



**Southwest Power Pool**  
**REGIONAL ENTITY TRUSTEES MEETING**  
**OCTOBER 28, 2013**  
**SPP Corporate Center**  
**Little Rock, Arkansas**  
**A G E N D A**

**8:00 a.m. – 12:00 p.m.**

1. Call to Order/Introductions ..... John Meyer
2. Antitrust Guidelines ..... Emily Pennel
3. Approval of Meeting Minutes – July 29, 2013, and August 5, 2013, (UFLS call) ... John Meyer
4. Critical Infrastructure Protection Committee Update.....Robert McClanahan
5. Staff Reports
  - 5a. CIP Transition Update..... Kevin Perry
  - 5b. General Manager’s Report.....Ron Ciesiel
  - 5c. Enforcement Report .....Joe Gertsch
  - 5d. Compliance Report & 2014 Implementation Plan.....Ron Ciesiel
  - 5e. Summary of Recent System Events ..... Alan Wahlstrom
6. 2013 Stakeholder Satisfaction Survey Results .....Ron Ciesiel
7. Winter Reliability Assessment Overview..... Jason Smith
8. SPP RE Trustee Self-Assessment..... John Meyer
9. NERC Committee Representative Written Reports – Comments or Questions
  - 9a. Planning Committee .....Noman Williams
  - 9b. Compliance and Certification Committee .....Jennifer Flandermeyer
  - 9c. System Protection and Control ..... Lynn Schroeder
  - 9d. Interchange Subcommittee .....Jeremy West
  - 9e. Operating Committee Report ..... Jim Useldinger
10. Staff Written Reports – Comments or Questions
  - 10a. Staff Goals and Metrics .....Ron Ciesiel
  - 10b. Year-to-Date Financial Statement.....Debbie Currie
  - 10c. Outreach Activity .....Emily Pennel
11. New Action Items ..... Emily Pennel



12. Future Meetings ..... John Meyer

- January 27, 2014 – Austin
- April 28, 2014 – Oklahoma City
- June 17, 2014 – Little Rock (budget meeting)
- July 28, 2014 – Omaha
- October 27, 2014 – Little Rock

# SPP Regional Entity Antitrust Guidelines

**It is SPP RE's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or which might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.**



Southwest Power Pool  
REGIONAL ENTITY TRUSTEES MEETING MINUTES

July 29, 2013

Marriott City Center

Denver, Colorado

Meeting Materials

8:00 a.m. – 12:00 p.m.

- 1. Call to Order/Introductions ..... Emily Pennel
- 2. Antitrust Guidelines ..... Emily Pennel
- 3. Approval of Meeting Minutes – June 18, 2013 ..... John Meyer

The meeting was called to order at 8:01 a.m. The Trustees approved the June 18, 2013, meeting minutes with no discussion.

- 4. **CIP Transition V3-V5** (*via phone/webex*) ..... Kevin Perry

CIP Version 5 is pending before FERC. FERC’s Notice of Proposed Rulemaking requested industry comments on several issues of concern; SPP RE and other entities have submitted comments. FERC Commissioner LaFleur has stated that FERC wants to approve V5 before 4/1/14; in that case V4 would be rescinded and entities would remain on V3 until V5 becomes effective. The latest proposed [NERC Transition Guidance Document](#), issued in July but not yet finalized, is significantly changed from NERC’s previous guidance released in April 2013. The latest guidance document is expected to be effective upon release until the V5 enforcement date and will supersede the NERC V4 guidance. The guidance document includes a plan for NERC to conduct a transition implementation study that will take six months.

During the transition period there are three proposed approaches for entities: 1) Status Quo: Continue to maintain a valid V3 Risk Based Assessment Methodology; 2) Adopt the V4 Bright-Line Criteria in its entirety, with caveats; 3) Adopt the V5 Bright-Line Criteria in its entirety. A stakeholder asked if SPP RE staff has a recommendation for which approach works best for SPP RE. We recommend entities carefully review all choices and select the approach that best meets your needs. SPP RE staff can deal with all approaches. There may be something in V4 that would be advantageous for helping your organization make the transition. Going straight to V5 may be more advantageous.

SPP RE will audit to whatever standard is in effect. If FERC doesn’t act by 4/1/14, we will have to audit V4. We can’t audit on V5 until its enforcement date, however we will accept adoption of the V5 Bright-Line Criteria in lieu of a V3-compliant Risk-Based Assessment Methodology. An entity going to V5 may come out of compliance with V3 or V4 – we recognize that condition and will not expect that an entity must be in compliance with all V3 requirements right up to the V5 enforcement date if it can demonstrate its program is consistent with the V5 parallel requirement.

There will be more information on the CIP transition at the [fall workshop](#).



5. **Discuss Recall of Regional UFLS Standard** .....Ron Ciesiel

SPP spent about six years developing the regional SPP Under Frequency Load Shedding (UFLS) Standard, PRC-006-SPP-1, which NERC approved in November 2012. One reason the regional standard was created was to require Generator Owners (GOs) to participate in the SPP UFLS program. The SPP RE Trustees passed the regional standard because there was no other NERC standard that would have covered the GO requirements. However, PRC-024-1 is also pending at FERC; it does require GOs to supply data to the Planning Coordinator (PC). The continent-wide PRC-024-1 and the SPP regional UFLS landed at FERC for approval at the same time. All requirements in the SPP regional standard are included in the SPP PC’s UFLS Plan.

The UFLS standard drafting team recommended that MOPC provide an advisory vote that PRC-006-SPP-1 should be withdrawn from FERC consideration since NERC PRC-024-1 is waiting on FERC approval. MOPC approved the recall. SPP RE staff supports effort to recall PRC-006-SPP-1, as all of its requirements are covered by NERC standards. For the majority of the footprint, the regional standard is already covered by the SPP PC’s UFLS Plan.

Once PRC-024-1 and PRC-006-1 go into effect, SPP RE will oversee GOs and Load Serving Entities against the SPP PC (or other PC) plan. The SPP RTO is required to create a valid UFLS Plan and SERC will oversee the SPP UFLS plan and program.

Chairman Meyer stated that he is not supportive of regional standards when they are not needed. He asked staff to provide a matrix comparing the regional and national standards on key issues. Chairman Meyer said the Trustees should consider the SPP Board’s advisory vote, to be taken the following day, before holding a public conference call in the coming week. During the call, the Trustees will vote on the recall.

6. **Long Term Reliability Assessment (LTRA)** .....Debbie Currie

*Action Requested: SPP RE Trustees accept LTRA*

The LTRA is prepared by RE and RTO staff. The 2013 LTRA is a projected 10-year long-term outlook (2014-2023). The report’s primary objectives are to provide a qualitative outlook of regional reliability and make recommendations for mitigations/actions as needed. The LTRA is created using Model Development Working Group model data submitted by Reporting Entities. Staff seeks inputs from the Transmission Working Group and Operating Reliability Working Group; the report then undergoes peer review at NERC.

The LTRA projected ~54,700 MW for 2014 Total Internal Demand and ~59,200 MW for 2023. Modest load growth is projected over next ten years. For 2014, the report indicates ~88,000 MWs Total Internal Capacity and ~91,000 MWs in 2023.

SPP members are required to maintain a 12% capacity margin, which translates to a 13.6% reserve margin. The forecasted anticipated reserve margin is ~35% in 2014, decreasing to ~28% in 2023. SPP has instituted a bi-annual study process to review environmental regulations that takes into account outage scheduling. Long-term challenges include oil/gas drilling and integration of variable generation.

The Trustees unanimously accepted the 2013 LTRA.

**7. Facility Ratings Alert Update** .....Debbie Currie

In the SPP RE region, nine entities have completed High Priority Line assessments; over 99% of High Priority discrepancies have been remediated. Twelve entities in the SPP region reported assessment results on Medium Priority Lines; ~ 1,900 discrepancies were found and ~13% have been remediated. Seventeen regional entities reported assessment results on Low Priority Lines; ~ 300 discrepancies were found and ~38% have been remediated. A large number of reporting entities did not provide an update for Low Priority facilities or did not complete assessment of Low Priority facilities following inspection. Ron Ciesiel recommended that entities make extension requests sooner rather than later. Compliance actions are deferred until the end of the program.

**8. Staff Reports**

**8a. General Manager’s Report** .....Ron Ciesiel

There has been a lot of discussion on the Reliability Assurance Initiative (RAI). As part of the RAI, NERC’s Compliance and Certification Committee recently published the [Internal Controls Working Guide](#); internal controls will have increased focus moving forward in the CMEP. A third-party recently assessed all RE audit processes, and all regions have agreed to adopt the resulting standardized audit template that should be in place by the end of the year.

All aspects of BES implementation has been deferred until 7/1/14. In the fourth quarter of this year, NERC plans to conduct outreach on the software program used to process inclusion and exclusion requests.

**8b. Enforcement Report**..... Jimmy Cline

The current caseload index is around nine months. We have a caseload of 194 active violations; 60 are 693 and 134 are CIP. There are 64 open High Impact violations. Self-reports are the leading discovery method of incoming violations. In 2013, 100 mitigation plans have been submitted.

Entities are not required to submit a mitigation plan unless we issue a Notice of Alleged Violation Proposed Penalty or Sanction. Some entities have waited for the Enforcement process to begin before working on mitigation. CIP issues are more complex to resolve. Ron Ciesiel encouraged stakeholders to proactively submit mitigation plans.

**8c. Compliance Report** .....Ron Ciesiel

A Standards Drafting Team is working on Phase 2 of the BES Definition to clear up open issues from Phase 1 and address issues raised in the FERC Order. The Phase 2 project only received 49% approval. Registered Entities should be compiling a list of self-nominated ‘exclusions’.

As part of the RAI, we expect more stakeholder involvement in the development of Reliability Standards Auditor Worksheets. Revisions to the Find, Fix, and Track process are underway based on FERC’s 6/20/13 Order. Self-reporting processes/requirements are also under review.

We need everyone to be committed to understanding the root causes of events. EOP-004 -2 becomes effective 1/1/14. This standard brings together the Event Analysis and mandatory reporting programs. Entities’ implementation of NERC/FERC recommendations from major events will be viewed favorably.



Our operations success rate is generally improving. Incorrect setting/logic/design errors and communication failures are most common cause of misoperations in our region. We have asked the SPCWG to investigate these causes and ask stakeholders to look at root causes. Second quarter data is due 8/31/13. Transmission Owners in the SPP RE footprint had no reportable contacts in the 2Q 2013 timeframe.

Ron Ciesiel encouraged everyone to look at the [fall workshop agenda](#) and [upcoming webinars](#).

Chair John Meyer served on a NERC panel of five independent industry experts who reviewed the 693 standards and [published a report](#) on their findings. The experts recommend retiring 147 requirements and consolidating the remaining requirements for an overall 43% reduction in requirements. They identified gaps in outage coordination, governor frequency response, situational awareness models, and clear three-part communications. The group recommended that NERC:

1. Retire 147 requirements and focus initial improvement efforts on 16 high-risk standards
2. Continue developing risk-based approaches to identify high priority reliability issues
3. Realign standards from the current 14 families into 10 families grouped by reliability functions
4. Address identified gaps
5. At an appropriate time in CIP standards' development, use a team of experts to evaluate the CIP requirements

**9. NERC Operating Committee (OC) Report** *(via phone/webex)* ..... Jim Useldinger

At the April OC meeting there was a lot of discussion on the revised MISO reliability plan. MISO and Joint Parties executed the "Operations Reliability Coordination Agreement" that defines the terms of the operations transition period. The next step is to develop an operations coordination process. The OC approved this MISO reliability plan in June.

The Balancing Authority Reliability-based Control standard drafting team developed a Reliability Guideline on Reserve Policy; the OC approved posting it for comment. The Operating Reliability Subcommittee issued a survey to Reliability Coordinators regarding follow-up on the Southwest Outage. The OC asked the subcommittee to develop a Guideline addressing the utilization of Operational Tools.

The OC approved the Event Analysis Subcommittee's (EAS) revisions to the Event Analysis process. The EAS discovered two equipment vendor issues; a Lessons Learned has been published on the topic. The EAS researched event data and did not find enough evidence to require EMS support, transmission/generation field support, or engineering support personnel to receive the level of training or certification required of a BA, TOP, or RC.

The OC heard a report on how some companies are addressing the aging workforce by utilizing military veterans to fill industry positions. Veterans bring skill sets that translate well, including leadership, commitment, discipline, crisis management, and teamwork.

**10. NERC Committee Representative Written Reports - Comments or Questions**

- 10a. Planning Committee ..... Noman Williams
- 10b. Compliance and Certification Committee ..... Jennifer Flandermeyer
- 10c. Critical Infrastructure Protection Committee ..... Robert McClanahan
- 10d. System Protection and Control ..... Lynn Schroeder
- 10e. Interchange Subcommittee ..... Jeremy West

There were no questions regarding these reports.

*Relationship-Based • Member-Driven • Independence Through Diversity  
Evolutionary vs. Revolutionary • Reliability & Economics Inseparable*



**11. Staff Written Reports - Comments or Questions**

- 11a. Staff Goals and Metrics .....Ron Ciesiel
- 11b. Year-to-Date Financial Statement.....Ron Ciesiel
- 11c. Outreach Activity ..... Emily Pennel
- 11d. Summary of Recent System Events .....Debbie Currie

SPP RE staff are on track with our metrics except for the Misoperations success rate, which is just under the 90% goal. We are under-running our budget, primarily related to some open positions.

Stakeholders are encouraged to attend the Oct. 8-9 fall workshop in Little Rock or via webinar and three upcoming webinars; see the [SPP.org RE calendar page](#) for details.

We have had nine events YTD. Category 1 events are the lowest-tier of events. We have had two Category 1 events and 7 Category 0 events, which are tracked just for trending purposes. One Category 1 event was the evacuation of a control room due to fire; a [Lesson Learned](#) was posted on SPP.org. The other was a lightning strike that caused catastrophic insulator failure on a 345 KV line.

Ron Ciesiel encouraged the RTO Generation Working Group to discuss winter weatherization.

**12. New Action Items ..... Emily Pennel**

Emily Pennel will schedule a public conference call for the Trustees to discuss and vote on a recall of the regional UFLS standard.

**13. Future Meetings ..... John Meyer**

- [October 28, 2013](#) - Little Rock
- [January 27, 2014](#) - Austin
- [April 28, 2014](#) - Oklahoma City
- [June 17, 2014](#) - Little Rock (budget meeting)
- [July 28, 2014](#), Omaha
- [October 27, 2014](#) - Little Rock

The meeting was concluded at 12:03 p.m.

Respectfully submitted,

Emily Pennel  
SPP RE Trustees Secretary



**REGIONAL ENTITY TRUSTEE MEETING**

**JULY 29, 2013**

**ATTENDANCE LIST**

NAME	SYSTEM
Sheila Scott	SPP RB
Emily Pennel	SPP RB
Jimmy Cline	SPP RB
MARTIN PENNING	EMPIRE DISTRICT
Stacy Duclatt	SPP
RON CIGSIEL	SPP RB
GERRY BURROWS	SPP RE TRUSTEE
John Meyer	" " "
Dave Christiano	" " "
DAVID GOULDING	NERC BOT
BRETT KRUSIE	CAL PINE
Patrick Smith	Westar
Bo Jones	Westar
TRACEY STEWART	SWPA
JULIAN BRIX	SPP DIRECTOR

NAME

SYSTEM

Sohn Rhea	OEAE
Kip Fox	AEP
Debbie Currie	SPP RE
Terri Eaton	Xcel Energy
Jamie Strickland	Xcel Energy
Lindsay Shepard	Sunflower
Noman Williams	Sunflower
BRIAN GEDRICH	NEXTERA
Philippa Narog	Xcel Energy (SPS)

## **Webex Attendance 7/29/13**

Kevin Perry (SPP RE)	SPP RE
John Allen (SPRM)	City Utilities of Springfield
Eric Ervin	Westar
Fred Meyer	Empire
Mike Murray	City of Independence, MO
Chris Haley	SPP
Jennifer Flandermeyer	KCPL
jim useldinger	KCPL
Mahmood Safi	OPPD
Noumvi Ghomsi	MO Public Service Commission



**Southwest Power Pool  
REGIONAL ENTITY TRUSTEES MEETING MINUTES**

**August 5, 2013**

**Teleconference: Vote on Recalling Regional UFLS Standard**

**Meeting Materials**

**3:00 p.m. – 4:00 p.m.**

The meeting was called to order at 3:07 p.m. John Meyer noted that the MOPC, RCWG, and Board of Directors gave positive advisory votes for recalling the SPP regional UFLS standard, PRC-006-SPP-1. The Trustees want to ensure that everything is covered with the NERC standards before voting to recall the regional standard.

General Manager Ron Ciesiel gave a short overview of the history of the SPP regional UFLS standard along with the concurrent NERC PRC-006-1 and PRC-024-1 standards. Mr. Ciesiel covered six issues related to the regional and NERC standard comparison:

1. Applicability to Registered Entities
  - a. Mr. Ciesiel noted that SPP is the only registered Planning Coordinator (PC) in the footprint.
2. Generator Data
3. Generator Owner Non-Conformance
4. Small Entity Flexibility
  - a. Mr. Ciesiel noted that the continent-wide PRC-006 requires PCs to have a UFLS plan in place by 10/1/13 that meets the attributes of PRC-006. The SPP PC's plan also includes attributes of the regional UFLS standard.
5. Generator Performance Curve Compliance
  - a. Mr. Ciesiel noted that SPP RE would have to re-file the regional UFLS standard to make the regional and national standards consistent. This is an unintended consequence of having regional and national standards that cover the same issue.
6. Coordination Among PCs

SPP RE staff asked the Trustees to approve the proposal to recall PRC-006-SPP-1 from FERC. Chair John Meyer asked those on the phone for comments/questions and received none. Trustee Burrows noted a minor concern about the five-year phase-in on PRC-024. Mr. Ciesiel noted that when PRC-024 was being approved, a number of industry stakeholders stated that voluntary compliance in this area is high.

Trustee Burrows moved to approve the proposal to recall PRC-006-SPP-1 from FERC. Trustee Christiano seconded the motion. The SPP RE Trustees unanimously approved the proposal.

Trustee Christiano and Ron Ciesiel both noted their appreciation of the hard work that staff and stakeholders, particularly the SPCWG, put into the regional UFLS standard. Many of the regional UFLS standard's attributes are now included in the proposed SPP PC UFLS Plan.

*Relationship-Based • Member-Driven • Independence Through Diversity  
Evolutionary vs. Revolutionary • Reliability & Economics Inseparable*



SPP RE will prepare a document for NERC explaining the reasons for the recall. The issue is expected to be added to the November NERC Board of Trustees packet. If the NERC Board of Trustees approves the recall, NERC will send a petition to FERC requesting the recall.

The meeting was concluded at 3:53 p.m.

Respectfully submitted,

Emily Pennel  
SPP RE Trustees Secretary

**Future Meetings:**

- October 28, 2013 - Little Rock
- January 27, 2014 - Austin
- April 28, 2014 - Oklahoma City
- June 17, 2014 - Little Rock (budget meeting)
- July 28, 2014, Omaha
- October 27, 2014 - Little Rock

## SPP RE Trustee Meeting 8/5/13

Rick Gurley	AEP
Louis Guidry (Cleco)	Cleco
Mike Grimes	EDPR
Martin Penning	Empire
Kathy Ehrhard	GRDA
Jennifer Flandermeyer	KCPL
Eric Ruskamp	LES
David Duebner	MISO
Tyler	MISO
Noumvi Ghomsi	MO Public Service Commission
Gerry Dunbar	NPCC
Don Schmit	NPPD
Ron Thompson	NPPD
Carter Edge (REMG)	SERC
Jonathan Hayes	SPP
Mark Robinson	SPP
Kim VanBrimer	SPP
Jason Speer	SPP
Thomas Teafatiller	SPP RE
Sheila Scott	SPP RE
Ron Ciesiel	SPP RE
Tasha Ward	SPP RE
Emily Pennel	SPP RE
Gerry Burrows	SPP RE Trustee
John Meyer	SPP RE Trustee
Dave Christiano	SPP RE Trustee
Ellen Watkins	Sunflower
Gary Condict (Sunflower)	Sunflower
Mathew Thykkuttathil	Sunflower
William Grant	Xcel
Bryan Kauffman	Xcel

# NERC Critical Infrastructure Protection Committee (CIPC) Report to Southwest Power Pool Regional Entity Trustees Submitted by Robert McClanahan, Chair, SPP Critical Infrastructure Protection WG October 17, 2013

## NERC CIPC Meeting

- The NERC CIPC held its quarterly meeting in Denver, CO on September 17-18, 2013. The materials for this meeting can be found at:
  - Agenda:
    - [http://www.nerc.com/comm/CIPC/Agendas%20Highlights%20and%20Minutes%202013/\(Word\) Agenda CIPC September 17-18 2013 \(Denver CO\).pdf](http://www.nerc.com/comm/CIPC/Agendas%20Highlights%20and%20Minutes%202013/(Word) Agenda CIPC September 17-18 2013 (Denver CO).pdf)
  - Presentations:
    - <http://www.nerc.com/comm/CIPC/Agendas%20Highlights%20and%20Minutes%202013/Presentations%20--%20September%2017-18,%202013.zip>
  - Draft Minutes:
    - <http://www.nerc.com/comm/CIPC/Agendas%20Highlights%20and%20Minutes%202013/Draft%20Minutes%20-%20September%2017-18,%202013.pdf>
- A physical security training workshop was conducted for CIPC Members and Alternates prior to the CIPC meeting.
- The Electric Sub-Sector Coordinating Council (ESCC), representing the industry in the DHS Critical Infrastructure program, has been reorganized.
  - Prior to the reorganization, the group had been led by NERC, and included five industry CEOs (1 Coop, 1 Municipal, 1 Canadian, and 2 Investor-Owned), the NERC CEO, and one NERC Board member.
  - The reformed ESCC consists of 30 industry CEOs, representing all industry sectors (Coop, Muni, IOU, etc.). NERC now sits on the ESCC as an observer.
  - The ESCC meets with corresponding officials within Government Agencies with regulatory authority over the industry to discuss policy-related matters.
- Bill Lawrence of NERC Staff provided an overview of the upcoming GridEx II exercise on November 13-14, and encouraged entities to participate, either as full players or as monitor/respond.
  - **NOTE:** The SPP CIPWG is developing a regional plan to allow SPP Member Companies to participate in both the National and an SPP Member exercise simultaneously.
- NERC Staff reported on the development of RSAWs for the CIP Version 5 standards. Concern was expressed by CIPC membership that RSAW development was taking place without industry input, though NERC had ensured industry a place at the table during the run-up to balloting on Version 5.
  - The specific concern was that a potential bait-and-switch was taking place, with NERC “promising” industry the opportunity to help develop the RSAWs in order to get Version 5 passed, but then renegeing after the standards were approved.

- NERC Staff responded that the industry would be able to comment on the RSAWs once they reach “90% versions”.
- The CIPC subcommittees and task forces provided updates on their progress.
  - Grid Exercise Working Group Chair Tim Conway reported on the progress toward the second biennial national grid exercise, GridEx II, to be held on November 13-14. Over 170 entities have registered to participate.
  - Physical Security Task Force Chair John Breckenridge recommended that the Electricity Sub-Sector Physical Security Response Guideline be circulated for e-mail approval following the CIPC meeting.
- Fred Hintermister of NERC Staff gave an update on the ES-ISAC and encouraged more entities to get involved to increase the overall value of the ES-ISAC.
  - He noted that the industry Trade Associations have reviewed legal language related to separation of ES-ISAC from Compliance and agree that it is strong enough to protect information shared with the ES-ISAC from being used in NERC compliance activities.
  - He also noted that the ES-ISAC is source-agnostic regarding information (they want any and all relevant information) and is only concerned with efficacy of that information, rather than the source.
- GridSecCon 2013 was held on October 15-17, 2013 in Jacksonville, FL. Over 300 participants met to hear presentations on electric grid security.
- CIPC Meeting Schedule for the next two meetings:
  - December 10-11, 2013 in Atlanta, GA
  - March 4-5, 2014 – Location TBD

### *SPP CIPWG Meeting*

- The SPP Critical Infrastructure Protection Working Group met at OG&E Headquarters in Oklahoma City, OK on October 3, 2013.
- Robert McClanahan was nominated for another 2-year term as CIPWG Chair, effective January 1, 2014 through December 31, 2015. The SPP RTO Board of Directors must confirm working group Chairs.
- Eric Ervin of Westar was elected as the incoming Vice Chair of CIPWG, effective January 1, 2014.
- The group heard a presentation on the NERC GridEx II national exercise and discussed how SPP Member Companies could coordinate their play in the exercise.

### *Other Notable Events*

- Central Arkansas experienced a number of sabotage incidents located along a section of the Entergy 500 kV transmission system between Keo, AR and Cabot, AR:
  - On August 21, a 500 kV transmission tower was damaged after a Union Pacific train ran over and severed a 500 kV conductor that had dropped onto the tracks. An inspection of the tower showed that more than 100 bolts had been removed from the structure. Authorities also found evidence that a ½” steel cable had been attached to the tower, stretched across an adjacent train track, and attached to a tree on the opposite side, apparently in hopes that a train would strike the cable and pull down the tower.



- On September 29, the control house at the Keo 500 KV substation was completely destroyed by fire. The message “You should have expected U.S.” was scrawled onto a junction box outside the substation fence.
- On October 6, two wooden structures on a 115 kV line were cut with a chainsaw and one was pushed over with a tractor, taking the line out of service. This event was within sight of the same 500 kV line as the other two events.
- On October 11, an explosion was heard near Jacksonville, AR. The local sheriff’s department responded and arrested an individual who later admitted that he was responsible for all three sabotage events.

# CIP Update

SPP RE Trustees Meeting  
October 28, 2013

Kevin B. Perry  
kperry.re@spp.org · 501.614.3251



# CIP Version 5 Status

- **CIP V5 Transition published September 5, 2013**
  - Includes a 6-month transition study project.
  - Still retains three options for Critical Asset Identification.
  - Entities can select Alternative Approach 1 or 2 at any time.
  - Entities can update their Critical Asset list upon adoption of the selected approach.
    - If Alternative Approach 1 or 2 is selected, the entity should prepare a Memorandum for Record or an attestation of the selection and have it signed by the CIP Senior Manager.

