution} = \frac{(\text{total number of correct operations})}{(\text{total number of operations})} \times 100\%
\]

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Success rate</td>
<td>84%</td>
<td>87%</td>
<td>90%</td>
</tr>
</tbody>
</table>

**Weight:**

2.5 %

**Comments:**

i. Although SPP RE does not have direct control over the operations success rate of protection system relays, SPP RE will continue to focus its outreach and assessment efforts to reduce misoperations within the SPP region.

**ii.** This metric’s weighting was changed from 5% to 2.5% to reflect its importance in relation to the other metrics.

**iii.** This metric is aligned with and directly supports the *ERO Enterprise Performance Metric 1: Reliability Results*, which is related to the reduction of BPS events. Additionally, this metric indirectly supports the *ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric I*, which is related to assessment of quality and availability of planning and engineering models and data.
15. **Assure proper Cause Codes can be verified from Event Analysis Reports issued by SPP RE Registered Entities**

**Objective:** To ensure regional events are tied to their causes as accurately as possible to support NERC’s continent-wide tracking and trending.

**Measure:** Regional success rate published in periodic NERC report.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Success rate</td>
<td>80%</td>
<td>90%</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Weight:** 5%

**Comments:**

i. The 110% success rate was eliminated because it is not possible to publish greater than 100% of the applicable reports before the required delivery date.

ii. This metric is aligned with and supports the ERO Enterprise Performance Metric 1: Reliability Results and Metric 2: Assurance Effectiveness, which are related to reducing the number of Category 3 – 5 events.

16. **Outreach Production Goals**

**Objective:** Complete 3 workshops, 6 webinars, 12 newsletters

**Measure:**

1. Percent completion: The number of workshops, webinars and newsletters completed in 2014 / (21), the number of workshops, webinars and newsletters planned for 2014.

2. An average outreach rating ≥ 3 for videos, webinars, workshops and newsletters is required for a performance contribution.

<table>
<thead>
<tr>
<th>Performance contribution</th>
<th>80%</th>
<th>100%</th>
<th>150%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent completion</td>
<td>80% + ≥ 3 Rating</td>
<td>100% + ≥ 3 Rating</td>
<td>100% + ≥ 4 Rating</td>
</tr>
</tbody>
</table>

**Weight:** 5%

**Comments:**

i. The number of planned webinars has been reduced from 9 (2013) to 6 (2014) due to the addition of break-out sessions at workshops.

ii. A quality factor was added by requiring a ≥ 3 or ≥ 4 average outreach rating for videos, webinars, workshops and newsletters in the 2014 SPP RE Stakeholder Satisfaction Survey.

iii. The 110% performance contribution was changed to 150% to align it with the other performance metrics and reflect the difficulty and benefit of achieving a ≥ 4 average outreach rating for videos, webinars, workshops and newsletters in the 2014 SPP RE Stakeholder Satisfaction Survey. The weighting was increased from 2.5 % to 5% to reflect a greater emphasis on outreach.
iv. This metric indirectly supports the ERO Enterprise Performance Metric 4: Program Execution Effectiveness, Sub metric A (the quality of board-approved standards), Sub metric E (increasing self-identified non-compliance by Registered Entities), Sub metric F (improving the mitigation aging curve), Sub metric G (implementation of RAI reforms), Sub metric H (increased participation in security model assessments and ES-ISAC), and Sub metric K (improving stakeholder satisfaction and perception).