SPP Southwest Power Pool Regional Entity

# SPP Regional Entity Trustees Meeting

## July 25, 2011
## Compliance Group Report

**Ron Ciesiel**
**Executive Director of Compliance**

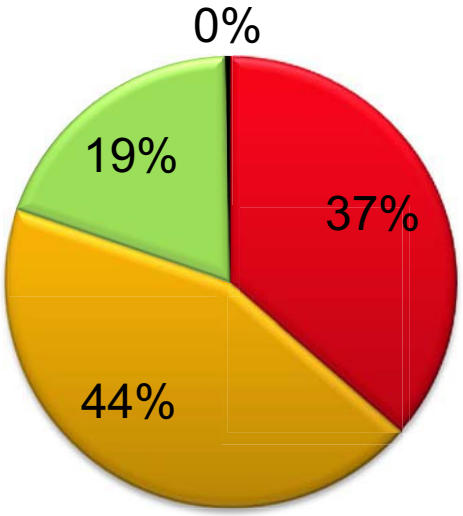
# Enforceable Violations Reported as of June 30, 2011

- Post June 18, 2007
  - 576 total [Increase of 91 since March 31, 2011]
    1. 210 – Self Report [+55]
    2. 252 – Compliance Audit/Spot Check [+33]
    3. 112 – Self Certification [+3]
    4. 2 – Periodic Data Submittal [+0]
    5. 0 – Investigation [+0]

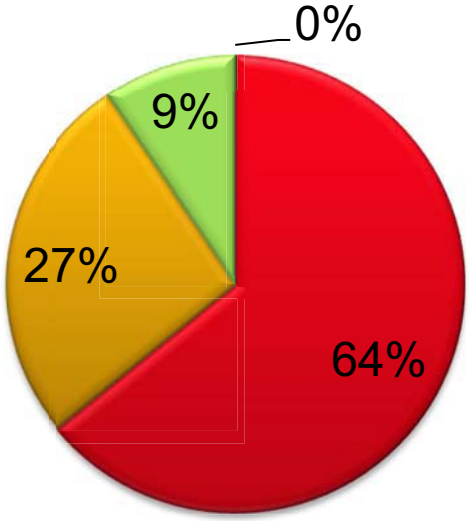
# Discovery Method Comparison

- Self-Report
- Compliance Audit/spot Check
- Self-Certification
- Periodic Data Submittal

## Discovery Method 2007 to Date




## Discovery Method 2011



# Violation Statistics

- Violations have been assessed against 48 registered entities [out of 132 registered entities]
- Next slide represents ~ 71% [- 4% points] of reported violations over the rolling 12 month time period

# MOST VIOLATED STANDARDS
# [BASED ON ROLLING 12 MONTHS THRU JUNE 30, 2010]
# [REPRESENTS ~ 71% of REPORTED VIOLATIONS FOR PERIOD]

| Standard | Description | # | NERC Top 20* | Risk Factor |
|---|---|---|---|---|
| CIP-007* | Systems Security Management | 48 [+10] | 1 | Medium/Lower |
| CIP-005 * | Electronic Security Perimeters | 28 [+12] | 2 | Medium/Lower |
| CIP-006* | Physical Security of Critical Assets | 17 [+9] | 3 | Medium/Lower |
| PRC-005 * | Protection System Maintenance | 17 [-1] | 4 | High |
| TOP-002 * | Normal Operations Planning | 15 [+2] | 12 | Medium |
| CIP-003* | Security Management Controls | 14 [-5] | 6 | Lower/Medium |
| CIP-001* | Sabotage Reporting | 13 [-1] | 7 | Medium |
| CIP-004 * | Personnel & Training | 9 [-6] | 5 | Lower |
| CIP-002* | Critical Cyber Asset Identification | 8 [-4] | 8 | High/Lower |
| CIP-009* | Recovery Plans for Critical Assets | 6 [-4] | 10 | Medium/Lower |