# CIP V5 Transition Study

- **SPP RE has one registered entity in the CIP V5 Transition Study**
  - **Focused on CIP-002, CIP-005, CIP-006, CIP-007, and CIP-010.**
  - **Large generation plant and a transmission substation included in the study scope.**
  - **Waiver from future CIP V3 compliance oversight has been submitted for FERC approval.**
    - **Waiver is dependent upon continued active participation in the study project.**
    - **Waiver recognizes accelerated move to CIP V5 compliance and the added burden an accelerated transition poses.**

# NERC GridEx II Exercise

- **Scheduled for November 13-14, 2013.**
- **Cyber Security and Physical components.**
- **Will build upon lessons learned from GridEx I, conducted November 2011.**
- **Numerous full-participation players, including SPP and several SPP members.**
- **Numerous rumors floating on the Internet that this drill will not be a simulation, but an actual event with widespread power outages.**
  - **Refer any questions to NERC Public Affairs**

**TO:** SPP Regional Entity Trustees  
**FROM:** Ron Ciesiel, SPP RE General Manager  
**DATE :** October 28, 2013  
**SUBJECT:** SPP RE General Manager Report

### **Emerging Issues**

#### **NERC Reliability Assurance Initiative [RAI]**

A number of pilot programs are underway in various regions concerning specific aspects of the proposed RAI program. Most of these programs will be wrapping up in early 2014 with proposed rollouts NERC-wide in mid 2014 and beyond.

The NERC-wide Auditor Handbook is nearing completion [December 2013] and once approved by the Regional Executives, will be made public for use by Registered Entities for their own internal control programs.

#### **BES Definition and Exemption Process**

SPP RE along with the other 7 REs and NERC are completing the development of the uniform software program. Beta and stress testing are being completed in October and November 2013 by the RE staffs. User training should begin soon thereafter.

#### **2014 Budget Process**

The SPP RE Trustees approved the 2014 Business Plan and Budget at its June 18, 2013 meeting.

See <http://www.spp.org/section.asp?group=1856&pageID=27>

NERC and the REs are waiting for final FERC approval of the combined 2014 budget submittals made earlier this summer.

### **Pending NERC Actions**

There will be two SPP RE actions presented at the November 2013 NERC Board meetings:

1. The withdrawal of the SPP RE UFLS PRC-006 standard from consideration at the FERC; and
2. A revision to the SPP RE Regional Standards Development Manual.

Neither of these items is expected to generate a lot of discussion or have any opposition.

### **Public Speaking Engagements**

I presented an RE update at the SPP MOPC meeting in October 2013.

I also made two presentations to the Sunflower Board of Directors and to the Sunflower Subject Matter Expert conference in October 2013.

### **Administrative and Organizational Issues**

#### **Organizational**

The following employees have an employment anniversary around this time of year and I would like to recognize the following employees for their years of service:

Jim Williams	30 years
Ron Ciesiel	15 years
Shon Austin	14 years
Jeremy Withers	5 years
Sheila Scott	4 years
Tyler Morgan	4 years
Thomas Teafatiller	3 years
Daniel Haney	3 years
Stephanie Kimp	3 years
Peggy Lewandoski	1 year
Chris Bills	1 year

**Staffing**

The following personnel changes were made since the last report:

Promotions – Debbie Currie was promoted to Manager of Regulatory Interface and Process Improvement

Additions – None

Terminations – Ryan Rainwater, Clay Layson

Currently, the SPP RE has 5 open positions, including the Director of Compliance position, two technical positions, one enforcement position, and a Law Clerk [not actively seeking a replacement at this time].

Interviews have been completed for the Director position and an announcement should be made by November 2013.

**Administrative**

The SPP RE Trustees have been invited to meet with the NERC Board of Trustees in November 2013 in Atlanta, Georgia in advance of the NERC Board meetings.

Respectfully submitted:

Ronald W. Ciesiel  
SPP RE General Manager  
October 28, 2013



# Enforcement Update

October 28, 2013

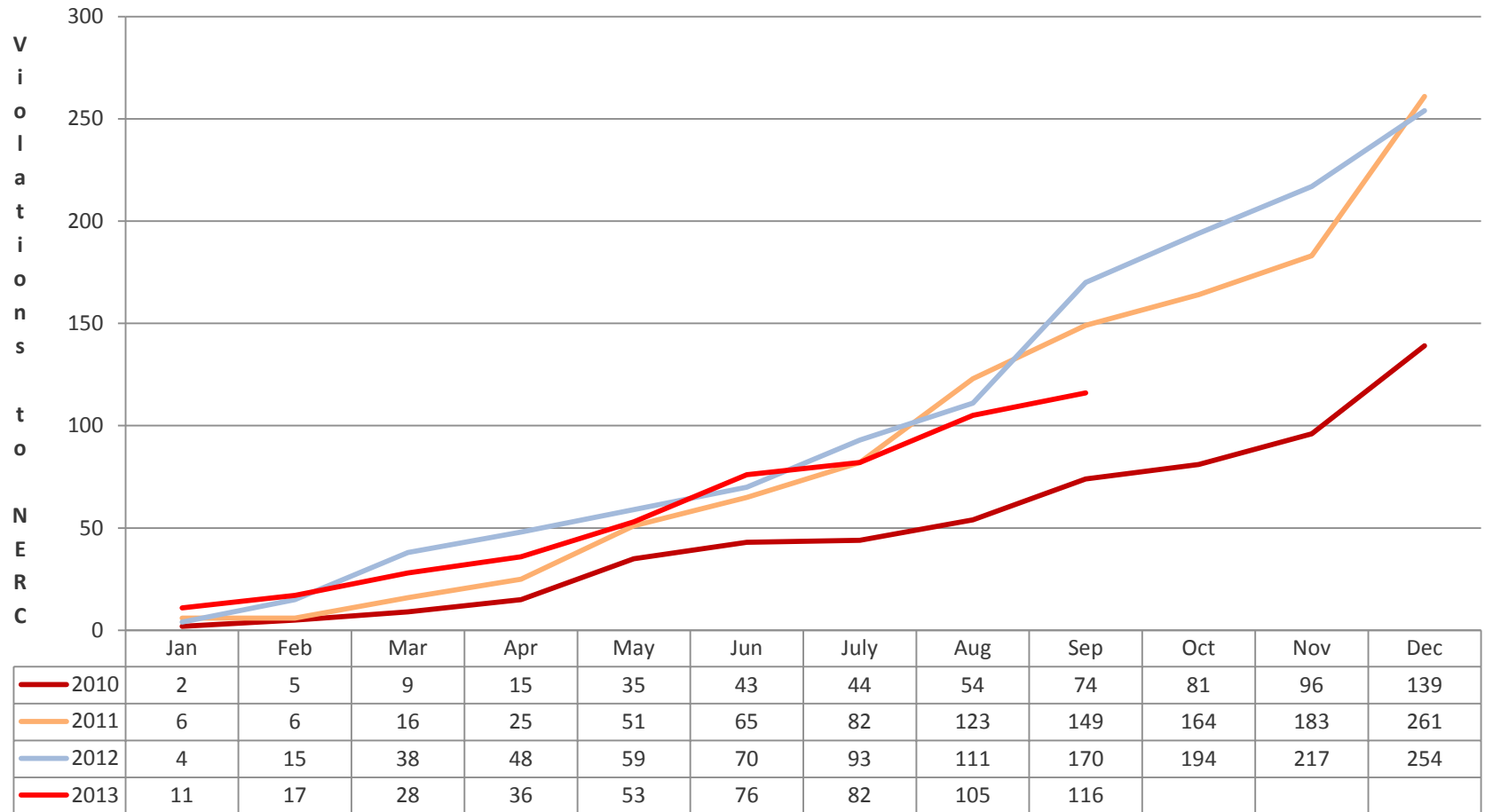
Joe Gertsch  
Manager of Enforcement  
[jgertsch.re@spp.org](mailto:jgertsch.re@spp.org)  
501-688-1672



SPP RE Enforcement Activities September 30, 2013	2007	2008	2009	2010	2011	2012	First Quarter	Second Quarter	Third Quarter	Total 2013
<b>NPV</b>										
Issued	6	56	132	254	239	173	56	46	40	142
<b>NAVAPS</b>										
NAVAPS Issued	6	45	10	7	0	2	0	0	0	0
<b>NOCV</b>										
NOCV Sent to Entity/NERC	0	8	25	15	4	1	0	0	0	0
NOCV BOTCC Approved	0	7	11	29	4	1	0	0	0	0
<b>Settlements</b>										
To NERC for Approval	0	0	0	89	118	131	0	1	3	4
BOTCC Approved	0	0	0	50	81	152	14	13	0	27
<b>Spreadsheet NOP</b>										
To NERC for Approval	0	0	0	16	22	N/A	3	9	6	18
BOTCC Approved	0	0	0	0	38	N/A	8	5	8	21
<b>Find, Fix, Track</b>										
To NERC for Approval	-	-	-	-	43	78	16	27	24	67
BOTCC Approval	-	-	-	-	36	74	16	25	13	61
<b>Dismissals</b>										
To NERC/SPP RE SRT for Approval	0	0	1	16	75	43	9	11	7	27
NERC/SPP RE SRT Approved		0	1	16	75	43	9	11	7	25
<b>Notice of Penalty/FFTR</b>										
Approved by FERC	0	5	13	57	180	184	76	37	10	123
<b>Violations Awaiting BOTCC Approval</b>									20	
<b>Active Violations - Caseload</b>									194	
<b>Caseload Index (months)*</b>									9.2	

\* Based on 2012 process rate of 21.1 violations/month.

# Enforcement Monthly Violation Processing



Running Total Violations

# Enforcement Processing

Av No of months from Discovery to Filing for violations discovered after 1/1/2012

Region	FFT	NOP	SNOP	Overall Processing Months from ERO perspective
FRC	8.97		13.91	10.21
MRO	8.62		14.18	8.93
NPC	8.23		11.07	8.92
RFC	7.49	15.28	11.66	8.85
SER	5.58	6.60	9.83	7.02
SPP	7.70	9.79	11.36	8.46
TRE	10.60	11.86	9.56	10.65
WEC	4.77	14.62	9.51	7.59
<b>ERO</b>	<b>7.4</b>	<b>13.1</b>	<b>10.7</b>	<b>8.6</b>

# 2013 FFT Processing

- **Minimal Risk Violations**
- **Mitigated before filing with NERC**
- **Triage of incoming violations – 60 day target**
- **Goal for FFT processing - less than 6 months**
- **29 - 2013 Possible Violations identified for FFT treatment**
- **Average time to process 2013 FFTs is 3.7 mo.**
- **Average time to receipt of MP Certification is 2.5 mo.**

# Enforcement Caseload – September 30, 2013

- **194 - Open Violations**
  - 19 - Joint Settlement w/ Other Regions
    - 1 - NAVAPS
    - 77 - Settlement
    - 58 - Settlement Not Requested (NAVAPS/NOCV)
    - 39 - Administrative Hold
- **59 - 693 Violations**
- **135 - CIP Violations**
- **65 - High Impact Violations**
- **Discovery Method**
  - 86 - Audit
  - 80 - Self Report
  - 14 - Self Certification
    - 3 - Spot Check
  - 11 - Investigation

# Days in Regional Inventory

Region	No of cases in Regional Inventory	Average no of months in Regional Inventory (Discovery to 10/1/2013)
FRC	26	7.0
MRO	144	11.6
NPC	92	9.9
RFC	313	12.3
SER	507	17.2
SPP	192	12.5
TRE	162	4.7
WEC	277	8.3
<b>Regions Overall</b>	<b>1713</b>	<b>12.1</b>

# High Impact Violation\* Summary

- **65 – Open High Impact Violations**
  - 1 - NAVAPS / Hearing
  - 21 - Settlement
  - 5 - Multi Region
  - 16 - Administrative Hold
  - 22 - Disposition Undetermined
- **Open High Impact Violations Mitigation Status**
  - 30 - Mitigation Plan Complete
  - 16 - Mitigation Plan Accepted
  - 3 - Submitted
  - 0 - Mitigation Plan Work In Progress
  - 16 - Mitigation Plan Initiated (No Action)

•As noted in our 2013 Metrics , High Impact violations are violations with a High Violation Risk Factor (VRF) and the following Medium and Low VRF violations as identified by Compliance staff: COM-002-2 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, and PRC-005 R2. Link to NERC VRF Table <http://www.nerc.com/pa/Stand/Pages/default.aspx>



# SPP RE 2013 Violation Dismissals

- Consolidation with another violation ..... 14
  - NERC V3 – V5 Guidance (approach 2) ..... 2
  - Self Report of wrong standard and/or requirement . 5
  - Provided exculpatory evidence ..... 2
  - Interpreted the standard incorrectly ..... 4
- Total      27**

# September Mitigation Plan Summary

- **Mitigation Plan Status (Sep / Year)**

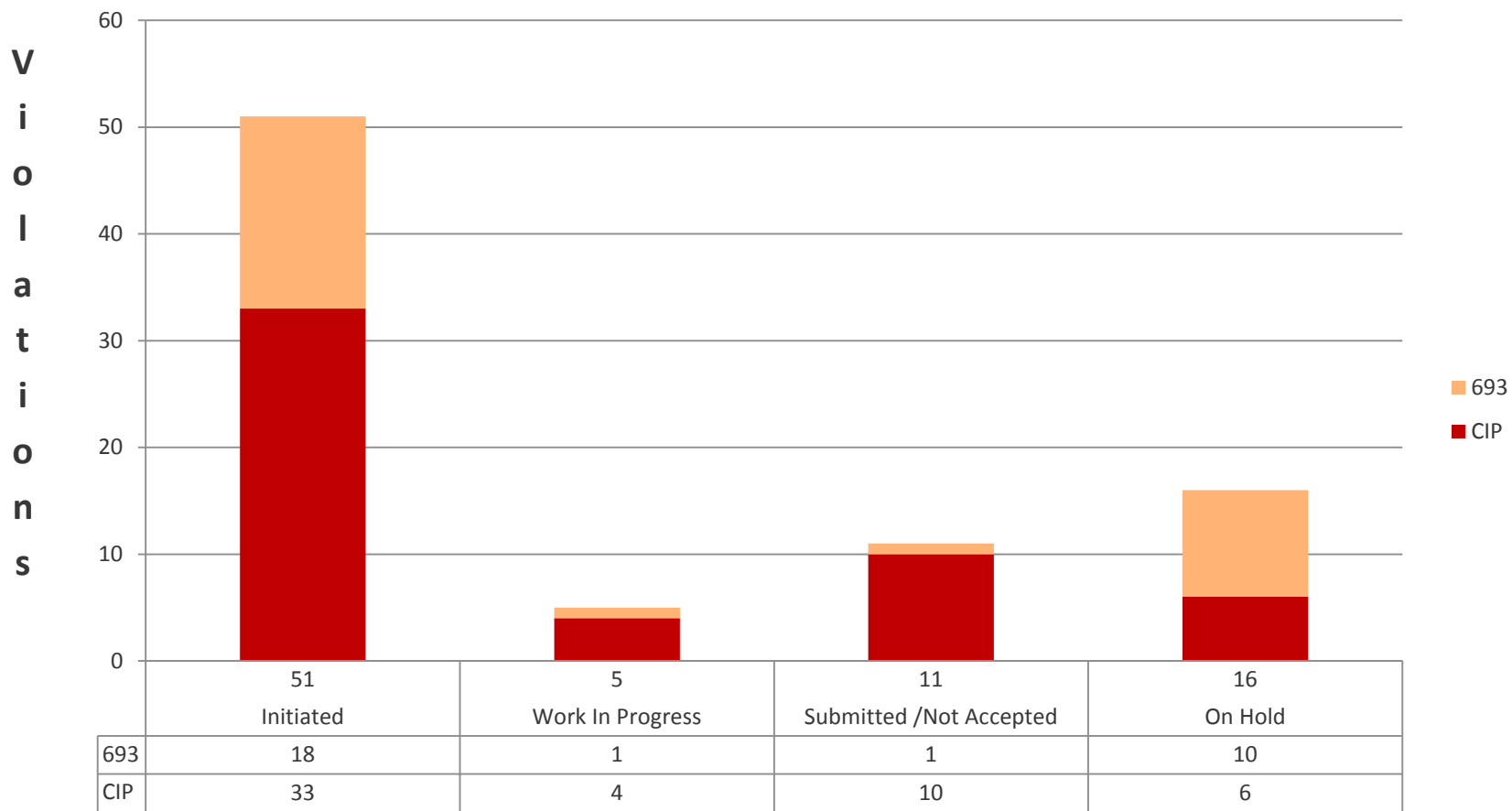
Submitted	10 / 142
Accepted	13 / 135
Certified Complete	13 / 140
Completion Verified	21 / 136

- **Violations with no Mitigation Plans**

Work in Progress	5	(MRRE)
Initiated	51	
Rejected	8	
Awaiting Approval	3	( 2 MRRE)

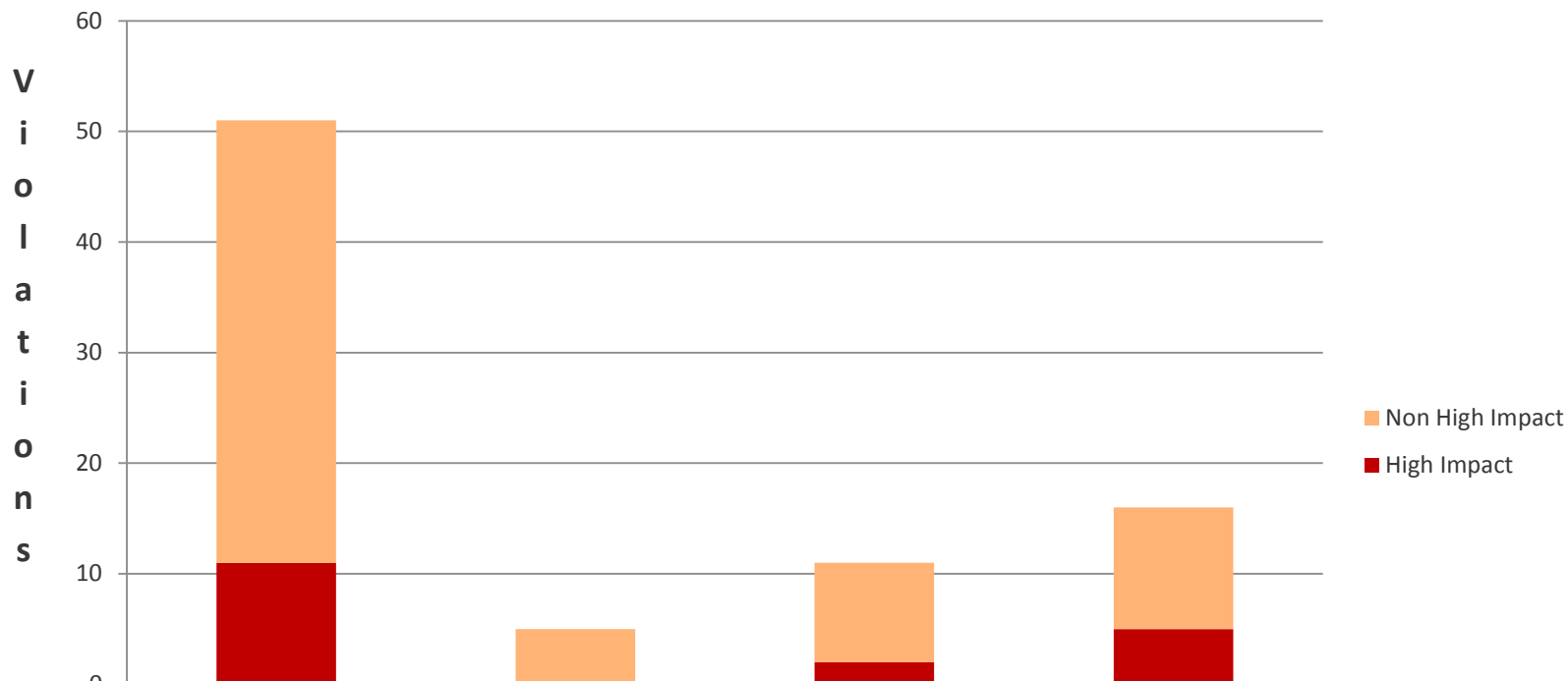
# Violations Without Mitigation Plans Detail

## Violations Without Mitigation Plans



# Violations Without Mitigation Plans Detail

## Violations Without Mitigation Plans



	51	5	11	16
	Initiated	Work In Progress	Submitted /Not Accepted	On Hold
Non High Impact	40	5	9	11
High Impact	11	0	2	5

# Mitigation Plan Aging

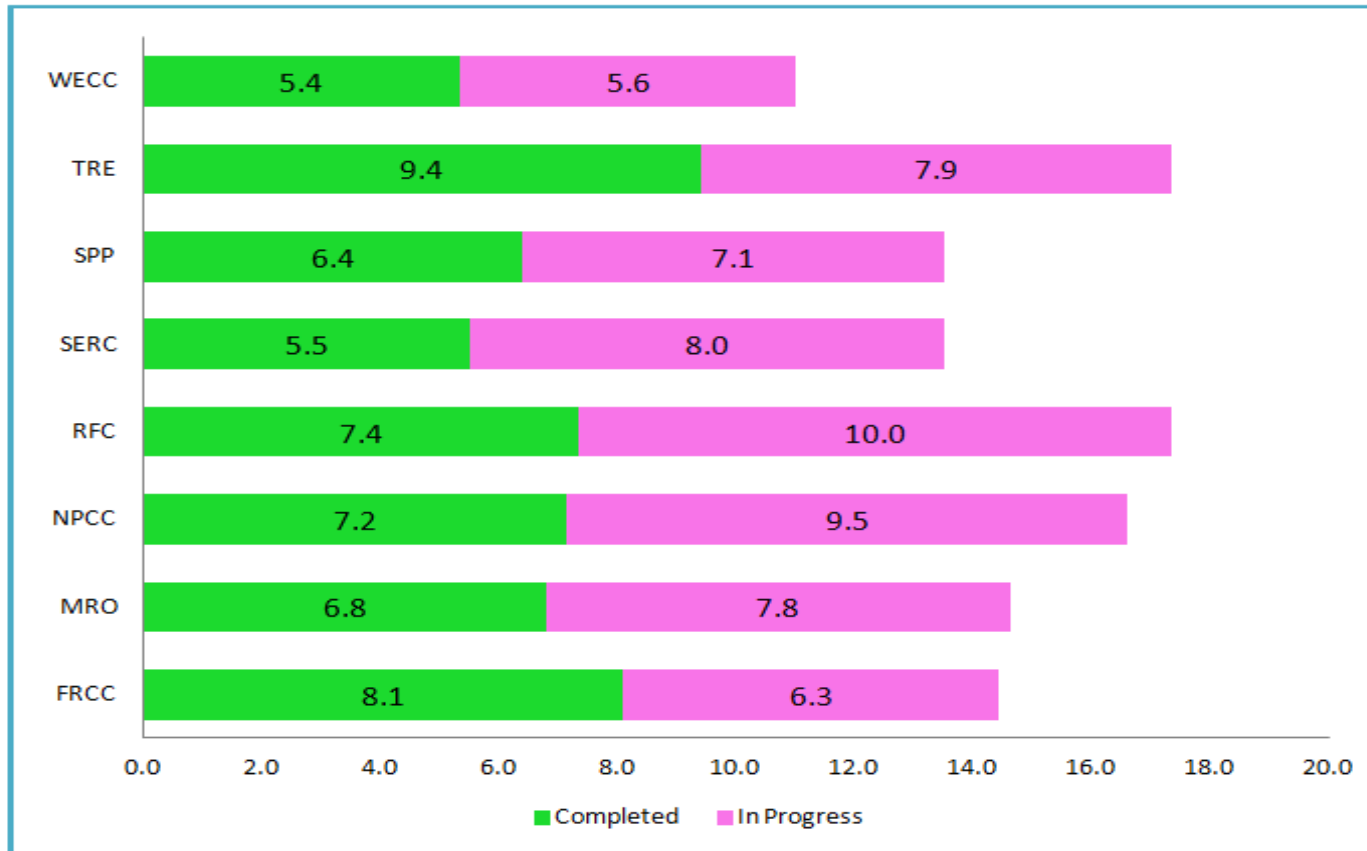


Figure 3. Average months (mitigation completion and in-progress) for violations discovered as of 1/1/2012 by Region



**SPP** *Southwest  
Power Pool  
Regional Entity*

Joe Gertsch  
SPP RE Manager of Enforcement  
jgertsch.re@spp.org  
501-688-1672

**SPP RE TRUSTEES  
MEETING  
Little Rock, Arkansas  
COMPLIANCE GROUP  
REPORT**

**Ron Ciesiel  
SPP RE General Manager**

**October 28, 2013**





# TOPICS OF TODAY'S DISCUSSION

- **Bulk Electric System Definition**
- **Reliability Assurance Initiative**
- **Misoperation Report 2Q 2013**
- **Vegetation Contact Report 3Q 2013**
- **Facilities Ratings Alert Update**
- **Most Violated Standards as of September 30, 2013**



# **BULK ELECTRIC SYSTEM [BES] DEFINITION**

- **NERC applied for and received a one year extension for the application of the Definition from July 1, 2013 to July 1, 2014. [See FERC Order 773]**
  - **Delay impacts all aspects of the Definition, including ‘inclusions’ and ‘exclusions’**
- **Currently a Standards Drafting Team is working on Phase 2 of the Definition that is intended to clear up open issues from Phase 1 as well as address issues raised in FERC Order**
  - **2nd Ballot results were 66% approval [just below approval]**
  - **Registration of smaller generating units seems to be the current open issue**

# BES Definition [cont.]

- **Reminder of Priorities**
  - **SPP RE Priorities**
    - **Requests that would change registration**
      - **Single element entities**
    - **Newly identified facilities because of definition implementation**
      - **Do not expect many, if any, in SPP RE**
      - **Likely items may be < 100Kv facilities that need review**
        - » **2-year compliance phase-in**
    - **Requests from other entities for exceptions for pieces of system without changes to registration**

# BES Definition [cont.]

- **Recommended interim activities for Registered Entities**
- **Registered Entities should be compiling a list of self-nominated ‘exclusions’ [facilities that meet one of the listed exclusions]**
  - **SPP RE will review and accept/reject facilities on the list as meeting exclusion criteria**
    - REs and NERC will have uniform data submittal requirements
    - Expected completion of software development on ~ 11-1-13
      - » Template rollout in 4Q 2013 or 1Q 2014

