

SPP Compliance Department Overview

Philip Propes
Director, Compliance
August 7, 2013



Helping our members
work together to
keep the lights on...
today and in the future

Section 1

COMPLIANCE DEPARTMENT: ORGANIZATION AND FOCAL AREAS

SPP Compliance Department

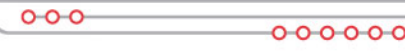
Philip Propes – Director, Compliance

Area of Responsibility	OPS Support, Events Analysis	ENG Support	BA/IM	CIP, IT Support	Outreach	Tariff/ Criteria	Documentation	SIEM, Security Tools
SME	Mark Robinson	Jonathan Hayes	Lonnie Lindekugel	Lesley Bingham	Kim Van Brimer	Alison Hayes	Keith Dover	Matt Roberson
ANALYST	Melissa Rinehart	Machelle Smith	Melissa Rinehart	Kevin Molder				

Compliance Department
Subject Matter Experts (SMEs) Activity Overview Matrix
- August 2013 -

Compliance Type	Compliance SME(s)
NERC	
CIP	
<i>CIP-001 - CIP-009</i>	Lesley Bingham, Kevin Molder
693 (IT-Oriented, Non-CIP)	
<i>COM, EOP, IRO, FAC</i>	Lesley Bingham, Kevin Molder
693 (Operations)	
<i>COM, EOP, FAC, IRO, NUC, PER, TOP</i>	Lonnie Lindekugel, Mark Robinson, Melissa Rinehart
693 (Engineering)	
<i>FAC, MOD, TPL, PRC, VAR</i>	Jonathan Hayes, Machel Smith
REGIONAL	
SPP Criteria (Ongoing Reviews)	Alison Hayes
Regional Standards Development	<i>Alison Hayes</i>
SPP Tariff (Reviews, Coordination)	Alison Hayes
<i>Governing Documents Tariff</i>	<i>Alison Hayes</i>
<i>Service Agreements Tariff</i>	<i>Alison Hayes</i>
<i>Open Access Transmission Tariff</i>	<i>Alison Hayes</i>
RTWG Liaison	Alison Hayes
MOPC Liaison	Alison Hayes
FERC	
FERC Compliance	Alison Hayes
<i>Self-Reports, RFI</i>	<i>Mark Robinson, Alison Hayes</i>
<i>FERC Orders, Review & Dissemination</i>	<i>Mark Robinson</i>

Compliance Department
Subject Matter Experts (SMEs) Activity Overview Matrix
- August 2013 -



Functional Type	Functional SME(s)
Outreach SME	
Member Outreach	Kim Van Brimer
<i>Compliance Forums</i>	<i>Kim Van Brimer</i>
<i>Compliance Calls</i>	<i>Kim Van Brimer</i>
<i>On-Site Review Coordination</i>	<i>Kim Van Brimer</i>
<i>In-House Review Coordination</i>	<i>Kim Van Brimer</i>
<i>Evidence Review Data Submission</i>	<i>Kim Van Brimer, Matt Roberson</i>
<i>Provide Member Evidence Reviews (693)</i>	<i>L. Lindekugel, M. Robinson, J. Hayes</i>
<i>Provide Member Evidence Reviews (CIP)</i>	<i>Lesley Bingham, Kevin Molder</i>
<i>Evidence Review Template Compilation and Finalization</i>	<i>K. Dover, M. Smith, M. Rinehart</i>
<i>Compliance Support Site Management</i>	<i>Kim Van Brimer</i>
<i>Compliance Support Site Administration</i>	<i>Matt Roberson</i>
<i>Standards Under Development Updates</i>	<i>Kim Van Brimer</i>
<i>Compliance Newsletter Editor</i>	<i>Kim Van Brimer</i>
<i>Compliance Newsletter Publisher</i>	<i>Keith Dover</i>
<i>Evidence Review Database Administration</i>	<i>Kim Van Brimer</i>
<i>Customer Relations Inquiry Facilitation</i>	<i>Kim Van Brimer</i>
Working Group Support	
<i>Event Analysis Working Group (EAWG)</i>	<i>Mark Robinson</i>
<i>CIP Working Group (CIPWG)</i>	<i>Lesley Bingham</i>
<i>Regional Compliance Working Group (RCWG)</i>	<i>Kim Van Brimer</i>

