Southwest Power Pool
Regional Entity

RE SURVEY RESULTS
2010 REPORT

October 15, 2010

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EXECUTIVE SUMMARY

Consistent with Southwest Power Pool's (SPP) member-driven value proposition, the SPP Regional Entity (SPP RE), an independent and functionally separate division of SPP, conducts an annual survey of all the entities registered in the SPP RE footprint. The survey gives the SPP RE's entities an opportunity to assess the SPP RE's effectiveness. The RE Trustees and RE General Manager use the survey results to help measure registered entities' satisfaction with the RE's administration of its NERC-delegated functions.

With the assistance of the SPP Communications Department, the SPP RE opened the 2010 survey on September 6 and closed it on September 17. Each registered entity was asked to submit one response. Thirty-eight of the 128[1] entities registered in the SPP RE footprint elected to complete the survey[2], which represents a response rate of approximately 30%. In 2009, 33 responses were submitted.

The 2010 survey results were generally consistent with those of 2009.[3] Most of the responding entities rated the SPP RE's Compliance Monitoring and Enforcement, Standard Development, and Training services as adequate to excellent. The average satisfaction ratings from the responding entities, along with the level of importance attributed to these services, were:

Service	Satisfaction with SPP RE's Provision of Service[4]		Importance of Service[5]	
	2010	2009	2010	2009
CMEP	3.4	3.8	4.3	4.5
Standards Development	3.2	3.3	3.3	3.8
Training	3.3	3.6	3.8	3.9
Overall Service	3.6	4.0	N/A	N/A

Attributes of the SPP RE's services receiving the most favorable comments include:

1. The RE and its staff members' ability to remain independent of owners, operators, and users of the bulk power system;

2. RE staff members professionalism;

3. RE staff members' responsiveness to the entities' needs; and

[1] There were 128 entities registered in the SPP RE as of September 6, 2010. As of October 1, the number of registered entities increased to 131.
[2] Respondents were asked to skip questions that were not relevant to them or their organization. Therefore, for some questions, the number of responses was less than the total number of responding entities.
[3] As with the presentation of the 2009 survey results, which were analyzed by Ariel Strategic Communications, the 2010 survey results have been analyzed using numeral values rather than percentages due to the small number of responses. (See the 2009 RE Survey Analysis Report prepared by Ariel at 3.)

[4] Ratings are based on a scale of 1 to 5, with 1 being poor and 5 being excellent.
[5] Ratings are based on a scale of 1 to 5, with 1 being not important and 5 being important.

4. The usefulness of the RE's compliance workshops and forums.

Areas where opportunity for improvement exist, or where further evaluation and monitoring may be warranted, include:

1. The usefulness of SPP's website in meeting stakeholders' needs;

2. Multiple email list-servs and/or exploder lists used by the SPP to send information to the entities; and

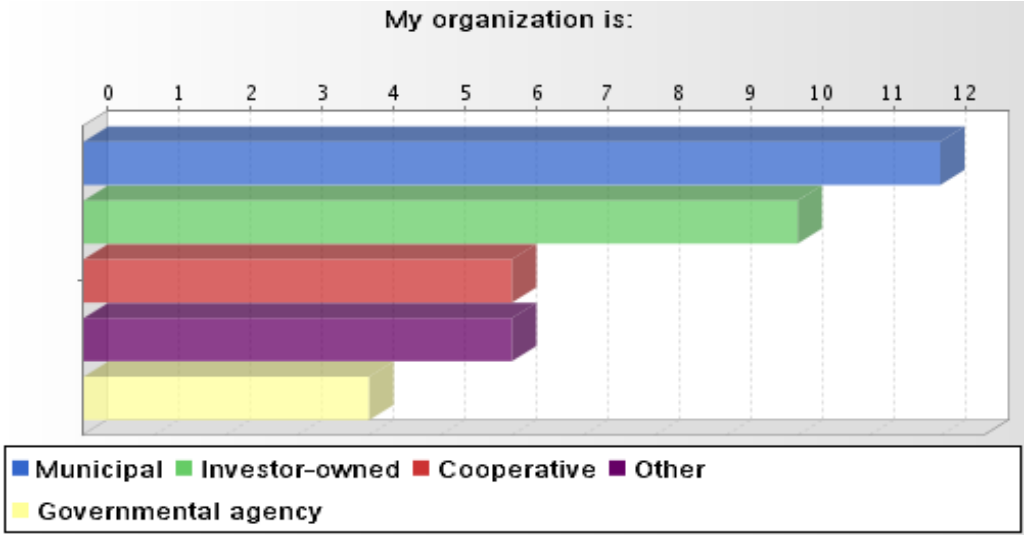
3. Entities' concerns regarding the various Critical Infrastructure Protection (CIP) compliance monitoring processes and procedures.

The results for each item included in the 2010 survey are detailed in the following section. Graphical comparisons of the 2010 and 2009 survey results, and where available the 2008 results, are presented on pages 33 through 36.

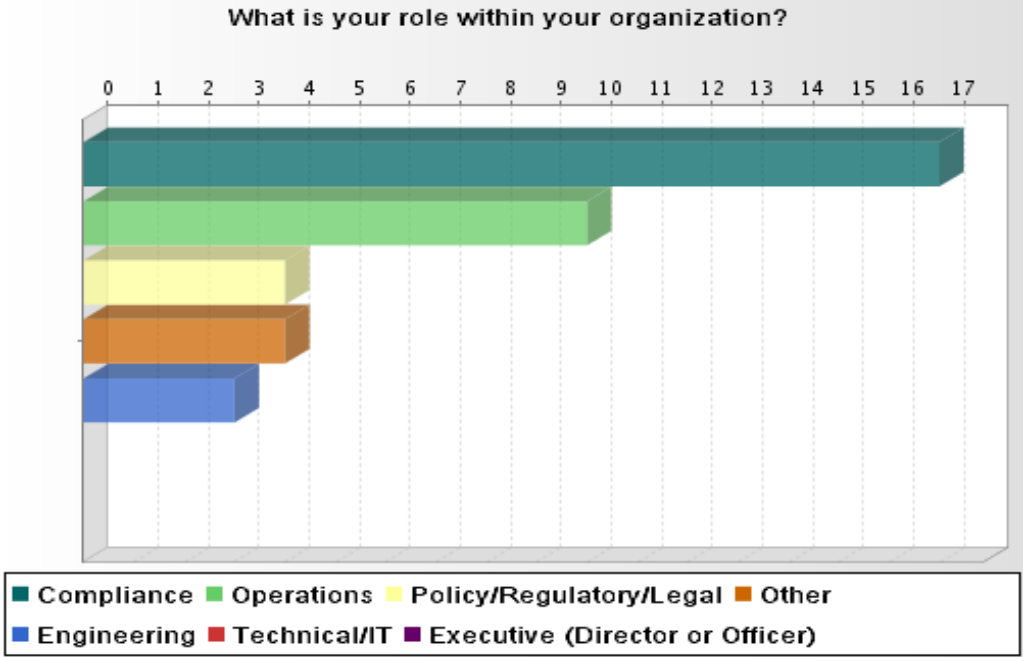
DETAILED SURVEY RESULTS

Profile of Responding Entities

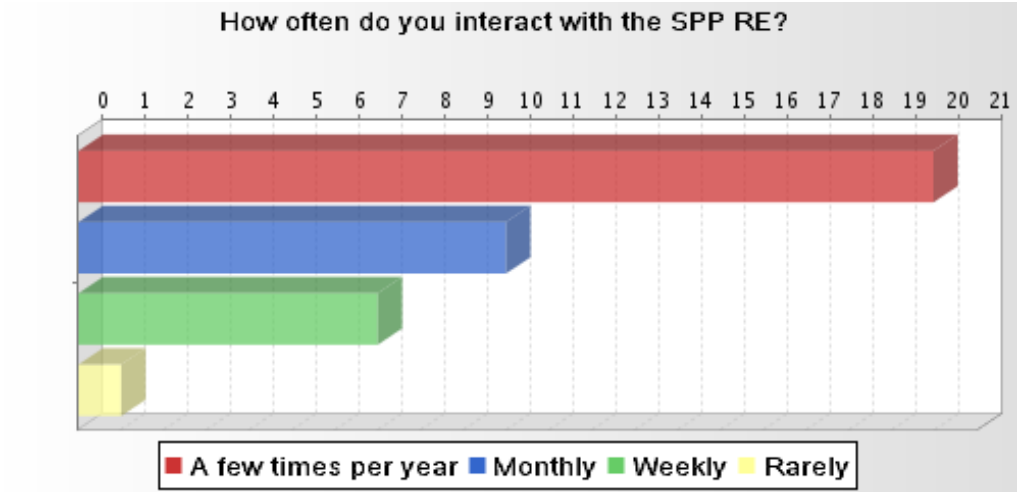
Of the 38 entities that submitted responses, all but six identified themselves as either investor-owned (10), municipal (12), cooperative (6), or governmental agency (4). The remaining six entities identified themselves as PSE, Power Marketer, IPP, Privately Owned, Supplier, and General Partnership.



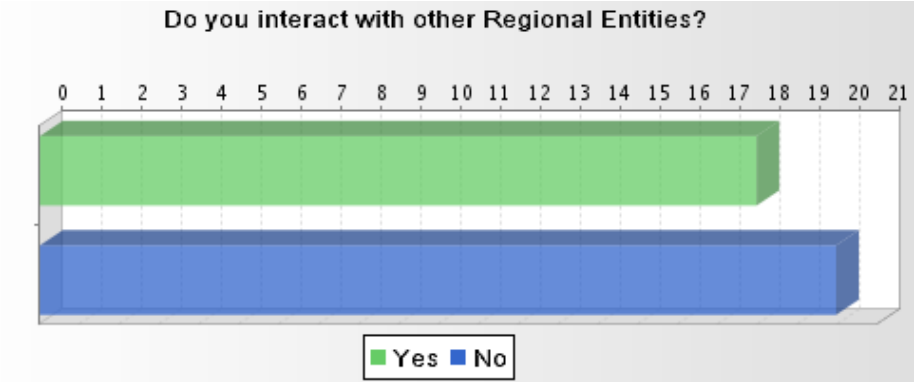
Thirty-four of the respondents viewed their role as compliance, operations, engineering, or policy/regulatory/legal. Three of the four respondents selecting "other" indicated their job involved some aspect of one or more of these four fields.



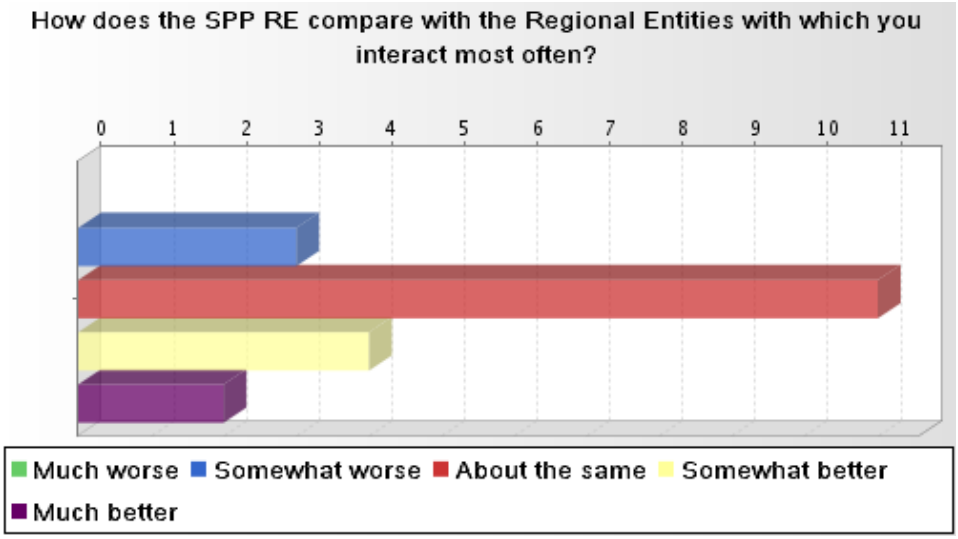
Seventeen of the responding entities indicated they interact weekly (7) or monthly (10) with the SPP RE, while 21 indicated they interact with the SPP RE only a few times per year (20) or rarely (1).