# Reliability Assurance Initiative [RAI]



## – Standards Process Revamping

- Streamlined process steps
- Results-based requirements
- Cost Effectiveness Review
- 5-year sunset review for every standard
  - **Blue Ribbon panel standards reviewed and endorsed at August NERC Board Meetings [see slides 17/18 for more info]**

## – Compliance initiative

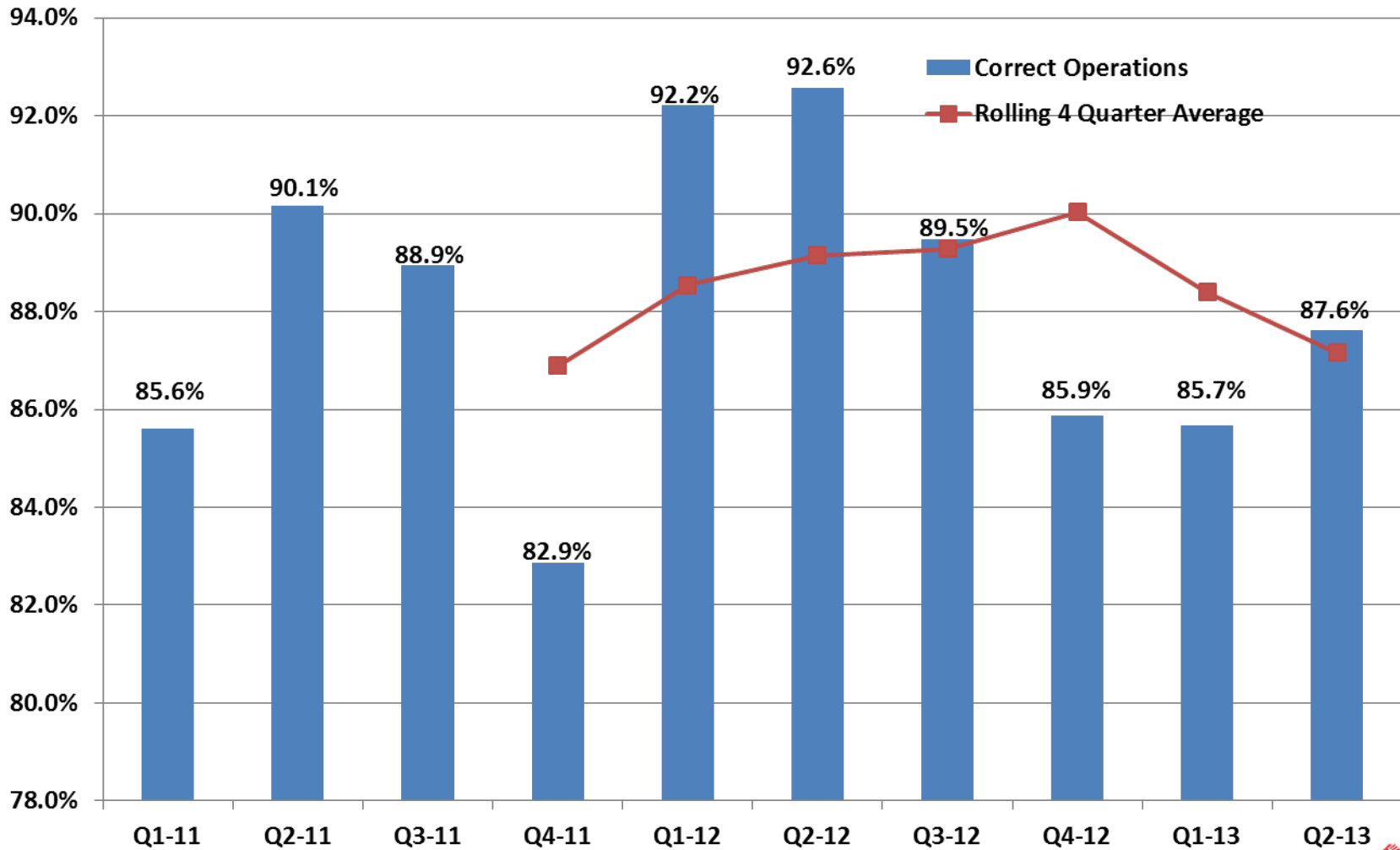
- Monitoring based on ‘risk’ assessments performed by RE
  - Paragraph 81 requirement retirements have been operationally implemented while waiting for FERC approval
  - **11 factors to be considered highlighted in 2014 Implementation Plan [page 10]**
- Entities internal programs may dictate disposition technique
- More stakeholder involvement in development of Reliability Standards Auditor Worksheets [RSAWS]

# Reliability Assurance Initiative [RAI]

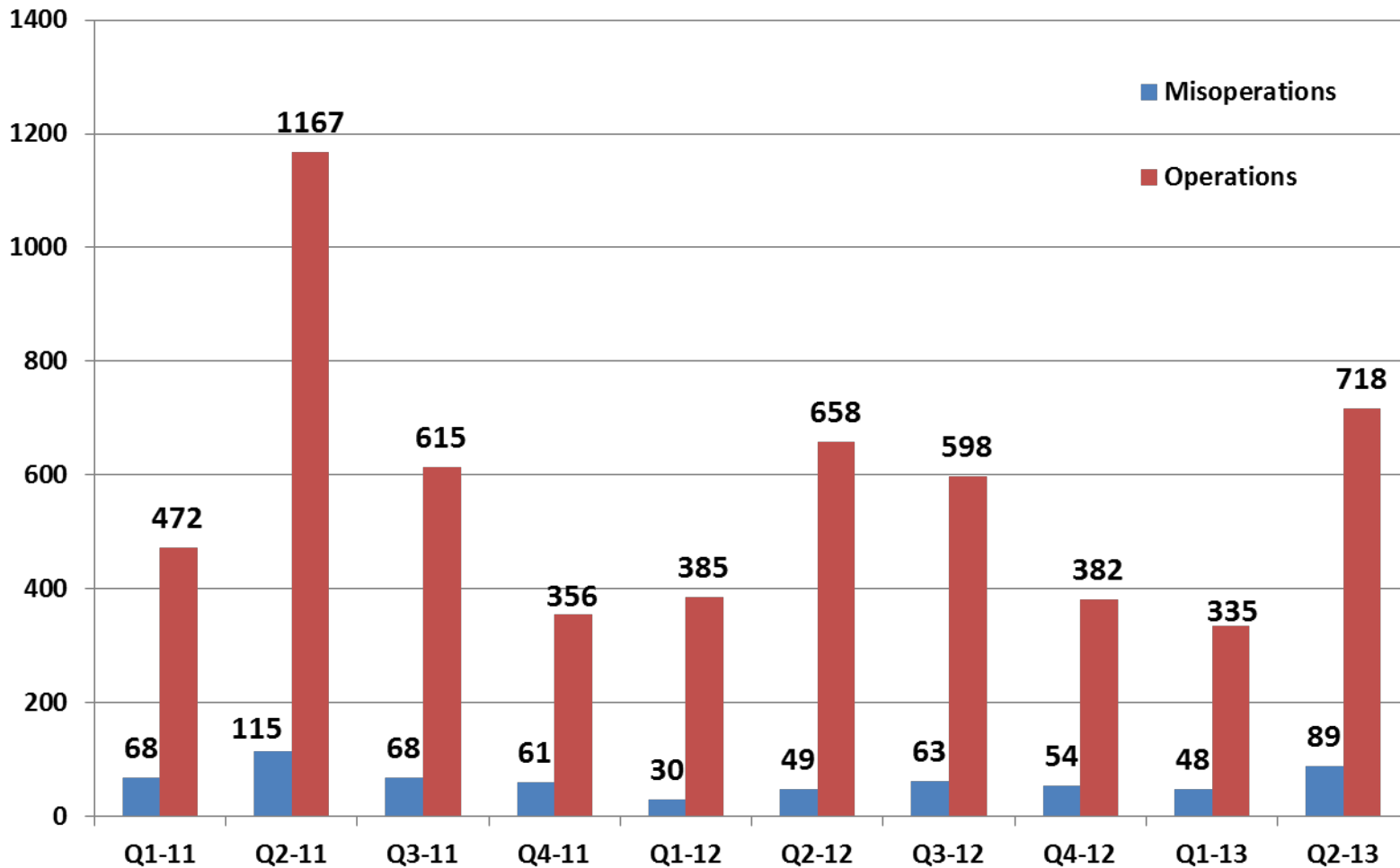
- Data Requirements
  - Emphasis should be on more recent data
    - Internal reviews & ongoing sampling may relieve need to keep all historical data
- Enforcement
  - Separate minor and major issues using different techniques
    - Find, Fix & Track initiative now in place
      - » Push decision making closer to beginning of oversight process
      - » **Revisions to process underway based on FERC 6-20-13 order**
  - **Self-Reporting processes/requirements under review**
- Events will continue to get attention
  - **Reminder EOP-004 -2 becomes effective 1-1-14**
  - Event assessment with Lessons Learned completed and shared
  - Entity self-assessment is important
  - **Implementation of ‘Recommendations’ from major events will be viewed in a favorable light**

# SPP RE Misoperation Report as of 2Q 2013

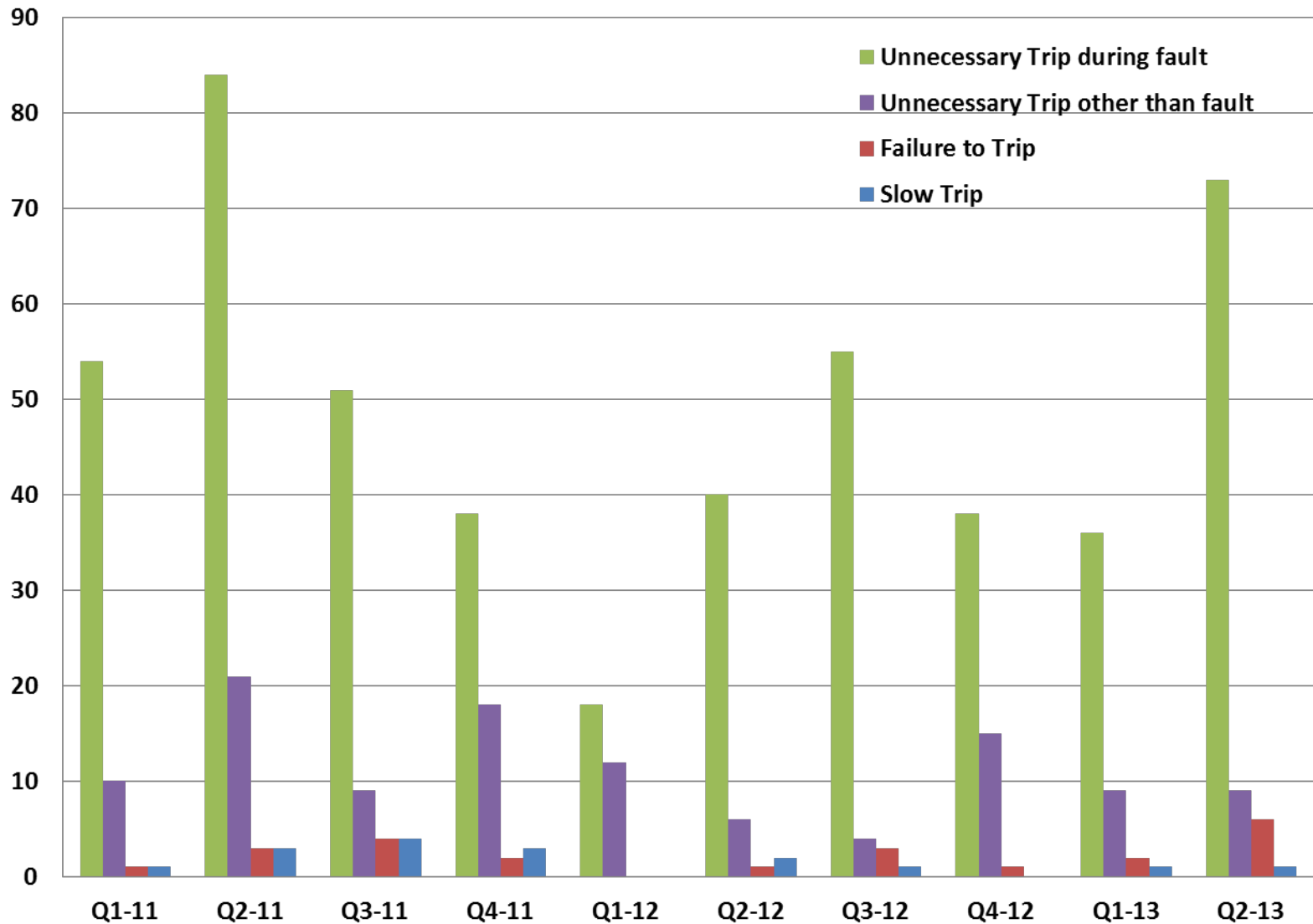
## Relay Operational Performance- Success Rate



# Operation/Misoperation Comparison [1Q11-2Q13]

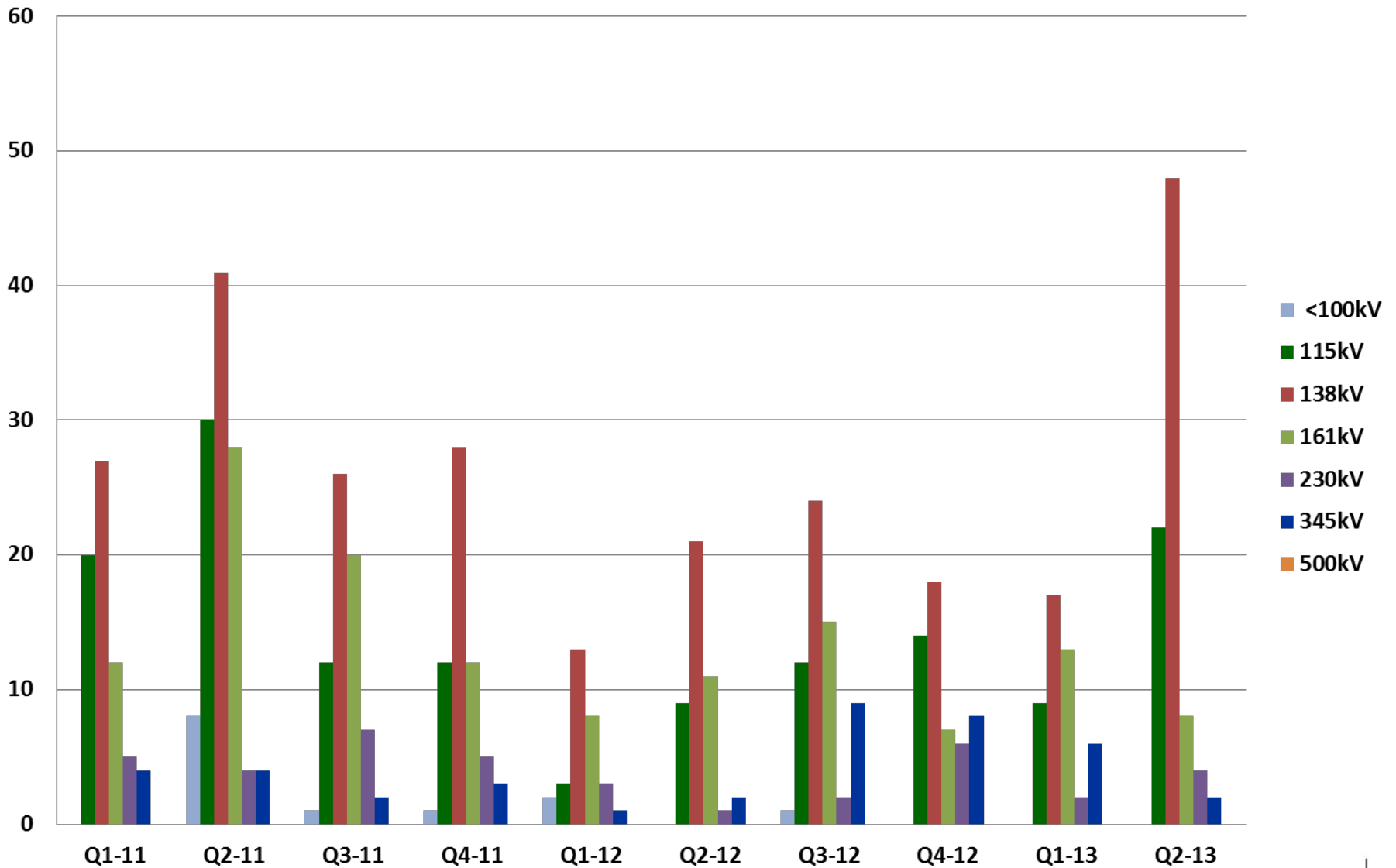


# Misoperation Category [1Q11-2Q13]

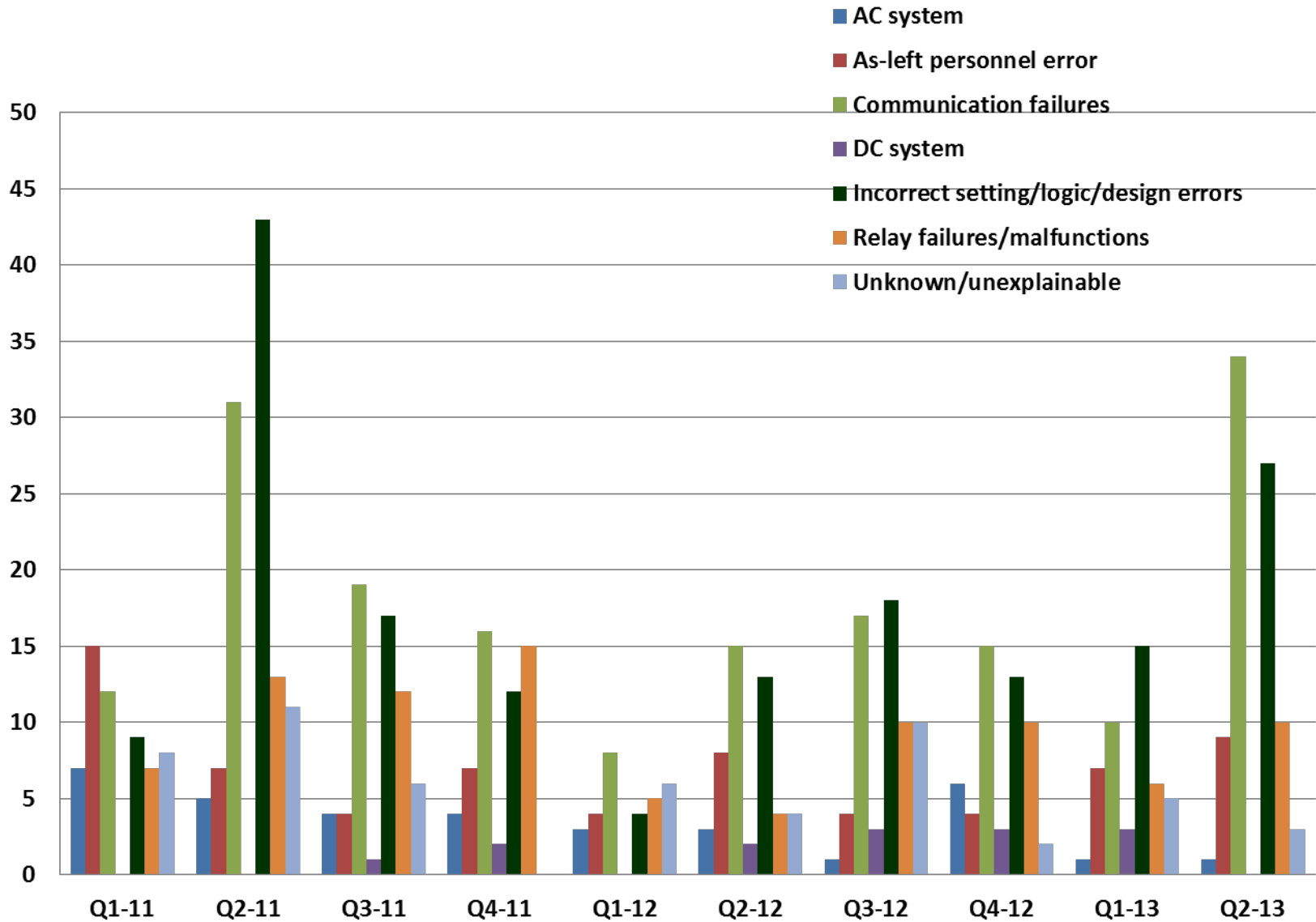




# Misoperation by Voltage [1Q11 – 2Q13]



# Causes of Misoperations [1Q11-2Q13]



# Vegetation Contacts 3Q 2013

- Transmission Owners in the SPP RE footprint had no reportable contacts in the 3Q 2013 timeframe
  - 2 quarters without reportable contacts after a Category 3 Reportable contact in 1Q 2013
  - Note: There were two vegetation contacts on lines not covered by the FAC-003 standard
    - Early warning of new growth cycle?

# NERC FACILITIES RATINGS ALERT UPDATE\*

- **NERC Facilities Ratings Alert**
  - Multi-year project began in 2010 to assess ratings of all BES transmission lines
  - Extends into 2014 plus extensions
  - Thousands [26,000 to-date] of discrepancies discovered and in need of remediation
    - **Discrepancies found:**
      - **High/Medium Priorities**
        - » SPP RE ~ 2,300
        - » NERC ~ 26,000
      - **Low Priority**
        - » SPP RE ~ 650 (to date)
        - » NERC (no report yet)
    - **Creating coordination issues with outage scheduling**
  - \* as of June 30, 2013

# Most Violated Standards

Based on rolling 12 months through 9/30/13 [Represents ~ 80% of total violations]

SPP RE Rank	NERC 12 Month Rank*	Standard	Description	Number Violations	Risk Factor
1	1	<b>CIP-007</b>	<b>Systems Security Management (HI)</b>	<b>37</b>	<b>Med./Lower</b>
2	3	<b>CIP-005</b>	<b>Electronic Security Perimeters (HI)</b>	<b>26</b>	<b>Med./Lower</b>
3	2	CIP-006	Physical Security-Critical Assets	26	Med./Lower
4	4	<b>PRC-005</b>	<b>Protection System Maintenance (HI)</b>	<b>14</b>	<b>High/Lower</b>
5	10	FAC-009	Facility Ratings	11	Med./Lower
6	7	CIP-003	Security Management Controls	10	Med./Lower
7	6	CIP-004	Personnel & Training	7	Med./Lower
8	8	VAR-002	Network Voltage Schedules	4	Med./Lower
9	**	PRC-008	UFLS Relay Maintenance	4	Medium
10	5	<b>CIP-002</b>	<b>Critical Cyber Asset Identification (HI)</b>	<b>3</b>	<b>High/Med.</b>

\* NERC Report Q2 2013

\*\* Not in NERC Rolling 12 month Top Ten

**(HI) Standards in RED include requirements designated as High Impact Violations**

# Questions/Comments

**Ron Ciesiel**  
**SPP RE General Manager**  
[rciesiel.re@spp.org](mailto:rciesiel.re@spp.org)  
**501-614-3265**

# Independent Experts' Key Findings

[Published report 7/13](#) (not yet approved by NERC Board of Trustees)

1. Recommended retiring 147 requirements and consolidating remaining requirements for overall 43% reduction
2. Of the 257 retained requirements, 81 are in “Steady-State” (no work needed) and 176 need enhancement
3. Identified gaps:
  - a. Outage coordination
  - b. Governor frequency response
  - c. Situational awareness models
  - d. Clear three-part communications
4. While newer standards are improved, the majority are not at Steady-State

# Independent Experts' Recommendations

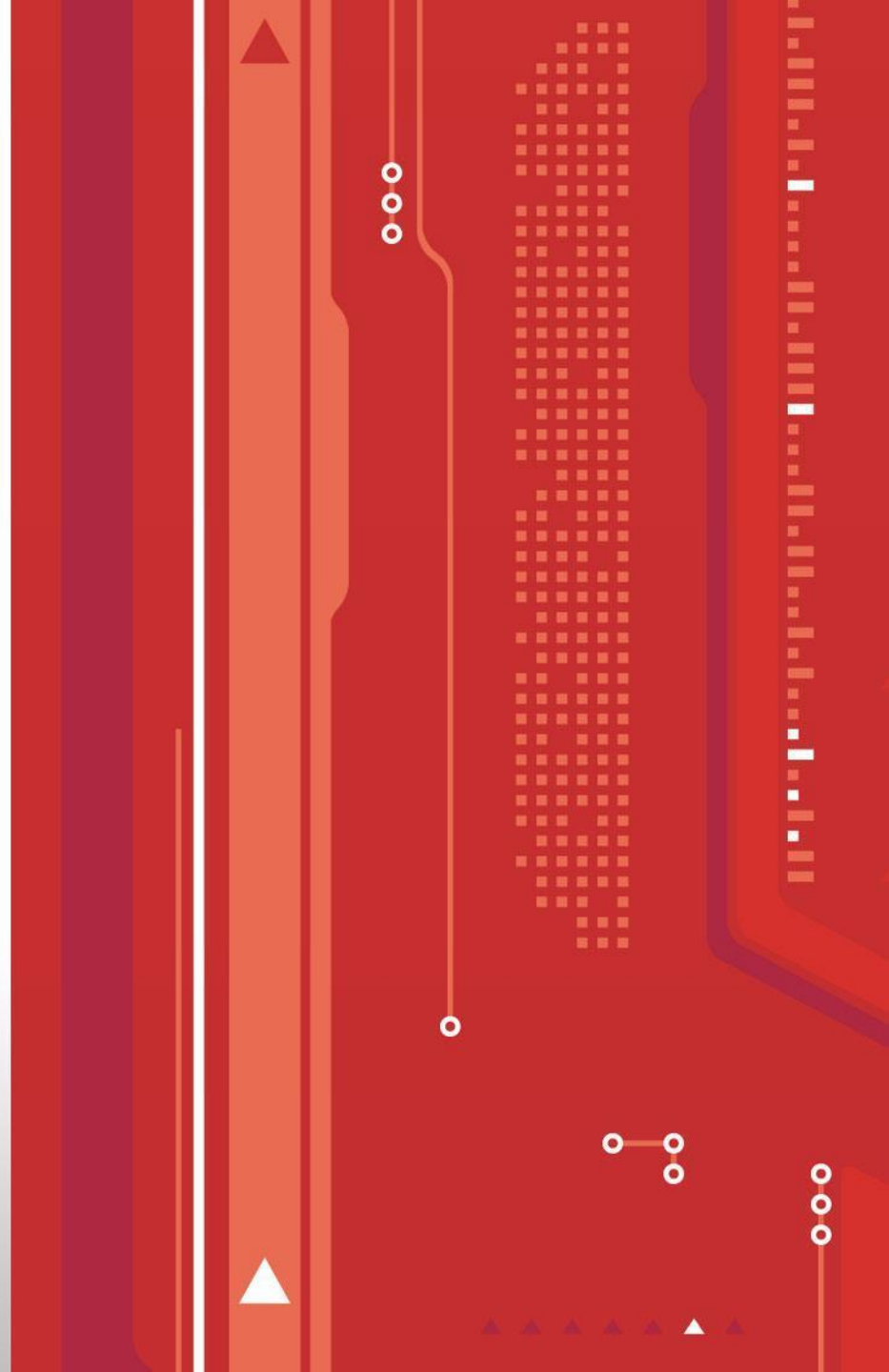
- 1. Retire 147 requirements and focus initial improvement efforts on 16 high-risk standards**
- 2. Continue developing risk-based approaches to identify high priority reliability issues**
- 3. Realign standards from the current 14 families into 10 families grouped by reliability functions**
- 4. Address identified gaps**
- 5. At an appropriate time in CIP standards' development, use a team of experts to evaluate the CIP requirements**



