SPP Southwest Power Pool Regional Entity

SPP Regional Entity Trustees Meeting

June 21, 2011
Compliance Group Report

Ron Ciesiel
Executive Director of Compliance

Enforceable Violations Reported as of May 31, 2010

- **Post June 18, 2007**
  - **539 total [Increase of 54 since March 31, 2011]**
    1. **205 – Self Report [+50]**
    2. **220 – Compliance Audit/Spot Check [+1]**
    3. **112 – Self Certification [+3]**
    4. **2 – Periodic Data Submittal [+0]**
    5. **0 – Investigation [+0]**

Violation Statistics

- **Violations have been assessed against 48 registered entities [out of 128 registered entities]**
- **Next slide represents ~ 74% [-1% points] of reported violations over the rolling 12 month time period**

MOST VIOLATED STANDARDS
[BASED ON ROLLING 12 MONTHS THRU MAY 31, 2010]
[REPRESENTS ~ 74% of REPORTED VIOLATIONS FOR PERIOD]

Standard	Description	#	NERC Top 20*	Risk Factor
CIP-007*	Systems Security Management	44 [+6]	1	Medium/Lower
CIP-005 *	Electronic Security Perimeters	21 [+5]	4	Medium/Lower
CIP-004 *	Personnel & Training	19 [+4]	3	Lower
CIP-003*	Security Management Controls	18 [-1]	6	Lower/Medium
PRC-005 *	Protection System Maintenance	17 [-1]	2	High
TOP-002 *	Normal Operations Planning	14 [+1]	14	Medium
CIP-009*	Recovery Plans for Critical Assets	12 [+2]	10	Medium/Lower
CIP-006*	Physical Security of Critical Assets	10 [+2]	5	Medium/Lower
CIP-002*	Critical Cyber Asset Identification	10 [-2]	8	High/Lower
CIP-001*	Sabotage Reporting	9 [-5]	7	Medium
FAC-009*	Establish and Communicate Facility Ratings	6 [-1]	13	Medium

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

- **Audit Reports**
  - **3 [+0 since March 31, 2010] Reports issued in 2011**
    1. **Average time to publication - 60 days**
    2. **2011 Performance Metric - 80 days**
- **Spot Check Reports**
  - **0 [+0 since March 31, 2010] issued in 2011**
    1. **Average time to publication overall – N/A**
    2. **2011 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 [Completed]**
    2. **Mid-American Energy [with MRO]**
    3. **SPA [Deferred to 3Q 2011]**
    4. **P.S. Company of New Mexico[with WECC]**
  - **CIP Audits**
    1. **KCP&L & KCPL-GMO [Completed]**
    2. **AEP [Completed]**

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

- **693 Audits [See http://www.nerc.com/elibrary.php]**
  - **AES Shady Point [Completed]**
  - **Cap Rock Energy & Sharyland Utilities [Completed]**
  - **Central Valley Electric Cooperative [Completed]**
  - **City of Gardner [Completed]**
  - **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,R5]**
    1. **Notification to Registered Entities in late March 2011**
    2. **Data due at end of April 2011**
       A. **One extension granted for late data submittal**
    3. **Draft Reports Completed**

Upcoming 2011 Activities [cont.]

- **Workshops**
  - **CIP Workshop**
    1. **May 11-12 Dallas, Texas**
       A. **Attendance ~ 95 Participants**
  - **Fall 2011 Compliance Workshop**
    - **October 4-5 Little Rock, Arkansas**
- **Webinars**
  - **June – Enforcement Processes**
  - **July - Revised Standards Effective on 10-1-11**

Other Issues
NERC Alerts

- **NERC Alerts Currently Outstanding [Data as of 5-31-11]**
  - **Actual Field Conditions in Determination of Facility Ratings**** **Due 1-18-11***

    SPP RE Response Rate: 66 of 66

  - * **Revised Date [was 12-15-10]**
  - ** **Ongoing Activity to 12-31-13**

Questions