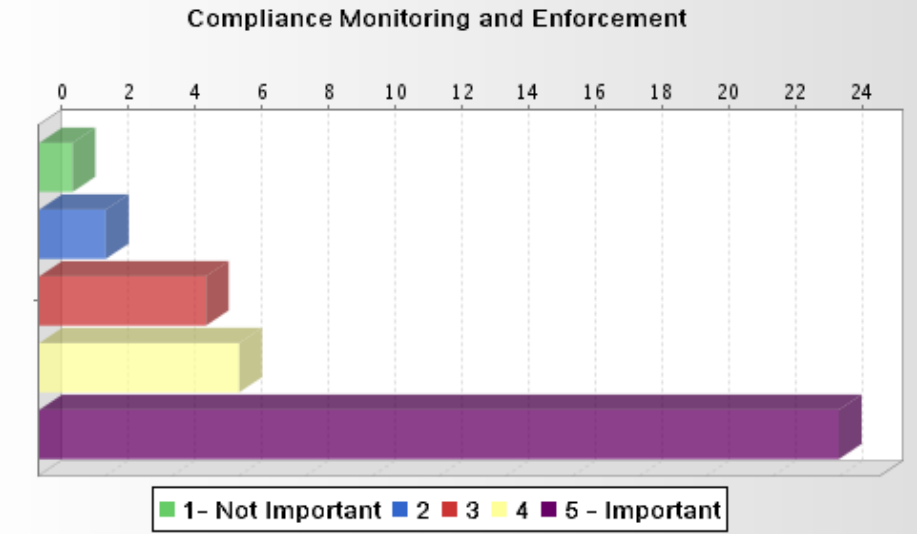
Eighteen of the responding entities also interact with other regional entities, while the remaining 20 did not.



When asked how the SPP RE compared with the other regional entities with which they interact most often, all but three entities indicated the SPP RE was about the same, somewhat better, or much better.[6] The average rating for this item was 3.3.[7]

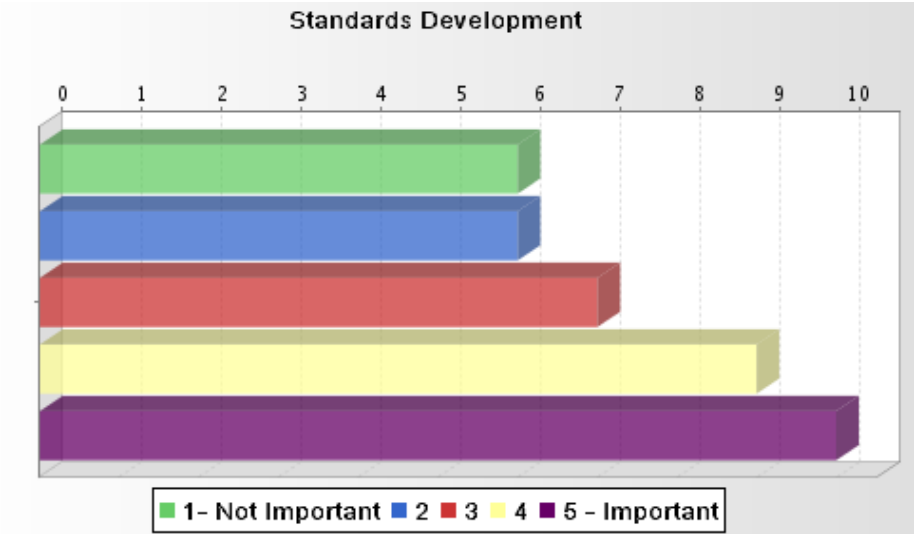


The majority of the respondents (24) view SPP RE's Compliance Monitoring and Enforcement (CMEP) Services as important, with one respondent indicating that it was unimportant. The average rating for this item was 4.3.[8]

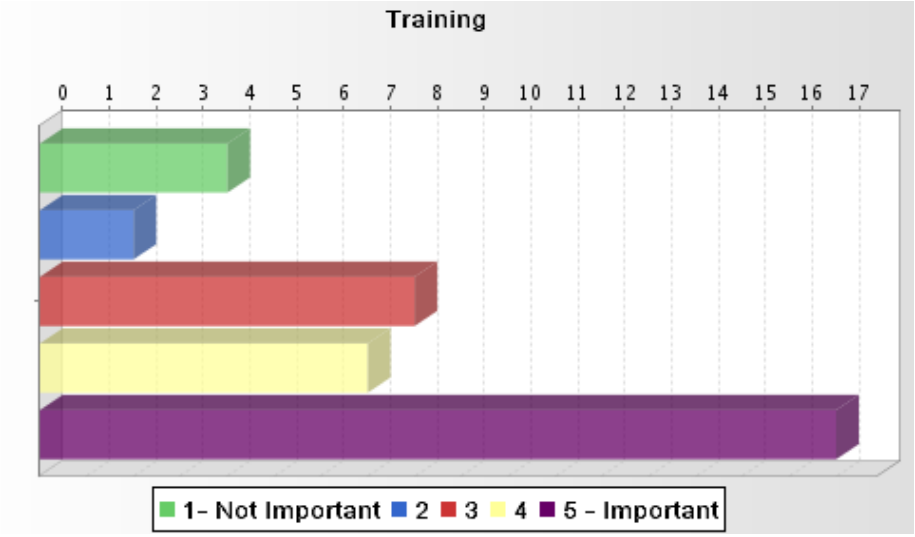


[6] Two of the entities that think the SPP RE compares about the same as other regional entities with which they most often interact also responded that they do not interact with other regional entities. Accordingly, the number of responses for "about the same" should be reduced to nine instead of 11.
[7] Rating is based on a scale of 1 to 5, with 1 being much worse, 2 being somewhat worse, 3 being about the same, 4 being somewhat better, and 5 being much better.
[8] Rating is based on a scale of 1 to 5, with 1 being not important and 5 being important.

Ten of the respondents view the SPP RE's Standard Development Services as important; six responded it was not important. The average rating for this item was 3.3.



Seventeen of the responding entities view the SPP RE's Training Services as important; four responded it was not important. The average rating for this item was 3.8.



Additional Comments

Five of the responding entities also provided additional comments. The unedited comments submitted by those entities are presented below.

Additional Comments
Standards Development are important to me but I don't have the time to give it the attention it deserves due to other safety/environmental/NERC compliance obligations. If the economy was in better shape I don't think I would be stretched so "thin".
Not much experience with training opportunities
I'm not sure what these questions are after. What are they in regards to? Me and what aspect of standards development? Mine? NERC's? SPP REs? Influence? Policy? Similar reasoning for the other two.
Training in RE/NERC interpretation of Standard Requirements is very important in order to ensure entity compliance. Entity is not clear on what influence SPP RE has in development of Standards.
CMEP seems to be the only service receiving serious attention from the RE staff right now.
Too many different people involved in sending emails and information on similar topics or requirements - not easy to keep up filing. Email subject lines not always clear. Changing to new CDMS was horrible. Obtaining extra or proper amount of certificates takes an act of congress and requires constant nagging to get.
A more coordinated regional standards development monitoring program would be beneficial to all members.

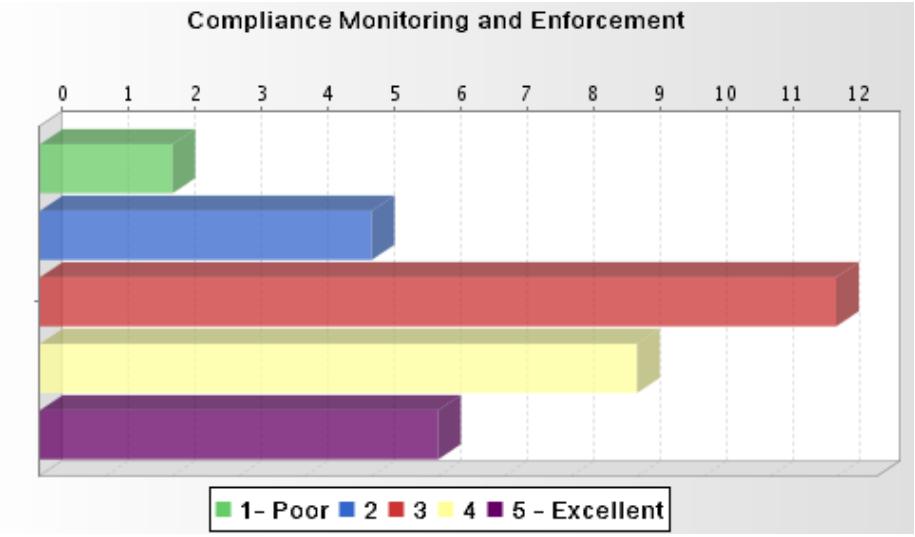
SPP RE's Program Services

Respondents were asked to rate the quality of the following SPP RE's program services on a scale of one to five, with one being poor and five being excellent:

- Compliance Monitoring and Enforcement Program
- Training
- Standards Development

Compliance Monitoring and Enforcement Program

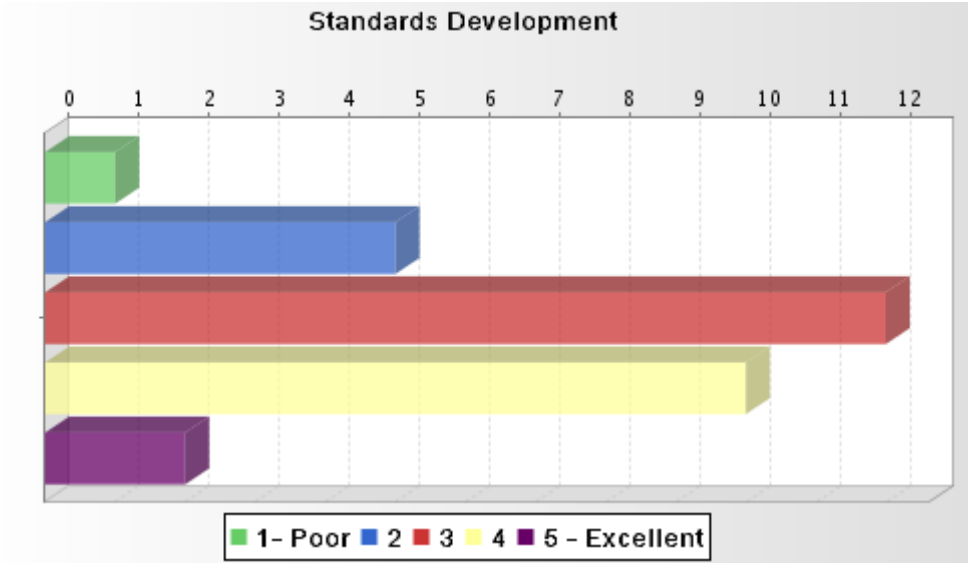
Twenty-seven of the 34 respondents rated the SPP RE's CMEP Services three or higher, six rated the services as excellent, and two rated the services as poor. The average rating for this item was 3.4.[9]



[9] Rating is based on a scale of 1 to 5, with 1 being poor and 5 being excellent.

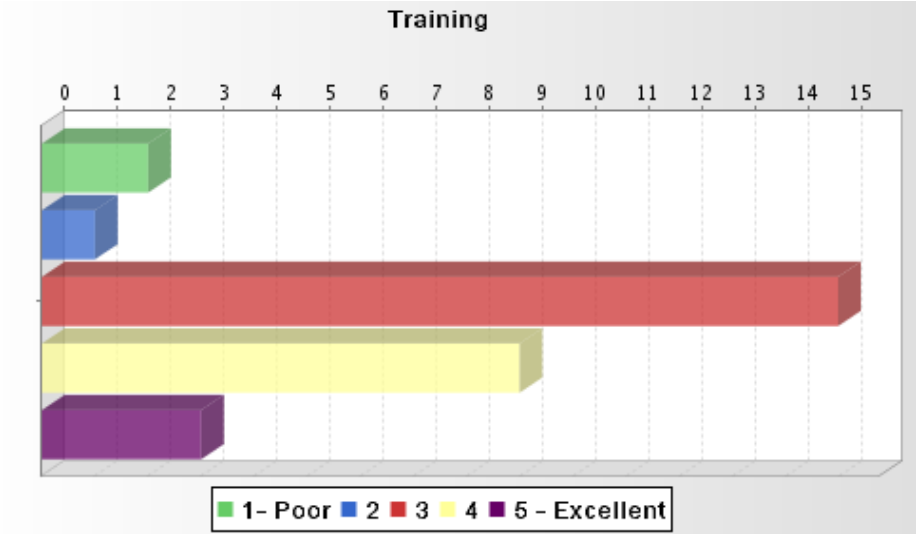
Standards Development

Twenty-four of the 30 respondents rated the SPP RE's Standards Development Services three or higher, two rated the services as excellent, and one rated the services as poor. The average rating for this item was 3.2.



Training

Twenty-seven of the 30 respondents rated Training Services three or higher, three rated the services as excellent, and two rated the services as poor. The average rating for this item was 3.3.



Additional Comments

Five of the responding entities also provided additional comments. The unedited comments submitted by those entities are presented below.