# 2013 Event Report

Alan Wahlstrom

October 28, 2013



## **SPP Regional Events (Jan 1<sup>st</sup> – September 30<sup>th</sup>)**

- **14 total events, 6 Category 1 Events analyzed via NERC's Event Analysis process**
  - **Category 1h event involving loss of AGC control**
  - **Category 1f event involving evacuation of primary control center**
  - **Category 1a event caused by bad trip coils in two breakers; multiple line loss**
  - **Category 1a event triggered by strong weather system; protection system acted properly to isolate fault, but breaker failure caused further line outages**

# SPP Regional Events (Jan 1<sup>st</sup> – September 30<sup>th</sup>)

- Category 1a event initiated by a lightning strike and failed insulator that led to the loss of ~1400 MWs of generation by two entities located in two regions
- Category 1f event involved evacuation of a primary control center due to smoke from a nearby fire
- 8 events were “Category 0” events that will be used by NERC for trending purposes
  - Weather
  - Vandalism

## Loss of AGC Control

- Database corruption occurred during a scheduled EMS software update
- An AGC data mismatch issue was being corrected
  - Software update worked properly in test environment
  - When installed on production server, the AGC records became corrupted
    - ACE could not be calculated
    - Generating units could not be controlled via AGC
- Attempted to remedy without complete EMS shutdown; but did have to perform a shutdown
- Event currently under SPP RE review

## Evacuation of Primary Control Center

- **Unscheduled fire alarms went off in primary control center**
- **Procedures call for evacuation of the control center when alarms are not scheduled**
- **Transfer to back-up control center successfully completed**
  - **Fire alarms triggered due to low water pressure in the building and fire suppression system**
  - **Fire department responded and all clear given**
- **Event currently under review**

# Substation Outage Due to Slow-Trip Breaker

- **Strong weather system caused line fault**
- **Protection scheme acted properly to isolate fault**
  - **Substation breaker slow to trip**
  - **Breaker protection scheme initiated**
- **Lost all lines at substation**
- **Cause coding session held with Entity, NERC and SPP RE Staff in late September**
  - **Weather/Equipment Failure determined to be event causes**

# Two Breaker Trip Coils Cause Outages

- **Line fault initiated substation breaker trip**
- **Breaker failed to open; transformer lock-out initiated further breaker operations**
- **2<sup>nd</sup> breaker failed to open**
- **All lines lost at substation; 70 MWs of load**
- **Bad trip coils found in both breakers that failed to open**
- **Cause coding session to be held with Entity, NERC and SPP RE Staff in late October**

# Links

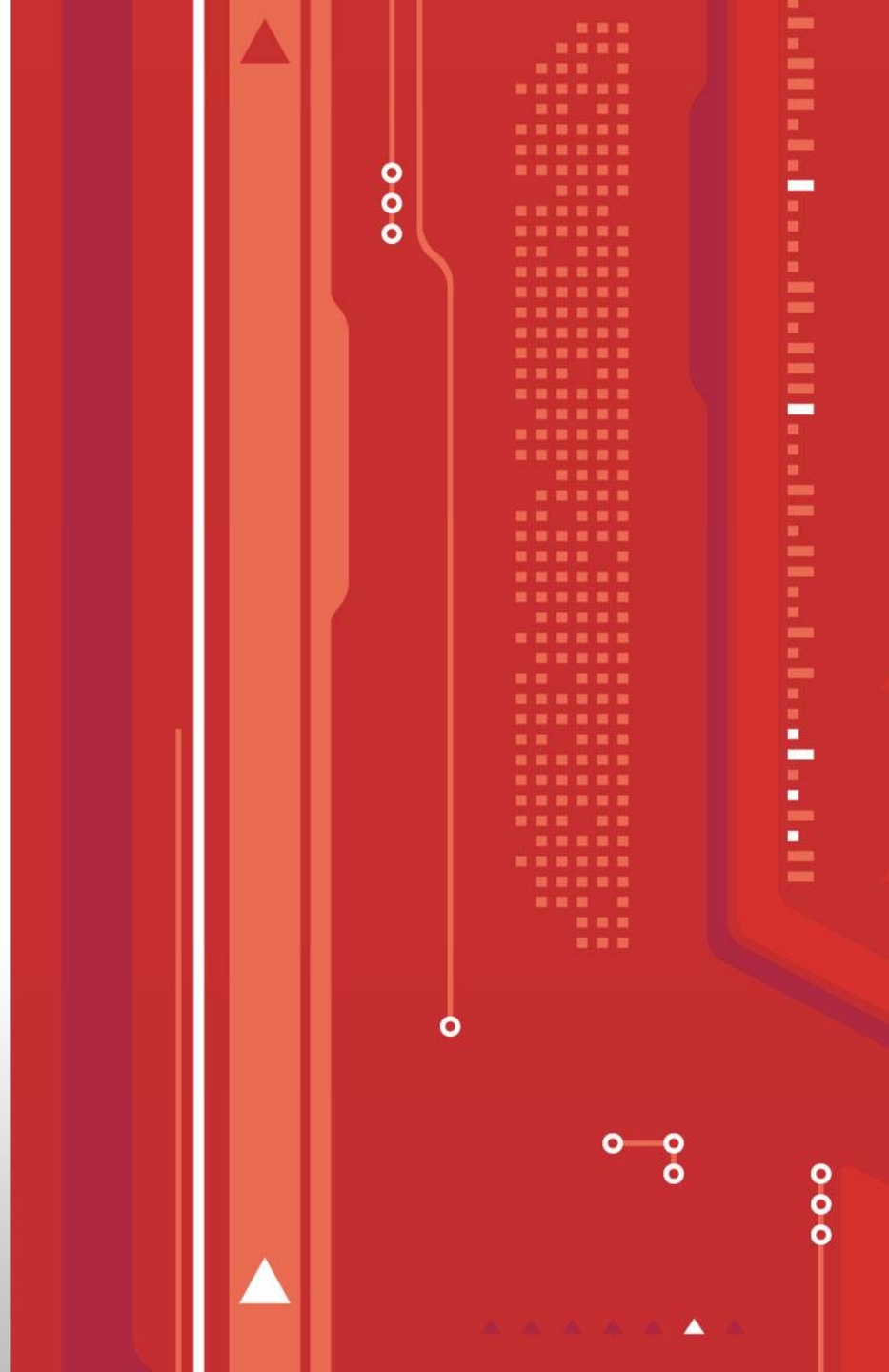
- [SPP RE Event Analysis Webpage](#)
- [NERC Event Analysis Process Documents](#)
- [SPP RE Lessons Learned](#)
- [NERC Lessons Learned](#)
- [Winter Weather Readiness Reliability Guide](#)



# 2013 RE Stakeholder Satisfaction Survey Results

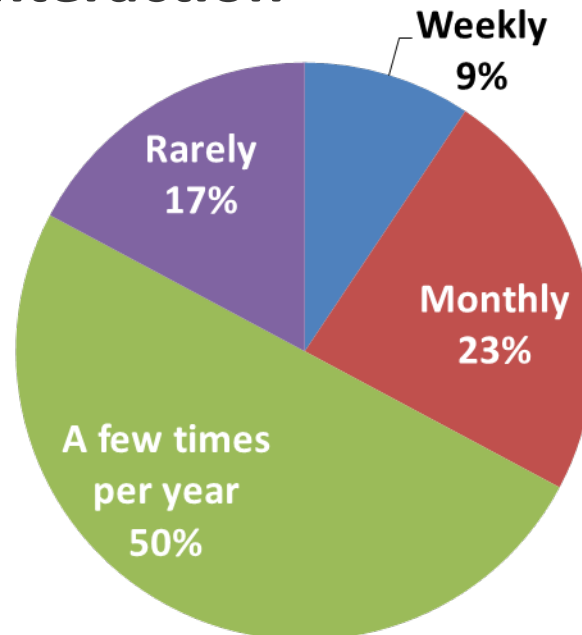
October 28, 2013

Ron Ciesiel  
SPP RE General Manager

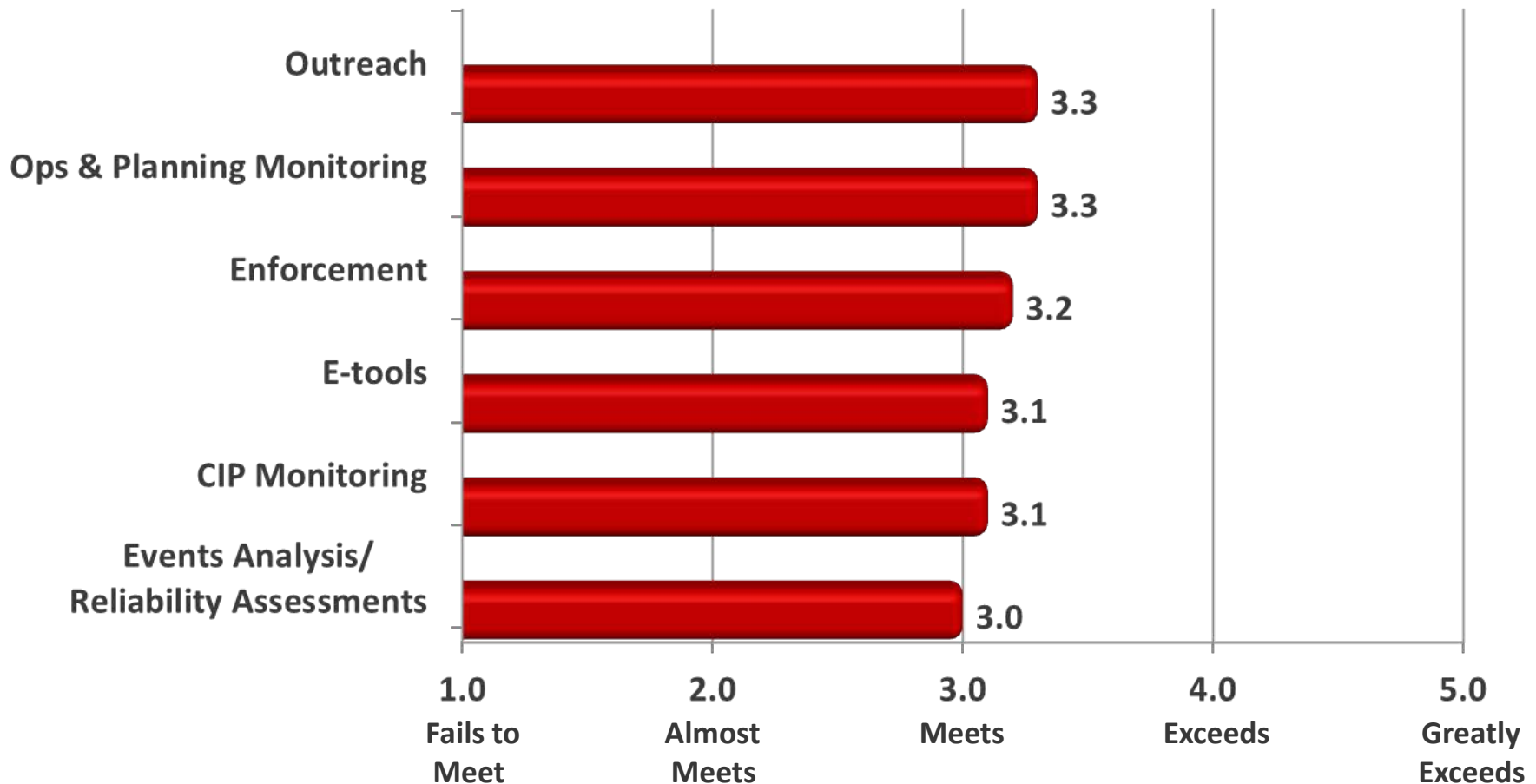


# About the respondents

- Sent to Primary Compliance Contacts
- 70 respondents
- 57% response rate
  - Up from 54% in 2012
- Frequency of interaction

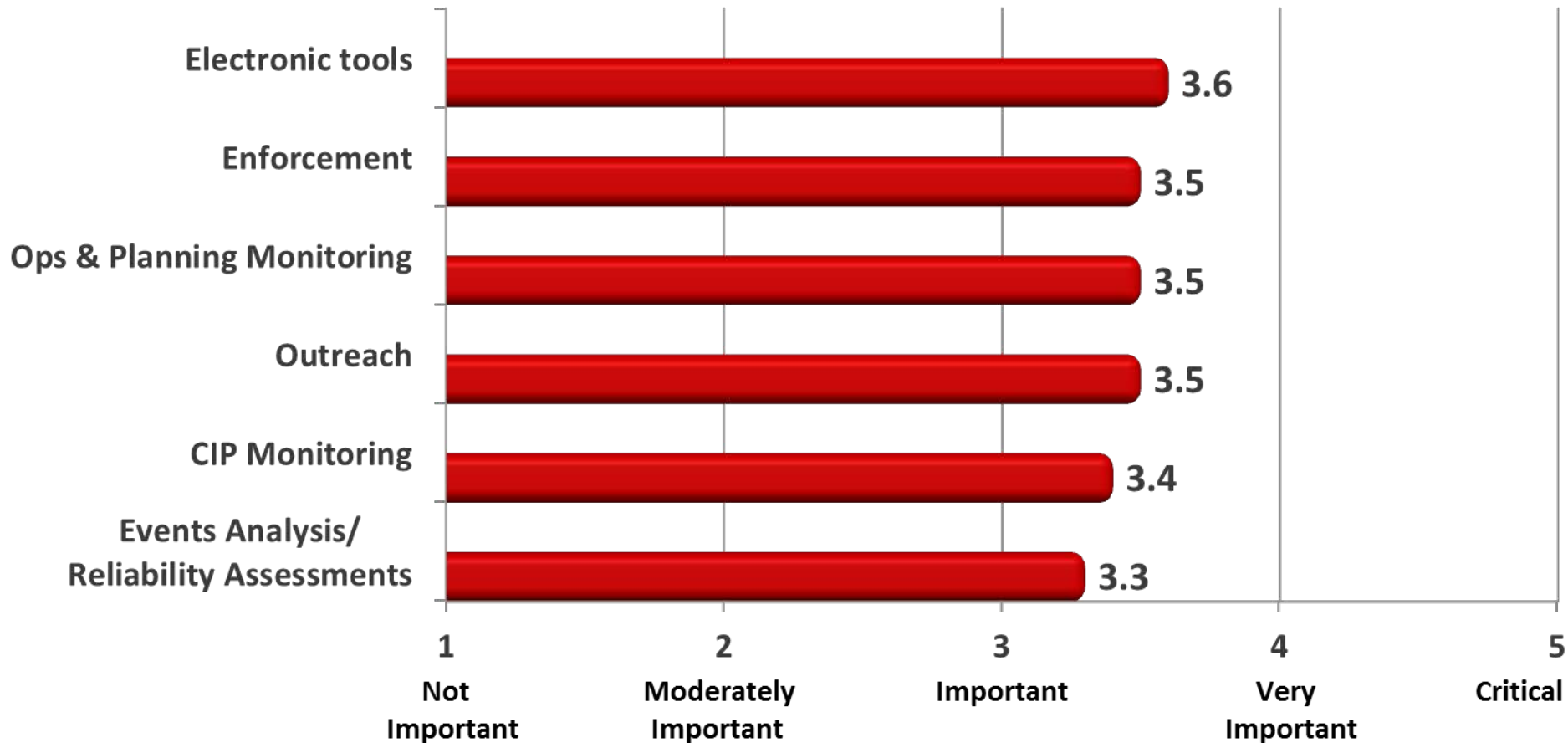


# How well program meets expectations



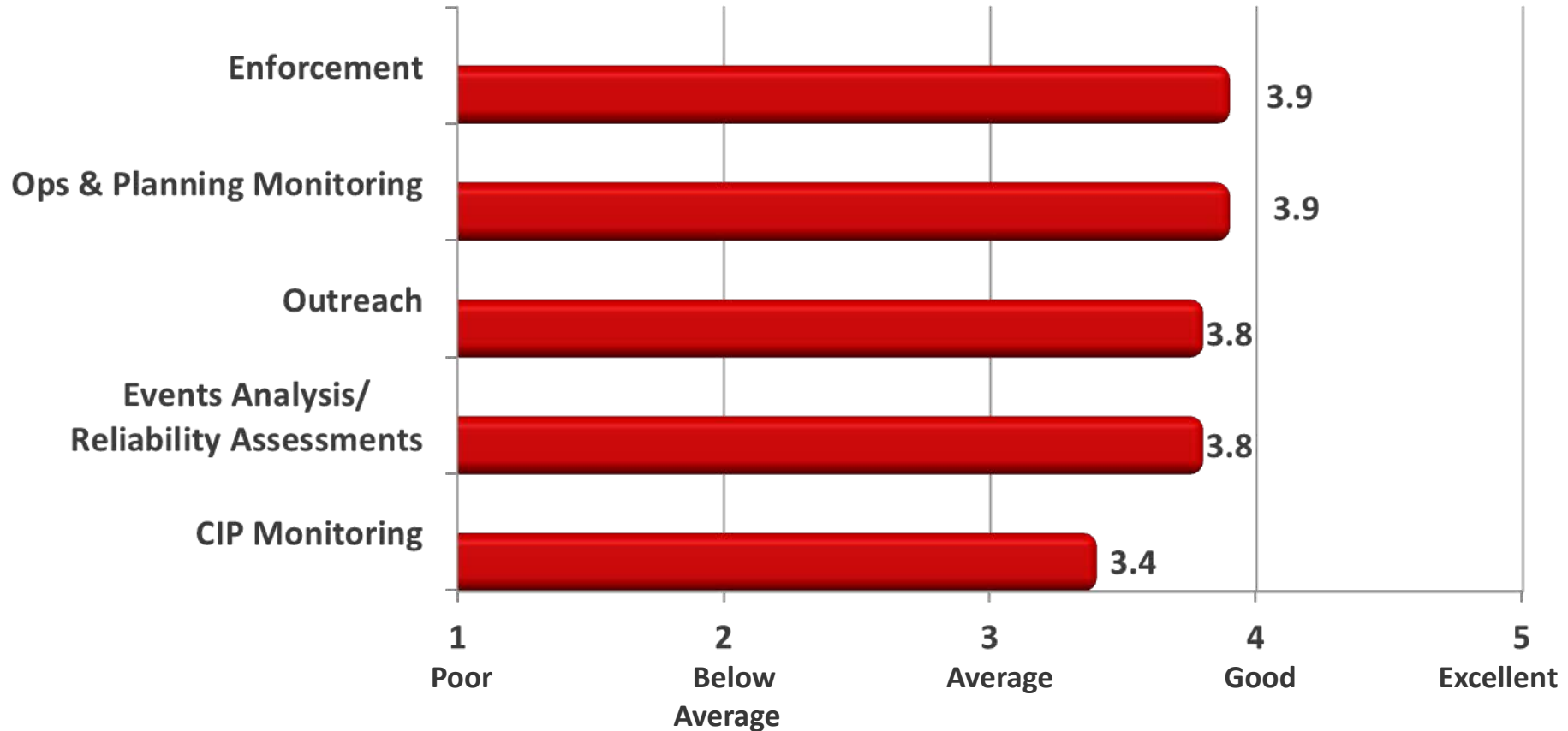
- All averages in *meets expectations* range between 3.0 and 3.3
- Narrow range among programs

# Program Importance



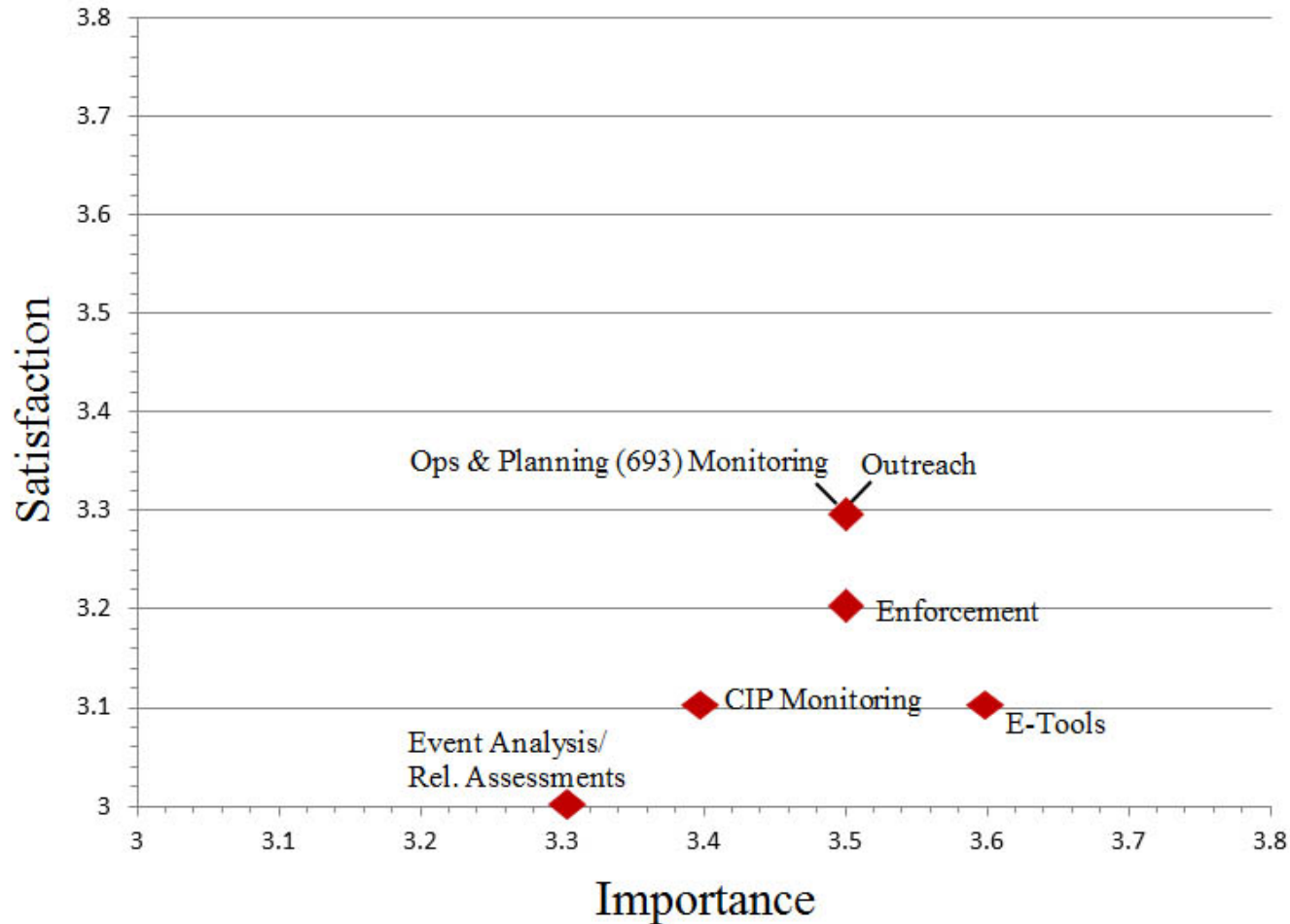
- Averages between 3.3 and 3.6 - *important* and *very important*
- Narrow range among programs

# Customer Service/Responsiveness



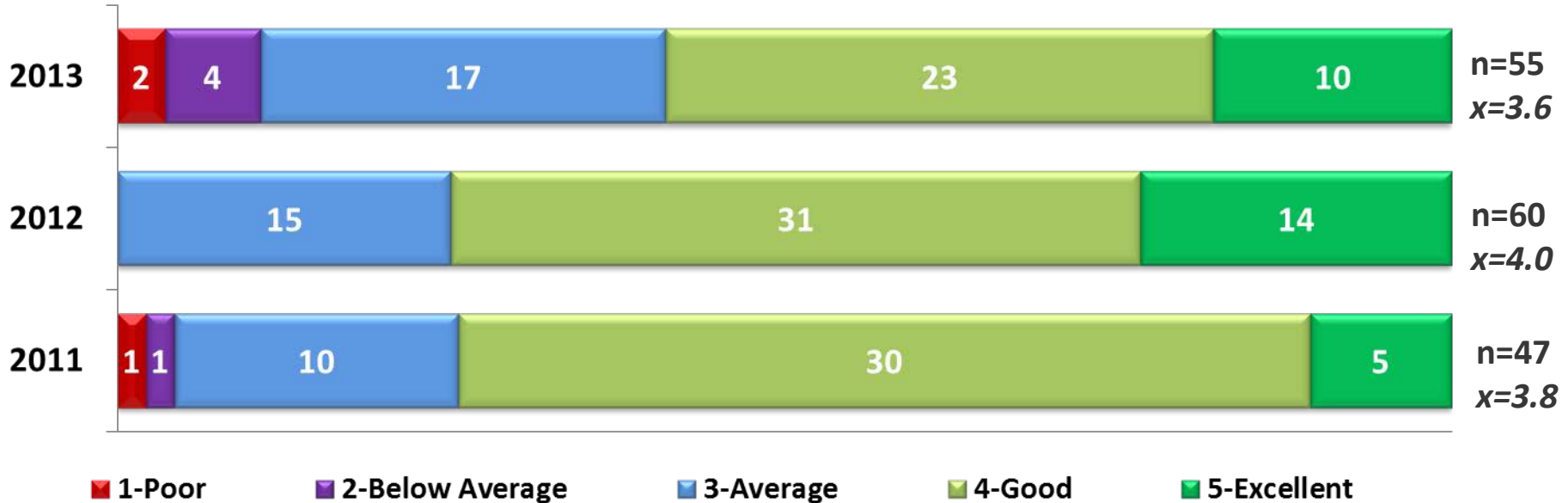
- All averages between *average* and *good*, from 3.4 to 3.9

