Self-Certification Update/webCDMS Enhancements

April 6, 2012
Outline

• General discussion on Self-Certification
• Open Enforcement Action (OEA) enhancement
• Demo by OATI on new enhancement
About Self-Certifications

• For each identified standard, entity attests:
  – Compliant
  – Do Not Own
  – Not Applicable
  – Not Compliant
    ▪ New! - Open Enforcement Action Form

• 1Q reporting period opened 4/2/12 and closes 4/30/12
  – Applicable only to registered functions in 2012 Reporting Schedule

• Requires Corporate Signature Page signed by senior management and uploaded into webCDMS by close of reporting period
When to select “Compliant”

• Met standard requirements and have evidence to demonstrate compliance
• Fully compliant during entire reporting period
• Completed OEA mitigation before reporting period starts
• “Event-driven” requirement did not occur; entity is fully compliant for reporting period

• **NOTE:** Do not select Compliant if requirement does not apply to you. “Compliant” indicates you have evidence of compliance.
When to select “Do Not Own”

- Requirement does not apply because you do not own applicable facilities
- Comments are required
- Examples:
  - PRC-001 R6 and PRC-017-Special Protection Systems
  - NUC-001- Nuclear Facilities
  - FAC-003-Vegetation Management
  - PRC-011 - UVLS
  - PRC-008 - UFLS
When to select “Not Applicable”

- Requirement does not apply for reason other than facility ownership
- Comments are required
- *Example*: EOP-002 R9-LSE in Energy Emergency Alert-TSP raise priority from non-firm Network to firm Network service
  - Not permitted in SPP Tariff
When to select “Not Compliant”

• Not fully compliant during entire reporting period
  – Have OEA and did not complete mitigation before start of reporting period, or
  – Violation occurred during reporting period that has not been reported yet

• Comments are required for any indication of Not Compliant
Not Compliant – New Violation

• Will continue to generate a violation and Mitigation Plan in webCDMS
Not Compliant - OEA

- If you have OEA and did not complete mitigation before start of reporting period
- Add NERC violation number in comment field
- Indicate if violation scope was expanded
  - Will open new webCDMS data fields for completion
- Indicate if violation was reported to other REs
- Submittal of OEA will not generate a new violation and Mitigation Plan in webCDMS since violation has already been reported
  - SPP RE may create a violation on review when appropriate
Access Open Enforcement Action Form

Select “Not Compliant”

Put NERC violation number in comment field

Select “Yes” and “Edit OEA” to display OEA Form
Completing OEA Form

“Select” OEA with associated NERC ID

“Yes” if scope has expanded

Select earliest date you reported to another region

With “yes”, other fields will display for completion. With “no”, additional fields will be greyed out
Completing OEA Form

Self-Cert Requirement - Open Enforcement Action

Requirement: CIP-001-2a R1

*Violation:
Discovery Method:
Date Reported To Region:
*Has the scope of Violation Expanded?: No

For these fields, use same information as you would for Self-Report

Date Mitigating Activities Completed (if applicable):

*Potential Impact to BPS: Please select...
*Actual Impact to BPS: Please select one...

*Description of Potential and Actual Impact to BPS:

*Risk Assessment of Impact to BPS:

Additional Entity Comments:
Self-Certification OEA Summary

- Available under Compliance tab
- Provides summary of all Requirements indicated as “OEA”
- SPP RE will review and has option to create new violation
OATI DEMO
Keep in mind...

- **Save, Save, Save.** Once submitted, Self-Certification and OEA Form will be locked.
- Entities should apply thorough review and self-assessment before determining status.
- Honest, robust self-assessment is fundamental to a strong internal compliance program.
- SPP RE will review your Self-Certification responses/history as a routine part of all future compliance activities.
Summary

• Meet the compliance submittal deadlines
• Submit the correct attestation form
• Review each requirement carefully to determine applicability to your registered function and appropriate compliant response
• Consider mitigation completion date of OEA in your “Compliant” or “Not Compliant” response
• Call us if you have questions
Please give us feedback on today’s webinar

Please take...

Anonymous, 6-Question Survey

...to let us know how we did and share ideas for future webinars/workshops
Upcoming Events

• **CIP Workshop**, May 22-23, Dallas. [Download Agenda]

• **Review of Standards Effective in 2012/2013** webinar, May 31, 2:00-3:00 CST

• **Long Term Reliability Assessment - Stakeholder Input** webinar, May 30, 9:00-10:00 CST

• **Fall Compliance Workshop**, Nov. 13-14, Little Rock

• **RE Trustee Meetings**
  – **April 23, 2012** – Oklahoma City, Oklahoma
  – **June 19, 2012** – Budget meeting – Little Rock, Arkansas
  – **July 30, 2012** – Kansas City, Missouri
  – **October 29, 2012** – Little Rock, Arkansas
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