* In NERC Top 20 as of 6-30-11

# SPP RE Performance Metrics [as of June 30, 2011]

- **Audit Reports**
  - **6 [+3 since March 31, 2011] Reports issued in 2011**
    1. **Average time to publication - 51 [-9] days**
    2. **2011 Performance Metric - 80 days**
- **Spot Check Reports**
  - **0 [+0 since March 31, 2011] issued in 2011**
    1. **Average time to publication overall – N/A**
    2. **2011 Performance metric - 90 days**

# Upcoming 2011 Activities

- **On-Site Activities [3rd Quarter of 2011]**
  - **693 Audits [See http://www.nerc.com/elibrary.php]**
    1. **Southwestern Power Administration (SWPA)**
    2. **Lafayette Utilities System (LAFA)**
  - **CIP Audits**
    1. **Independence Power & Light (Independence, Missouri)**

# Upcoming 2011 Activities [cont.]
# Off-Site Activities [3rd Quarter of 2011]

- 693 Audits [See http://www.nerc.com/elibrary.php]
  - Calpine Corporation (CALPGO) / Calpine Energy Services (CALP)
  - Farmers' Electric Cooperative, Inc. Of New Mexico (FARMCOOPNM)
  - Green Country Energy, LLC (GREENCOGO) /Green Country Operating Services, LLC (GREENCOGOP)
  - Llano Estacado Wind, LP (LLANOEWIND)
  - Missouri Joint Municipal Electric Utility Commission (MJMEUC)
- CIP Audits
  - City Of Malden Board Of Public Works (MALDENMO)
  - City Of Ottawa (OTTAWA)
  - Farmers' Electric Cooperative, Inc. Of New Mexico (FARMCOOPNM)
  - Green Country Energy, LLC (GREENCOGO) /Green Country Operating Services, LLC (GREENCOGOP)
  - Calpine Corporation (CALPGO) / Calpine Energy Services (CALP)
  - Llano Estacado Wind, LP (LLANOEWIND)

# Upcoming 2011 Activities [cont.]
# Off-Site Activities [3rd Quarter of 2011]

- CIP Audits [ Cont]
  - Missouri Joint Municipal Electric Utility Commission (MJMEUC)
  - Paragould Light & Water Commission (PARAGOULD)
  - United States Army Corps Of Engineers - KC District (COEKS)

# 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 received at end of April 2011
       A. One extension granted for late data submittal
    3. Reports due out by the end of July

# Upcoming 2011 Activities [cont.]

- Workshops
  - Fall 2011 Compliance Workshop
    - October 4-5 Little Rock, Arkansas