# Importance and Satisfaction



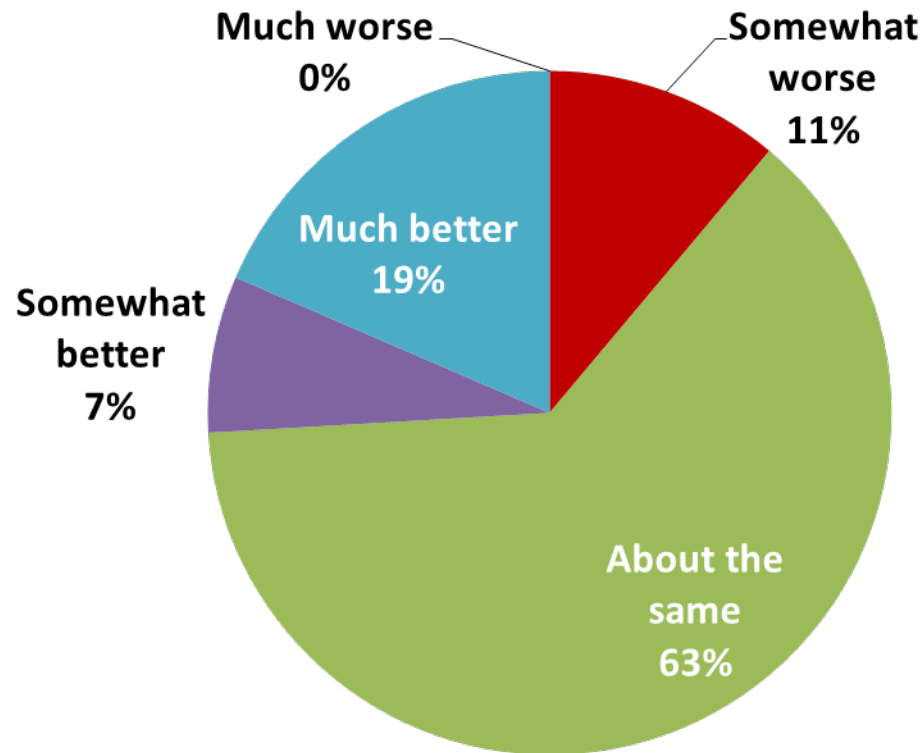
- All scores in favorable *importance* and *satisfied* ranges

# Overall Satisfaction Year-By-Year



- Overall score of 3.6 lower than in 2011 and 2012
- Remains over halfway between *average* and *good*

# Interaction with other Regional Entities



- 47% (27) interact with other Regional Entities



# Qualitative Analysis

- **Dissatisfied** comments:
  - Process inconsistencies/inefficiencies
  - SPP RE staff applying interpretations to standards
  - Need for more independence between enforcement and compliance
  - Staff's slow responsiveness/lack of knowledge
- **Satisfied** comments regarding staff's:
  - Helpfulness
  - Professionalism
  - Responsiveness
  - Knowledge

# Next Steps

- **SPP RE management and staff will discuss survey results**
- **Management and staff will develop action plan to address concerns**



# 2013 SPP RE Stakeholder Satisfaction Survey Report

## Table of Contents

<b>Executive Summary .....</b>	<b>3</b>
<b>Demographics .....</b>	<b>6</b>
<b>Interaction with other Regional Entities.....</b>	<b>7</b>
<b>Operations and Planning Compliance Monitoring.....</b>	<b>8</b>
<b>Critical Infrastructure Protection (CIP) Compliance Monitoring .....</b>	<b>10</b>
<b>Enforcement .....</b>	<b>14</b>
<b>Event Analysis/Lessons Learned and Reliability Assessments.....</b>	<b>16</b>
<b>Outreach .....</b>	<b>17</b>
<b>Electronic Tools.....</b>	<b>19</b>
<b>Importance and Satisfaction .....</b>	<b>20</b>
<b>Overall Performance 2010-2013 .....</b>	<b>21</b>
<b>Qualitative - Dissatisfaction .....</b>	<b>22</b>
<b>Qualitative - Satisfaction .....</b>	<b>24</b>

## Executive Summary

SPP RE strives to continuously improve its performance of its NERC-delegated functions. Each year SPP RE asks its Registered Entities to provide anonymous input on the organization’s programs and customer service to stakeholders.

SPP RE issued the 2013 Stakeholder Satisfaction Survey on September 12, 2013 to the 122 Primary Compliance Contacts who are registered in SPP RE’s compliance database (webCDMS). The survey had a 57% response rate (70 respondents), up from 54% in 2012. Of the 70 respondents, 16 opted out of the survey because they do not work with SPP RE enough to provide input.

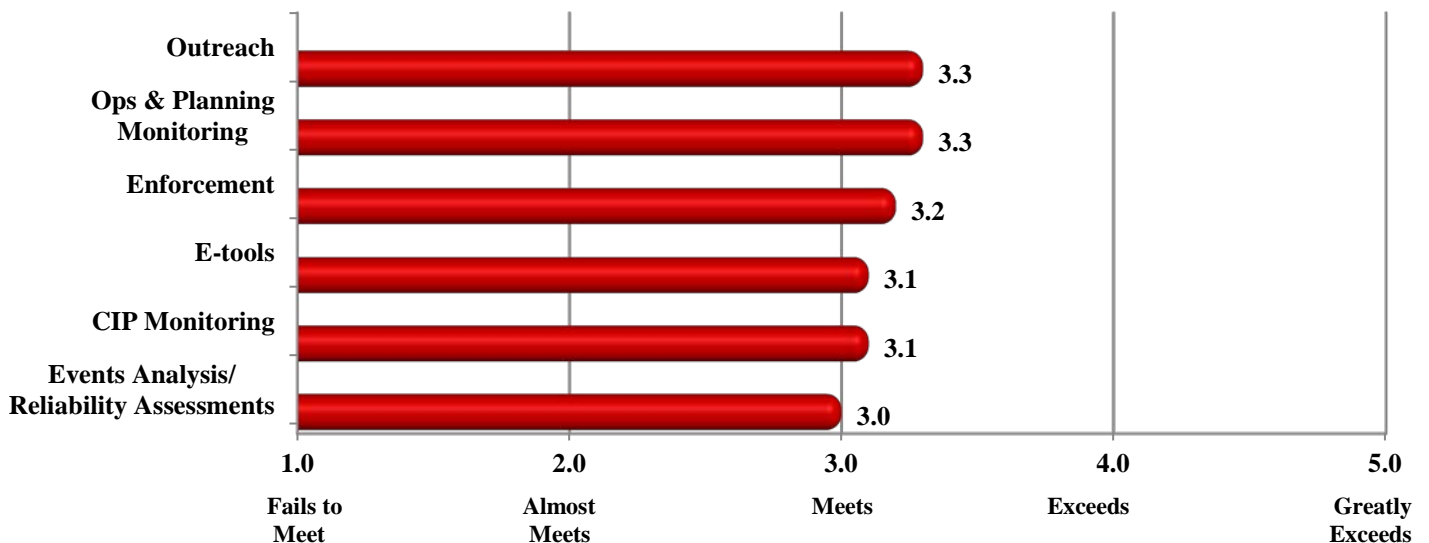
Respondents were asked to assess six SPP RE programs on their importance, how well they meet expectations, and customer service/responsiveness. Stakeholders were also asked to assess SPP RE’s performance in relation to other Regional Entities, to rate overall performance, and to provide qualitative comments.

On a scale of 1-5 in which 5 represents the most favorable score, average ratings throughout the survey were between 2.9 and 3.9.

Of the 27 respondents who interact with other Regional Entities, none rated SPP much worse, 11% rated SPP RE somewhat worse, 63% rated SPP RE about the same, 7% rated SPP RE somewhat better, and 19% rated SPP RE much better.

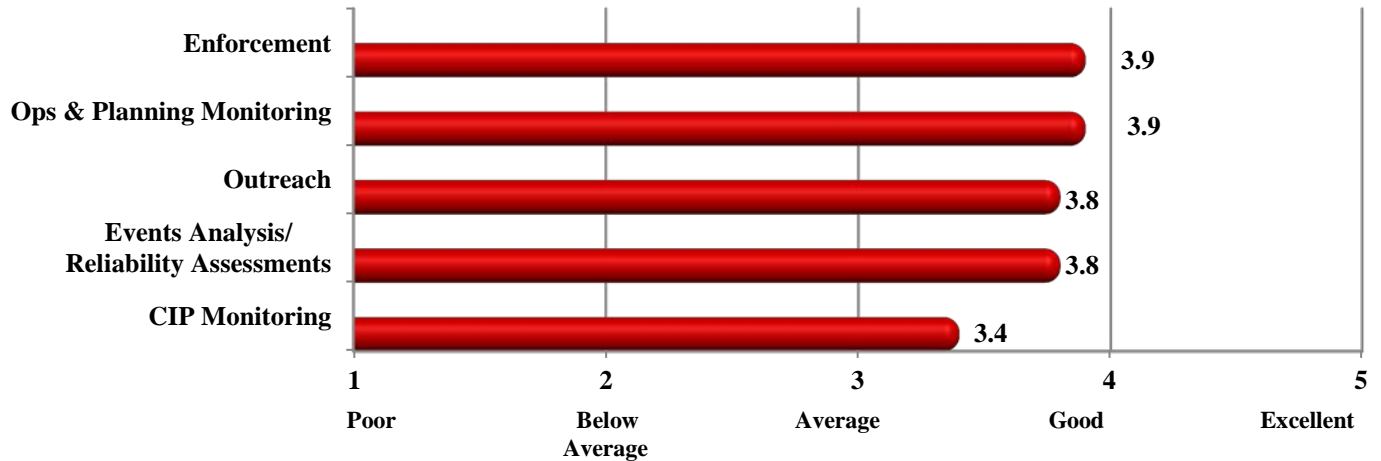
When asked how well SPP RE’s programs and services meet expectations, respondents rated all with average scores in the *meets expectations* range between 3.0 and 3.3.

### How well program meets expectations



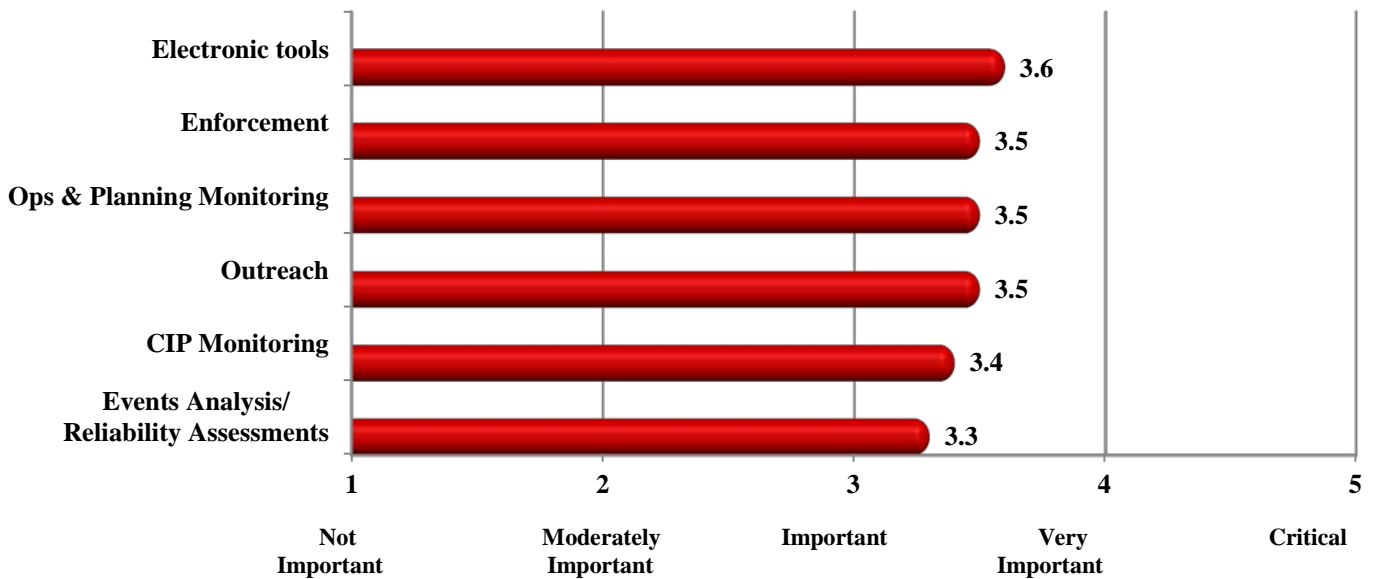
When asked to rate employees' customer service ability or programs' responsiveness to needs, respondents rated all with average scores between *average* and *good*, from 3.4 to 3.9

### Customer Service/Responsiveness

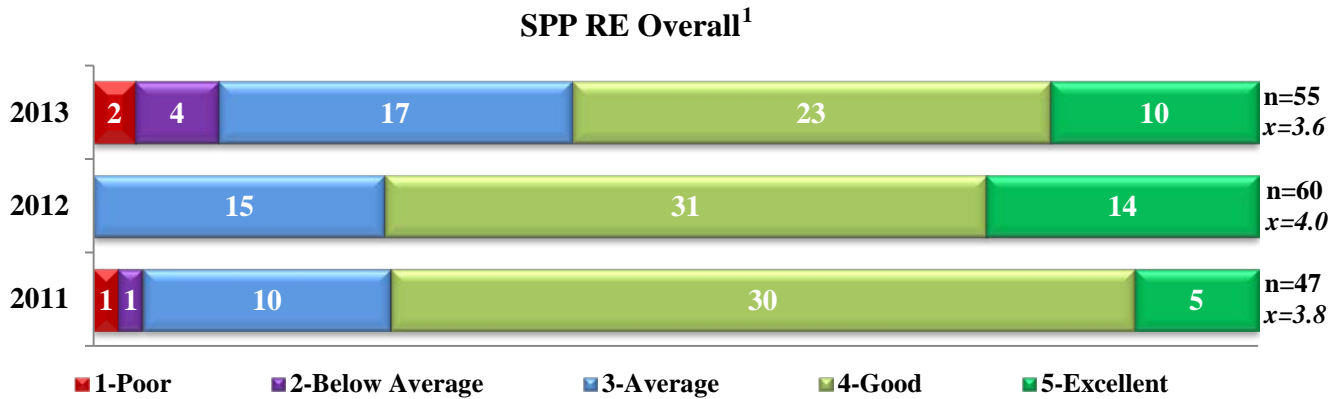


Respondents rated the importance of SPP RE's programs and services between *important* and *very important*, with average scores between 3.3 and 3.6.

### Importance



The 2013 overall satisfaction rating of 3.6 dropped from the 2012 rating of 4.0 and the 2011 rating of 3.8.



Respondents could answer open-ended questions regarding each program and SPP RE in general. Unfavorable comments related to process inconsistencies/inefficiencies, SPP RE staff applying personal interpretations to standards, the need for more independence between enforcement and compliance, and staff’s slow responsiveness/lack of knowledge. There were also a number of positive comments related to staff’s helpfulness, professionalism, responsiveness, and knowledge.

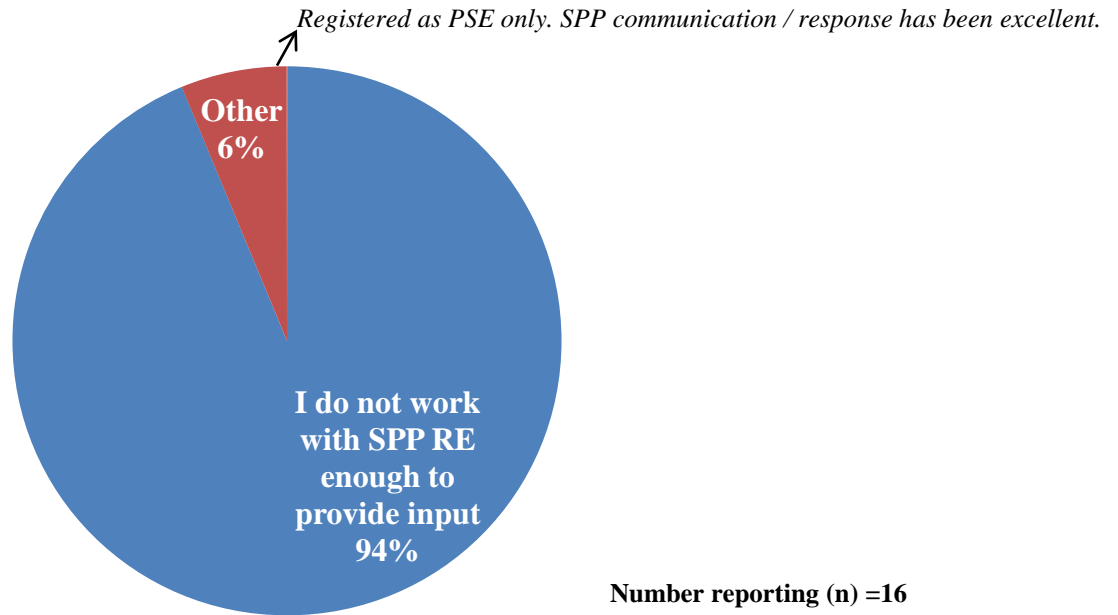
<sup>1</sup> Stacked bar charts throughout this report indicate the number of respondents in each category, not the percentage. “N” represents the number of people who responded to that question, while “x” denotes the average response. Respondents were asked to skip questions that were irrelevant to them or their organization rather than making a neutral selection.

---

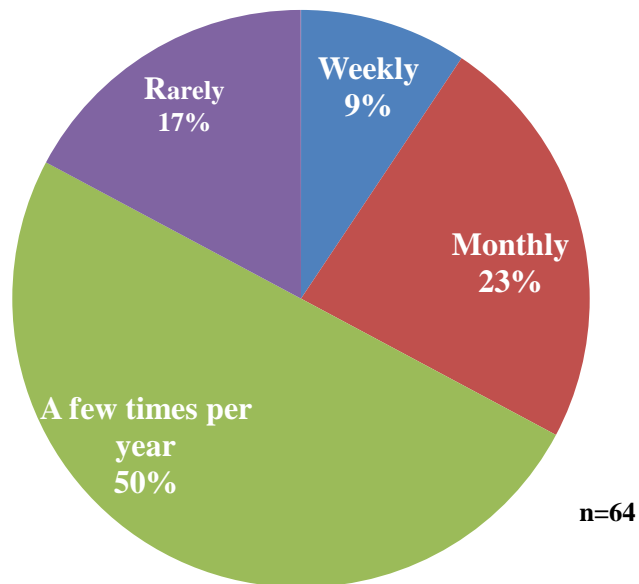
## Demographics

---

I choose not to take this survey because:



How often do you interact with SPP RE?



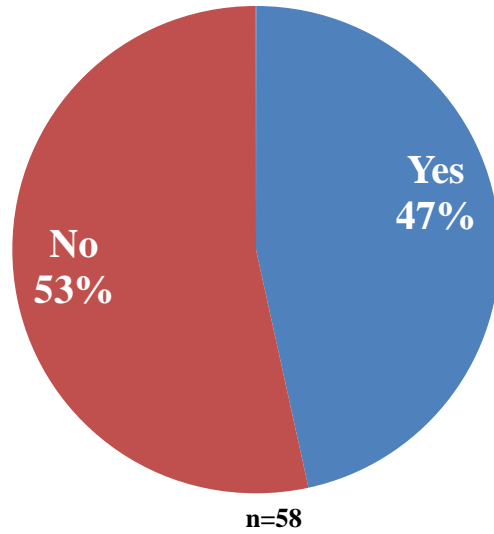


---

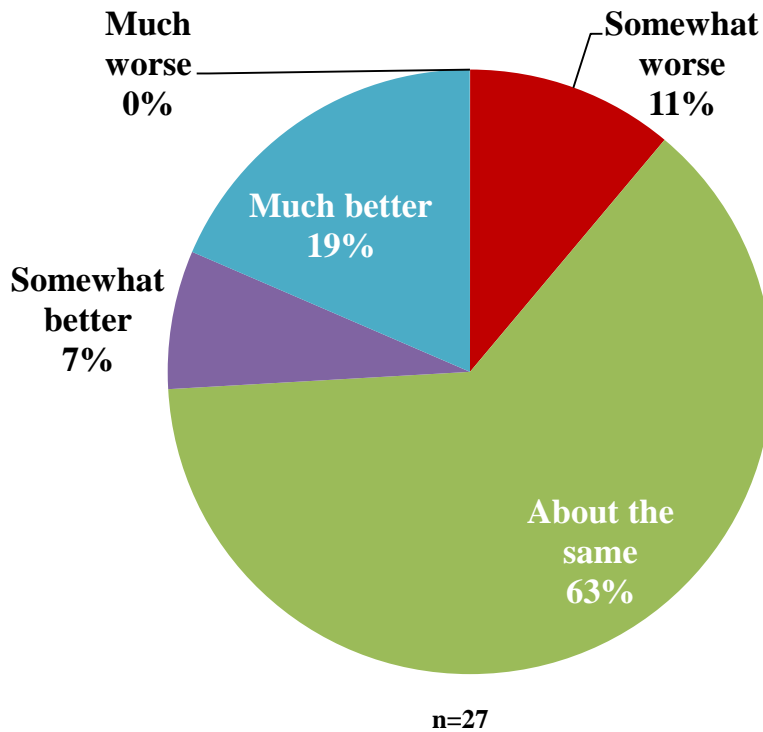
## Interaction with other Regional Entities

---

Do you interact with other Regional Entities?

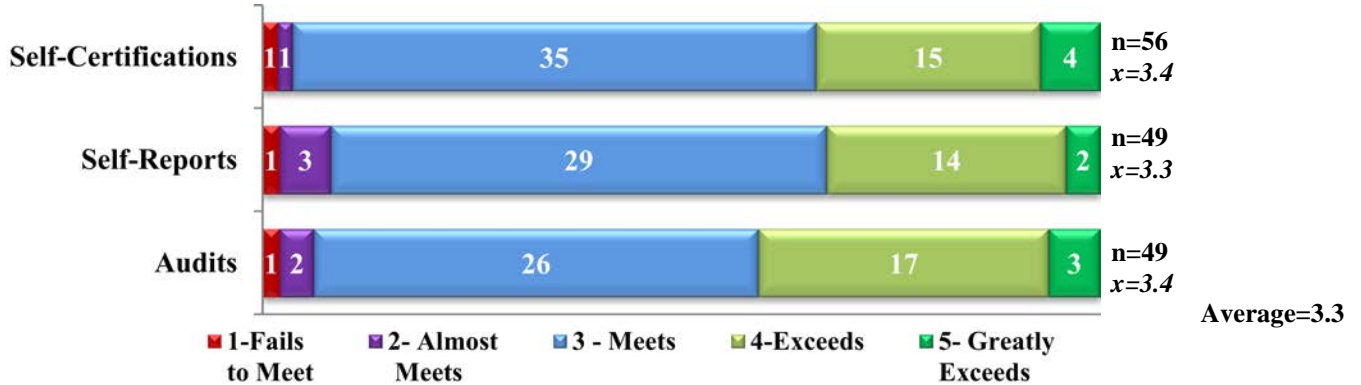


If "yes", how does SPP RE compare with the Regional Entities with which you interact most often?



## Operations and Planning Compliance Monitoring

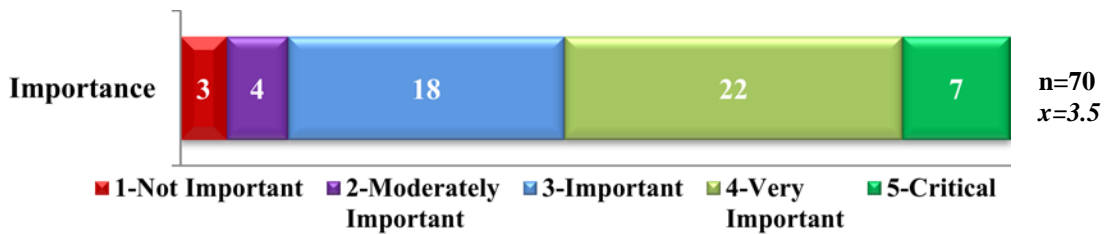
How well does our Operations & Planning (693) program meet your expectations?



Please rate the Operations & Planning (693) staff's customer service ability (responsiveness, professionalism, problem solving, and communication skills):



How important is our Operations & Planning (693) program to you or your organization?



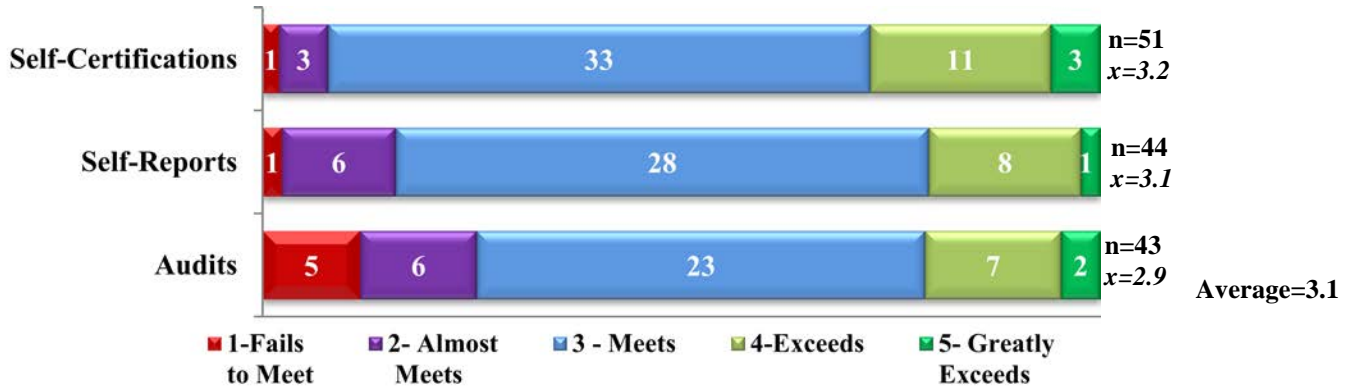
Please share your suggestions for improving our Traditional (693) Compliance Monitoring program:

- No suggestions for improvements. Overall, the SPP staff has been very responsive and supportive when responding to my inquiries.
- Bentonville provides almost no impact to the BES. We have no protective devices, no transmission relays, we have a contract with our BA to do most of the work. The standards that have been applied to Bentonville, for all intents and purposes, just cost Bentonville money with no real benefit. The only benefit is to not get fined.
- None.

