December 18, 2014

Email
All Primary Compliance Contacts of Registered Entities in SPP RE footprint

Re: SPP RE 2014 4th Quarter Required Reports

SPP RE 2014 Annual Self-Certification
SPP RE 2014 4th Quarter FAC-003-3 Periodic Data Submittal
SPP RE 2014 4th Quarter PRC-004-2a Misoperation Data Submittal

Reporting Periods:
Annual Self-Certification: January 1, 2014 - December 31, 2014
All others: October 1, 2014 – December 31, 2014

Submission Periods:
4th QTR FAC-003 Periodic Data Submittal: Jan 2, 2015 – Jan 15, 2015
4th QTR PRC-004 Periodic Data Submittal: Jan 2, 2015 – Feb 28, 2015

NERC annually designates specific reliability standard requirements for Registered Entity Annual Self-Certification. The SPP RE, at its discretion, determines periodicity and may select other reliability standard requirements in addition to those designated by NERC. All registered entities are required to complete and submit Self-Certifications for applicable functions. Additionally, All Transmission Owners are required to submit the FAC-003-3 Fourth Quarter Periodic Data Submittal. All standards and their periodicities monitored through self-certifications and periodic data submittals are listed in the SPP RE 2014 Reporting Requirements which is available on the SPP RE website and in webCDMS.

All GOs, TOs, and DPs must complete the PRC-004 data submittal.

Failure to complete these reports by the specified deadlines could result in a violation for every requirement with which your entity must comply.

webCDMS: Accessing the Self-Certification and Periodic Data Submittal Forms

The webCDMS system will be used for Self-Certification and Periodic Data Submittals. The URL for webCDMS is:

https://www.cdms.oati.com
Submittal Instructions for Self-Certification
Entities should apply self-diagnosis before determining their status. When evaluating violations discovered through an audit, spot check, or investigation, the self-certification history of the violated requirements will be considered throughout the enforcement process. The SPP RE uses its web-based Compliance Data Management System (webCDMS) Self-Certification function to perform Self-Certifications. The webCDMS Self-Certification Function allows the registered entities to answer either “Compliant”, “Not Compliant”, “Do Not Own”, or “Not Applicable” for each of the applicable reliability standard requirements designated for Self-Certification.

A response of “Compliant” indicates that the entity: a) did not have any violations, b) has completed mitigation on an Open Enforcement Action before the start of the reporting period, c) the requirement is applicable and the entity is fully compliant for the reporting period and has evidence of compliance, or d) an applicable “event” driven requirement did not occur.

A “Not Compliant” response indicates that the entity had a new violation(s) or has an Open Enforcement Action that has not completed mitigation prior to the start of the reporting period. The NERC Violation ID number should be provided in the comments section if the violation was previously identified.

A “Not Compliant” response and a “Yes” response to “Has the violation previously been reported or discovered?” indicates an Open Enforcement Action.
1. Click “Edit OEA” to open the open the Self –certification Requirement screen.
2. Click on the “Select” button to select a violation which has previously been reported- a list of violations previously created for the standard requirement will display. Complete form and click “save”.

A “Not Compliant” response and a “No” response to “Has the violation previously been reported or discovered?” indicates a new violation is being reported. Click the edit detail button and complete the information required on each screen.

Further information on reporting Not Compliant responses via a Self- Certification can be found at the SPP RE website 2013 Self Assess Webinar presented November 21, 2013. This webinar addresses webCDMS enhancements to self-certification reporting that went into production in December 2013.

A “Do Not Own” response indicates that the entity did not own the applicable facilities, and as such the reliability standard requirement does not apply.
A “Not Applicable” response indicates the requirement does not apply to the registered entity for a reason other than facility ownership or the entity has not identified any Critical Cyber Assets (note that all entities subject to the CIP standards must self-certify to CIP-002-3, requirements R1 through R4 and CIP-003-3, requirement R2; however any Registered Entity that declares ownership of any Critical Cyber Assets must self-certify to all requirements in CIP-002-3 through CIP-009-3).