# EMERGING ISSUES 2011 & BEYOND

**Situational Awareness Expansion**

- **No Update**

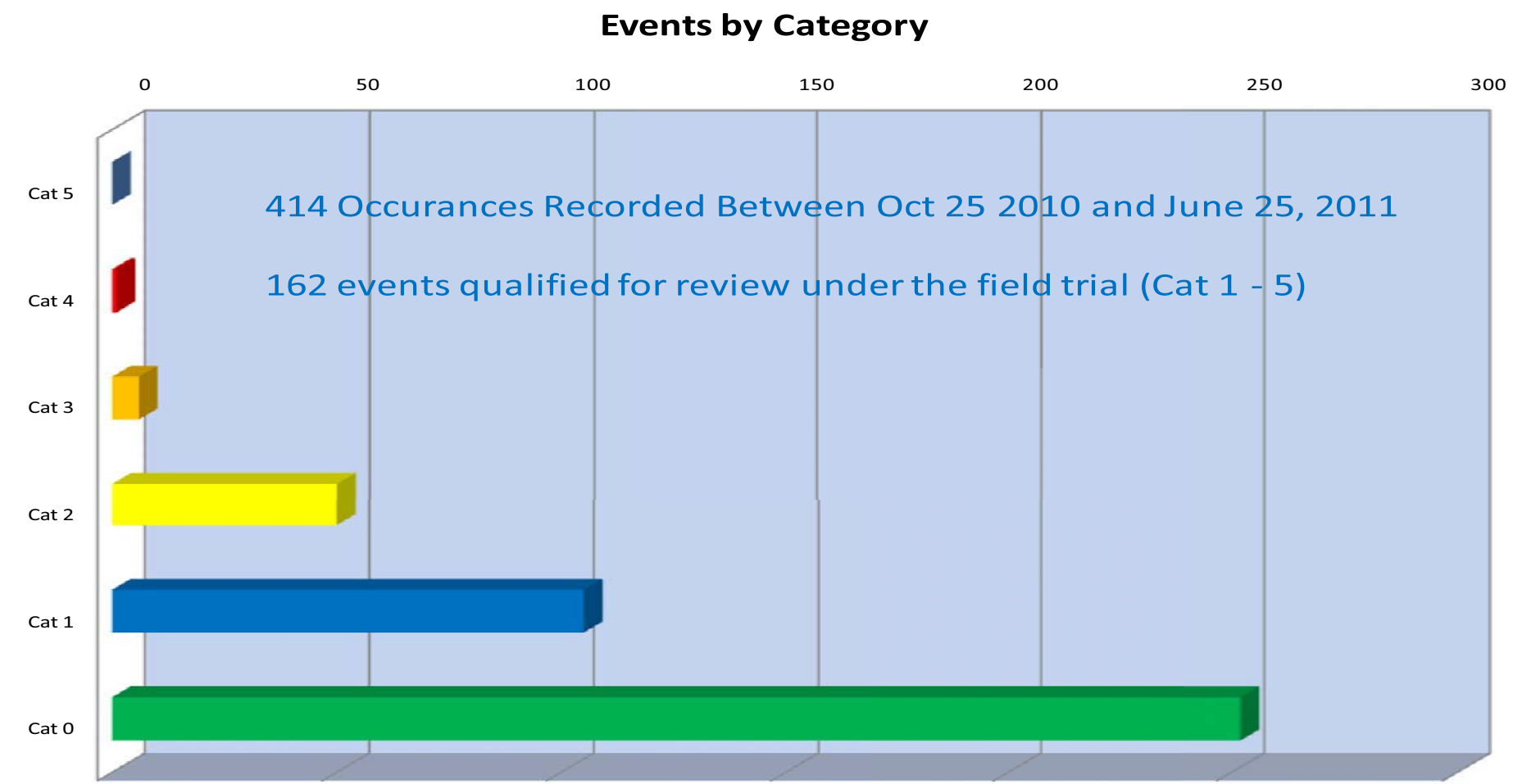
**BES Definition**

- **Drafting underway – target end of 2011**

# Event Analysis

- 2nd Phase of Field Trial to begin in 2Q 2011
- Proposed to be incorporated into NERC Rules in 2012
- NERC Event Analysis Working Group consists of NERC/Regional Entity/Stakeholders
- SPP initiating Event Analysis Working Group to assist entities in the SPP footprint
- See next slide for statistics

# Field Trial Metrics - Events by Category




| | Cat 0 | Cat 1 | Cat 2 | Cat 3 | Cat 4 | Cat 5 |
|---|---|---|---|---|---|---|
| Total | 252 | 105 | 50 | 6 | 1 | 0 |

# Facilities Ratings Alert

- Initiated in 4Q 2010
  - Registered Entities with High Priority required to report semi-annually beginning in July 2011
- Long-term Project [2011 to 2013]
  - High Priority — Year-end 2011
  - Medium Priority — Year-end 2012
  - Low Priority — Year-end 2013
- NERC Standards Drafting team developing Standard to place this activity into monitoring program
- SPP RE participants expanded from 66 to 75 since the beginning of the year

# Questions