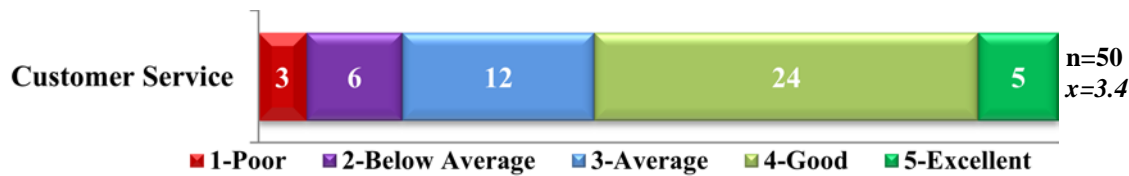
- i have no suggestions at this time.
- More knowledge of operations on renewable energy plants.
- There are many occasions where SPP RE Staff are delivering presentations to SPP Working Groups. I suggest these presentations and information be delivered back to PCCs also to avoid miscommunications and misunderstanding in direction.
- Not so many e mails they dominate my system
- We always have a positive interaction with SPP RE staff. They are knowledgeable and provide helpful assistance.
- I would encourage the SPP RE to consider utilizing more periodic data submittals, like the annual reviews for TPL assessments, blackstart tests, etc. It is more efficient use of our time, as well as the SPP RE's, if we continue to reduce the requirements for the on-site audits. The annual reviews are also a control to ensure that we remain on track with the expectations of the SPP RE.
- Consistency among all NERC Regions for Self Cert Schedules would be every help. The MRO just adopted the same monitoring Self Cert Schedule as SPP. This helps alot.
- The Rat-stats provide the auditor a method for sampling the data but when provided with an alternative method, they are not interested.
- Eliminate the Neighboring Entity Survey. This provides no value and is a waste of time. Registered Entities are not going to wait until audit time to tattle tail on each other. We deal with issues promptly and directly.
- It is the compliance department's responsibility to interact with the SPP RE. Our compliance contacts would like to be notified PRIOR to SPP RE personnel speaking at other working groups to ensure a compliance point of view is taken into consideration when viewing the RE presentations.
- This program is not as successful as it could be due to inconsistencies in the processes and the application of Standards requirements. We are committed to reliability but cannot continue to dedicate resources to administrative items/actions that do impact/improve reliability.

## Critical Infrastructure Protection (CIP) Compliance Monitoring

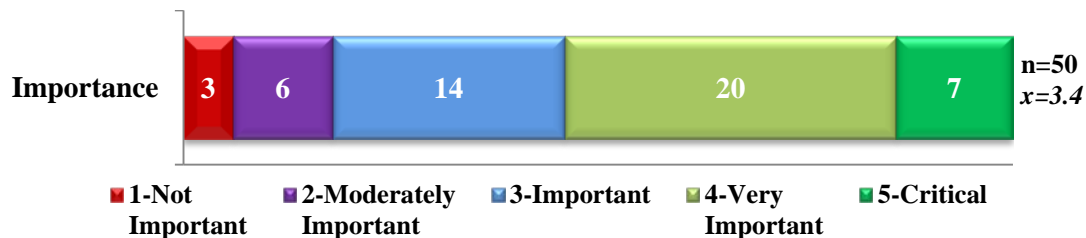
How well does our CIP program meet your expectations?



Please rate the CIP staff's customer service ability (responsiveness, professionalism, problem solving, and communication skills):



How important is our CIP program to you or your organization?



Please share your suggestions for improving our CIP program:

- Bentonville has no critical infrastructure, so again, the CIP Compliance Monitoring Program has done nothing but cost Bentonville money.
- As a utility with no critical assets, the CIP program has much less effect on our organization that with other utilities.
- None.
- no suggestions at this time

- The auditors should audit to the standard and not their personal interpretation or expectation. They should also be consistent across companies, without changing expectations based on the size of the company being audited or upon their experiences or perceived 'best practices'.
- I feel that sometimes the auditing staff follows their interpretation of a standard instead of following the strict wording of the standard. We feel that being compliant is critical but if the RE doesn't follow the strict wording of the standard it is more detrimental.
- The SPP Compliance Enforcement staff responsiveness to inquire and/or guidance need improvements as it takes days sometimes weeks before a response is acknowledged. This can cause an issue due to the nature of compliance.
- We do not have very much interaction with CIP as we do not have critical assets.
- Inconsistencies in process and application of regulations are making this program extremely difficult to be successful. We are committed to success and take this very seriously but cannot dedicate resources to those items that matter for chasing administrative as well as random thoughts of "helpful outreach".
- Inconsistencies in process and application of regulations are making this program extremely difficult to be successful. We are committed to success and take this very seriously but cannot dedicate resources to those items that matter for chasing administrative as well as random thoughts of "helpful outreach". There are many occasions where SPP RE Staff are delivering presentations to SPP Working Groups. I suggest these presentations and information be delivered back to PCCs also to avoid miscommunications and misunderstanding in direction.
- Not critical to us we don't own most everything that is vulnerable
- We have no critical cyber assets so the CIP monitoring is not relevant.
- The CIP audit tends to be longer than most other audits. It would be nice to keep audits lasting one week.
- We always have a positive interaction with SPP RE staff. They are knowledgeable and provide helpful assistance. Workshops are worth attending, never just a rehash of previous years' info.
- The SPP RE CIP compliance staff are not consistently auditing to the plain language of the requirements. Auditors frequently insert personal opinion or use external documents (FAQs, guidelines, FERC Orders, etc.) to expand the requirements. If we challenge these practices, then we are told by the auditors to "take it up with enforcement". The time and resources necessary to process these issues once they enter the enforcement process are not a good use of SPP RE or the entity's limited resources.
- The SPP RE CIP Audit team brings with them an agenda. They believe to know what the intent of the drafting team was when the standard was written. They disregard what is written and have decided what it should say. There is an additional burden of completing the RSAWs when they are not even used during the audit. The CIP Audit team uses a separate worksheet for data submittal. Also, why is the data file required to be hashed. This seems like an additional step that is really not necessary.

- Limit interpretations by the Audit team. Best practices, while good conversation, are not required for compliance and should be treated as such. The requirement to hash files needs to stop! This provides absolutely no value to the process and is a waste of time.
- As interpretations of the standards change (i.e. what types of equipment are included in CIP-006 R2.2), it would be helpful if the RE notified the entities instead of the entities learning about it in the audit. Ultimately, our entity wants to do the right thing to ensure compliance but it can be difficult if the target is constantly moving. The presentations posted on your website don't include the new interpretations. We would ask if the interpretations change, please update your presentations.
- This program is not as successful as it could be due to inconsistencies in the processes and the application of Standards requirements. We are committed to reliability but cannot continue to dedicate resources to administrative items/actions that do impact/improve reliability.

In our experience, at times, the auditors referenced documents outside of the Standards and RSAWs (e.g., expired CANs, 693 standards (during CIP audit), etc. which made the auditors appear less credible. Also, auditors are not credible when they use their own rules and interpretations. Examples include:

1. In order to avoid onerous/harsh requirements, devices that had no ability to impact the BES were moved outside of the ESP making them less effective.
2. To classify assets as Critical Assets, the auditor utilized 693 Standards, expired CAN-024, and SPP criteria during a NERC CIP Audit.
3. Auditors are more focused on compliance over security, as evidenced by finding a violation which resulted in an entity “dumbing down” a password, which resulted in a less secure environment. In addition, NERC and FERC both approved this violation.
4. For CIP audits, SPP requires all entity evidence to be hashed, purportedly to the benefit of the entity. But, the entity is not allowed to opt –out of this alleged benefit. Over forty hours of overtime were required for this process alone.
5. Auditor reversing their recommendations that were given in the previous CIP audit.
6. Use of a public source application Net APT required the entity to agree to allow firewall datasets to be analyzed using the public sourced Net APT tool.
7. Auditor applying personal interpretation when conducting a minimum performance standard audit.

The audit team does not appear to be prepared and/or organized to conduct the audit process. Examples include:

- 1) We provided the auditors completed RSAW's and approx. 2,000 documents prior to the audit, but no compliance issues were indicated complete before the auditors came on-site. It did not appear that the auditors reviewed the RSAWs/information prior to the audit.
- 2) Auditors submitted a very large data request late on the last full day of a two-week audit, which made it difficult to show evidence of compliance in a short time period
- 3) The Auditor required the company to produce a 600mb+ file which was difficult and time-consuming to compile; but, after this task was completed, the auditor decided the information was unnecessary.

In some instances, the audit team does not adhere to established rules and processes. For example, the auditors referenced/utilized CAN-024, even though this document had already been retired. Also, the auditors used 693 Standards during a NERC CIP audit to determine Critical Cyber Assets, i.e. ICCP server was not classified as a CCA under the NERC CIP standard CIP-002 R3. In addition, the Auditors used onerous workbooks instead of our

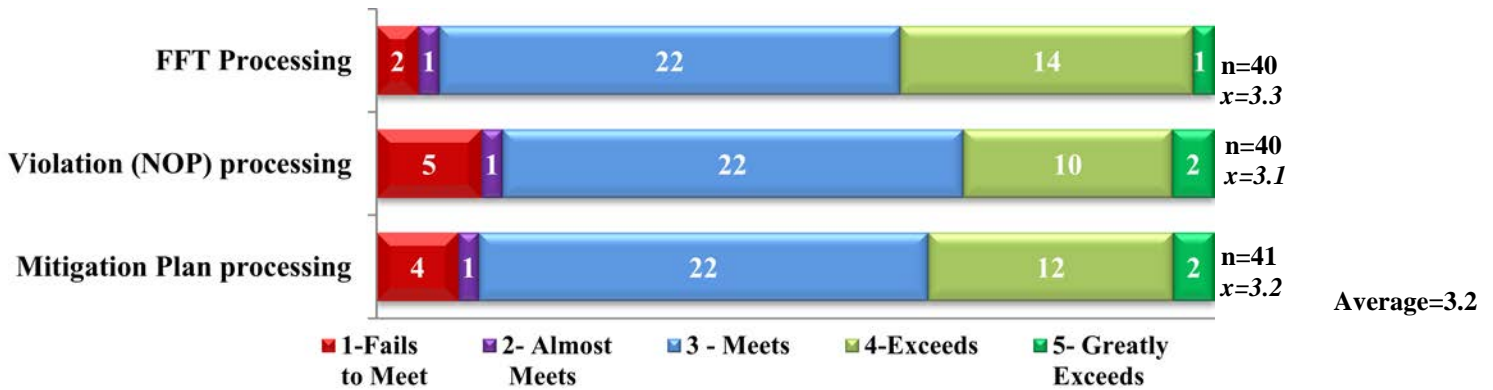
completed RSAWs, which was burdensome and inefficient.

The post-audit activities of our most recent audit did not meet the guideline criteria regarding timeliness. The draft report was very late and we had very limited time to submit comments. Not only was the draft late, but we did not have the opportunity to review the draft after we submitted our comments, prior to the final draft issuance.

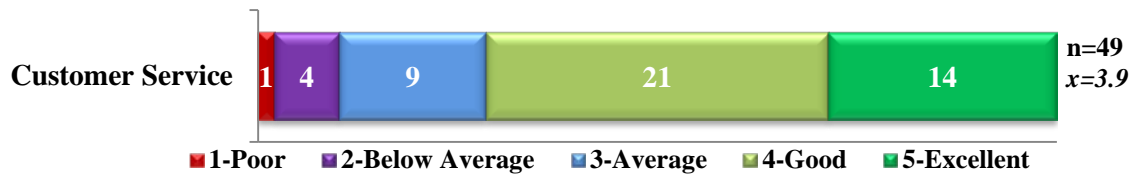
Regarding the self-reporting process, the tool used for this purpose, the CDMS, is cumbersome and not intuitive to use.

# Enforcement

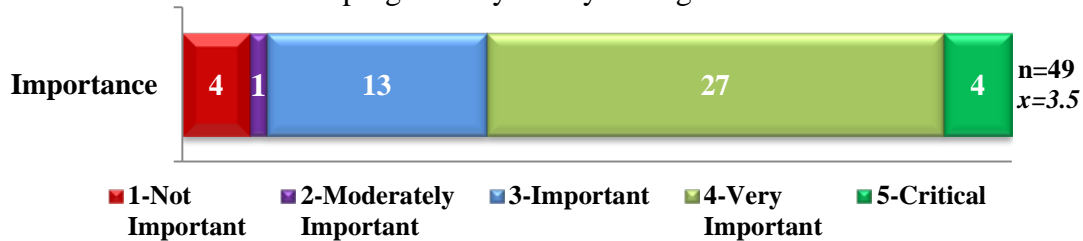
How well does our Enforcement program meet your expectations?



Please rate the Enforcement staff's customer service ability (responsiveness, professionalism, problem solving, and communication skills):



How important is our Enforcement program to you or your organization?



Please share your suggestions for improving our Enforcement program:

- None.
- We feel the customer service is adequate if initiated from our end, but if moving through an enforcement process there is little to no communication for extended periods of time. We feel the Enforcement group is influenced by the audit team at times and needs to be totally seperated from the SPP RE audit team influence.
- SPP Enforcement Attorneys have all been responsive, professional and willing to address any and all issues. They provide guidance within a timely manner.
- More knowledge of operations on renewable energy plants.
- Never had a violation we are a little guy



- We haven't dealt with the enforcement side of the RE.
- The SPP RE enforcement staff overall are very responsive to our needs and conduct themselves in a professional manner. However, due to SPP RE CIP compliance staff getting involved in enforcement's "independent review" of the violations and Mitigation Plan requirements and approvals, some violations are not fully processed until years after the initial finding. Many times this is due to additional requirements or expectations being added to complete Mitigation Plans. If these issues are clearly a threat to reliability, then enforcement staff need to ensure these items are closed out in a timely manner. When we bring these problems to the attention of the SPP RE General Manager, we are told if we don't like it, we can take it to a hearing. This is not an efficient and effective way to process these disagreements.
- I would like to see Enforcement be totally independent of the CIP and 693 audit teams.
- SPP RE CIP auditors have identified findings during Audits that Registered Entities do not agree with and have specifically said - 'We will through it over the fence to Enforcement to deal with'. Registered Entities have expected this to provide an independent view of the issue without the Auditor bias. In fact in many cases Enforcement, during their review, goes right back to the Auditor with questions thereby limiting the independent review.
- There should be a stronger division between your audit group and the enforcement group. Recommend adding more technical staff to your enforcement group in order to prevent using the audit group for technical expertise.
- Regarding mitigation plan submissions, we are expected to develop mitigation plans based on a PowerPoint presentation during the exit interview. We do not receive detailed information on what the violation is at that time, which at times makes it difficult to develop a mitigation plan.
 

Audit Reports do not identify clear, definitive, and actionable items to address. The most recent audit report had references to previous versions of standards, which was confusing at times. The reports do not describe what they believe needs to be done to correct the issue. They do not explain why something is a violation. Also, it takes significant time (three months) to get the audit report finalized and the CDMS populated with PVs, yet we are expected to mitigate items on the report prior to receiving it.

Communication of violations do not clearly or specifically describes the manner in which a requirement was violated; we are told only that a requirement is violated, not how. In addition, we have no visibility or transparency regarding the risk to the BES for any Potential Violation finding.

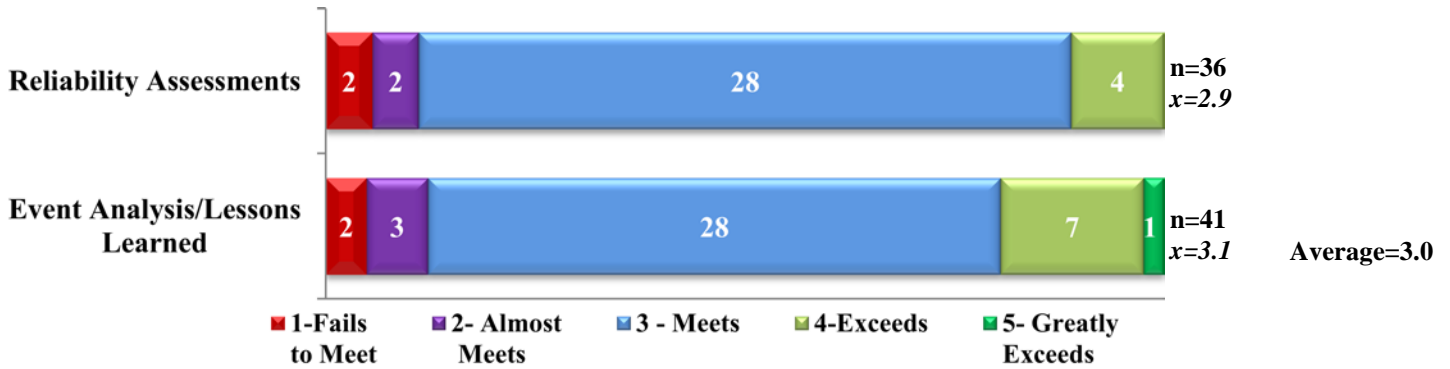
Regarding the penalty process, the process is not transparent in that we do not know the actual criteria used to determine penalties and how they are applied.

The "Enforcement Review" includes SPP enforcement staff as well as auditors. This does not allow for an "independent review" of the audit process and results. There should be a distinct separation between enforcement and audit staff to allow enforcement to conduct a true independent review of the audit.

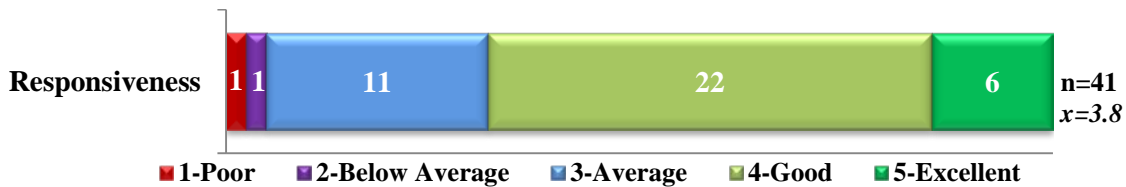
Regarding the settlement process, once negotiations with SPP RE are completed, we do not have a chance to further present our case. This is concerning since there are multiple layers that can change the settlement further down the process.

## Event Analysis/Lessons Learned and Reliability Assessments

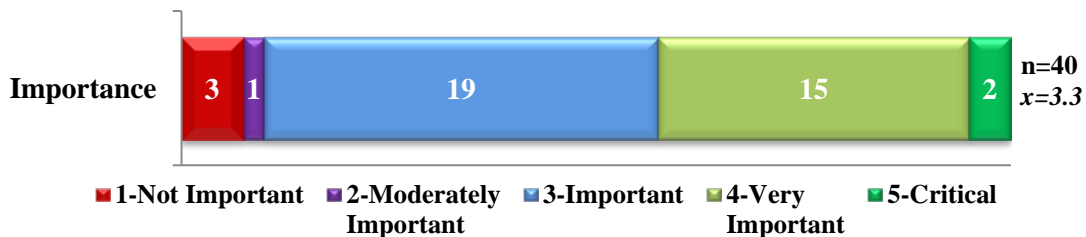
How well do our Event Analysis/Lessons Learned and Reliability Assessment programs meet your expectations?



Please rate our Event Analysis/Lessons Learned and Reliability Assessment staff's customer service ability (responsiveness, professionalism, problem solving, and communication skills):



How important are our Event Analysis/Lessons Learned and Reliability Assessment programs to you or your organization?

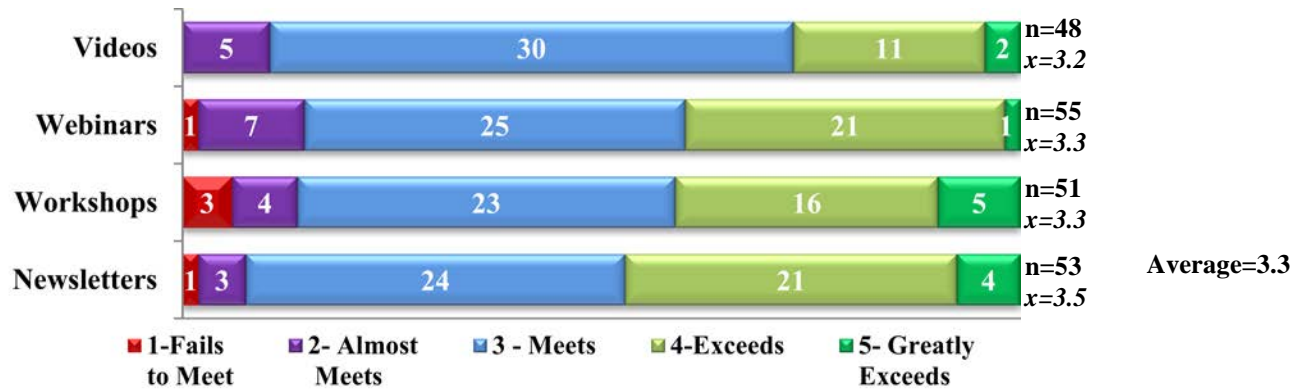


Please share your suggestions for improving our Event Analysis/Lessons Learned and Reliability Assessment programs:

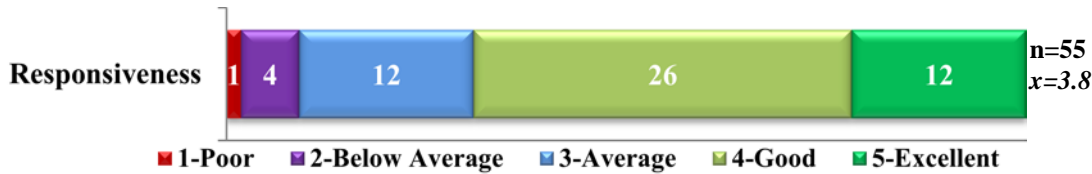
- None.
- no suggestions
- Again we are a small utility co.
- As an LSE we have no involvement with the event analysis.

# Outreach

How well does our Outreach program meet your expectations?



Please rate our Outreach program's responsiveness to your needs:



How important is our Outreach program to you or your organization?



Please share your suggestions for improving our Outreach program:

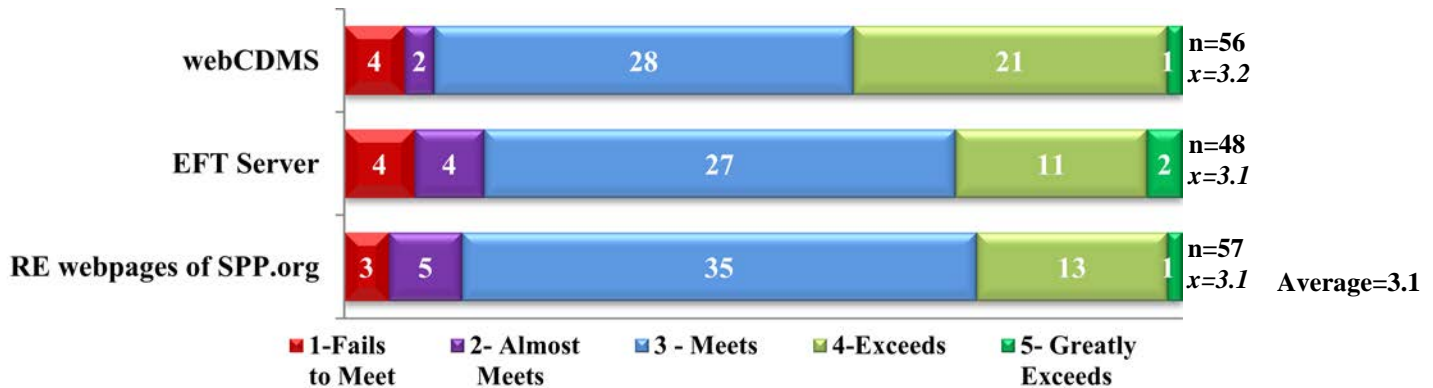
- None.
- We feel that some information shared through the outreach was not follow during audits and the answer we received was we are better auditors now. The outreach should be used if items presented in the past were changed for future audits.
- All Outreach programs are helpful. The most beneficial are the workshops and webinars. Small entities would appreciate additional guidance on the development of internal controls and how other larger entities have set up their programs.
- We need to hear more from RE Staff on emerging issues, coordination with NERC and other regions as well as how items will be interpreted. We as peers speak all the time about process and response to compliance obligations. It is not necessary or helpful to have this done in the Workshop.

- We need to hear more from RE Staff on emerging issues, coordination with NERC and other regions as well as how items will be interpreted. We as peers speak all the time about process and response to compliance obligations. It is not necessary or helpful to have this done in the Workshop.
- Same we spend our time per size (small) than the (large)dose per Capata filling out reports for the spp one (person) me has 12 other jobs
- Could more information be shared on events that have occurred within and outside the region?
- The Workshops need to be focused on compliance guidance from SPP RE staff. The registered entities need to hear how auditors are going to interpret the requirements. Many times we don't learn this information until the audit. By that time it is an enforcement action that consume limited resources to process.
- Outreach should be able to provide specific answers to a compliance question. We do not need to hear from our peers at the workshops but need answers in writing from the RE.
- Would like to see more presentations by the RE staff regarding their interpretations of requirements and what evidence they will be looking for when they audit.
- There are many occasions where SPP RE Staff are delivering presentations to SPP Working Groups. PCCs should have advance notice of these presentations in order to attend and hear the same information as the SMEs. In addition, these presentations and information should be delivered to PCCs to avoid miscommunications and misunderstanding in direction. Including PowerPoint presentations and Q&A notes would be the most helpful information.

During SPP RE Compliance workshops, we would like to hear from RE Staff, instead of from our peers, regarding interpretations, audit focus areas, lessons learned, etc. We would prefer to use the RTO forum for Entity sharing.