Comments are required for ALL “Not Compliant”, “Not Applicable”, or “Do Not Own” responses. The self-certification data entry will open on Jan. 2, 2015 and is due by Feb. 28th, 2015. Any self-certification submittals after Feb. 28th will be marked in webCDMS as a “late” status.

Entities should do a thorough self-review and ensure their programs meet compliance before self-certifying. Honest and robust self-assessment is fundamental to the success of the compliance program. Your responses to self-certification as well as any late submittals are reviewed as a routine part of all future compliance activities. If an entity is no longer registered for a particular registration function, they will not be required to self-certify for those requirements associated with that function. The CIP self-certification is only required annually.

All quarterly and annual self-certifications will require a Corporate Signature Page signed by senior management and uploaded into webCDMS by the close of the reporting period. The appropriate self certification Corporate Signature Page for either CIP or Operations and Planning can be downloaded from the compliance/document download section of webCDMS for completion and signatures. To upload a Corporate Signature Page, click the gray “Entity Documents” link on the left side of the entry screen, then click the “Add Document” button to attach the file. Please check the “Corporate Signature Page has been Uploaded” box in webCDMS prior to submitting your Self Certification responses. To verify the document uploaded correctly in webCDMS, the entity documents link on the left side of the Self Certification Details screen should list the number of documents successfully uploaded.

Please do not upload the Corporate Signature Page to a specific requirement as it will not map to the Entity Document section stated above.

Any questions related to the Self-Certification process for Operations and Planning Standards should be directed to Jeff Rooker at jrooker.re@spp.org or 501-614-3278. For Self Certification questions related to the CIP standards, contact Jeremy Withers at jwithers.re@spp.org or 501-688-1676.
Submittal Instructions for the Quarterly FAC-003-3 Periodic Data Submittals (TO only) due January 15, 2015

The periodic data submittal form to address vegetation-related transmission outages is available on webCDMS under Compliance, Document Download. All Transmission Owners must fill out the FAC-003-3 data submittal form and submit via the webCDMS data submittal portal under the tab “Fourth Quarter 2014 FAC-003 Report”. The reporting form is new this quarter (do not use the old form). This data submittal will be open from Jan 2, 2015 to Jan 15, 2015.

Any questions related to FAC-003 data submittal should be directed to Mike Hughes at mhughes.re@spp.org or 501-688-1712.

Submittal Instructions for PRC-004-2a Misoperation Submittals (TO, GO and DPs)

SPP RE uses the webCDMS “RAPA” module to collect misoperations data from registered entities. A webinar was presented on March 22nd, 2013 to explain the submittal process. A copy of the presentation slides can be found here. A Frequently Asked Questions document was also provided and can be found here. Please follow the instructions as outlined in the webinar slides to submit your misoperations.

The attestation page contains a table to submit the total number of Protection System Operations experienced. The NERC definition for Protection System Operation can be found in the FAQ document. Be sure to count ALL Protection System Operations as outlined in the NERC definition.

This data submittal will be open from Jan 2, 2015 to Feb 28, 2015.

Any questions related to Misoperations should be directed to Thomas Teafatiller at tteafatiller.re@spp.org or 501-688-2514.

Verification of Entity Compliance Contact Information

Please verify and update the contact information on webCDMS. In order to facilitate timely communication, it is essential that the contact information in webCDMS is correct. Please verify that your company’s address is correct. Additionally, please verify your company’s identified Chief Executive Officer, Primary Compliance Contact, and Authorized Officer contact information is correct. If necessary, you may add additional Alternate Primary Compliance Contacts who will be contacted in case the Primary Compliance Contact cannot be reached.
If you have any questions on a submittal, please contact the staff person noted in that section.

Sincerely,

Jeff Rooker

Jeff Rooker

Copy to:
Registered Entities Alternate Primary Compliance Contact
Registered Entities Authorizing Officer
SPP RE General Manager