Additional Comments
Need a non-compliance individual on staff for entities to work with.
SPP Compliance Monitoring and Enforcement communications could be more clear. Training does not always reflect the movement of interpretation of Standards.
The people doing the compliance and enforcement have been good to work with - very reasonable.
The unanticipated changes in the quarterly self-certification and exception reporting processes were not communicated in an efficient manner. However, once brought to the attention of the SPP RE, corrections were made to the process and adequate time was provided. Going forward, we recommend significant changes be communicated to the Registered Entities well in advance.
Compliance monitoring - 3 Enforcement - 5 Average - 4

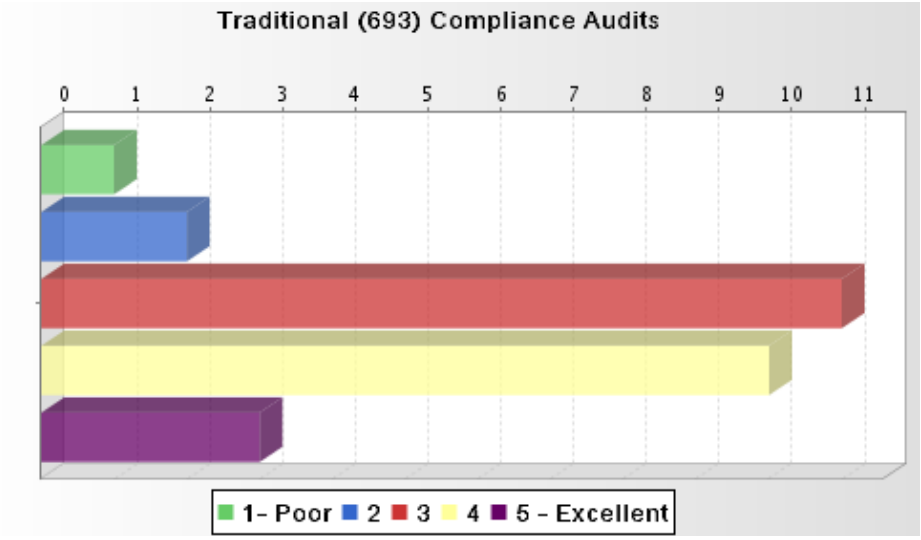
SPP RE's Compliance Monitoring and Enforcement Processes

Respondents were asked to rate the quality of the following SPP RE's CMEP processes on a scale of one to five, with one being poor and five being excellent:

- Traditional (693) Compliance Audits
- Traditional (693) Spot Checks
- Traditional (693) Self Certifications
- Traditional (693) Self- Reporting
- Critical Infrastructure Protection (CIP) Spot Checks
- Critical Infrastructure Protection (CIP) Self Certification
- Critical Infrastructure Protection (CIP) Self Reporting
- Mitigation Plans
- Settlements

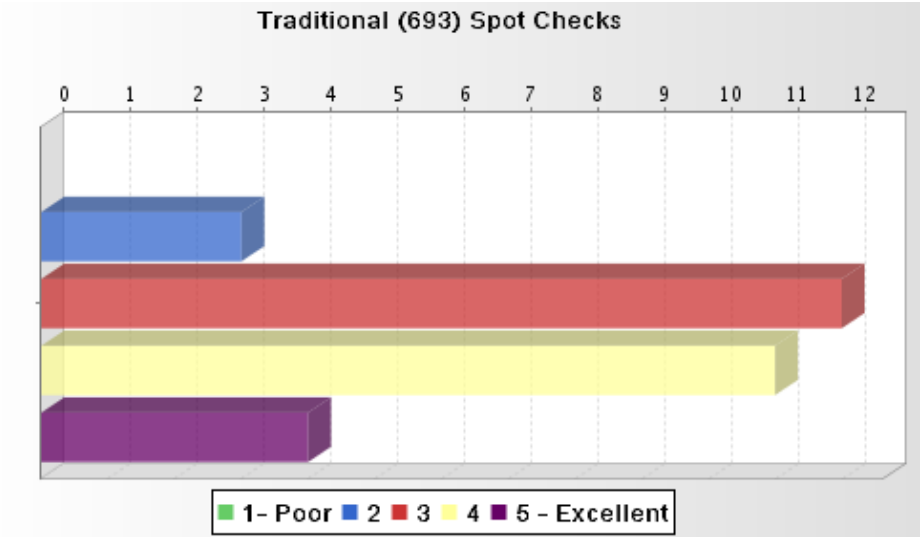
Traditional (693) Compliance Audits

Twenty-four of the 27 respondents rated the quality of Traditional Compliance Audit processes three or higher, three rated the processes as excellent, and one rated them as poor. The average rating for this item was 3.4.



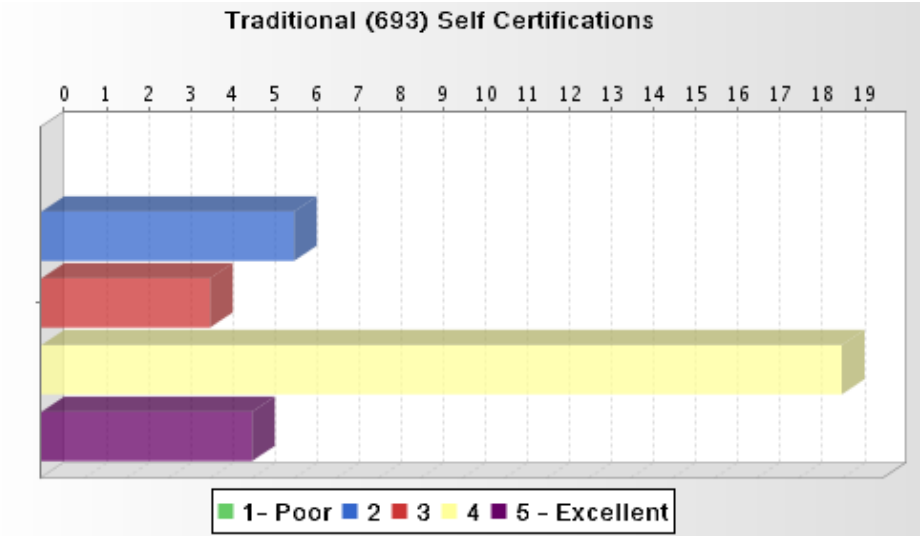
Traditional (693) Spot Checks

Twenty-seven of the 30 respondents rated the quality of Traditional Spot Check processes three or higher, four rated processes as excellent, and none rated them as poor. The average rating for this item was 3.5.



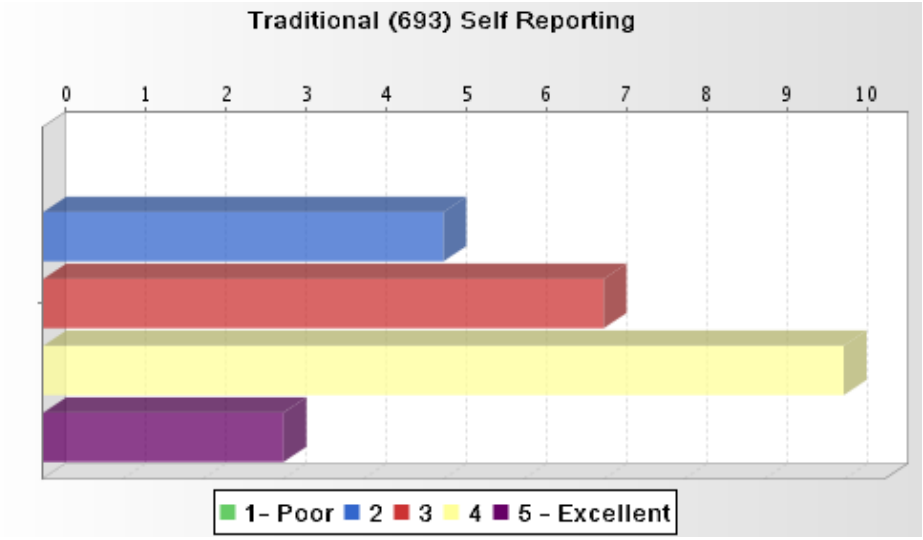
Traditional (693) Self Certifications

Twenty-eight of the 34 respondents rated the quality of Traditional Self Certification processes three or higher, five rated the processes as excellent, and none rated them as poor. The average rating for this item was 3.7.



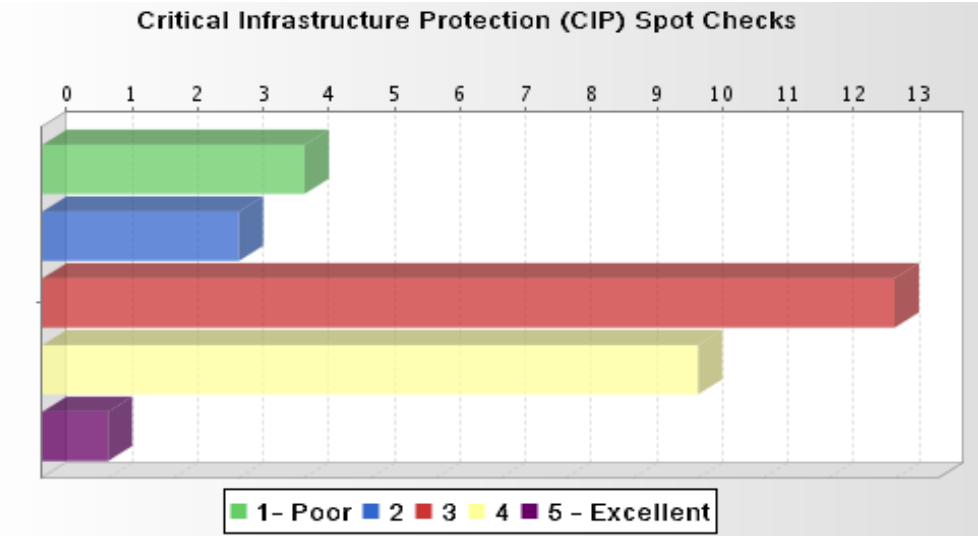
Traditional (693) Self Reporting

Twenty of the 25 respondents rated the quality of Traditional Self Reporting processes three or higher, three rated the processes as excellent, and none rating them as poor. The average rating for this item was 3.4



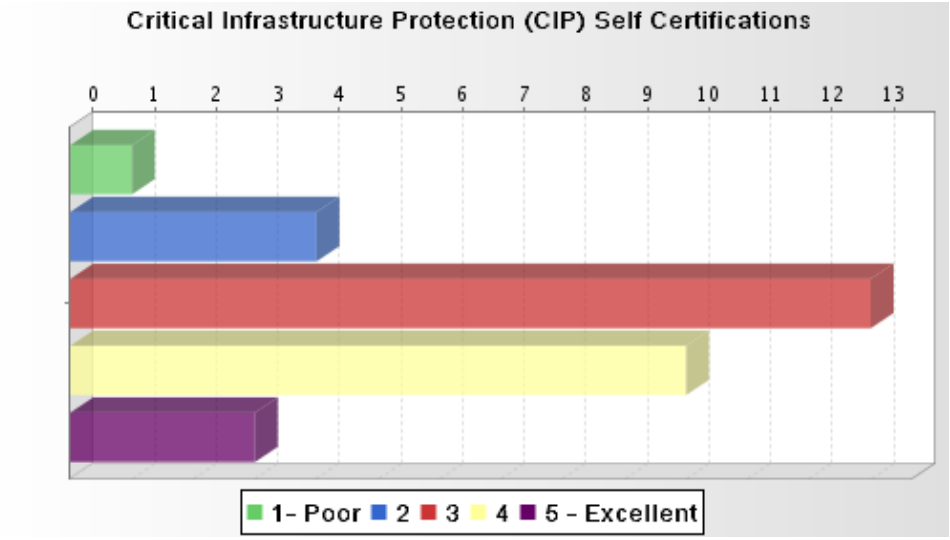
Critical Infrastructure Protection (CIP) Spot Check

Twenty-four of the 31 respondents rated the quality of CIP Spot Check processes three or higher, one rated the processes as excellent, and four rated them as poor. The average rating for this item was 3.0.