Compliance Department
Subject Matter Experts (SMEs) Activity Overview Matrix
- August 2013 -



Functional Type	Functional SME(s)
Corporate Outreach	Machelle Smith
<i>Internal Audit/Review Coordination</i>	<i>Machelle Smith</i>
<i>Compliance Automation Support</i>	<i>Matt Roberson</i>
<i>Process Compliance Reviews</i>	<i>(See Direct Support)</i>
<i>Project Management Coordination</i>	<i>Machelle Smith</i>
Investigative Support	Mark Robinson
<i>Event Analysis Research/Reponse</i>	<i>Mark Robinson</i>
<i>CI/Mitigation Preparation</i>	<i>Mark Robinson</i>
<i>CI/RFI Responses</i>	<i>Mark Robinson</i>
<i>Data Request Support - Operations</i>	<i>Mark Robinson, Melissa Rinehart</i>
<i>Data Request Support - Engineering</i>	<i>Jonathan Hayes, Machelle Smith</i>
<i>Data Request Support - IT</i>	<i>Lesley Bingham, Matt Roberson</i>
Audit Support	Melissa Rinehart
<i>Audit Preparation</i>	<i>Melissa Rinehart</i>
<i>Self-Certification Oversight/Verification</i>	<i>Melissa Rinehart</i>
<i>Disturbance Report Tracking</i>	<i>Mark Robinson</i>
<i>SSAE16 Support (IT)</i>	<i>Lesley Bingham</i>
<i>SSAE16 Support (Ops)</i>	<i>Melissa Rinehart</i>
Documentation Support	Keith Dover
<i>Department plan support (BC/DR, Safety, et al.)</i>	<i>Keith Dover</i>
<i>Documentum (Compliance Document Archives)</i>	<i>Melissa Rinehart</i>
<i>Document management (Files, SharePoint)</i>	<i>Keith Dover</i>
<i>Compliance reports (As needed)</i>	<i>Keith Dover</i>

Functional Type	Functional SME(s)
Training Outreach	Machelle Smith
<i>CIP Training</i>	<i>Lesley Bingham</i>
<i>Ops Training</i>	<i>Machelle Smith</i>
<i>Materials Preparation</i>	<i>Keith Dover</i>
Technical Support	Matt Roberson
<i>Security Monitoring/Event Collection</i>	<i>Matt Roberson</i>
<i>Process Automation, Compliance</i>	<i>Matt Roberson, Kevin Molder</i>
<i>Survey Tool Support</i>	<i>Matt Roberson</i>
Oversight/Tracking /Reporting	Kim Van Brimer
<i>Budget Coordination Tracking/Reporting</i>	<i>Kim Van Brimer</i>
<i>Department Metrics Tracking/Reporting</i>	<i>Kim Van Brimer</i>
<i>Employee Utilization Tracking/Reporting</i>	<i>Kim Van Brimer</i>
<i>Ad Hoc Report Creation</i>	<i>Melissa Rinehart</i>
<i>Strategic Planning Support</i>	<i>All</i>
Direct Support Type	Direct Support SME(s)
Operations Department	Mark Robinson, Lonnie Lindekugel (M. Rinehart)
Engineering Department	Jonathan Hayes (M. Smith)
IT Department	Lesley Bingham (K. Molder)
Outreach	Kim Van Brimer
	BOLD = Topical Area SME

Section 2

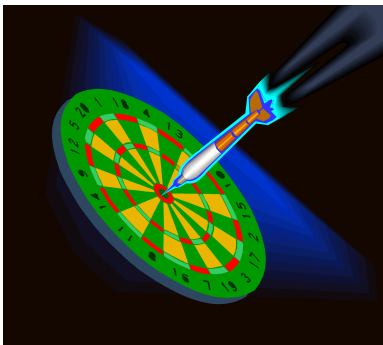
PRIMARY RESPONSIBILITIES: **AUDITS, INVESTIGATIONS, OUTREACH, AND PREPAREDNESS**

