SPP RE PROPOSED ADJUSTMENTS TO CMEP PROCESSES

JULY 2009

Pre-Audit Activities

1. Implement recommended changes to the SPP RE Audit notification documents:
    a. Registered Entity rights and responsibilities concerning the production of evidence
    b. Change language of certain sections to conform more strictly to the formal language of the CMEP
2. Proposal to add secure data submittal/retrieval site to SPP RE database in August 2009. This proposal has been in the works for several months and it is now being tested by the SPP RE staff.
3. Deployment of national Reliability Standards Auditor Worksheets [RSAWs] on audits
4. Addition of 1-2 pre-audit review days for each on-site audit; Addition of ½-1 pre-audit day for off-site audits [precise time requirements is still under review and will be adjusted according to experience]

On-Site Activities

5. Sampling changes were recommended by the regional CMPWG and discussed by RCIG at July 2009 meeting. Expected increase across the board for sampling activities. Linked to the additional time discussed in item 4 above
6. All on-site teams have been expanded with 3-person CIP team with more expertise in communications and data transfer
7. For standards that are reviewed by SPP RE staff outside of the audit process, add completed evidence and review documents to the audit folder for all audits
8. Perform complete audit on all standards, including standards from item 7 above, when accompanied by observers
9. Review procedures for team discussions. Presently, the audit team convenes during the evening to discuss the activities of the current day and preparing for the next day activities. Several participants have suggested shorter but more frequent break-out sessions for the teams.

Post-Audit Activities

10. Add a more formal post-audit review by next level of management or independent reviewer
11. Quicker and more formal handoff of violations from the audit team to the NERC Workbook Administrator/Enforcement team

Other Activities Under Consideration

12. Develop a more definitive audit proposal for activities performed by the SPP RTO. Example: next-day studies – how do we determine that the TOP and/or SPP RC actually performed the studies each day and that they were reviewed by the TOP?
13. Improve situational awareness activities
    i. Education
    ii. Criteria Changes
    iii. Compliance Forums
    iv. Compliance Workshops
    v. Screening
    vi. Improved/Increased Reporting