2013 Metrics (Draft)

1. Expedite processing and mitigation of High Impact (HI) violations

Objective: Have Registered Entities mitigate HI violations as soon as possible.

HI violations are violations of reliability standards and requirements with a High Violation Risk Factor (VRF) and violations of a select group of non-High VRF standards and requirements identified by SPP RE Compliance.

HI violations shall include violation of standards and requirements with a High VRF and the high risk standards and requirements identified by Compliance as follows:

- COM-002-2 R2
- PRC-005-1 R2
- CIP-002-3 R2
- CIP-002-3 R3
- CIP-005-3a R2
- CIP-005-3a R3
- CIP-007-3 R2
- CIP-007-3 R3
- CIP-007-3 R6

Enforcement shall fast track HI violations to ensure they are mitigated as soon as possible. To accomplish this metric, Enforcement will solicit the submission of mitigation plans or issue a NAVAPs to require the submission of mitigation plans for all HI violation, and existing caseload within 105 days.[1,2]

Measure: Average number of days to mitigation plan acceptance or NAVAPS issuance for all HI violations.

(the earlier of the date of MP Acceptance or Issuance of the NAVAPS) – (the date of Compliance Sync of HI violations in CDMS) = days

Performance Contribution	**80%**	**100%**	**120%**
Average Number of Days	**120**	**105**	**75**

Weight: **10%**

Comments: -Number of days reduced by 15 days from 2012

[1] Violations of the identified standards and requirements may be exempted from HI treatment with SRT approval. Violations of standards and requirements not identified may be designated for HI treatment with SRT approval.
[2] 2012 High Impact Violation without accepted mitigation plan or issuance of a NAVAPS on January 1, 2013 will count toward the 2013 metric.

2. Maintain caseload of no more than one year

Objective: Maintain violation processing capability and efficiency in 2013 in order to achieve a one year caseload by January 1, 2014.

As of December 31, 2012, the SPP RE caseload is 168. To achieve the metric, the RE will send to NERC in 2013 completed dispositions (i. e. settlements, NOCVs, FFTs, spreadsheet NOPs, dismissals[3]) equivalent to 100% of the December 31, 2012, Enforcement caseload.

Measure: (Number of completed dispositions / (Caseload on December 31, 2013) = Percent Caseload Completed

Performance Contribution	**80%**	**100%**	**120%**
Percent of 2013 Caseload	**80%**	**100%**	**120%**

Weight: **15 %**

3. Accept or reject mitigation plans within 30 days of submission by the Registered Entity

Objective: To accept submitted mitigation plans in accordance with CMEP requirements

Measure: (1) (number of mitigation plans accepted or rejected in <= 30 days in a month) / (number of mitigation plans submitted in the month) = Percent Mitigation Plans Accepted/Rejected <= 30 days each month

Accept/Rejected Days = ("Submitted on Date" in CDMS) – ("Accepted by Region On" or "date of email requesting resubmission" in CDMS)

(2) average number of days to accept or reject mitigation plans

To be able to calculate the metric in January 2014, the metric applies to all mitigation plans submitted between December 1, 2012 and November 30, 2013.

<table>
<tr><td>Contribution[4]</td><td>∑Months where100% MPs Accepted/Rejected <=30 days/12 *100%</td><td rowspan="2">Enforcement must achieve a 100% success rate for acceptance/rejection <= 30 days in 2013 before becoming eligible for a Performance Contribution above 100%.</td><td>120%</td></tr>
<tr><td>Goal</td><td>100% MPs Accepted/Rejected <= 30 days / month</td><td>Average Number of Days to Accept/Reject = 20</td></tr>
</table>

Weight: **5.0 %**

[3] The number of dismissals shall include those dismissals not requiring NERC approval but approved by the SRT.
[4] The 100% performance contribution is based on the number of months 100% of submitted mitigation plans are accepted/rejected within 30 days. For example if Enforcement accepted/rejected 100% of the mitigation plans submitted within 30 days for 11 of 12 months in 2013 then the performance contribution would equal 11/12 x 100% or 91.6%. The 120% performance contribution is determined on an annual basis and is not available unless Enforcement achieves 100% mitigation plans accepted/rejected within 30 days for all 12 months.