Audit Readiness

- **Goal:**

- **On Target Audit Readiness for:**

- BA Certification
 - 706 Audit
 - 693 Audit



- **Qualitative Metric:**

- **Pre Audit Completion of:**

- SME Training
 - RSAW and Evidence Compilation
 - Logistics

- **SERC Submittals:**

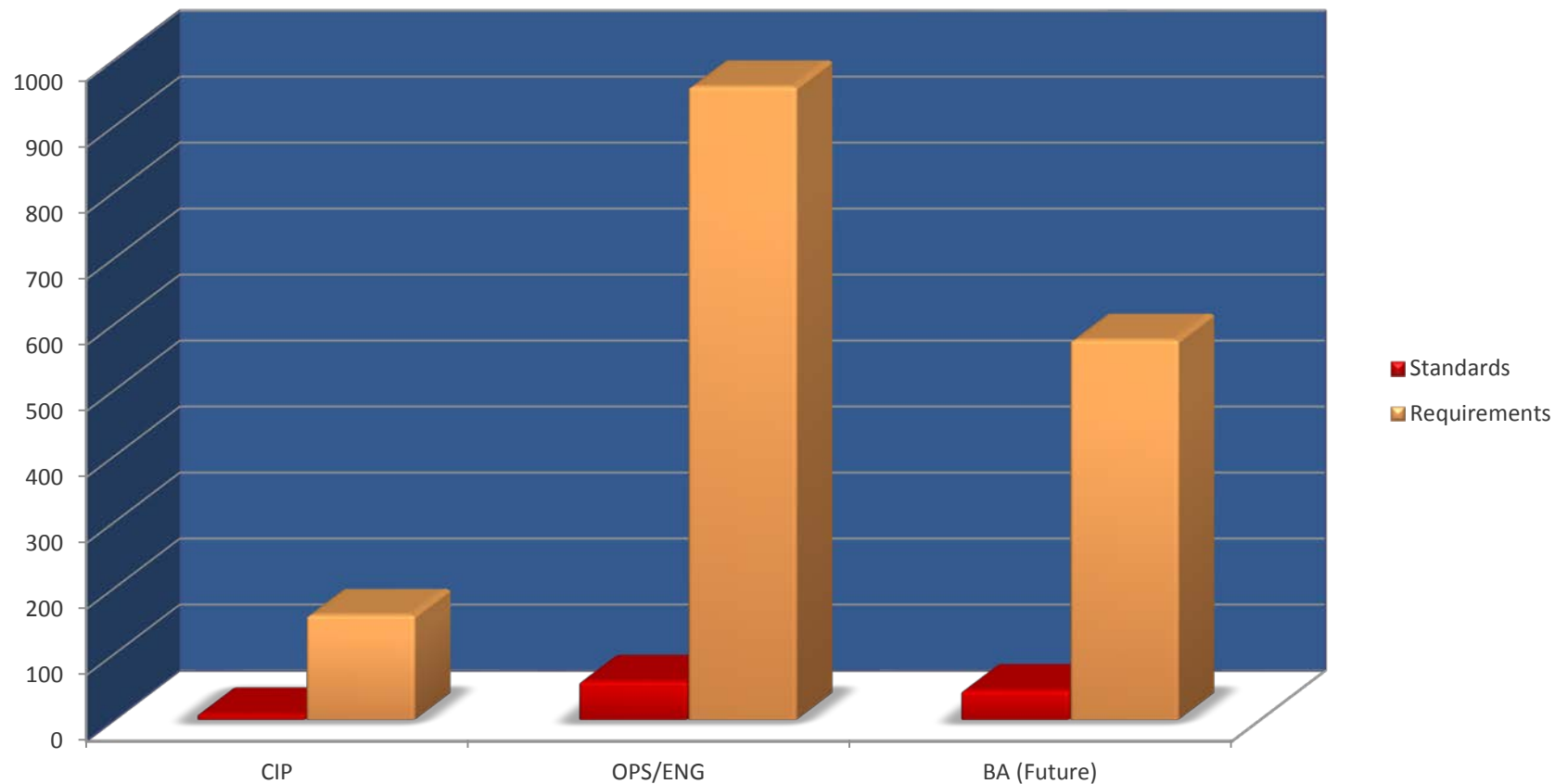
- Pre Audit Survey and RSAW Submittals

- **Response to Audit Report**

- **Post Audit Recommendations and Lessons Learned**

SPP Applicable Standards and Requirements

CIP: 9 Standards and 159 Requirements
693: 59 Standards and 960 Requirements
BA: 45 Standards and 576 Requirements