## Electronic Tools

How well do our electronic tools meet your expectations?



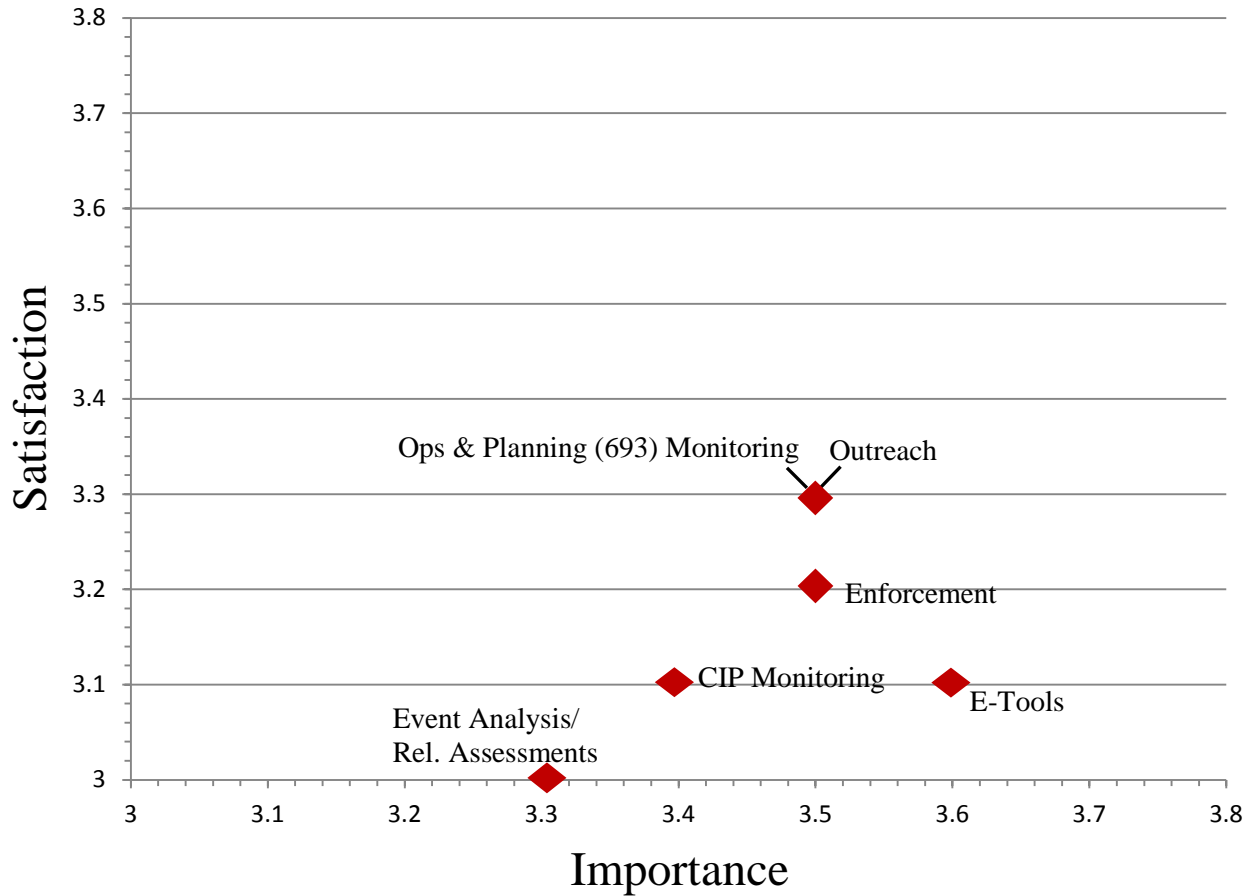
How important are our electronic tools to you or your organization?



Please share your suggestions for improving our electronic tools:

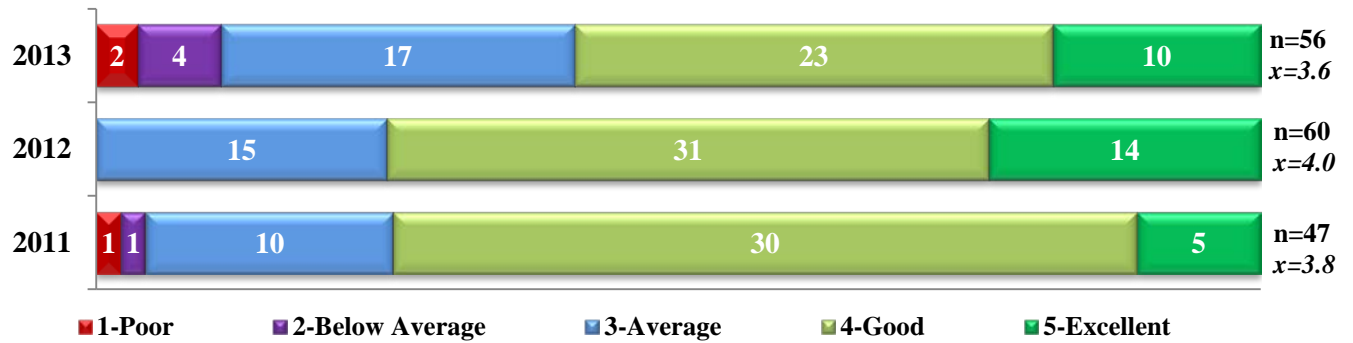
- I believe the electronic tools are critical to our needs because they streamline the self-certification and ability to provide information in a timely manner.
- None.
- Webcdms is a great tool and very easy to use.
- Insure large amounts of data can be transfered on the EFT. We have always had issues with this tool.
- The new format for the SPP web pages is difficult to maneuver and find specific topics of information.
- Same as above not important to us
- It would be beneficial if the RAPA (Misoperations) could be uploaded into the webCDMS rather than transposed field by field into the system.
- CDMS, where mitigation plans and reporting are required to be managed, is cumbersome and not intuitive to use.

# Importance and Satisfaction



All satisfaction (how well the program meets expectations) and importance scores fall within a small range of 3.0 and 3.6.

## Overall Performance 2010-2013<sup>2</sup>



The 2013 overall satisfaction rating of 3.6 dropped from the 2012 rating of 4.0 and the 2011 rating of 3.8.

<sup>2</sup> In this year’s report, we compared the 2013 overall satisfaction score to the 2012 and 2011 reports’ overall satisfaction scores. In previous years, the year-over-year comparison was generated by asking that year’s respondents to rate all three years. For instance, the 2012 report asked respondents to rate 2012, 2011, and 2010.

---

## Qualitative - Dissatisfaction

---

Please share other comments regarding your dissatisfaction with SPP RE

- No dissatisfaction with the SPP RE
- Not so much satisfaction with SPP, just the overall FERC/NERC compliance program. Bentonville has no impact on the BES, and the compliance program has just cost Bentonville extra money.
- None.
- see above
- Audits should be limited to the applicable approved Standard requirements.
- Why is the self-cert quarterly in SPP and no other RE has this?
- Adding a "Not Applicable" option would be very helpful to future surveys.
- Not so many e mails i delete 95% of them
- The SPP RE CIP compliance staff should separate their Section 2.15 NERC auditing function from their informal outreach efforts to encourage best practices. While it is beneficial to learn about new security threats and practices, we should not be required to address these threats or implement these practices until the NERC Standard requires it.
- Lack of separation/independence between compliance and enforcement in technical review of PVs and mitigation plans. Perhaps more technical staff in enforcement are needed, or a cooperative agreement with neighboring REs to review each other's PV cases. Workshops should not include audit lessons learned from entities - this should happen in the forum where entities (both presenting and listening) have more freedom to interact honestly and openly without concern. Entities need more information at these forums from the staff themselves - genericized examples of best practices on otherwise top violated standards, guidance documents, etc. There have been multiple times over the past couple of years that the RE manager doesn't appear to be knowledgeable about some very basic initiatives, concepts, etc. - this is worrying. There are many instances when CIP compliance staff will answer a question only to be contradicted immediately by another staff member - this not only provides uncertainty for the entities but makes it appear that the CIP team is somewhat dysfunctional.
- There is too much intermingling of resources between the RE and RTO. At times the RE is mandating compliance to the working groups when the working group is made up of mostly technical people who are not versed in compliance.
- I would like to see a more proactive and collaborative approach from the SPP RE with respect to finding solutions to compliance and reliability issues. Registered Entities have a wealth of knowledge, insight and understanding of these issues that if coupled with the SPP RE regulatory perspective prior to establishing a position would be beneficial to both sides.



The NERC RAI is a good example of such an opportunity.

The ever evolving interpretation of some Standards is very frustrating. We want to do the right thing but it's difficult when the target keeps getting moved!

- See previous comments.

---

## Qualitative - Satisfaction

---

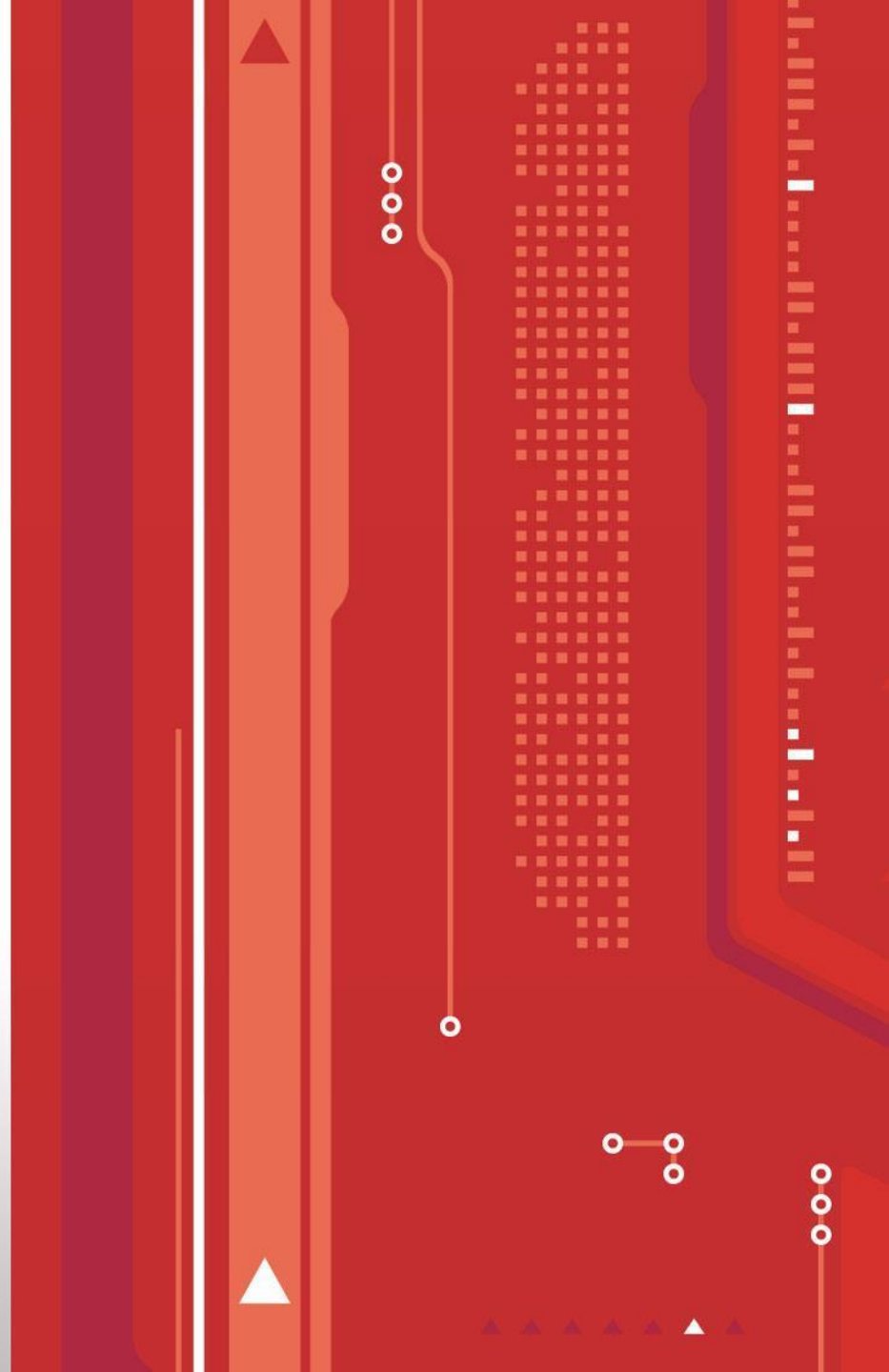
Please share other comments regarding your satisfaction with SPP RE:

- Overall the staff has been professional and responsive to my inquiries.
- The staff is always easy to get ahold of and easy to speak with. They are very helpful and full of useful information.
- When we approached the RE with a question that would alter our CIP program, we were provided with unbiased and sound guidance that greatly assisted in our re-evaluating of our critical assets listing, resulting in removing all items from that list due to more clearly defined criteria for establishing such assets. It seems to be win-win, relieving some of the auditing burden from the RE and from our utility at the same time having no adverse effect on reliability in our territory.
- None.
- I feel that the SPP RE does a great job!
- see above
- Please add a Not Applicable response to the questions. Some items may not be used in a given time period (Event analysis, etc). Our responses should not reflect process is working if not used.
- u folks Ark had mabe 5 doing a good job why so many of you now I'm Sure we taxpayers are paying for all of this we come from the hills like duck dynistey getter Done!!!!!!!!!!!!
- I always know you're there if I need answers. Your workshops keep me current. It's easy to let things slide but if there is a workshop around the corner it's a wake-up call to refresh my activities in the compliance world.
- The staff at the SPP RE are very professional and qualified at what they do. In most cases, they are willing to listen to other perspectives on.
- SPP is viewed as reasonable and fair. Other Regional Entities vary greatly. SPP has earned our respect.
- The SPP RE 693 compliance staff have adequately separated their Section 2.15 NERC auditing function from their informal outreach efforts to encourage best practices. This is beneficial to the entity and to reliability.
- Staff are helpful and knowledgeable. Auditors know their stuff and get down to solid issues
- It is obvious that the staff are earnest and trying to perform to the best of their ability, and they are nearly always quite pleasant to interact with, with a few exceptions.
- Overall the SPP RE staff is professional, prompt and courteous.
- Some RE Staff are helpful.

# 2013/2014 Winter Assessment

October 28, 2013

Jason Smith  
[jsmith@spp.org](mailto:jsmith@spp.org)  
501-614-3293



# Assessment Staff

- **David Kelley**, Manager of Interregional Coordination (RTO)
- **Chris Haley**, Engineer Associate III (RTO)
- **Debbie Currie**, Lead Engineer (SPP RE)
- **Jason Smith**, Manager, Operations Analysis and Engineering Support (RTO)

# 2013/2014 Winter Assessment Timeline

- **Sept. 16** Initial data & draft narratives due to NERC
- **Sept. 27** Comments due to SPP
- **Oct. 1-2** NERC Reliability Assessment Subcommittee peer review meeting
- **Oct. 7** Revised narratives and corrected data due to NERC
- **Oct. 11** Complete draft sent to NERC member committees
- **November** NERC target release

# Winter Reliability Assessment

- **Projected seasonal outlook for winter 2013/2014**
  - **December, January, February**
- **Provides high-level overview of winter reliability assessment for SPP RTO region**
  - **Demand growth**
  - **Capacity adequacy**
  - **Operational reliability**

# Assessment Area

- **SPP RE Reporting Footprint**
  - Nebraska still registered with Midwest Reliability Organization (Regional Entity)
  - SPP RTO operational and planning area includes Nebraska
  - CLECO, LAFA, and LEPA moved to MISO (Reliability Coordinator)

# Assessment Process

- SPP staff used member-submitted data from [SPP Model Development Working Group](#) and Long Term Reliability Assessment
- Assessment undergoes peer-review process internally and at NERC prior to finalization
  - As part of the peer-review process, SPP solicits feedback from stakeholders



# Data Improvement

- **SPP staff is making an effort to use in-house member-submitted data to complete NERC assessments**
  - **Purpose is to reduce the number of data requests**
- **SPP staff is working with the Model Development Working Group to improve generator modeling**

# 2013/2014 Winter Demand & Capacity

- **34,415 MW**      **Projected Total Internal Demand (coincident)**
- **33,703 MW**      **Actual 2012/2013 winter peak demand**
- **64,466 MW**      **Existing Certain Capacity resources**
  - **842 MW**      **Added since Summer Assessment timeframe**
  - **759 MW**      **Expected to be added during winter assessment timeframe**
- **1,156 MW peak**      **Demand Response – total controllable**
- **153 MW peak**      **Energy Efficiency**

# 2013/2014 Winter Reliability Assessment

- **No regional reliability issues expected**
- **Reserve Sharing membership changes and Consolidated Balancing Authority integration activities ongoing through the winter**
- **Reserve margins are adequate**
  - **SPP members required to maintain 12% capacity margin, which translates to a 13.6% reserve margin**
  - **94.2% forecasted reserve margin based on Existing-Certain and Net Firm Transactions**

**SPP Organizational Group Self-Evaluation/Assessment**  
(August 1, 2012 – August 5, 2013)

**GROUP NAME:** **SPP Regional Entity Trustees**

**CHARTER/SCOPE UPDATE:** Attached Charter/Scope has been reviewed: **N/A**

**MEMBER ROSTER/ATTENDANCE PUBLIC :**

Member	Company	Sector	# Present	# Absent
John Meyer	RE Trustee, Chairman	N/A	6	-
Gerry Burrows	RE Trustee	N/A	6	-
Dave Christiano	RE Trustee	N/A	6	-
Emily Pennel	RE Trustee Secretary	N/A	6	-

Please list the number of members represented in the following areas:

Trans/Owners	Trans/Users	Directors
N/A	N/A	N/A

Sectors							
IOU	Coop	Muni	State/Fed	IPP/Marketer	Alt Power/Public Interest	Lg Retail	Sm Retail
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**AVERAGE OVERALL ATTENDANCE (INCLUDING NON-GROUP MEMBERS): 32**

**MEETINGS HELD TO DATE: Live: 5 Teleconference: 1** (vote to recall UFLS standard)

**AVERAGE LENGTH OF MEETINGS: 3.5 HOURS**

**NUMBER OF VOTES TAKEN: 10**

**\*MEETING COST(S): \$77,117**

**MAJOR ACCOMPLISHMENTS/ISSUES ADDRESSED BY THE GROUP:**

1. Approved and implemented use of staff performance goals and metrics
2. Approved revised Regional Standards Development Process Manual for submission to NERC
3. Approved recalling the regional UFLS standard from FERC's consideration
4. Maintained favorable stakeholder satisfaction scores
5. Maintained <12 month enforcement caseload
6. Reviewed/accepted three regional reliability assessments
7. Worked with NERC to implement regional Event Analysis cause coding

**MAJOR PENDING ISSUES BEFORE THE GROUP:**

1. Coordinate with NERC and Registered Entities on implementing BES definition exception process
2. Continue working with NERC and other Regional Entities to streamline and standardize CMEP processes through tools and initiatives such as the Reliability Assurance Initiative,

Auditor Handbook, auditor training/certification, added on-site audit efficiencies, and reduced audit scope

3. Monitor Registered Entities' remediation of Facility Ratings discrepancies (FAC Alert)
4. Work with Registered Entities on CIP version transition
5. Continue targeting outreach to improve Registered Entity compliance programs to reduce violations and achieve greater BES reliability

\* Meeting costs include hotel expenses (room rental, A/V, food and beverage), estimate of teleconference expenses, and Trustee fees for attendance at quarterly and special meetings.

**NERC Planning Committee**  
**September 17 & 18, 2013**  
**SPP RET October 2013 Update Report**

1. The Integration of Variable Generation Task Force (IVGTF) presented a report on the inability of variable generation resources to ride through voltage and frequency excursions on the distribution system. The report identified a concern that the proliferation of distributed variable generation resources could create a reliability impact. This is due to the lack of obligation for these resources to ride through voltage and frequency excursions and the current IEEE standard requires the variable resources on the distribution system to trip off-line for a variety of circumstances that may be contrary to actions necessary to support the Bulk Electric System. The report recommends that the NERC PC intervene in the IEEE standard making process and request that voltage and frequency ride through provisions be written into the standard. Based on feedback the PC did not approve the report as it provided little evidence that a problem currently exists or is even imminent.
2. CAISO presented a report regarding integrating variable energy resources (VER) into their market. The integration of large quantities of VER is changing their planning and operations. This report provides an explanation of the current efforts of CAISO to integrate VER, as well as some of the current and proposed solutions to maintain resource adequacy and reliable operations in anticipation of a significantly changing resource mix. The CAISO issue heightened by the state mandated 33% renewable portfolio standard for 2020. Installation of many of the VER is at the distribution level limiting CAISO visibility. As a result, the net load/generation balance at the traditional peak hour will present operation and reliability issues. CAISO projections are there will not be enough flexible resources to accommodate the ramps and reduce the minimum generation to the minimum load level.
3. Southwest Outage recommendations
  - a. Regarding the resolution of modeling discrepancies between real-time and planning models, the Modeling Working Group (MWG) recommended that a data change management process be implemented by industry. The process would require GOs and TOs to notify TPs, TOPs, RCs, and PCs whenever there are changes made to the system requiring changes in the models. The actual implementation of this process undefined.
    - i. The PC approved a motion to direct the MWG to continue working on developing the change management system and to develop a work plan and schedule.

**NERC Planning Committee**  
**September 17 & 18, 2013**  
**SPP RET October 2013 Update Report**

- b. To address another Southwest Outage recommendation regarding development of recommended guidelines or standards requirements that would drive the selection of bases cases and parameters that TOPs should use to conduct simulations, the System Analysis and Modeling Subcommittee (SAMS) concluded that additional guidelines and standards requirements were unnecessary because existing enforceable or BOT-approved standards requirements already address the issue.
      - i. The PC approved the associated report that presented analysis supporting this conclusion.
    - c. In response to a Southwest Outage recommendation to consider further applicability of PRC-023-2 to sub-200 kV load responsive relays, the SPCS determine that revisions included in the latest version, PRC-023-2, are sufficient. The revisions were not in effect at the time of the outage and allow the PC to designate applicability of the standard to facilities below 200 kV including those below 100 kV.
  - 4. The MWG presented the concept of using node-breaker models for planning cases similar to real-time models as opposed to the bus-branch models. The view is that these models will allow better alignment of real-time and planning models and will avoid issues with planning studies due to topology changes from various breaker configurations.
    - a. The Planning Committee will continue studying the issue.
  - 5. In response to a directive in FERC Order 758, NERC is required to develop maintenance and testing standards requirements for relays that do not respond to electrical quantities. The System Protection and Control Subcommittee (SPCS) has reviewed potential applicable relays and determined that requirements should be developed only for sudden pressure relays. They also developed a suggested minimum maintenance schedule for inclusion in PRC-005-3.
    - a. The PC will review the report in detail and will to act on the report at the next meeting.
  - 6. In response to a FERC approved delay in the implementation of the BES definition, the PC approved the Transmission Availability Data System Working Group's (TADSWG) recommendation to delay the collection of data less than 200 kV by one year to 2015 to align with the implementation of the BES

**NERC Planning Committee**  
**September 17 & 18, 2013**  
**SPP RET October 2013 Update Report**

definition. Failure to align the collection of the data with the implementation of the BES definition would result in collecting data based on two definitions, which could lead to confusion. NERC staff pushed back on this issue so the issue could rise again or NERC could choose to bypass the PC's decision since the associated section 1600 data request authorizing collection of the data is already approved.

7. In response to recommendations from the Protection System Mis-operations Task Force (PSMTF), the SPCS has modified the protection system mis-operations reporting template.
8. The NERC Geomagnetic Disturbance (GMD) Task Force presented two draft guidelines
  - a. GMD planning application guide this guide provides guidance on conducting system assessment studies that consider the effects of GIC.
  - b. Geomagnetic induced current (GIC) calculation guide is a reference that explains theoretical considerations and underlying assumptions used in GMD simulations tools and data sources.
  - c. The PC will review these and they will be considered for approval at a future meeting.
9. The chair of the Spare Equipment Database Working Group (SEDWG) requested additional participation of the industry in populating the database. Participation is voluntary and has been very limited. FERC has expressed interest in the effectiveness of this tool and encourages industry-wide participation. Minimal participation could reflect poorly and result in additional FERC directives. The tool is intended to enhance resiliency and recovery of the bulk electric system during high-impact, low-frequency events such as coordinated cyber and physical attacks, GMDs, and extreme weather events. Providing information on spare equipment does not obligate an entity to share the spare equipment.



**NERC Compliance and Certification Committee (CCC)  
Report to Southwest Power Pool Regional Entity Trustees  
Submitted by Jennifer Flandermeyer, SPP RRO Representative  
Senior Manager, Operations Compliance, Kansas City Power & Light  
September 19, 2013**

***NERC CCC Meeting***

- The NERC CCC held its quarterly meeting in Denver, CO on September 18-19, 2013. The materials for this meeting can be found:
  - Agenda: <http://www.nerc.com/comm/CCC/Pages/AgendasHighlightsandMinutes-.aspx>. File: September 2013 CCC Agenda Package.pdf.
  - Minutes and Presentations: <http://www.nerc.com/comm/CCC/Pages/AgendasHighlightsandMinutes-.aspx>. File: September 2013 CCC Meeting Minutes\_Draft.pdf.
- Committee spent time reviewing action items from the Board and RMICS.
- Update was given to the committee on the Board and MRC meetings.
- Discussed potential issues with existing RSAWs at the requirements level – recommendations listing will be proposed and submitted to NERC for consideration.
- Update was given on Key Reliability Standard Spot Check and process outcomes as well as recommendations – Terry Bilke (MISO), Jason Marshall (ACES) and Jennifer Flandermeyer (KCPL) were CCC participants.
- Key Compliance Monitoring Index (KCMI) Enhancement Proposal update – see presentation materials. The NERC CCC endorsed the proposal.
- Update on the NERC Reliability Risk Control Process – see presentation materials. This concept is still in development and will be discussed at the Leadership Summit on October 24<sup>th</sup>. The meeting is open and all are encouraged to attend. The content discussed improved processes to sharpen focus on items with confirmed focus on reliability for placement into the Standards Development Process. There will be roles fulfilled by all NERC Committees. NOTE: I would encourage all stakeholders to review these materials as proposed. There will be a terminology change taking the word “control” out and replacing it with something else to avoid confusion with RAI concepts.