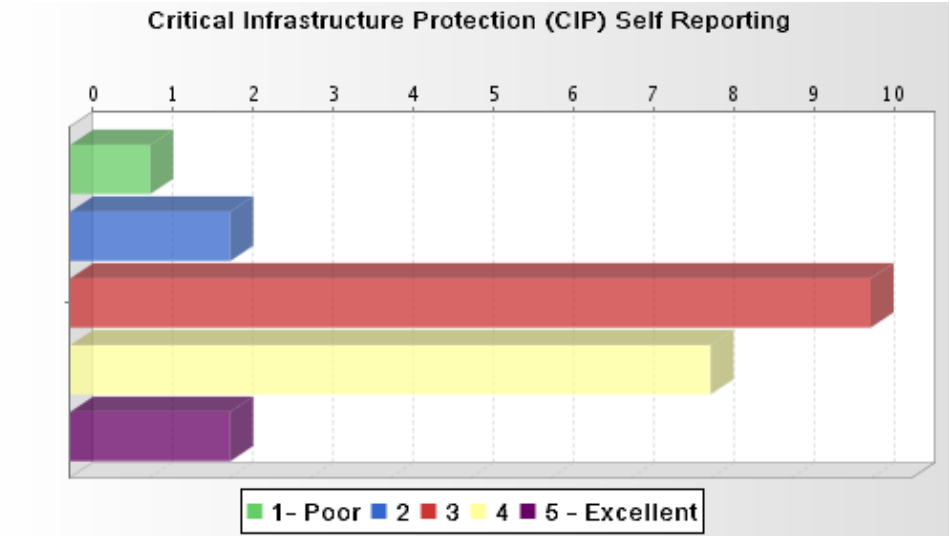
Critical Infrastructure Protection (CIP) Self Certifications

Twenty-six of the 31 respondents rated the quality of CIP Self Certification processes three or higher, three rated the processes as excellent, and one rated them as poor. The average rating for this item was 3.3.



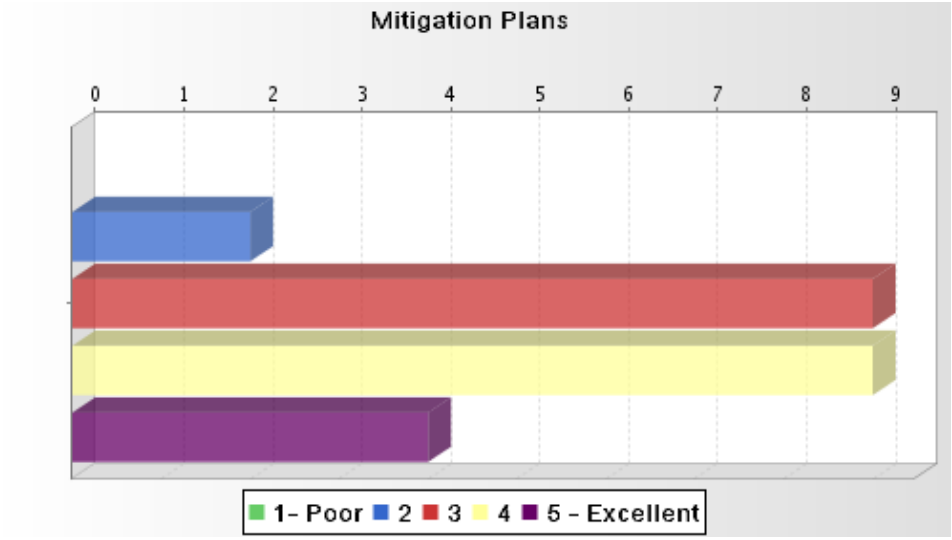
Critical Infrastructure Protection (CIP) Self Reporting

Twenty of the 23 respondents rated the quality of CIP Self Reporting processes three or higher, two rated the processes as excellent, and one rated them as poor. The average rating for this item was 3.4.



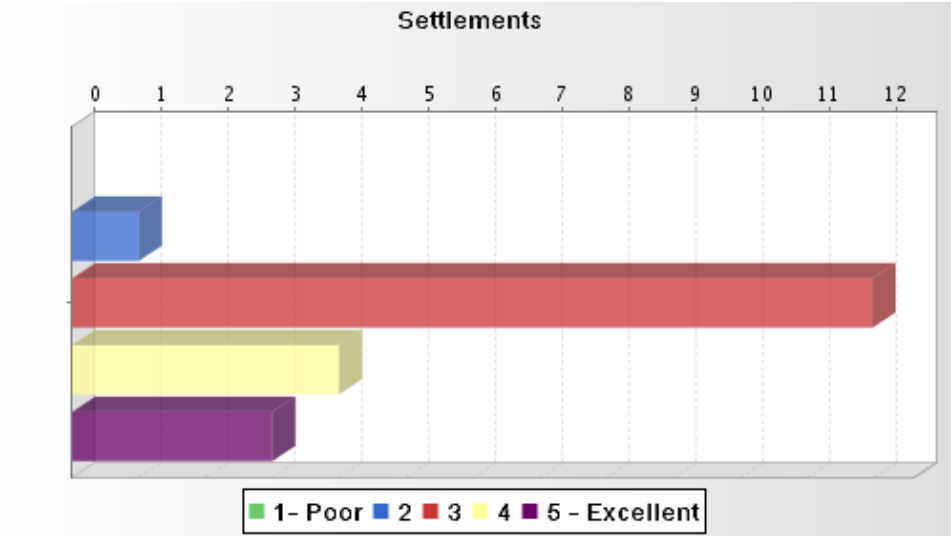
Mitigation Plans

Twenty-two of the 24 respondents rated the quality of Mitigation Plan processes three or higher, four rated the processes as excellent, and none rated them as poor. The average rating for this item was 3.6.



Settlement

Nineteen of the 20 respondents rated the quality of Settlement processes three or higher, three rated the processes as excellent, and none rated them as poor. The average rating for this item was 3.5.



Additional Comments

Three of the responding entities also provided additional comments. The unedited comments submitted by those entities are presented below.

Additional Comments
Self-Reporting processes should reward entity diligence, with violations requiring no further action and no fines for Self-Report issues that have already been mitigated or were very short-term. The Settlement process should be more transparent as to process, with the fine formula being disclosed. This would allow entities to make reasonable judgments on ROI and resource priorities.
The CIP spot checks are being handled in an inconsistent manner with the traditional (693) standards. It is understood that these requirements may require a different knowledge base; however, that fact should not dictate a bifurcation of the process. Furthermore, many of the requirements are ambiguous (in CIP and other standards), but it is our opinion that the CIP auditors are currently wielding too much discretion in making interpretations during the audits without a balanced opportunity for the Registered Entity to defend their interpretation and implementation. The CIP self-certification process needs to consider on-going compliance in addition to the implementation of compliance.
The CIP spot chk rigor needs to be reconsidered and take into account the actual impact to the BES of some of these non-compliance findings. The cost in time and resources to follow up on these items far outway the benefit to the BES.

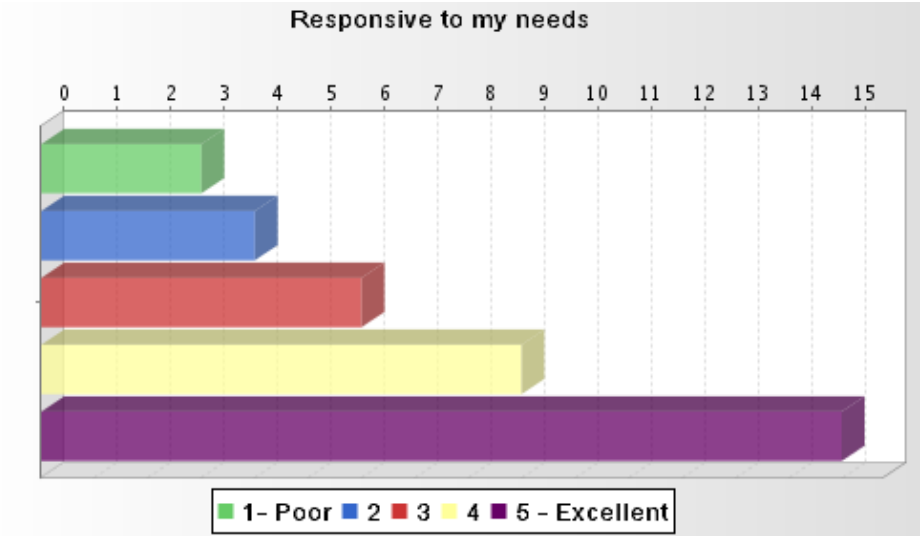
SPP RE Staff's Customer Service

Respondents were asked to rate the SPP RE's staff's customer service ability in the following areas on a scale of one to five, with one being poor and five being excellent:

- Responsiveness to Entities' Needs
- Accuracy of Information
- Timeliness of Solving Problems
- Professionalism
- Communication Skills
- Overall Service

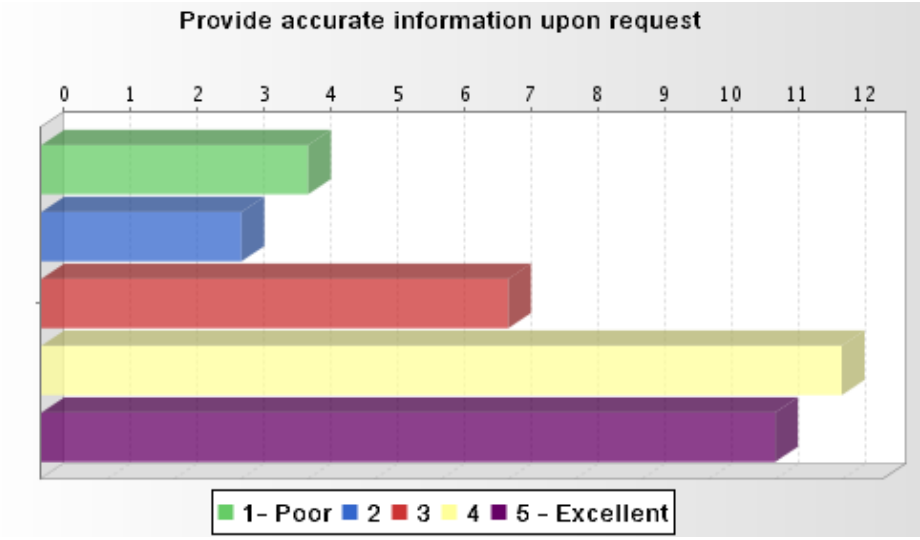
Responsiveness to Entities' Needs

Thirty of the 37 respondents rated staff's responsiveness to their needs three or higher, 15 rated responsiveness as excellent, and three rated it as poor. The average rating for this item was 3.8.


Responsive to my needs
0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15
1- Poor
2
3
4
5 - Excellent

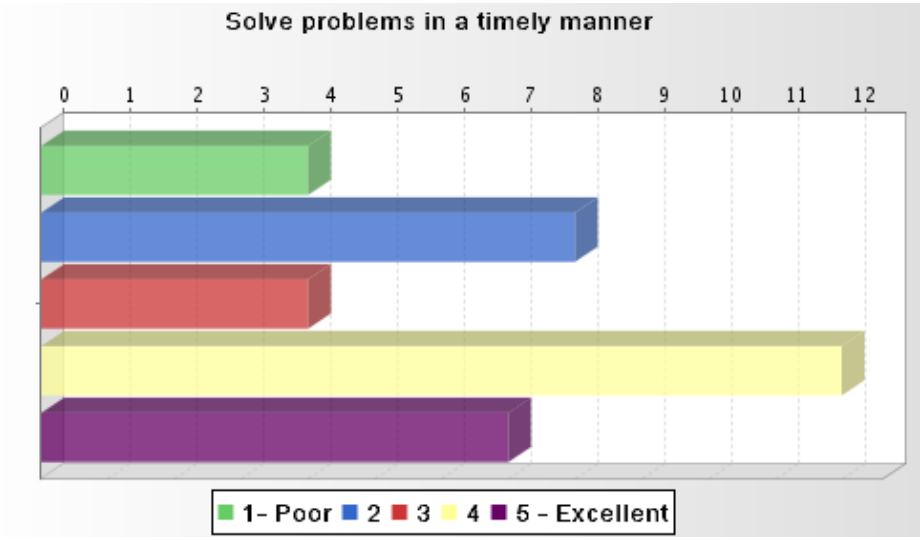
Accuracy of Information

Thirty of the 37 respondents rated the staff's ability to provide accurate information upon request three or higher, 11 rated staff's ability as excellent, and four rated it as poor. The average rating for this item was 3.6.



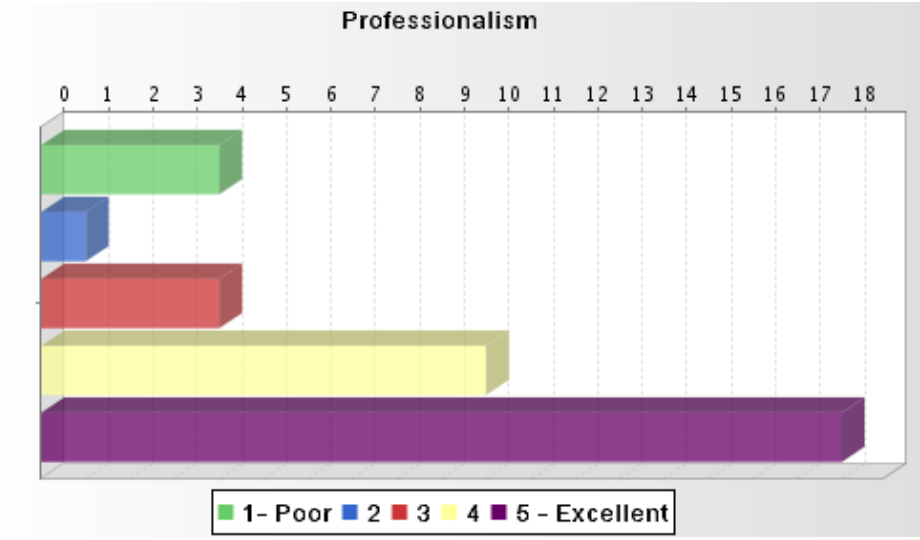
Timeliness of Solving Problems

Twenty-three of the 35 respondents rated the staff's ability to solve problems in a timely manner three or higher, seven rated the staff's ability as excellent, and four rated it as poor. The average rating for this item was 3.3.