Investigations, Events, Inquiries

Compliance Staff supports external inquiries

- FERC
- NERC
- SERC, SPP RE, MRO
- Tariff Compliance Issues
- Criteria Compliance Issues
- SSAE16 Compliance Issues
- Financial, HR Audit Support

Entity Outreach Offerings

Regional Compliance Outreach Program

- Evidence Reviews (In-House, On-Site)
- Monthly Compliance Calls
- Entity Outreach Visits
- Quarterly Compliance Forums
- Weekly Industry Updates
- Compliance Support Site
- Standards Development Calls

Policy and Process Reviews

Compliance Staff supports process reviews

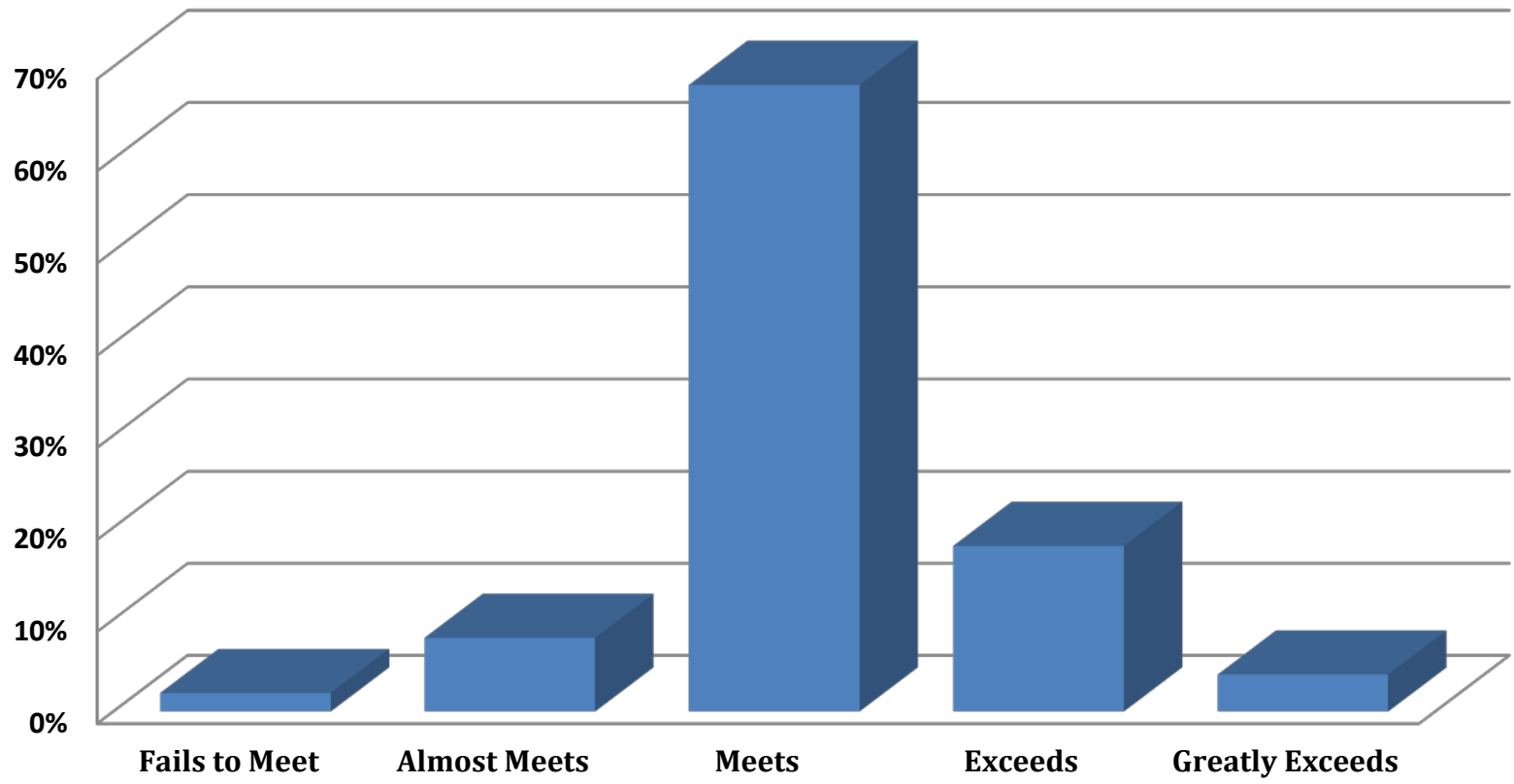
- **Operations-based processes**
 - Reliability and Markets
- **Engineering processes**
 - Planning, Data Submission, etc.
- **IT processes**
 - Security, Disaster Recovery, Architecture/Design
- **Human Resources processes**
 - Hiring/Termination, access requests, PRAs, etc.

