SPP Southwest Power Pool Regional Entity

SPP Regional Entity Trustees Meeting

January 24, 2011
Compliance Group Report

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Enforceable Violations Reported as of December 31, 2010

- **Post June 18, 2007**
  - **448 total [Increase of 31 since September 30, 2010]**

    1. **128 – Self Report [+21]**
    2. **218 – Compliance Audit/Spot Check [+7]**
    3. **100 – Self Certification [+3]**
    4. **2 – Periodic Data Submittal [+0]**
    5. **0 – Investigation [+0]**

Violation Statistics

- **Violations have been assessed against 43 registered entities [out of 128 registered entities]**
- **Next slide represents ~ 85% of reported violations over the rolling 12 month time period**

MOST VIOLATED STANDARDS
[BASED ON ROLLING 12 MONTHS THRU DECEMBER 31, 2010]
[REPRESENTS ~ 85% of REPORTED VIOLATIONS FOR PERIOD]

Standard	Description	#	NERC Top 20*	Risk Factor
CIP-007*	Systems Security Management	40 [-1]	1	Medium/Lower
CIP-004 *	Personnel & Training	25 [-3]	2	Lower
CIP-003*	Security Management Controls	23 [-2]	6	Lower/Medium
PRC-005 *	Protection System Maintenance	20 [+0]	3	High
FAC-001*	Facilities Connection Requirements	16 [+0]	13	Medium
CIP-009*	Recovery Plans for Critical Assets	15 [-2]	10	Medium/Lower
CIP-002*	Critical Cyber Asset Identification	15 [+1]	7	High/Lower
CIP-005 *	Electronic Security Perimeters	14 [+0]	5	Medium/Lower
TOP-002 *	Normal Operations Planning	14 [+0]	14	Medium
CIP-006*	Physical Security of Critical Assets	7 [-1]	4	Medium/Lower
CIP-008 *	Incident Reporting/response Planning	7 [-1]	17	Higher/Medium
FAC-009*	Establish and Communicate Facility Ratings	7 [+0]	16	Medium

SPP RE Performance Metrics [as of December 31, 2010]

- **Audit Reports**
  - **26 [+3 since September 30, 2010] Reports issued in 2010**
    1. **Average time to publication - 66 [-3] days**
    2. **2010 Performance Metric - 90 days**
- **Spot Check Reports**
  - **37 [+2 since September 30, 2010] issued in 2010**
    1. **Average time to publication overall – 109 [-1] days**
    2. **Average time to publication w/o BAL-003 – 89 [-1] days**
    3. **2010 Performance metric - 90 days**

Upcoming 2011 Activities

- **On-Site Activities [First half of 2011]**
  - **693 Audits [See http://www.nerc.com/elibrary.php]**
    1. **OG&E**
    2. **Mid-American Energy [with MRO]**
    3. **SPA**
    4. **P.S. Company of New Mexico[with WECC]**
  - **CIP Audits**
    1. **AEP**
    2. **KCP&L & KCPL-GMO**

Upcoming 2011 Activities [cont.]
Critical Infrastructure Protection Related

- **Technical Feasibility Exception [TFE] Reviews**
  - **207 [+2] TFE Accepted by SPP RE [Step 1]**
  - **Step 2 – Analysis of Accepted TFE Requests**
    - **As of 12-31-10**
      - **120 TFE Approved**
      - **53 Not Approved [Entity has one more chance to cure defect]**
      - **34 Under Review**

        Field Visits Scheduled for remaining entities
    - **Expected to provide disposition on all 207 by the established 1 year deadline [generally 1-31-2011]**
      - **Travel disruption during week of January 9th may impact final report for one entity**

Upcoming 2011 Activities [cont.]
Off-Site Activities [first half of 2011]

- **693 Audits [See http://www.nerc.com/elibrary.php]**
  - **AES Shady Point**
  - **Cap Rock Energy & Sharyland Utilities**
  - **Central Valley Electric Cooperative**
  - **City of Gardner**
  - **City of Malden**
  - **City of Ottawa**
- **CIP Audits**
  - **AES Shady Point**
  - **Sharyland Utilities**
  - **Central Valley Electric Cooperative**
  - **City of Gardner**

Upcoming 2011 Activities
Mandatory Spot Checks

- **Mandatory Spot Check for 2011**
  - **BAL-003 [R1,R2,R4,R5,R6]**
    1. **Expected Notification in mid to late February 2011**
    2. **Data due in March 2011**

Upcoming 2011 Activities [cont.]

- **Workshops**
  - **Spring 2011 Compliance Workshop**
    1. **March 28-29 Tulsa, Oklahoma**
  - **CIP Workshop**
    1. **May 11-12 Dallas, Texas**
  - **Fall 2011 Compliance Workshop**
    - **October 4-5 Little Rock, Arkansas**
- **Webinars**
  - **TBD**

STANDARDS REMINDER

MOD-001-1;MOD-004-1;MOD-008-1; MOD-028,29,30

- **Effective Date for MOD standards is <u>April 1, 2011</u>**
- **Most Requirements are applicable to Transmission Service Provider [TSP]**
- **Some Requirements are applicable to TOP,LSE,RP,BA,TP**
- **See [SPP RE Webinar Page]: http://www.spp.org/publications/2011%20CMEP%20Implementation%20Plan%20Webinar.pdf**

Other Issues
Event Analysis Activities

- **Field Trial for Event Analysis Procedure is drawing to an end [ending in 1Q 2011]**
- **SPP RE has had only one reportable event during field trial [Acadiana Load Pocket Load Shedding]**
- **Expectations are that categories will be adjusted based on field trials**
- **Clearer expectations for registered entities concerning internal assessments and reporting**

Other Issues [cont.]
NERC Alerts

- **NERC Alerts Currently Outstanding [Data as of 1-17-11]**
  - **Malware Targeting SCADA** **Due 10-15-10**
    - **SPP RE Response Rate: 120 of 120**
  - **BA Frequency Response** **Due 10-29-10**
    - **SPP RE Response Rate: 16 of 16**
  - **Generator Governor Settings** **Due 12-9-10**
    - **SPP RE Response Rate: 56 of 56**
  - **Aurora Mitigation** **Due 12-13-10**
    - **SPP RE Response Rate: 89 of 90**
  - **Actual Field Conditions in Determination of Facility Ratings** **Due 1-18-11***
    - **SPP RE Response Rate: 28 of 69**

*** Revised Date [was 12-15-10]**

Questions