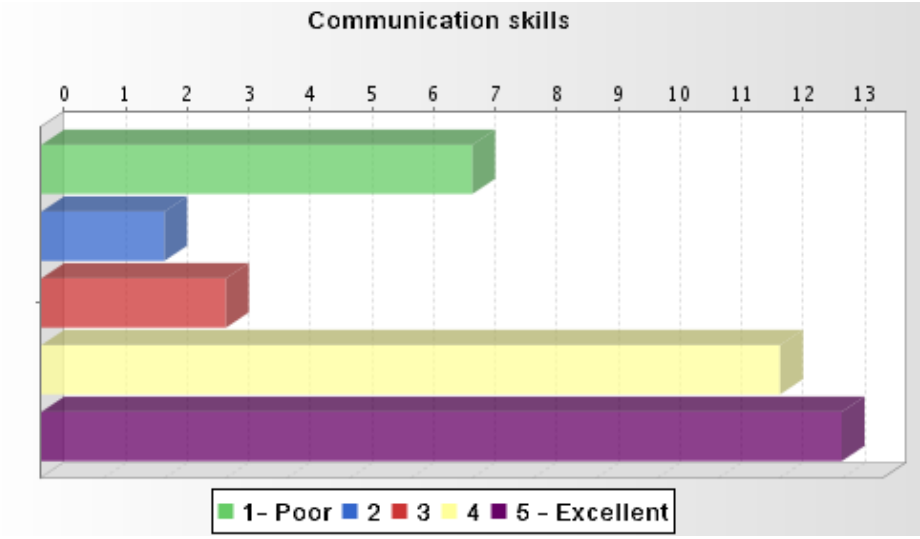
Professionalism

Thirty-two of the 37 respondents rated staff's professionalism three or higher, 18 rated staff's professionalism as excellent, and four (4) rated it as poor. The average rating for this item was 4.0.



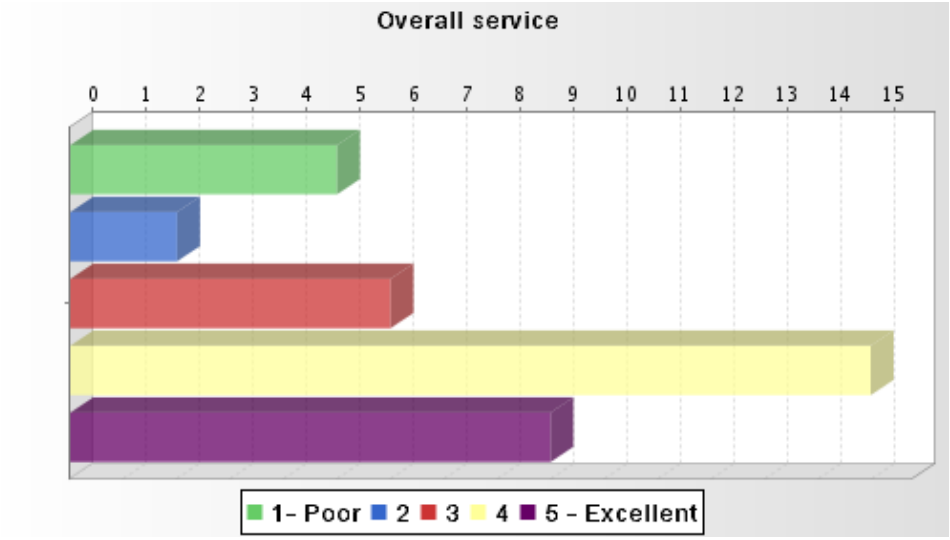
Communication Skills

Twenty-eight of the 37 respondents rated the staff's communication skills three or higher, 13 rated staff's communication skills excellent, and seven rated it as poor. The average rating for this item was 3.6.



Overall Service

Thirty of the 37 respondents rated the SPP RE's staff's overall service three or higher, nine rated the overall service as excellent, and five rated it as poor. The average rating for this item was 3.6.



Additional Comments

Five of the responding entities also provided additional comments. The unedited comments submitted by those entities are presented below.

Additional Comments
SPP's provides very professional service, but the processes and interpretations are often unclear or labored. Communications are often ambiguous, confusing or to often subject to revision or revocation.
Some RE Staff members seem to want to be the "rugged enforcer", and let their own biases direct their interpretations and compliance determinations.
Send emails and make calls, but rarely receive responses.
In general, the staff members at the SPP RE are very professional and have a desire to help the Registered Entities to the ability allowed.
Staff is very professional, responds to questions and willing to assist.

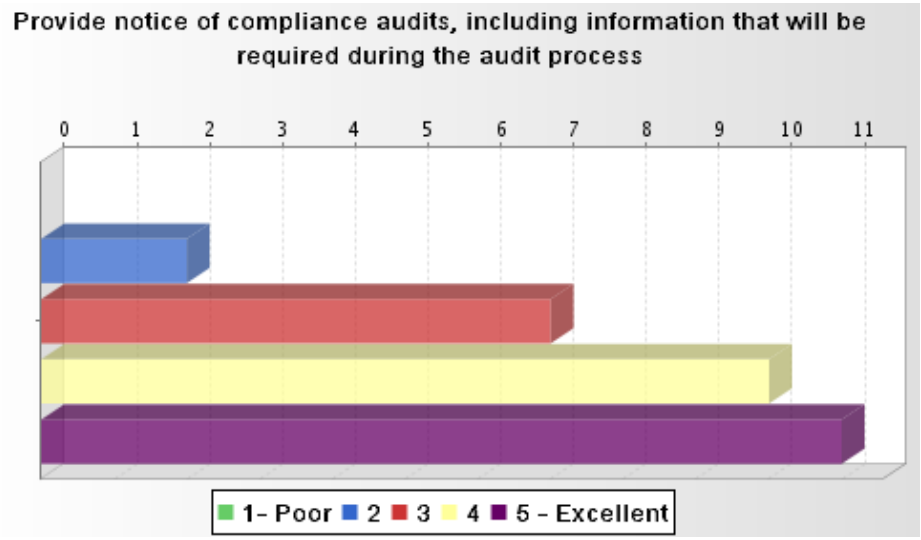
SPP RE Staff's Performance

Respondents were asked to rate the SPP RE's Staff's performance in the following areas on a scale of one to five, with one being poor and five being excellent:

- Providing Notice of Compliance Audits
- Providing Notice of Spot Checks
- Giving Timely Feedback to Entities
- Processing Violations in a Timely Manner
- Using Electronic Tools and Forms
- Providing Clear Options to Entities
- Conducting Compliance Inquiries and Investigations
- Providing a Website that is Useful to Stakeholders
- Providing Timely and Useful Newsletters and Other Communications
- Providing Reasonable Opportunity for Stakeholder to Give Input on RE Budget
- Remaining Independent from Owners, Operators, and Users of BPS

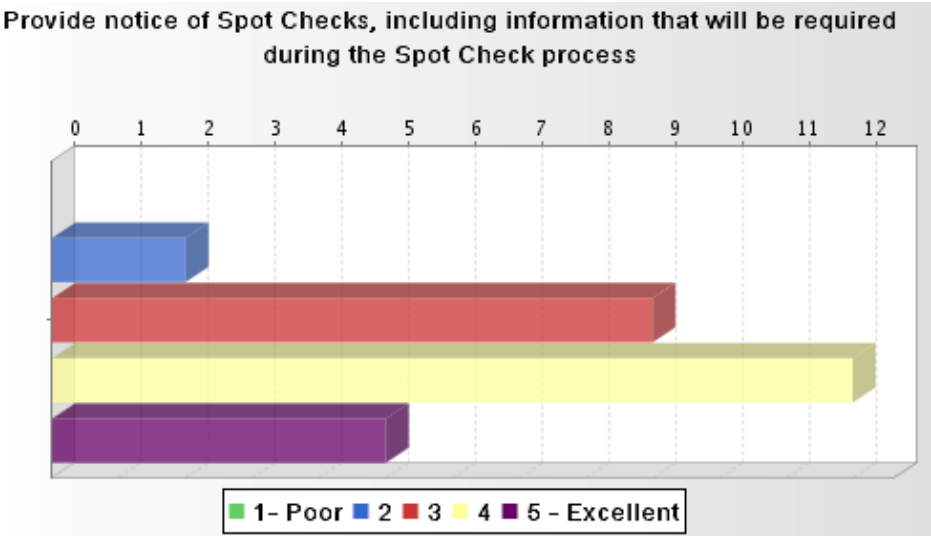
Providing Notice of Compliance Audits

Regarding the SPP RE's Staff's performance in providing notice of compliance audits, including information that will be required during the audit process: 28 of the 30 respondents rated three or higher, 11 rated the performance as excellent, and none rated it as poor. The average rating for this item was 4.0.



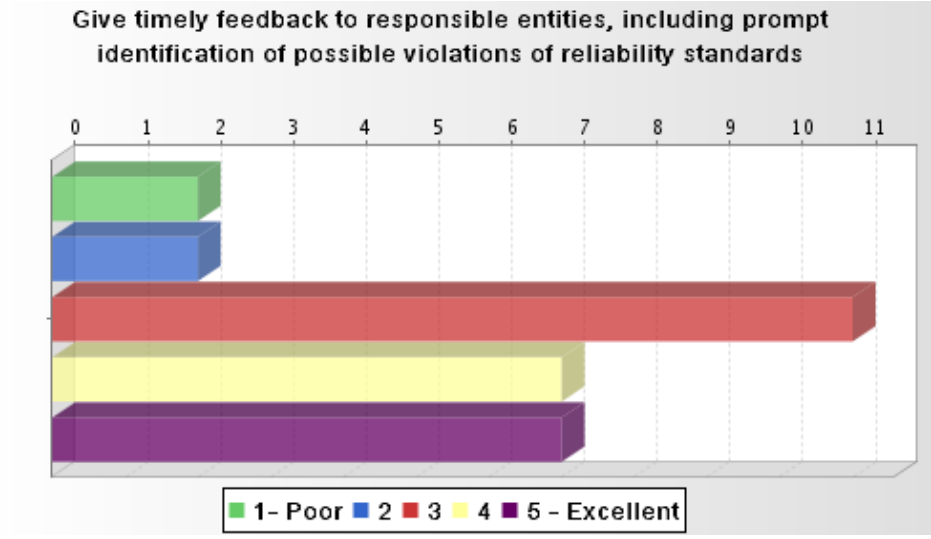
Providing Notice of Spot Checks

Regarding the SPP RE's Staff's performance in providing notice of spot checks, including information that will be required during the spot check process: 26 of the 28 respondents rated three or higher, five rated the performance as excellent, and none rated it as poor. The average rating for this item was 3.7.



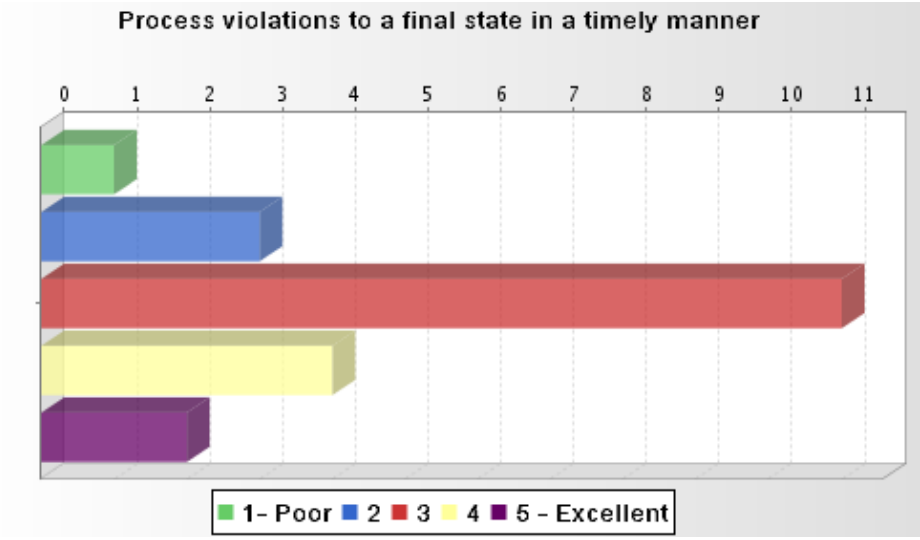
Giving Timely Feedback to Entities

Regarding the SPP RE's Staff's performance in giving timely feedback to responsible entities, including prompt identification of possible violations of reliability standards: 25 of the 29 respondents rated three or higher, seven rated performance as excellent, and two rated it as poor. The average rating for this item was 3.5.



