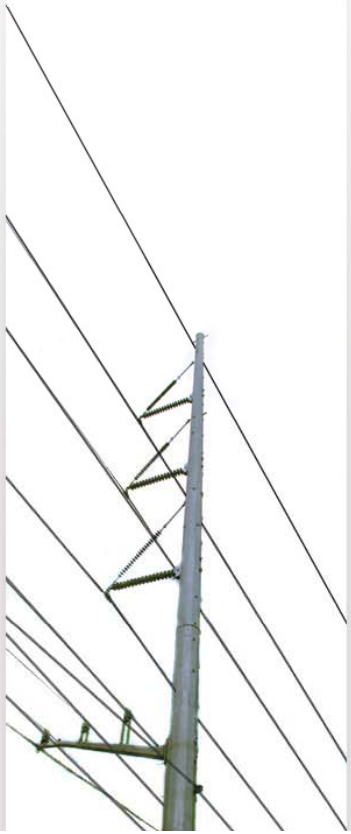
SPP Southwest Power Pool Regional Entity



Helping our members work together

to keep the lights on...

today & in the future

SPP Southwest Power Pool Regional Entity

Enforcement Update
January 25, 2010

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Southwest Power Pool Regional Entity

Most Frequently Violated Reliability Standards

CIP-004-2 Cyber Security – Personnel & Training

FAC-008-1 Facility Ratings Methodology

FAC-009-1 Establish & Communicate Facility Ratings

PRC-005-1 Transmission and Generation Protection System Maintenance and Testing

Most Frequently Violated Reliability Standards

Standard	Number	Percent
CIP-004-2	19	9.5
FAC-008-1	18	9.0
FAC-009-1	15	7.5
PRC-005-1	36	18.0
Total	88	44.2

Based on violations as of 1/15/10.

CIP-004-1

R2 - Establish Cyber Security Training program and training personnel annually

3 violations – not all personnel trained annually

3 violations – training program missing required elements

R3 - Perform personnel risk assessment and background checks

9 violations – background checks not performed before access granted or not renewed within 7 years

R4 - Maintain personnel access list and eliminate access if employment status changes

2 violations – master list errors

2 violation – master list quarterly review not performed or incomplete

2 violations – personnel access not revoked within prescribed time

FAC-008-1

R1/R2 – develop a documented Facility Ratings Methodology

12 violations – no methodology or methodology not documented

3 violations – incorrectly relied on SPP Criteria, Section 12

3 violations – failed to correctly identify the scope of the methodology

FAC-009-1

R1 – establish facility ratings consistent with the Facility Rating Methodology

12 violations – related to not having a Facility Rating Methodology

3 violations – related to incorrectly identifying the scope

PRC-005-1

R1 – documented Protection System maintenance and testing program

11 violations – failed to include all Protection System devices

3 violations – Protection System maintenance and testing not documented

R2 – evidence Protection Systems were maintained and tested

13 violations – related to failure to correctly identify the scope

9 violations – failed to maintain and test within interval

Why the violations occur?

- ❖Registered Entities are required to perform a large quantity of individual tasks and manage the associated documentation.
- ❖Standards are technically oriented.
- ❖Requirements of the standards do not align with normal utility practice.
- ❖Inattention to detail.
- ❖Zero tolerance.
- ❖No statute of limitations.

Anticipated Future Violations

Near Term

Violations will continue at the present or a higher frequency

No statute of limitations.

Long Term

A reduction in violations will occur due to:

Elimination of procedural and scope errors

Standards improvements

Improved Registered Entity performance

Questions?