**Subcommittee Updates**

- EROMS Update: This subcommittee gave an update on the NERC self certification, the 2013 Stakeholder Survey and Procedure update. Related to the Stakeholder survey, to date, there have only been 150 responses of 1500. This is typical of this survey as the deadline tends to be extended for an additional week for completion. This survey is very important feedback to NERC and responses feed into their strategic plan. Preliminary analysis is expected in December. There were additional proposed procedure revisions for the CCC consideration and approval in December.
- SIS / PROCS Update: Subcommittee met with Brian Murphy, Standards Committee chair, to discuss 5 primary issues: RSAW input, Monitoring compliance with Standards development, Cost effectiveness / cost benefit pilots, Data retention, SC / CCC / NERC Metrics – how do we get the biggest bang for the buck so to speak. NERC Legal contacted and reported to the subcommittee on upcoming or proposed changes to the RoP involving the TFE reporting – Appendix 4D. These are in response to a FERC order. This is in support of a December 2<sup>nd</sup> filing with FERC that NERC will need to make to comply with FERC direction. There was an update on the discussion for consolidating two of the subcommittees to ensure there is an appropriate focus on those items of importance – RAI for example. The committee is finalizing a draft charter and this change would require NERC CCC

approval and NERC Board adoption. This is anticipated at the February 2014 meeting.

- ORCS Update: RISC submitted Planning Coordinator issue for review by ORCS. Proposed letter of response was submitted to CCC for review. ORCS will be adding further definition to response letter to frame issues, current activities, outstanding questions and coordination with other stakeholders. The final draft will be resubmitted to CCC for notice but recommendations and actions will be longer term discussion items for the ORCS and the full committee. Proposed 2014 work plan items were reviewed with the full CCC for discussion and comment. Multiple action items were closed from previous meetings.

### **CCC Ongoing Projects**

- Team 1 – Mr. Bob Hoopes presented the RAI Benefits and Impacts Matrix
- Team 2 - Mr. Bob Hoopes presented the RAI Question and Answer Document that is posted on the NERC website.
- Team 3 – Mr. Jim Stanton presented the RSAW RAI project status
- Team 4- Mr. Terry Bilke presented the Data Retention (Identify Reasonable Record Retention) status **Exhibit J**.
- Team 5 – Ms. Martyn Turner presented the status on Internal Control Guidance (coordination w/RBRCWG) **Exhibit K**.

There were discussions surrounding adding language regarding small entities and the use of internal controls. Mr. Bilke offered that the use of internal controls could be incentivized to small entities if the regularly scheduled audit could be replaced with an internal controls assessment.

### **NERC Staff Update**

- Mr. Earl Shockley presented an update on the Reliability Assurance Initiative (RAI) **Exhibit L**.
- Mr. Earl Shockley gave an update on the RAI Governance, RAI Projects, RAI Workshop, and the CCC Support of the RAI Activities.

### **Scheduled CCC meetings are as follows:**

- December 4 – 5, 2013, Atlanta, GA
- March 2014, TBD
- June 2014, TBD
- September 2014, TBD
- December 2014, TBD

## NERC Operating Committee

### Report to the SPP Regional Entity Trustee

October 28, 2013

Jim Useldinger, Kansas City Power & Light

#### Activity Update

A regular meeting of the NERC Operating Committee (OC) was held on September 17-18, 2013, in Denver, CO

OC meeting highlights:

- COM-003-1

As directed by the NERC Board at its August 15, 2013 meeting, the OC reviewed and discussed the responses from the Reliability Issues Steering Committee (RISC), the Independent Experts Review Panel and NERC management to the five questions pertaining to the draft Standard. The OC provided perspectives and thoughts on these five questions and sent, by letter, to the NERC Board Chairman on September 23, 2013. Several important points from these comments include:

  1. OC believes that incentives are currently in place and three-part communications are currently being used for many operational communications
  2. OC recognizes the need for clear communication and is important for the reliable operation of the system in both normal and emergency conditions. In recognition of this need, the OC created the Reliability Guideline: System Operator Verbal Communication – Current Industry Practices to document and share current verbal BES communications practices and procedures from across the industry that have been found to enhance the effectiveness of system operator communications programs.
  3. OC concurs with the RISC's comments that there is little evidence that non-emergency communications represent a reliability gap.
  4. OC recommends that a standard is not needed for non-emergency operational communications.
  5. However, if the Board chooses to move forward with a standard development, the OC could support a single standard that addresses operational communication that provides continuity across all operational states.
- Operations Reliability Subcommittee reported on the ongoing review of transitioning the ISN from NERC to a 3<sup>rd</sup> party. NERC has not made a decision on vendor. Several members voiced concern regarding a reduced level of redundancy and potential reliability and compliance implications (e.g. State Estimator, Real-Time Contingency Analysis tools). The OC approved a strong recommendation that NERC coordinate with the Eastern Interconnection RC's to develop a coordinated action plan that ensures a smooth transition of the ISN to the industry. The coordinated action plan shall meet all the requirements, including redundancy, as identified by the technical expertise of the Data Exchange and Telecommunications Working Groups and documented within the ISN RFP.
- The OC Strategic Plan was approved. The OC formulated 4 goals with action plans for each goal.

- 1) The OC will be proactive in leading the focus on the prioritization of Reliability Standards development and improvement
  - 2) Utilize the results of the Event Analysis Process to improve the reliable operation of the BES,
  - 3) Improve the depth of NERC reports to include operations perspectives
  - 4) To investigate emergent issues that impact the reliability of the BES
- The OC discussed the industry comments to the recently posted **Reliability Guideline: Operating Reserve Management**. This guideline addresses recommended practices for the management of an appropriate mix of a BAs and RSGs Operating Reserve. Also, it provides guidance to BAs and RSGs with respect to the management of the Operating Reserve required to meet NERC Reliability Standards. The OC subsequently schedule an OC webcast on October 11 for further discussion on the responses to the comments.
  - OC reviewed the draft **Reliability Guideline: Generating Unit Operations during Complete Loss of Communications**. This guideline provides a strategy for power plant operations in the event of complete loss of communications between the on-site generating unit(s) operator and the system operator for the balancing area. It is designed to keep frequency within allowable limits and continued safe operation of generators while maintaining acceptable frequency control. OC providing review and comment by October 15. Expectation is to have the guideline ready for final review at December meeting, with request to post to industry upon approval.

#### **Next Meeting**

The next meeting of the Operating Committee will be on December 10-11, 2013 in Atlanta, Georgia.

# SPP RE Metrics Reporting As of September 30, 2013

W/in Target   Outside Target but w/in Alloted Range   Outside Alloted Range  

### 1. High Impact

Accept MP or issue NAVAPS at avg. of <= 105 days

Current Avg. Days = **80.52**

### 2. Maintain Caseload

Maintain a one year caseload

FFT	Settle	Dismiss	NOCV	Total:	Yr. Passed	75.00%
67	20	27	0	114	Caseload Complete	<b>67.86%</b>

### 3. Mit. Accept/Reject

Accept/Reject Mit Plans w/in 30 days

Current Avg. Days = **10.41**

Metric Eligibility = 100.00%

### 4. Mit. Plan Completion

Complete Mitigation reviews <= 30 days

Current Avg. Days = **12.54**

### 5. Milestones

Review Milestones w/in 30 days of qtr. ending

Current Avg. Days = **12.33**

Metric Eligibility = 100.00%

### 6. Documentation Close Out

Close Out 75% of all Closed Violations.

75% target

Current % of closed violations closed out = **84%**

### 7. Publish Off-Site Audit

Publish Off-site w/in 55 days

Current Avg. Days = **32**

### 8. Publish On-Site Audit

Publish On-site w/in 75 days

Current Avg. Days = **54**

### 9. Publish Spot Checks

Publish Spot Checks w/in 90 days

Current Avg. Days = **22**

### 10. Publish: Excep., PDS, Self-cert

Publish reports w/in allotted timeframe 95% of time or greater

Current Success Rate = **100%**

Target = 95%

### 11. Process Incoming Viol.

Notify NERC of new violations w/in 5 business days

Current Avg. Days = **2.92**

### 12. Reduce Cash Costs

10% reduction below estimated audit costs

X < -5%   -10% < X < -5%   x <= -10%  

Current Percentage of Estimated Costs based on All Reported Costs:

**-15.26%**

### 13. Maintain/Increase Misop Success

90% success rate or greater over rolling 4 quarter avg.

Current Success Rate = **87.15%**

### 14. Cause Code Success Rate

Achieve 90% success rate in Cause Coding Events

Current Success Rate = **100.00%**

### 15. Issue Reliability Assmnt.

Issue 100% of assesments on time

On Time? "Y" or "N"

Y Summer

Y LTRA

Y Winter

### 16. Outreach

Conduct 3 Workshops, 9 webinars, and 12 newsletter in '13

# SOUTHWEST POWER POOL REGIONAL ENTITY

## STATEMENT OF ACTIVITIES 2013 SEPTEMBER YTD DRAFT (UNAUDITED)

<i>(In Whole Dollars)</i>	2013 September YTD ACTUAL	2013 September YTD BUDGET	VARIANCE	2013 FULL YEAR PROJECTION	2013 FULL YEAR BUDGET	VARIANCE
<b>Funding</b>						
ERO Funding	6,397,541	6,397,541	-	8,530,054	8,530,054	-
Penalty Sanctions	746,265	746,265	-	995,020	995,020	-
<b>Total SPP RE Funding</b>	<b>7,143,806</b>	<b>7,143,806</b>	<b>-</b>	<b>9,525,074</b>	<b>9,525,074</b>	<b>-</b>
Testing Fees	-	-	-	-	-	-
Workshops	-	-	-	-	-	-
Interest	2,167	-	2,167	-	-	-
Miscellaneous	-	-	-	-	-	-
<b>Total Funding (A)</b>	<b>7,145,973</b>	<b>7,143,806</b>	<b>2,167</b>	<b>9,525,074</b>	<b>9,525,074</b>	<b>-</b>
<b>Expenses</b>						
<b>Personnel Expenses</b>						
Salaries	2,513,231	3,054,466	(541,235)	3,365,419	4,072,621	(707,202)
Payroll Taxes	185,713	233,666	(47,953)	248,897	311,555	(62,658)
Benefits	223,354	234,123	(10,769)	298,092	312,164	(14,072)
Retirement Costs	109,882	122,179	(12,297)	146,837	162,905	(16,068)
<b>Total Personnel Expenses</b>	<b>3,032,179</b>	<b>3,644,434</b>	<b>(612,255)</b>	<b>4,059,245</b>	<b>4,859,245</b>	<b>(800,000)</b>
<b>Meeting Expenses</b>						
Meetings	60,940	64,875	(3,935)	81,397	86,500	(5,103)
Travel	262,526	374,250	(111,724)	354,103	499,000	(144,897)
Conference Calls	-	-	-	-	-	-
<b>Total Meeting Expenses</b>	<b>323,466</b>	<b>439,125</b>	<b>(115,659)</b>	<b>435,500</b>	<b>585,500</b>	<b>(150,000)</b>
<b>Operating Expenses</b>						
Contracts & Consultants	389,797	1,037,363	(647,566)	958,485	1,383,150	(424,665)
Office Rent	-	-	-	-	-	-
Office Costs	8,829	1,875	6,954	7,060	2,500	4,560
Administrative Costs	-	-	-	-	-	-
Professional Services	115,244	237,075	(121,831)	236,205	316,100	(79,895)
Computer Purchase & Maint.	-	-	-	-	-	-
Depreciation	-	-	-	-	-	-
Miscellaneous/ Contingency	-	-	-	-	-	-
<b>Total Operating Expenses</b>	<b>513,870</b>	<b>1,276,313</b>	<b>(762,443)</b>	<b>1,201,750</b>	<b>1,701,750</b>	<b>(500,000)</b>
<b>Total Direct Expenses</b>	<b>3,869,514</b>	<b>5,359,871</b>	<b>(1,490,357)</b>	<b>5,696,495</b>	<b>7,146,495</b>	<b>(1,450,000)</b>
SPP Inc. Indirect Expenses	3,268,288	3,276,242	(7,954)	4,468,323	4,368,323	100,000
SPP RE Indirect Expenses	-	-	-	-	-	-
<b>Total Indirect Costs</b>	<b>3,268,288</b>	<b>3,276,242</b>	<b>(7,954)</b>	<b>4,468,323</b>	<b>4,368,323</b>	<b>100,000</b>
<b>Total Expenses (B)</b>	<b>7,137,802</b>	<b>8,636,114</b>	<b>(1,498,311)</b>	<b>10,164,818</b>	<b>11,514,818</b>	<b>(1,350,000)</b>
<b>Net Change in Assets (A-B)</b>	<b>8,170</b>	<b>(1,492,308)</b>	<b>1,500,478</b>	<b>(639,744)</b>	<b>(1,989,744)</b>	<b>1,350,000</b>
<b>Fixed Assets</b>						
Depreciation	-	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-	-
Equipment CapEx	-	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-	-
<b>Increase/(Decrease) in Fixed Assets (C)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Budget (Expenses plus Incr (Dec) in Fixed Assets (B+C))</b>	<b>7,137,802</b>	<b>8,636,114</b>	<b>(1,498,311)</b>	<b>10,164,818</b>	<b>11,514,818</b>	<b>(1,350,000)</b>
<b>Change in Working Capital (Total Funding less Total Budget) (A-B-C)</b>	<b>8,170</b>	<b>(1,492,308)</b>	<b>1,500,478</b>	<b>(639,744)</b>	<b>(1,989,744)</b>	<b>1,350,000</b>
<b>FTEs*</b>	<b>30.0</b>	<b>34.5</b>	<b>(5)</b>	<b>31</b>	<b>34.5</b>	<b>(3.5)</b>
Beginning WC - 01/01/2013	3,198,329	1,358,075	1,840,254	2,706,445	1,358,075	1,348,370
Change to WC - 2013 YTD	8,170	(1,492,308)	1,500,478	(639,744)	(1,989,744)	1,350,000
<b>Working Capital as of 9/30/13</b>	<b>3,206,499</b>	<b>(134,233)</b>	<b>3,340,732</b>	<b>2,066,701</b>	<b>(631,669)</b>	<b>2,698,370</b>

\*Headcount (RE direct staff count as of 09/30/2013 and shared staff YTD billed hours/1880).

# 2013 Outreach Report

---

October 17

---

## September Newsletter:

- Don't Forget to Register for Fall Workshop/Book Hotel by 9-17
- From Ron's Desk: Continued CMEP Improvements
- CIP Tip: Microsoft Ending XP Support 4-8-14
- webCDMS Tip: TFE Amendments
- Revised CIP Transition Guidance Posted
- SOLs & Winter Assessment Webinars
- Regional Standards Update
- Transmission Planners: Oct. 2 Deadline for 300 kV+ Data Submittal
- NERC Industry Advisory: 345 kV Breaker Failures
- Are you getting NERC's short weekly standards recap?
- Save the Dates! 2014 Workshops/Forums
- More NERC News

## Videos:

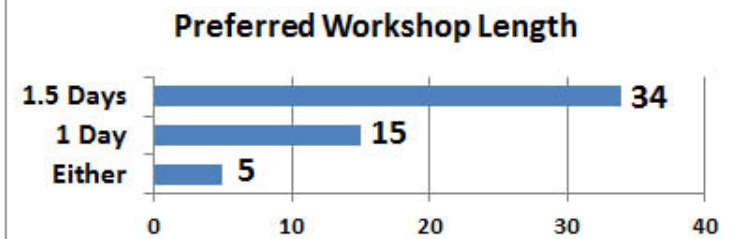
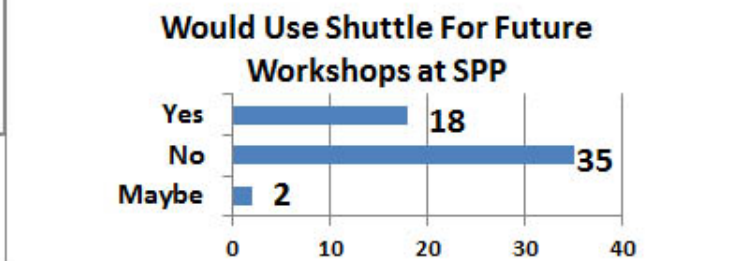
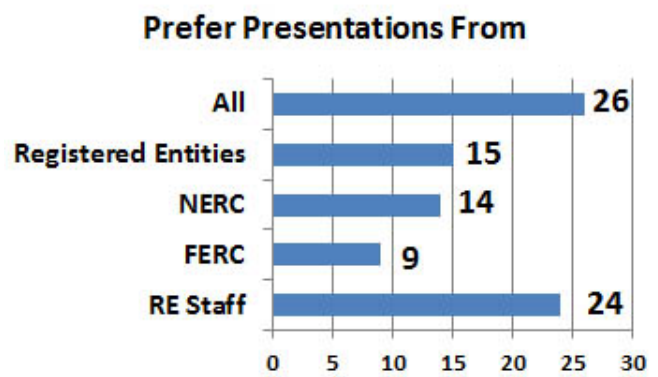
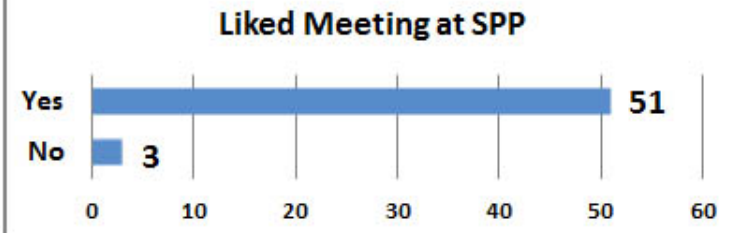
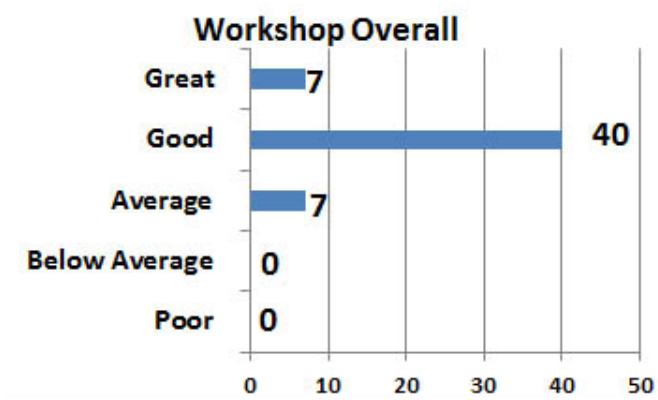
- Seven new videos posted:
  - [CIP Standards Violation Analysis, 2008-2012](#)
  - [CIP-005 R2, Electronic Access Controls](#)
  - [How to Read & Understand Standards](#)
  - [CIP-003 R5, Access Control](#)
  - [Internal Controls \(CIP\)](#)
  - [How to Use EFT Server](#)
  - [Comprehensive Mitigation](#)
- 946 plays YTD

## Webinars

- Scheduled Nov. 21 webinar on [2014 Implementation Plan/2013 Self Assessment](#)
- 49 participants for Aug. 27 [Standards Development Status Report Presented By NERC](#) webinar
- 93 participants for Sept. 19 [2013 Winter Reliability Assessment](#) webinar
- 84 participants for Sept. 20 [Determining and Communicating TOP System Operating Limits](#) webinar

## Workshops:

- 163 stakeholder attendees at Fall Workshop
  - 29 webex
  - 135 in-person





---

## July 18

---

### June Newsletter:

- FERC Extends BES Implementation to July 1, 2014
- Reminder: June Webinars

### Videos:

- Four new videos posted:
  - [CIP-005 R3](#)
  - [Firewalls: 13 Ways to Break Through](#)
  - [NetAPT Demo](#)
  - [CIP-007 R3 and R4](#)
- 679 plays YTD

### Workshops:

- Created and published [agenda](#) for Oct. 8-9 Fall Workshop

### Webinars

- 78 registrants for June 27 webinar on *EOP-003 and PRC-006 Effective 10/1/13*
- Scheduled Aug. 27 webinar on [Standards Development Status Report Presented By NERC](#)
- Scheduled Sept. 19 webinar on [2013 Winter Reliability Assessment](#),
- Scheduled Sept. 20 webinar on [Determining and Communicating TOP System Operating Limits](#)

---

## June 10

---

### May Newsletter:

- From Ron's Desk (*BES definition, State of Reliability Report, ERO Strategic Plan, Staff Metrics*)
- June 27 webinar on EOP-003 and PRC-006, Effective 10/1/13
- Trouble Finding Standards info on NERC's New Website?
- 2013 Summer Assessment: Sufficient Reserves For SPP Region
- July 15 Deadline for Facility Ratings Alert, Low Priority Lines
- Consider Joining Spare Equipment Database
- New Standard Versions Effective July 1, 2013
- CIP Tip: Free NERCFilt Module
- FERC Issues NOPRs on Transmission Planning Standards and Interpretation of Disturbance Control
- May 9 NERC Board Approvals

### Videos:

- 583 "plays" YTD for all videos
- Filmed four videos at CIP Workshop; currently being edited

## Workshops:

- 172 stakeholders attended CIP workshop in-person or via webex
- 

# May 20

---

## April Newsletter:

- From Ron's Desk: CIP Transition, RAI, BES Processing, and Paragraph 81 Retirements
- CIP Workshop Hotel Cut-off 4/29/13 - Event Available via Webinar
- June 27 webinar on EOP-003 and PRC-006, Effective 10/1/13
- May 9 webinar on Long Term Reliability Assessment
- Understanding NERC's CIP Transition Guidance
- New Regional Lesson Learned on Control Center Evacuation
- Important Reminders re: Data Submittal and Deadlines
- TOP Blackstart Plans due to RC May 1
- April webCDMS Tip – Using IE 10
- FERC Issues NOPR on Generator Requirements at the Transmission Interface

## Videos:

- 539 “plays” YTD for all videos

## Webinars:

- 90 registrants for May 9 webinar on Long-Term Reliability Assessment
- Held several work sessions for June 27 webinar on [EOP-003 and PRC-006 Effective 10/1/13](#)

## Website:

- Updated all RE webpages with new NERC.com links

## Workshops:

- Finalized logistics and presentations for CIP Workshop
- 

# April 22

---

## March Newsletter:

- Equipment in New Protection System Definition Must be Included in Maintenance/Testing Program by 4/1/13
- Need More Info on EFT Server? Join April 18 Webinar
- May 9 Webinar on Long Term Reliability Assessment
- CIP V4 Compliance Guidance
- Are you Accurately Completing your Self-Certification?
- Missed the Spring Workshop? Get presentations, handouts, FAQs, & videos
- Mar. webCDMS Tip – Purchasing Additional webCDMS Digital Certificates
- Slides Posted: 2013 Summer Assessment and Misoperations webCDMS Module
- Reminder re: Q1 Reporting Deadlines
- FERC Approves FAC-003-2 - Transmission Vegetation Management
- Reliability Assurance Initiative – All Concept White Papers Now Posted
- CANs to be Phased Out

- NERC Events and New on NERC.com

**Videos:**

- Posted two new videos posted to [video training webpage](#):
  - [Event Analysis – An Entity’s Perspective](#)
  - [Compliance Education at My Organization panel](#)
- 463 “plays” YTD for all videos

**Webinars:**

- 100 registrants for March 22 webinar on [Misoperations Reporting in webCDMS – FAQ](#) also provided to registrants
- 47 registrants for April 18 webinar on [How to Use the EFT Server](#)
- Scheduled June 27 webinar on [EOP-003 and PRC-006 Effective 10/1/13](#)

**Website:**

- Added links to all training videos from [Outreach page](#)
- Added [webpage for CIP Workshop](#)

**Workshops:**

- 120 stakeholders registered to-date for [May 21-21 CIP workshop](#)
- Holding conference calls and practice sessions for presentations; finalizing logistics

---

## March 18

---

**February Newsletter:**

- March Workshop Available via Webinar
- Clarification re: Mitigation Plan Proposed and Actual Completion Dates
- Check out our May 21-22 CIP Workshop Agenda
- Quick CIP Tip: CIP-006-3 R1
- Feb. webCDMS Tip – Submit Self-Report for New Self-Cert Non-compliance Responses
- March-May Webinars
- Staff News: Welcome Back to Greg Sorenson
- The White House on Cyber Security
- Four New EMS/SCADA Lessons Learned
- NERC Trustees Approve Multiple Standards
- NERC Pilots Cost Effective Analysis Process

**Webinars:**

- 64 registrants for March 15 [Stakeholder Input on Summer Assessment Webinar](#)

**Website:**

- Major updates to [Standards Process Manual Task Force webpage](#)

**Workshops:**

- 162 stakeholders attended March 5-6 workshop in-person or via webinar; feedback very positive, particularly regarding small group discussions
- 

## February 15

---

**January Newsletter:**

- 2012 By the Numbers
- Clarification re: CIP V4 and V5 Implementation
- Have you Registered for March Workshop? Hotel Cut-off 2/18
- Registration Open for May 21-22 CIP Workshop
- Webinars on Misops Reporting, Assessments, EFT Server
- 100 Ways Your Organizations Are Making Training “Stick”
- Three New Training Videos Posted
- Quick CIP Tip: CIP-007 R.5.1.2
- January webCDMS Tip – Revoking/Reassigning webCDMS Digital Certificates
- Reminder – Comments due 2/9 on Revised SPP RE Standards Process Manual
- Staff News: Welcome Mike Hughes & Congrats to Shon Austin

**Webinars:**

- Scheduled March 15 [Stakeholder Input on Summer Assessment Webinar](#)
- Scheduled May 9 [Stakeholder Input on LTRA webinar](#)

**Workshops:**

- Completed preparations for March 5-6 workshop
  - Published agenda for [May 21-11 CIP workshop](#) and confirmed all guest speakers
  - Scheduled conference calls and practice sessions for CIP Workshop
  - Held conference calls and practice sessions for March workshop
- 

## January 18

---

**Videos:**

- Posted three new videos:
  - [Human Performance: Entity Perspectives & Experiences](#)
  - [Human Performance: Impact on Reliability](#)
  - [Training Employees on Compliance](#)

**Webinar:**

- Scheduled [How to Use EFT Server & Evidence Protection](#) webinar, April 18, 10:00-10:45 CST

**Workshops:**

- Developed draft agenda for [May 21-11 CIP workshop](#) and confirmed eight guest speakers; will publish agenda in February

- Scheduled conference calls and practice sessions for [March 5-6 workshop](#)