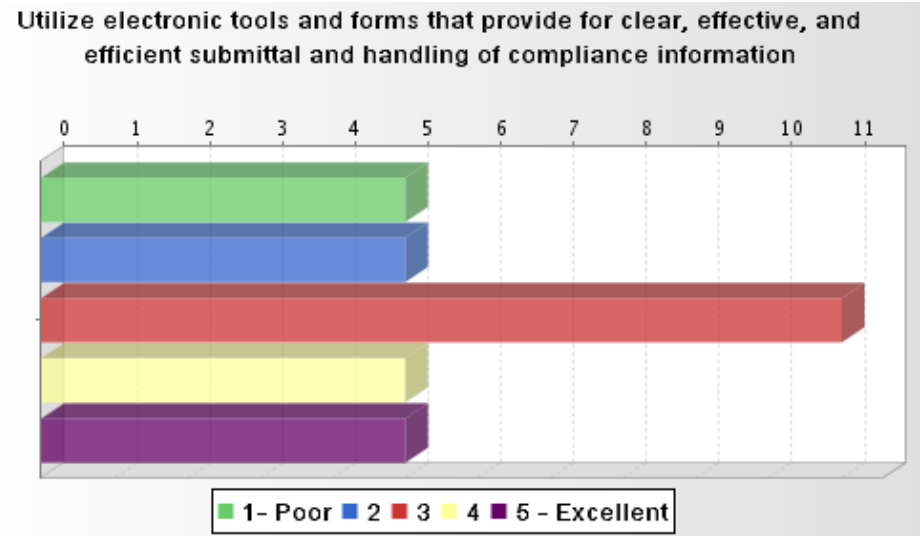
Processing Violations in a Timely Manner

Regarding the SPP RE's Staff's performance in processing violations to a final state in a timely manner: 17 of the 21 respondents rated three or higher, two rated the performance as excellent, and one rated it as poor. The average rating for this item was 3.1.



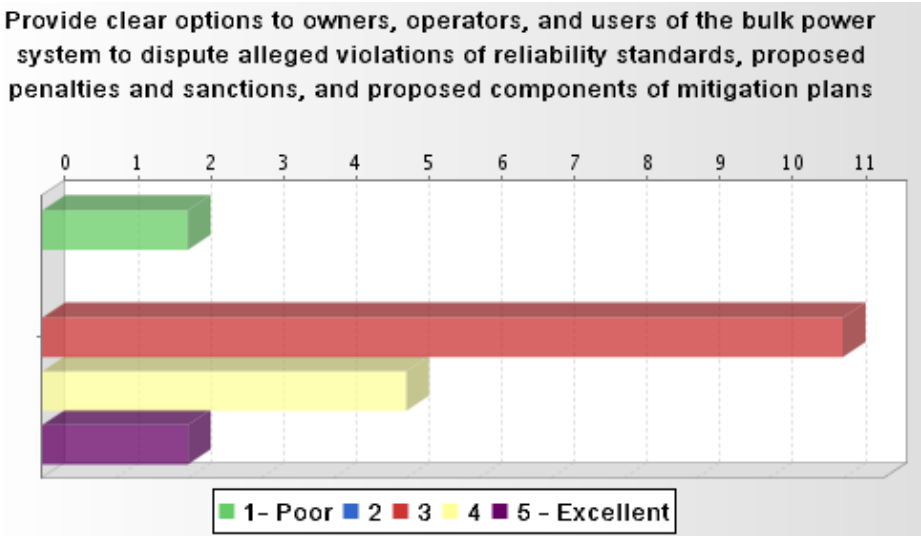
Using Electronic Tools and Forms

Regarding the SPP RE's Staff's performance in using electronic tools and forms that provide for clear, effective, and efficient submittal and handling of compliance information: 21 of the 31 respondents rated three or higher, five rated performance as excellent, and five rated it as poor. The average rating for this item was 3.0.



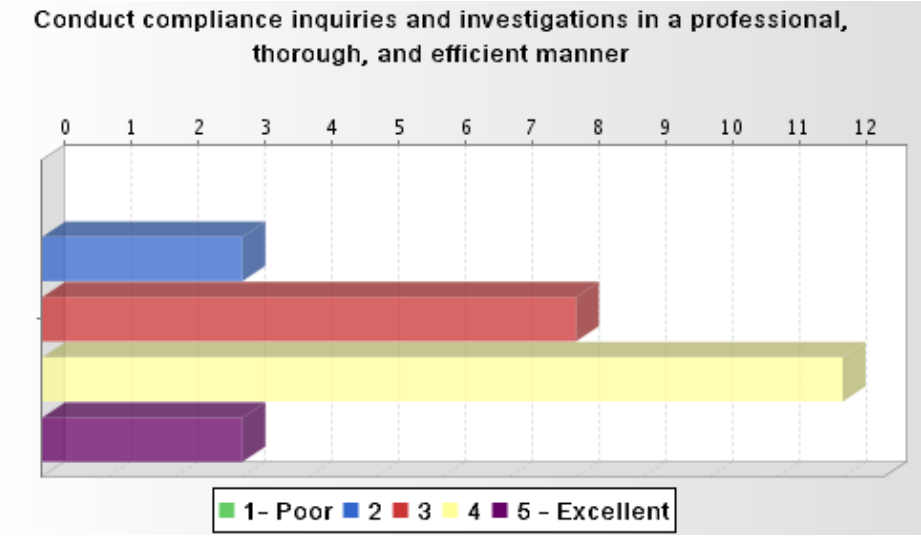
Providing Clear Options to Entities

Regarding the SPP RE's Staff's performance in providing clear options to entities to dispute alleged violations, proposed penalties and sanctions, and proposed components of mitigation plans: 18 of the 20 respondents rated three or higher, two rated performance as excellent, and two rated it as poor. The average rating for this item was 3.3.



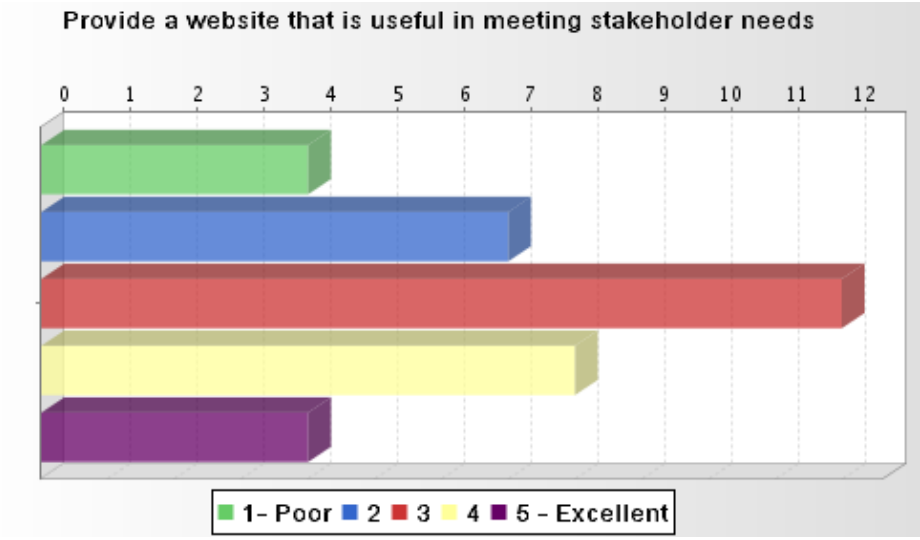
Conducting Compliance Inquiries and Investigations

Regarding the SPP RE's Staff's performance in conducting compliance inquiries and investigations in a professional, thorough, and efficient manner: 23 of the 26 respondents rated three or higher, three rated the performance as excellent, and none rated it as poor. The average rating for this item was 3.6.



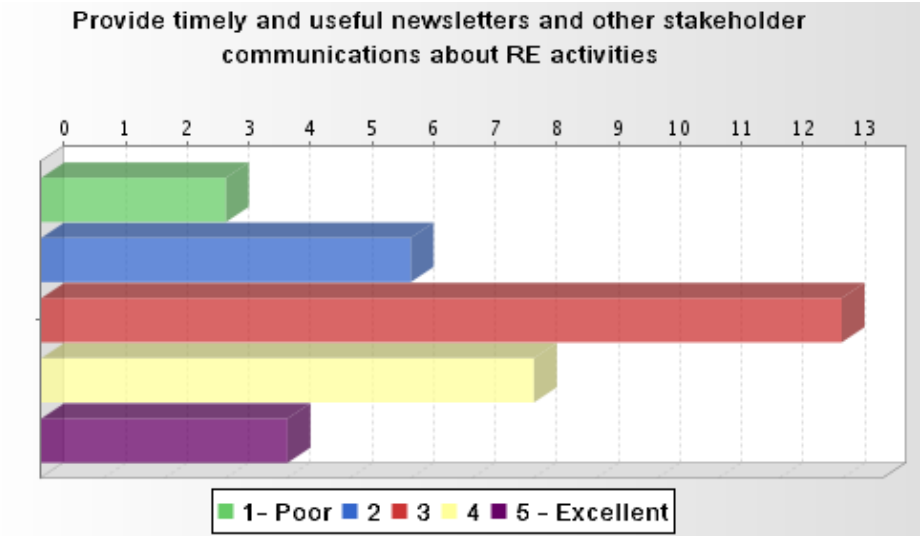
Providing a Website that is Useful to Stakeholders

Regarding the SPP RE's Staff's performance in providing a website that is useful in meeting stakeholder needs: 24 of the 35 respondents rated three or higher, four rated performance as excellent, and four rated it as poor. The average rating for this item was 3.0.



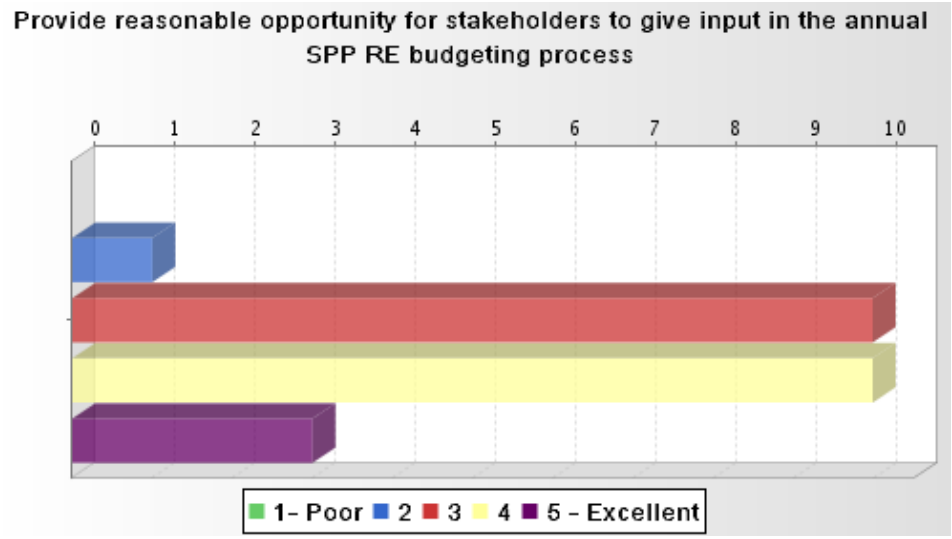
Providing Timely and Useful Newsletters and Other Communications

Regarding the SPP RE's Staff's performance in providing timely and useful newsletters and other stakeholder communications about RE activities: 25 of the 34 respondents rated three or higher, four rated the performance as excellent, and three rated it as poor. The average rating for this item was 3.1.