4. Complete mitigation plan completion reviews within 30 days of Registered Entity notification of completion

Objective: To complete the review of mitigation plan completions in accordance with SPP RE requirements.

Measure: Average Mitigation Plan completion review days

Days = ("Certification Received by Region On" date in CDMS) – ("Mitigation Verified On" date in CDMS)

Performance Contribution	**50%**	**100%**	**150%**
Average MP Completion Review days ***Applies to all mitigation plan certifications received in 2013***	**40**	**30**	**20**

Weight: **5.0%**

5. Complete quarterly mitigation plan milestone completion reviews within 30 days of the end of the quarter[5]

Measure: (1) (number of mitigation plan milestone reviews completed in <= 30 days of the end of the quarter for each quarter) / (number of mitigation plan milestones to be completed in the quarter) = Percent Milestone Reviews Completed

Review Days = (Publication of the Milestone Review Report) – (last day of the quarter)

(2) average number of days to produce the Milestone Review Report

Applies to all mitigation plans with milestones scheduled for completion between October 1, 2012 and September 30, 2013.

Contribution[6]	∑Quarters where100% Milestone reviews completed <=30 days/4 * 100%	Enforcement must achieve a 100% success rate for milestone completion reviews <= 30 days in 2013 before becoming eligible for a Performance Contribution above 100%.	150%
Goal	100% Milestone reviews completed <= 30 days of quarter end		Average number of days to complete reviews 20

Weight: **5.0 %**

[5] The first quarterly review is due in January for the last quarter of 2012.

[6] The 100% performance contribution is based on the number of quarters 100% of milestone completion reviews are completed within 30 days of the end of the quarter. For example if Enforcement achieved 100% milestone completion reviews within 30 days for 3 quarters in 2013 then the performance contribution would equal 3/4 x 100% or 75%. The 150% performance contribution is determined on an annual basis and is not available unless Enforcement achieves 100% milestone completion reviews within 30 days for all 4 quarters.

6. Complete the documentation close out of 75% of all closed violations. [7]

Objective: To ensure Enforcement case records and webCDMS are complete and include all documentation necessary to support the processing of a violation of the Reliability Standards. During the 2011transition from the Excel workbook to the NERC Sync process for sending violation documentation to NERC, supporting documentation was not uploaded to webCDMS. This metric is designed to backfill pre Sync process supporting documentation in webCDMS and complete documentation close out of new violations as the violations are closed.

Measure: Violation documentation close out has successfully occurred when :

(1) Case Manger review of the Violation Case Record is performed and the Case Record folder is complete.
(2) Substantive and relevant violation documentation has been copied to the violation Enforcement Docket folder and the folder is complete.
(3) Documents required for Sync with NERC have been uploaded to CDMS.
(4) CDMS data fields have been completed and verified as accurate.

Percent Completed Violation Documentation Close Out = (Total Number of Violations with Documentation Close Out Completed) / (Total Number of Violations Closed as of November 1, 2013)

Performance Contribution	**50%**	**100%**	**150%**
Percent Completed Violation Documentation Close Out	**60%**	**75%**	**90%**

Weight: **7.5 %**

[7] Closed violations shall include the backlog of closed violations with incomplete violation documentation and all violations closed in 2013. A violation is closed when the Notice of Completion of Enforcement Action is issued. For metric purposes, the set of closed violations will be subject to a November 1, 2013 cut-off date to allow time for documentation close out of violations closed in 2013.