Section 3

CONTINUOUS IMPROVEMENT: IDENTIFYING SUCCESSES, STRENGTHS, AND WEAKNESSES

2012 SPP Survey Satisfaction Results

SPP Compliance Department



Performance Feedback

Numerous feedback opportunities are utilized

- **Working Groups**
 - Minutes, verbal feedback, surveys
- **Compliance Forums**
 - Post-Forum surveys, verbal feedback
- **Electronic Mail**
 - Evidence Review comments, customer support comments, other unsolicited feedback
- **Internal Feedback**
 - Other Departments, Managements, Staff

Section 4

WORKING GROUP SUPPORT: **RCWG, CIPWG, EAWG**

Working Group Support - RCWG

- **Regional Compliance Working Group (RCWG)**
 - **Philip Propes, Staff Secretary**
- Provide guidance on policy issues to SPP on reliability compliance activities of federal or regional regulators, committees, or companies.
- Provide expertise to other SPP Working Groups on membership issues related to regional compliance matters specific to execution, interpretation or implementation of federal or regional regulatory requirements.
- Provide a stakeholder forum to encourage membership discussion of regional compliance issues and provide a means to communicate collective membership input to appropriate regulatory bodies, i.e., FERC, NERC, RE Staff, etc.
- Provide a membership forum to interface with SPP RTO Compliance staff on matters of NERC Reliability Standards Compliance on process, procedures.

Working Group Support - CIPWG

- **Critical Infrastructure Protection Working Group (CIPWG)**
 - **Lesley Bingham, Staff Secretary**
- The purpose of the Critical Infrastructure Protection Working Group (CIPWG) is to advance the physical and cyber security of the electricity infrastructure within the SPP region. This group will serve as a forum for discussing security issues, for establishing security policies and procedures for SPP Member-common resources, and will serve as an interface between the NERC CIP Committee and the SPP membership.

Working Group Support - EAWG

- **Event Analysis Working Group (EAWG)**
 - **Mark Robinson, Staff Secretary**
- **The purpose of the Event Analysis Working Group (EAWG) is to foster a culture of reliability excellence within the SPP region by reviewing event analysis reports prepared by registered entities after a system disturbance event to ensure an appropriate root cause analysis has been performed and by sharing lessons learned within the SPP Region. For multi-entity events within the region, the EAWG will prepare an event analysis report. The EAWG will provide an independent assessment using a team with expertise from each technical area within SPP (CIPWG, SPCWG, ORWG, GWG, and TWG).**

Section 5

NOTABLE DATES AND ACTIVITIES: THE COMPLIANCE DEPARTMENT HORIZON

2013 – Notable Events

- **CIP (706) Audit:**
 - June 24 – June 28 and July 8 – July 12
- **OPS (693) Audit:**
 - September 23 – September 27
- **BA Certification**
 - November 5 – November 6



2014 – Looking Ahead

- **Focusing on continuous improvement**
- **Increase tracking through improved performance metrics**
- **Gauging the value of reliability standards compliance**
- **Continue developing relationships with members, non-members, FERC, NERC, SPP RE, MRO, SERC**
- **Better collaborate with SPP RE on outreach efforts**
- **Focus staff resources on pending compliance needs**
- **Focus on pro-active compliance processes**
- **Continue developing strategic plans for a 5+ year horizon**

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