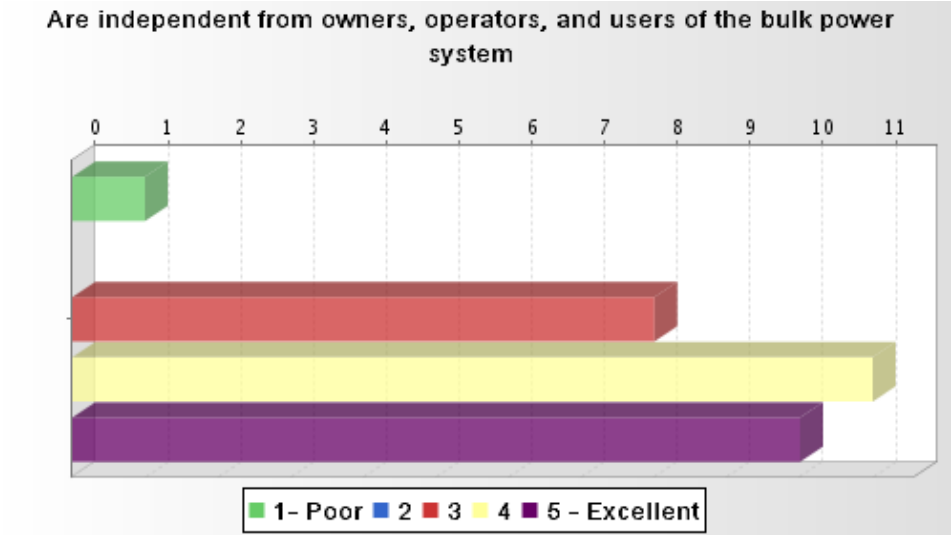
Providing Reasonable Opportunity for Stakeholder to Give Input on RE Budget

Regarding the SPP RE's Staff's performance in providing a reasonable opportunity for stakeholders to give input in the annual SPP RE budgeting process: 23 of the 24 respondents rated three or higher, three rated the performance as excellent, and none rated it as poor. The average rating for this item was 3.6.



Remaining Independent from Owners, Operators, and Users of BPS

Regarding the SPP RE's Staff's performance in remaining independent from owners, operators, and users of the bulk power system: 29 of the 30 respondents rated three or higher, 10 rated the performance as excellent, and one rated it as poor. The average rating for this item was 4.0.



Additional Comments

Four of the responding entities also provided additional comments. The unedited comments submitted by those entities are presented below.

Additional Comments
Regarding the Newsletters; I find them VERY useful - so useful that I would like to see them every month. Seems like we only receive them quarterly yet there is plenty to cover for a monthly newsletter.
Tools have improved with the new web-based systems. The volume of compliance information coming from all sources is such that it is difficult to remain current and sort out important information.
The former CDMS application had many problems in the first part of 2010. We look forward to improvements with the newly released system. The event analysis process is not well defined and is very cumbersome process.
The description of information required during the audit process could be improved. Entities struggle with what to provide, and in what format, in some cases and it would be good to have more specific information and examples from the RE prior to the audit.

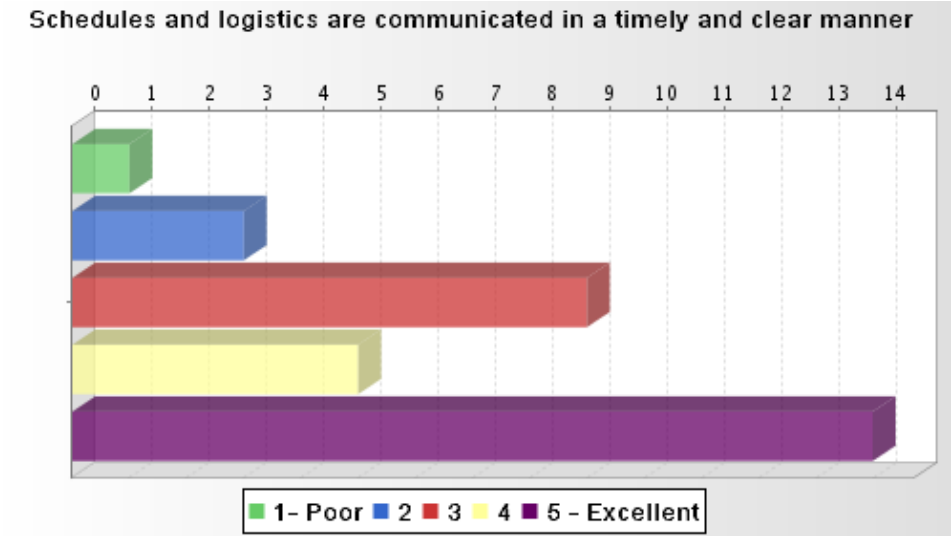
SPP RE's Compliance Workshops

Respondents were asked to rate the following areas of the SPP RE's compliance workshops on a scale of one to five, with one being poor and five being excellent:

- Schedules and Logistics
- Facilities
- Material

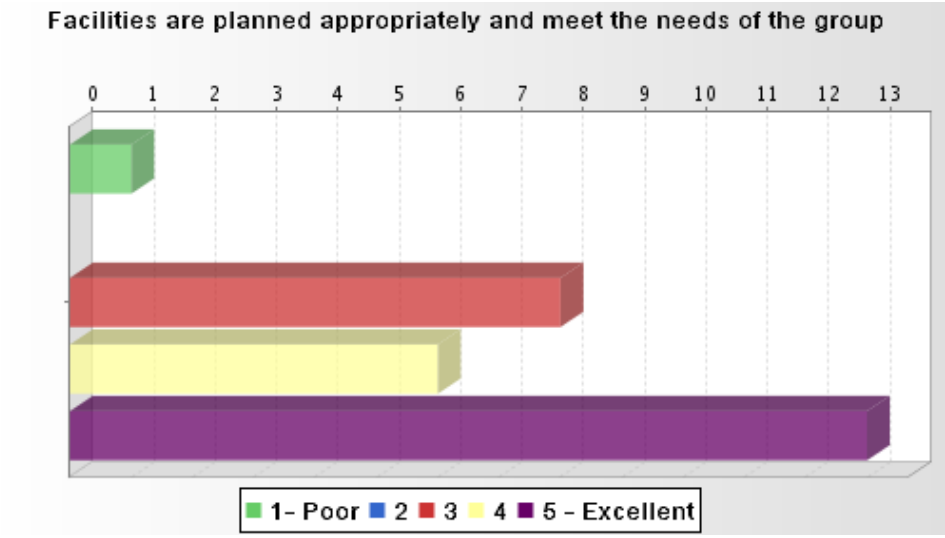
Schedules and Logistics

Regarding the manner in which the SPP RE communicated schedules and logistics: 28 of the 32 respondents rated three or higher, 14 rated it as excellent, and one rated it as poor. The average rating for this item was 3.9.



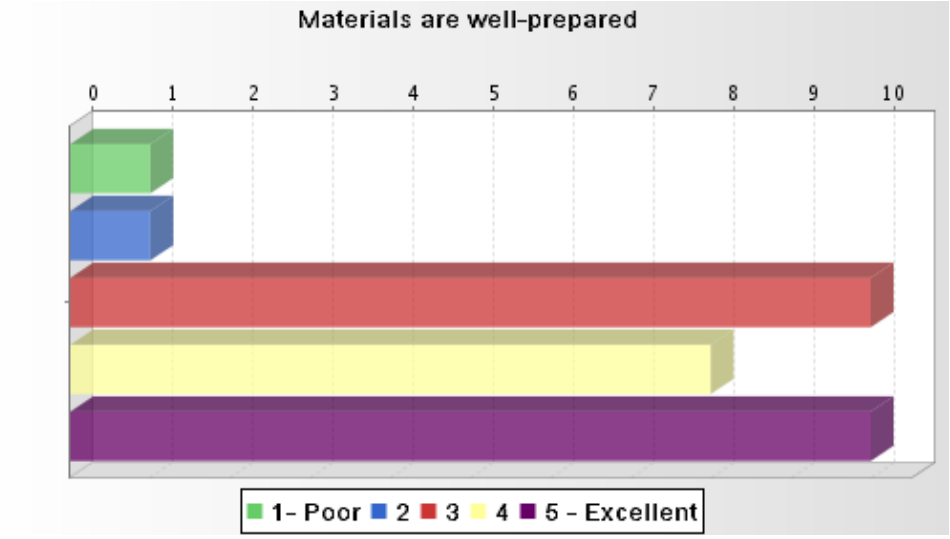
Facilities

Regarding facilities that meet the needs of the compliance workshop attendees: 27 of the 28 respondents rated three or higher, 13 rated it as excellent and one rated it as poor. The average rating for this item was 4.1.



Material

Twenty-eight of the 30 respondents rated preparation of compliance workshop material three or higher, 10 rated it as excellent, and one rated it as poor. The average rating for this item was 3.8.



Characteristics of SPP RE with which the Entities Are Satisfied or Dissatisfied

Respondents were asked to list any characteristics of the SPP RE with which they are satisfied or dissatisfied. Twelve respondents made listed characteristics with which they were satisfied and 16 respondents listed characteristics with which they were dissatisfied. The unedited comments are presented below.

Satisfied
support and service
Newsletter content. Most folks in the RE are fairly responsive and that is helpful to entities. Compliance Forums - specifically the one in KC - was excellent - especially with NERC and FERC guest speakers. I think the Compliance Forums have improved.
*Very Knowledgeable *Professional *Approachable
Good communications regading the change in the portal
Great communication on all events.
Professionlism of staff.
Always willing to help and will take the time required to meet the request as long as it's within their area of approved services
The people have been good to work with.
Overall, the staff members at the SPP RE are very professional and well organized. The enforcement group is always approachable and friendly.
All the RE staff is great and willing to work with us.
We have a very limited presence in SPP, so we haven't responded to a number of questions. Staff was very helpful during the transition to the new OATI web site. SPP is requiring a number of quarterly self-certifications for Purchasing-Selling Entities that we're only required to submit annually for other REs (a negative), but staff has been responsive in addressing questions about that process (a positive). It's too early to tell whether the webCDMS will be an improvement, but the training in Minneapolis was very helpful.
I find the RE staff is willing and avaliable when we need assistance or information. I also find training events to be very helpful.

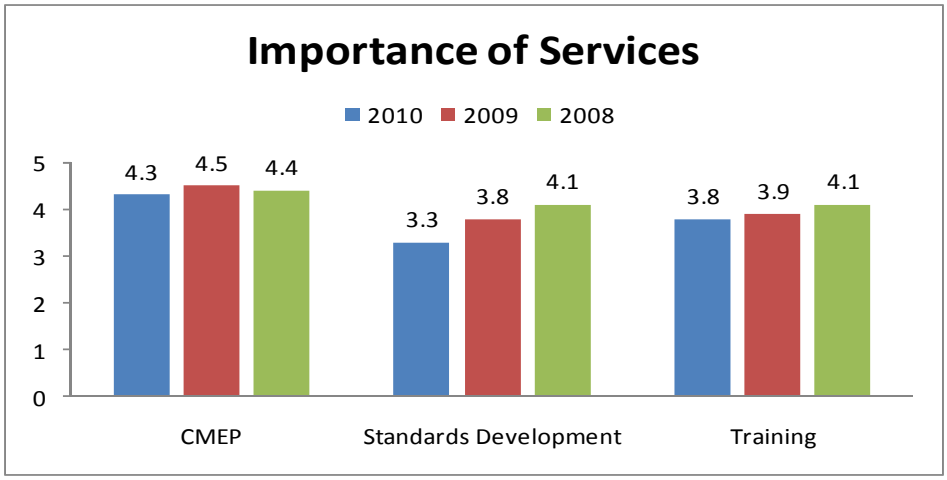
Dissatisfied
The communication for compliance issues is subpar compared to other regions.
none
Newsletter frequency Sometimes multiple emails are sent out (with corrections or additional info) for Self-Certs, reporting, etc. This can get confusing. Would like to see one original (correct) and maybe 1 or 2 followups when it gets closer to the deadline.
*None
CDMS reporting tool
The new CDMS Digital signature should allow more than two users with out additional cost. I beleive at least three should be allowed and maybe four for larger utilities.
Communications. Clarity of processes and procedures.
If the SPP RE could use one exploder list for email that would help, it seems that everyone has their own list and no one uses the email list that we provide in the CDMS system that was supposed to be the hub for the entities information. The way it is handled now maybe one would receive the email and if that person was out due to vacation or being sick the others in the compliance group would either miss a deadline or be pressed for time when the person got back.
There is too much inconsistency; from consecutive audits of the same entity, audits of different entities close in time, expectations regarding the same standard from one entity to the next. As noted previously, some auditors are too "hooked" on their own past experiences and biases, and don't view the standards in an objective manner.
"closed minded I'm right and you are obviously wrong" attitude.
The CDMS website stinks and is difficult to get around. Where you find information and how to input the information is not intuitive - it is not user friendly or even close to it.
It is a very confusing process. Our company is only a PSE and yet we are inundated with stuff from all regions. It is unclear, confusing and overwhelming. The web pages are unorganized and hard to follow. There is no good flow amongst regional entities and ther eshould be.
The CIP spot checks are being handled in an inconsistent manner with the traditional (693) standards. It is understood that these requirements may require a different knowledge base; however, that fact should not dictate a bifurcation of the process. Furthermore, many of the requirements are ambiguous (in CIP and other standards), but it is our opinion that the CIP auditors are currently wielding too much discretion in making interpretations during the audits without a balanced opportunity for the Registered Entity to defend their interpretation and implementation. With regard to the CIP Technical Feasibility Exception process, while the process was directed by FERC and the framework was crafted by NERC in the Rules of Procedure, too much effort and emphasis has been placed on a small portion of the CIP requirements to which there are necessary and valid exceptions. In many cases these exceptions are very trivial and impact many organizations in a similar manner. However, this process has evolved into an extremely time and resource intensive endeavor that will perpetuate into the foreseeable future. The opportunity cost of redirecting resources on these "exceptions" results in a reduction in meaningful efforts focused on reliability
The rigor of the CIP compliance audits should be evaluated. More instruction and examples of adequate compliance documentation would be helpful. Deadlines for response to requests are sometimes not realistic (NERC is worse).
The SPP web site (not just for the RE function, but for all of SPP at www.spp.org) tends to be rather "clunky" compared to other RTOs - it's hard to locate documents.
Sometimes we receive information or forms with cut and paste errors in official documentation. We have received forms that were copied from MISO or others for use by SPP and the MISO logo was not removed. Type-o's cause miscommunication and error. Consider individual templates.