7. Publish non-public off-site audit report to NERC

Goal: 55 days

Base Measurement Point: Measured from last day of audit

Achievement Goals:

80%	100%	120%
60 days	55 days	45 days

Weight: **10%**

Comments:
- Reduced by 5 days from 2012
- Based on blend of proposed audits in 2013, average time is ~ 60 days for audit reports

8. Publish non-public on-site audit report to NERC

Goal: 75 days

Base Measurement Point: Measured from last day of audit

Achievement Goals:

80%	100%	120%
80 days	75 days	65 days

Weight: **10%**

Comments:
- Same as 2012
- Based on blend of proposed audits in 2013, average time is ~ 60 days for audit reports

9. Publish non-public Spot Check Reports to NERC

Goal: 90 days

Base Measurement Point: Measured from last day of required data submittal

Achievement Goals:

80%	100%	110%
95 days	90 days	75 days

Weight: **5%**

Comments:
- Metric should top out at 110%
- Same as 2012

10. Publish internally completed assessment of self certification/exception reporting/periodic data submittals

Goal: 95% published within allotted timeframe

Base Measurement Point: Measured from last day of due dates in SPP RE-published reporting requirements schedule

Achievement Goals:

80%	100%	110%
<95%	> 95%	100%

Weight: **2.5%**

Comments:
- Metric should top out at 110%
- Same as 2012

11. Process incoming possible violations to NERC through CDMS in 5 business days or less

Goal: 5 business days

Base Measurement Point: Measured from original entry date in CDMS/last day of audit/last day of spot check

Achievement Goals:

80%	100%	110%
6 days	5 days	3 days

Weight: **2.5%**

Comment: Metric should top out at 110%
Same targets as 2012

12. Reduce estimated cash cost of audits - on-site/off-site over standard costs; includes contractor billings and travel

Goal: 10% reduction

Base Measurement Point: Standard Cash Costs as Stated below:

2012 On-Site:	*CIP*	$28,250 [2012 - $38,029]
	693	$34,000 [2012-$33,057]
2012 Off-Site:	CIP	$0 [2012 - $0]
	693	$5,900 [2012 - $5,858]

Achievement Goals:

50%	100%	150%
5% reduction	**10% reduction**	**20% reduction**

Weight: **7.5%**

Comments:
- Similar to 2012
- Adaptable audit techniques should lead to reduced cash expenditures per unit of work

13. Increase outreach/ oversight of relay misoperations data to maintain or improve success rate for 4Q2012 – 3Q2013 versus same period of 2012

Goal: 90% or greater success rate over 4 quarter rolling average

Base Measurement Point: Based on totals reported for the period using new national database

Achievement Goals:

80%	100%	150%
<87%	**> 90%**	**>92%**

Weight: **5%**

Comments:
- Similar to 2012; Changed to Success Rate from raw data inputs
- Current rolling 4Q Success Rate is 89.75%
- Outreach efforts will be general and targeted
- Oversight may include spot checks of misoperation reports
- There are many factors that can influence the raw numbers of misoperations and ultimately a rolling average over a longer period of time will need to be substituted but until then only short term goals can be made

14. Assure proper Cause Codes can be verified from Event Analysis Reports issued by SPP RE Registered Entities

Goal: 90% or greater

Base Measurement Point: Measured by NERC report issued periodically on regional success in this area

Achievement Goals:

80%	100%	150%
80%	**90%**	**100%**

Weight: **5%**

Comment: New for 2013
Current NERC National Statistics is 60% success rate
SPP RE for 2012 was at 85% success rate

15. Issue all Reliability Assessments required by NERC in a timely manner

Goal: Issue on or before posted due date

Base Measurement Point: Assessments published to NERC

Achievement Goals:

50%	100%	110%
Less than 100% time	**100% on-time**	**None**

Weight: **2.5%**

Comment: New for 2013

16. Outreach Production Goals

Goal: Conduct 3 workshops; 9 webinars and issue 12 newsletters in 2013

Base Measurement Point: Based on measured count at end of year

Achievement Goals:

50%	100%	110%
Does not meet stated goals	**Meets stated goals**	**None**

Weight: **2.5%**

Comment: New for 2013