General Comments

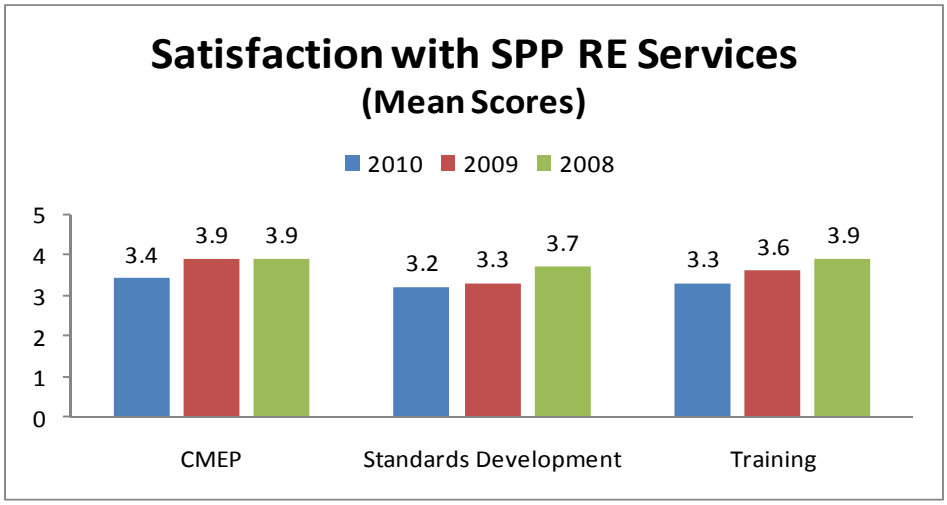
In addition to specific questions noted above, respondents were asked to share any remaining thought they had about the SPP RE. The unedited comments made by six of the responding entities are presented below.

Additional Comments
assign a compliance contact to each entity. Have that contact respond promptly to requests.
I appreciate SPP's workshops/training. I find them helpful for me when dealing with other NERC regions.
The amount of time necessary to address the NERC and RE compliance programs is extremely high compared to the perceived value of enhanced reliability for the bulk electric system. Entities such as ours should not even be a part of the NERC and RE compliance programs. Our entity does not affect the bulk electric system; however we spend an enormous amount of time making sure we stay compliant with NERC and our RE. How can a program that cannot determine who does and doesn't affect the bulk electric system, enhance the reliability of the bulk electric system?
Foreign entities hired as consultants create difficulties with acceptance by many. Not enough knowledge regarding US practices and culture in general.
It is hard to provide a comparison between the different Regional Entities as there is a lack of consistency in many aspects.
Overall, I believe that SPP RE is trying to do what is required of them. As for the effort expended on NERC Compliance, much of it seems like a paper chase that does not strengthen the BES, for the cost to the consumer.

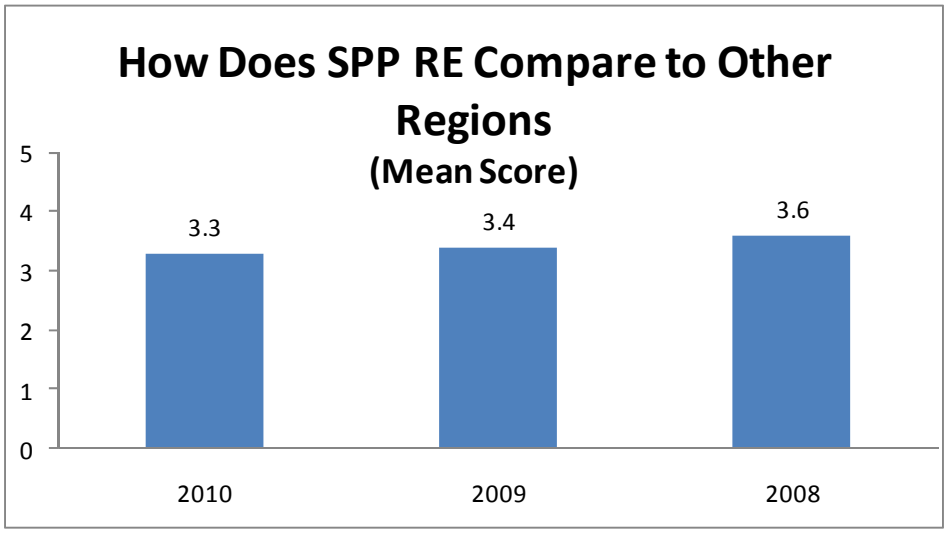
YEAR TO YEAR COMPARISON OF SURVEY RESULTS



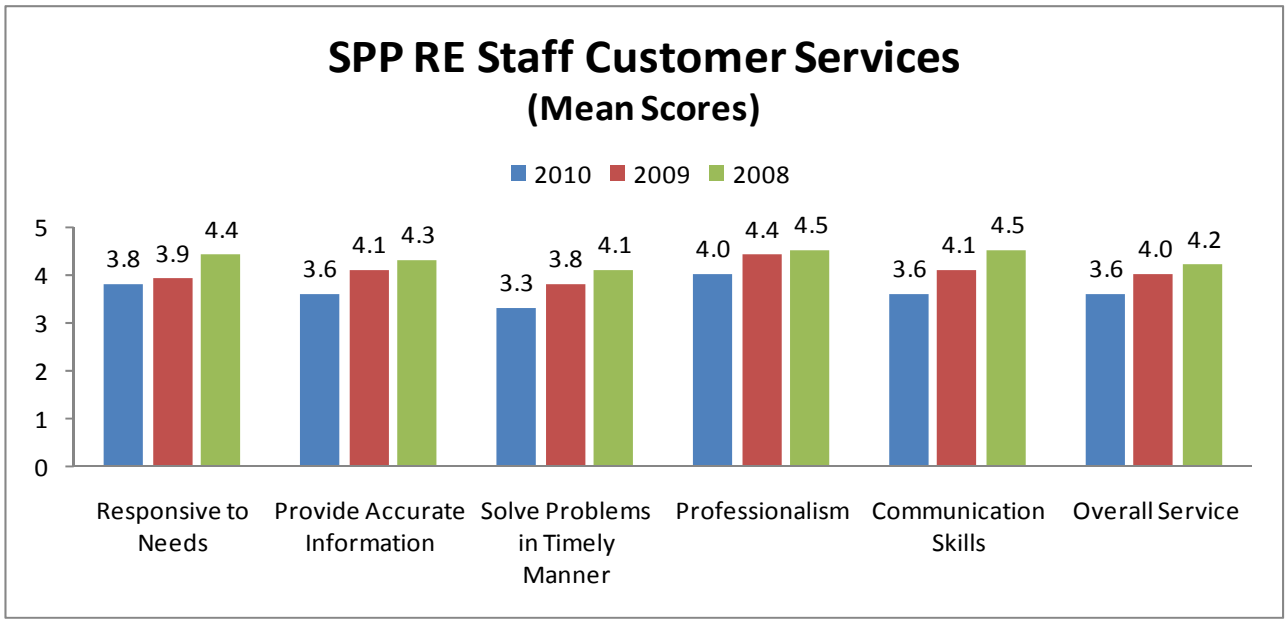
1= Not Important; 5= Very Important



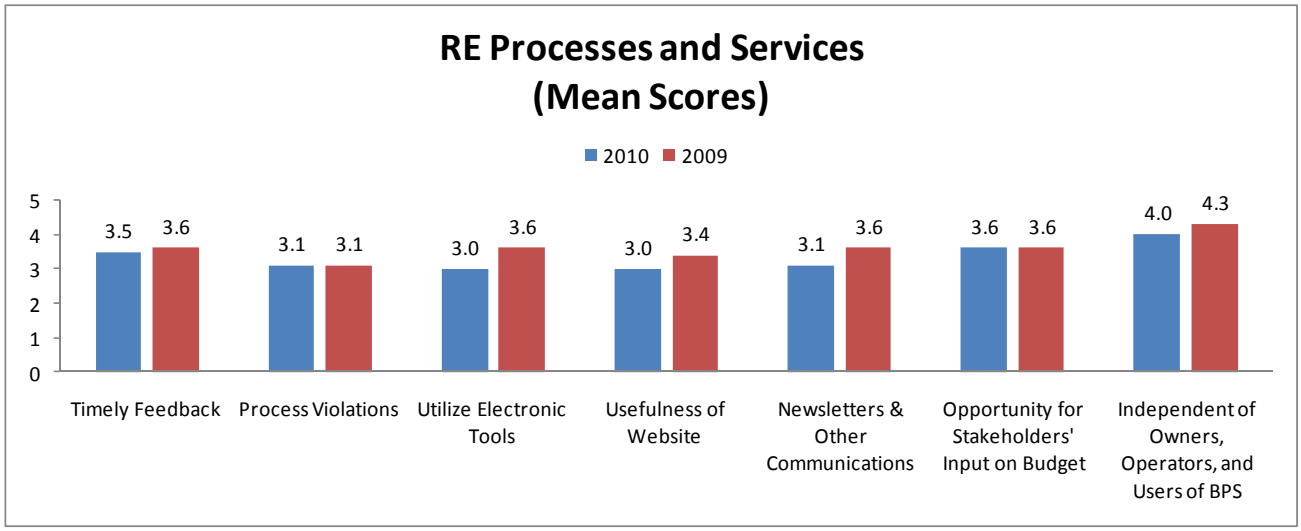
1= Poor; 5= Excellent



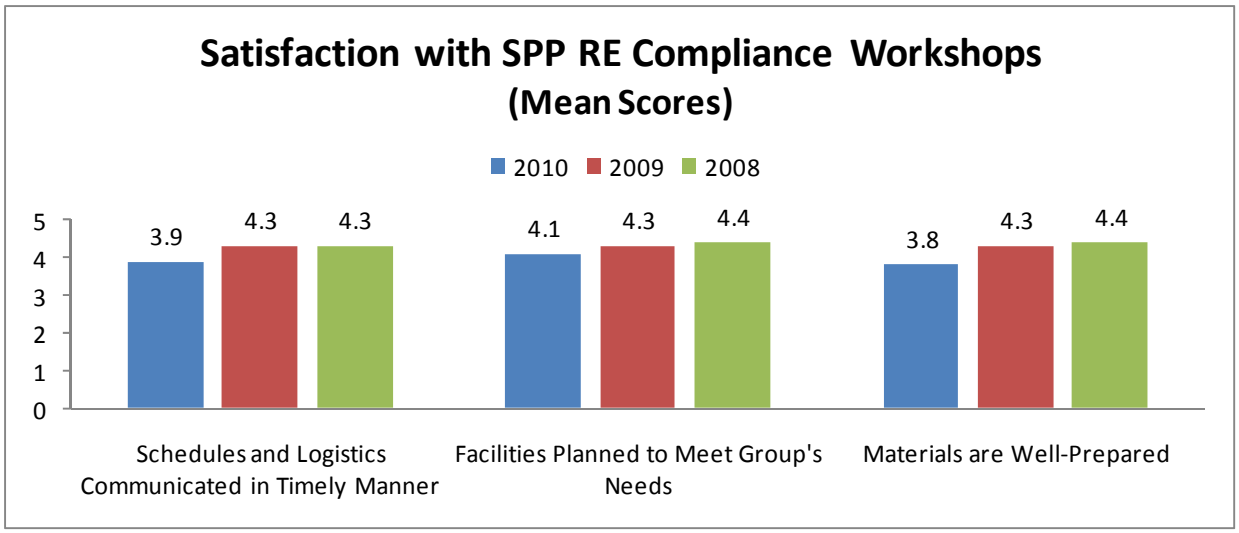
1= Much Worse; 5= Much Better



1= Poor; 5= Excellent



1= Poor; 5= Excellent



1= Poor; 5= Excellent